

Commercial Customs Operations Advisory Committee (COAC)

Secure Trade Lanes Subcommittee: Trusted Trader Working Group

March 2022



**U.S. Customs and
Border Protection**

Office of Field Operations/Cargo and Conveyance Security
CTPAT Trade Compliance
Trusted Trader Working Group
March 2022

Action Required:

The latest Statement of Work (SOW) for the Trusted Trader Working Group focuses on providing strategic recommendations on the ongoing development of an enhanced Trusted Trader program in line with the Trusted Trader Strategy Framework, in particular the implementation of the Forced Labor program requirements and benefits.

This COAC session focuses on six strategic objectives:

- Provide input regarding the implementation of Forced Labor requirements into the CTPAT Trade Compliance program.
- Propose methods to receive and process industry recommended Trade Compliance benefits for consideration; including the ability to evaluate, prioritize, and vet recommended benefits within the Trusted Trader Framework.
- Propose methods for the communication of benefit status to include new benefits, benefits under consideration, and effectiveness of benefits.
- Develop metrics that evaluate and mutually quantify benefit effectiveness for industry and government
- Develop a proposed strategic inter-agency partnership engagement approach to Trusted Traders.
- Further development of the CTPAT Trade Compliance program.

The COAC met for the first time this session on February 10th, 2022. In this meeting, CTPAT leadership provided an overview of what will assist the CTPAT program with evolving the Forced Labor requirements from discussions to program implementation. CTPAT Leadership informed the committee that the Forced Labor requirements in the “Minimum Security Criteria” will be changing from a recommendation to a program requirement in January of 2023 and it is imperative of the group to finalize the requirements for CTPAT Trade Compliance in this session.

Although there is also a COAC Forced Labor Working Group under the Intelligent Enforcement Subcommittee, the COAC Secure Trade Lanes Subcommittee’s Trusted Trade Working Group is working only on the aspects of forced labor that impact the CTPAT Trade Compliance Program. CBP anticipates implementing new forced labor requirements in FY 2022. However, CTPAT communicates with CBP leadership from the Forced Labor Working Group.

BACKGROUND

The 15th Term of the COAC instituted a restructuring of the previous subcommittees to align more with CBP's vision and priorities. Under the newly formed Secure Trade Lanes Subcommittee, a Trusted Trader Working Group was formulated. This working group has continued the great work that was completed under the auspices of the former Trusted Trader Subcommittee. The 16th Term of the COAC is a continuation of this effort.

The former COAC subcommittee was asked to provide CBP with recommendations and advice on a Trusted Trader Program. Trusted Trader Strategy is an integration of the CTPAT and ISA programs into a consolidated program that includes supply chain security and trade compliance. The program is being implemented via the Trusted Trader Pilot Program, announced in the Federal Register (79 FRN 13992) on June 16, 2014. The transition from ISA to CTPAT Trade Compliance has been completed and all former ISA participants now enrolled in the CTPAT Trade Compliance. A Federal Register Notice, now in the approval process, will completely the trusted trader pilot and announce the CTPAT Trade Compliance program.

Submitted by: Manuel Garza, Director CTPAT, OFO
Date: March 15, 2022