

For Public Distribution

COAC EXPORT SUBCOMMITTEE

General Description

Objective/Goal of the Subcommittee

In support of the priorities and strategies of the President's National Export Initiative, the primary goal of the Export Subcommittee is to advise U.S. Customs and Border Protection of any advice or recommendations related to export procedures, trade enforcement, and facilitation issues. Advice will be given in an effort to increase information sharing, further enhance the Automated Export System (AES) Re-engineering pilot and Advance Targeting System (ATS) and provide an understanding of the impact of national and international trade policies.

Where does it fit in our trade transformation strategy?

The Export Subcommittee created the Export Mapping Work Group to support the following trade transformation initiatives and guiding principles:

*ACE: Modernization, Bi-directional Education, Consistency & Harmonization, Co-creation.
Comprehensive Trusted Trader Program: Bi-directional Education.*

Chair/Co-Chair Names

The current government subcommittee Co-Chairs are Dan Baldwin, Executive Director, Cargo and Conveyance Security Division, Office of Field Operations, CBP and Brenda Smith, Executive Director, Automated Commercial Environment (ACE) Business Office, Office of International Trade, CBP. The trade subcommittee Co-Chairs are Julie Ann Parks, Senior Manager, Export/Import Operations, Raytheon Company and Elizabeth Shaver, Director, Cargo Services, Airlines for America.

Number of participants from COAC

The Export Subcommittee is comprised of 10 COAC members and 16 U.S. Government members. All trade members are COAC members.

Anticipated Recommendations – November 15, 2013

2013 COAC Export Survey

The COAC issued the 2013 COAC Export Survey in order to collect the voice of all entities involved in the export process and capture feedback regarding the current export operations along with the root cause of impacts to their customers and the supply chain. As the survey sought to query three constituencies, three surveys were tailored specifically to target the following audiences:

- Brokers, freight forwarders, international air carrier (IACs), and non-vessel operating common carriers (NVOCCs);
- Carriers; and
- Exporters.

Based on the results of the surveys, COAC issued the following recommendations to CBP on November 1, 2013 for review and consideration:

Recommendation 1

The COAC recommends that CBP share the survey information with the Partner Government Agencies (PGAs) to achieve a better understanding by the PGAs of the impact of cargo holds, detention and dwell times on the international supply chain.

- The Bureau of Census and Bureau of Industry and Security representatives currently participate in the COAC Export Subcommittee. CBP will share the survey information with the PGAs. The COAC Executive Summary and 2013 Export Survey has been posted on www.CBP.gov for public and private sector disclosure.

Recommendation 2

The COAC recommends that CBP and PGAs partner with the trade community to target PGA requirements training and promote visibility of holds in ACE. We recognize and encourage the implementation of the One US Government at the Border Single Window approach, coupled with the PGA Message Set will provide greater visibility to the trade community as to the reasons for the holds. We encourage the Partner Government Agencies to become early adopters of PGA Message Set, allowing for early submission of information so the PGA may make earlier risk assessment decisions on admissibility of cargo.

- CBP is consistently coordinating with the Partner Government Agencies in order to target PGA requirements, training, and promote visibility and is sensitive to these issues.

Recommendation 3

The COAC recommends working with CBP to define delays and holds and ensure a process exists for those types that require data capture. In addition, once delays and holds are defined in accordance with 2013 operations, COAC recommends that CBP develop national import/export port metrics as a method a) to understand the complexities associated with goods release by mode of transport and region and b) to achieve standardization of best operating practices across ports. Further, we recommend sharing the results with the Centers of Excellence and Expertise via the Industry Working Groups to achieve industry-specific best practices.

- CBP is committed to looking into providing aggregate statistics back to the trade where the systems functionality, security requirements, PGA regulations and Trade Secrets Act allow that data to be gathered and shared.
- At this moment, the Centers are not processing exports. The Centers provide one-stop processing for participating importers using a team of industry-focused CBP experts located virtually nationwide. The Centers also perform validation activities, post entry amendment/post entry correction reviews, and review prior disclosure for participating importers.

In partnership with the Bureau of Industry and Security, CBP will continue to issue officer training at the ports of entry regarding updates to the Export Control Reform initiative. Based on the results of the survey, CBP will analyze the key findings to identify additional areas for improvement.

2013 Trade Efficiency Survey

Members of the COAC Export Subcommittee assisted with the analysis of the 2013 Trade Efficiency Survey results and plan to present these results to the public and private sector during the November 15, 2013 meeting.

Highlights

Accomplishments

The Export Subcommittee met 2 times since the August 7, 2013 COAC meeting. The Export Subcommittee and work group have worked hard on developing recommendations that are currently being considered by COAC. The leadership will plan out a strategy for the second year of the 13th term within the next several weeks.

The Export Mapping Working Group met 3 times since the August 7, 2013 COAC meeting to review public comments received regarding the Foreign Trade Zone and Bonded Warehouse processes to understand the impact on the movement of commercial trade prior to export. The Export Subcommittee will update the Export Mapping Education Package to include feedback from the private sector within 60 days.

The Export Subcommittee met on November 1, 2013 and reviewed the draft subcommittee recommendations anticipated for a vote during the November session. The subcommittee discussions focused on the results of the 2013 COAC Export Survey and the development of the Master Principles for a One U.S. Government at the Border Cooperation for Exports document that will be further developed and presented to the Border Interagency Executive Council (BIEC) and the International Trade Data System (ITDS) Board of Directors by March 2014.

Next Steps

The next step for the Export Subcommittee will include the development of the Export Process Work Group within 90 days. The Export Subcommittee will also help CBP gain a deeper understanding to build the export criteria to fully implement the Mutual Recognition Arrangements (MRA) with other countries' Authorized Economic Operator (AEO) programs.