

# Commercial Customs Operations Advisory Committee

## Government Issue Paper Secure Trade Lanes Subcommittee: Trade Partnership and Engagement Working Group

September 2022



U.S. Customs and  
Border Protection

Office of Field Operations  
Customs Trade Partnership Against Terrorism  
Trade Partnership and Engagement Working Group  
June 2022

**Action Required:** Informational

The latest Statement of Work (SOW) for the Trade Partnership and Engagement (formerly Trusted Trader) Working Group focuses on providing strategic recommendations to 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 Commercial Customs Operations Advisory Committee (COAC) session focuses on six strategic objectives:

- Provide input regarding the implementation of Forced Labor requirements into the Customs Trade Partnership Against Terrorism (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; and
- Further development of the CTPAT Trade Compliance program.

The COAC met for the first time this session on February 10<sup>th</sup>, 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 change from a recommendation to a program requirement in January 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.

U.S. Customs and Border Protection (CBP) implemented the Forced Labor requirements into the CTPAT Trade Compliance program, in conjunction with COAC recommendations, in August, 2022. CTPAT will continue to communicate with CBP leadership from the Forced Labor Working Group.

**Background:**

The 15<sup>th</sup> 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 16<sup>th</sup> Term of the COAC is a continuation of this effort. In this quarter, the working group changed its name to "Partnership Programs and Industry Engagement".

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 Importer-Self Assessment (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 are enrolled in the CTPAT Trade Compliance. The Trusted Trader pilot has been concluded and the CTPAT Trade Compliance program opened the program for new applications on August 1, 2022.

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