

**Commercial Customs Operations Advisory Committee  
Intelligent Enforcement Subcommittee  
Forced Labor Working Group  
Recommendations**

**September 2023**

**COAC**

**COMMERCIAL CUSTOMS OPERATIONS  
ADVISORY COMMITTEE**

**Commercial Customs Operations Advisory Committee (COAC)  
Intelligent Enforcement Subcommittee  
Forced Labor Working Group  
Recommendations**

## **COAC Recommendations**

1. COAC recommends that CBP continue to educate stakeholders (trade, NGO's, CSO's, governments, technology vendors) about implementation and enforcement of UFLPA. This should include updated fact sheets as new situations arise, webinars, and other outreach activities to provide guidance on trends and best practices for enforcement and compliance. This should also include additional guidance and training for the ports and CEEs to ensure consistency across CBP for enforcement. CBP should work with the COAC to help identify additional areas of education and guidance that are needed.
2. COAC recommends that CBP revisit recommendation 010544 to provide additional information to an importer when a shipment is stopped for a suspected UFLPA violation. More specifically CBP could identify the component and/or supplier in question to allow the importer to focus efforts on supply chain mapping and information gathering and enable an efficient and focused submission of data needed to determine admissibility. This will also provide benefits to CBP personnel to focus on the suspected violative part of the shipment and thereby improve enforcement response time.
3. COAC recommends CBP re-examine recommendation 010546 to continue to engage in a solution for the use of FTZ's within or external to the initial port of import/entry to hold detained merchandise under UFLPA pending a decision. If CBP is unable to adjust its position on the use of FTZ's, CBP should provide legal justification for the decision.