A large, faint watermark of the EPA logo is centered in the background. It features a stylized flower with a sun-like center and leaves, surrounded by the text "UNITED STATES ENVIRONMENTAL PROTECTION AGENCY" in a circular arrangement.

EPA ACE Pilots

Pilot Orientation Webinar

Washington, DC

December 15, 2015



Agenda

Pilot Overview

- Pilots with unlimited participation
- Pilots limited to 9 or fewer importers
- Roles of Key Parties
- Lessons Learned

Pilot Preparation (Certification)

Initiating Pilot Filings (Production)



EPA Pilots

Import Pilots with Unlimited Importers

- On-Road Vehicles and Engines (Special OEM Notice)
- Toxic Substances Control Act (TSCA)
- Ozone Depleting Substances (ODS)

Import Pilots Limited to 9 Importers

- Non-Road Vehicles and Engines
- Pesticides Notice of Arrival

Export Pilot Limited to 9 Exporters

- Hazardous Waste



No limit for testing in CBP CERT environment



Roles of Key Parties

Importer/Exporter

- Know what you need to file
- Be able to provide all required information to Broker/Filer



Software Vendor

- Understand CBP and EPA CATAIR Information
- Program to meet CATAIR Standards
- Complete testing in CERT environment

Broker/Filer

- Test internal systems for correct PGA Data to file for each pilot commodity
- Test in CERT environment



EPA ACE Pilot Lessons Learned

Fall 2015

Regularly Use Published Guidelines, Updates (CATAIR, EPA CATAIR Supplemental, and appendices). Living documents with changes improvements.
Ask questions if clarity is needed.



Take Advantage of Help

- CBP daily meetings,
- One-on-one sessions with EPA
- Other [CBP weigh in here]



Get Data Needed to File

Early communication with importers/exporters to identify:

- **How.** How will new data elements get in broker/filers system? Electronically submitted from importer? Manually entered by the importer? Manually entered by the broker/filer?
- **What.** Will data need transformation before inserting in the message sets? Dashes removed? Capitalization of lower case letters?



Lessons Learned (continued)

Test, Test, Test!

Test scenarios using fake date (equivalent to a live filing)

- Make sure it works!
- Know what to expect (filing, messaging) for the shipment
- Regularly test changes and updates



Identify commodities

- Changing HTS codes,
- Updating HTS flags
- Identifying products
 - When to file EPA PGA Message Sets
 - When to Disclaim

Plan, Start ASAP –don't wait.



Pilot Prep

- **CBP Set Up** - Talk to your CBP Client Rep to be set up in CERT.
- **What to file**
 - Pesticides Notice of Arrival – **DIS Image of the Pesticide Label & PGA Message Set**
 - Vehicles and Engines (On-Road and Non-Road), Ozone Depleting Substances, and Toxic Substances – **PGA Message Set**
 - Used ODS Non-Objection Notice (25-30 per year) – **DIS Image**
- **Construct message** – Use latest CATAIR & other documents from:
<http://www.cbp.gov/trade/ace/catair#field-content-tab-group-tab-4>
 - **Get the right data to the filer :**
 - Correct LPCO numbers *in the correct format*
 - PGA Message sets code for importer's data (CATAIR)

Testing

Three horizontal grey bars are shown below the word "Testing". The first bar has a green checkmark to its left, the second has a green checkmark, and the third has a red X to its left.



Pilot Preparation (cont)

What Happens When You file?

- **Electronic review** of Entry, PGA Message Set
- **Messages:**
 - **'Reject'** (AX/SX) [File couldn't be processed, Try Again]
 - **'Accept'** (AX/SX)
 - ↳ A EPA **"PGA Under Review"** (SO70) – Some EPA Data is missing or invalid
 - ↳ A EPA **"May Proceed"** (SO70) – you have met EPA filing requirements
- **Fewer Messages in CERT than in PROD**
 - No OFO or EPA messages (Hold, Hold Intact, Docs Required, etc) in CERT
 - Goal: **'Accept'** (SX) followed by a **'May Proceed'** (SO), both Automated Messages
- **Test in CBP Certification Environment** (provide filings and messages you receive to EPA)
 - Feedback, Re-testing
 - Receive a 'May Proceed' for Test filing similar to what you will file in production





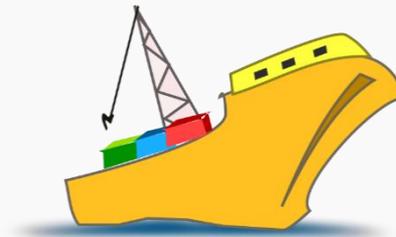
Testing Tip Summary

1. **Availability of key data** for filing (electronic is best)
2. **Review CATAIR/ EPA Supplemental** ask questions, meet with EPA if needed
3. **Test samples/cases** including disclaimer
4. **Confirm active filing in CERT with CBP Client Rep**
5. **Heads up** to CBP and EPA when starting testing
6. **Use unique entry numbers** so we can provide feedback.
7. **Feedback on messaging/timing.**
8. **Confirm active filing in PROD, Go Live!**



Initiating Pilot Filings (Production)

- Ready to file: after successful ***Entry Filing Equivalent to Production filing*** in CERT
- Setup filing: Client Reps ***authorize filer ID in production*** (EPA programs and ports)
- When to file: ***Prior to arrival***—varies by the mode of transportation
- Schedule filing: ***War room call*** with CBP and EPA for first live filing(s)
- ***Messages*** you may receive (timing and expected messages in PROD)
 - Accept/Reject
 - Under Review/May Proceed
 - Possible Actions: Intensive, Doc Required, Hold Intact, Re-delivery
 - ***One USG***
- Recurring filings/shipments





For More Information



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Questions?