



CBP PILOT OVERVIEW – Susan Dyszel, Vincent Annunziato

1. Could you please clarify the statement regarding some PGAs and their inability to handle automated corrections and or cancellations - is this in reference to their current systems or their (physical) operations?

This is meant in a positive manner. There are some smaller agencies that will not be able to handle the volume of auto corrections that would come in. CBP would have to build business rules around that, i.e., to support those agencies. That's something that hasn't been 100 percent decided either way.

2. Will the ACE HTS numbers updates be flagged with the PGA indicator?

CBP is working on a flagging system to handle multiple PGA indicators. Everything that has requirements regarding the PGA message set will be flagged. So yes we plan on providing that capability.

3. Please confirm that you are also considering the impact to 06 entries, as well as FTZ admissions?

All entry types are going to be taken into consideration. This will be happening over the course of the next couple years. CBP does not have exact schedules but we will have dedicated teams handling each of the specific functionality, including entry types.

4. Do volunteers for the PGA Message Set Pilots need to be ACE filers?

Yes. All volunteer filers for the EPA and FSIS pilot need to be ACE filers. The PGA message set will be filed with the ACE entry summary Certified for Release or the Simplified Entry.

FOOD SAFETY INSPECTION SERVICE (FSIS) - Bob Berczik

5. If there are multiple PGA's that require data for an ABI line will we have to send two separate message sets or one PG set with shared data recorded one time?

The filer will only have to submit one PG transaction if the required data is the same for both agencies. So in this case the PG01 would be repeated with the first line containing the necessary data followed by another PG01 with just the second agency. If the data is required by two agencies and there are differing data elements that cannot be shared with each agency then some of the data will need to be repeated.

6. Is PHIS the name of the FSIS system?

Yes, the FSIS Public Health Information System (PHIS) is the system designed to collect, consolidate and analyze data. This is the system used to complete the import application electronic process. The PHIS utilizes this information for electronic notifications that go out to the trade through the system such as potential failures to present, refused entries, and



laboratory samples taken by FSIS personnel at the import inspection facility. That's why that data is extremely important and that's why we require it in the import application.

7. How will you track fraudulent certificates?

All entries that come in are triggered by HTS codes. FSIS has an enforcement office that is tasked with looking at the entries and references provided to verify their accuracy. Appropriate action is taken on fraudulent entries.

8. Is FSIS working with software vendors on this effort?

At the current time FSIS is not working with any software vendors on the PGA Message Set Pilot. FSIS would welcome the opportunity to work with interested vendors..

9. Would actual batch/lot numbers from product packaging be used in the PGA record set?

While FSIS does not have a requirement for global trade identification numbers or the intended use codes, we do capture those in the message set and in our electronic application. We strongly encourage filers to use and provide those numbers as FSIS is extremely interested in the continuation of product identification code project and the granularity of product identification.

10. Does a filer have the option to add any codes to the message set? As an example FIRMS code?

The FIRMS code could be submitted by the trade on the PG30 record for "Inspection or arrival Location code". However, FSIS is not asking for the trade to provide the FIRMS code as part of the pilot and would expect to see the official import inspection facility identified by the number it is assigned from FSIS.

11. Are there any other pilots associated with DIS that FSIS will announce in the near future?

The short answer is yes. As FSIS is actively engaged with the message set, we are also engaged with CBP on utilizing the Document Imaging System (DIS) for collecting data on its forms. As that process evolves we will keep trade up to date

12. Australia and New Zealand are sending certification information electronically. This means they do not send import certificates. How will an importer of record enter the certification number into the ACE PG14 record – will they get some identification information document from Australia or New Zealand?

FSIS is working to eliminate the paper application FSIS form 9540-1. FSIS is also working to eliminate the need for a paper inspection certificate where a government-to-government electronic exchange is operational through the PHIS; though we are not there yet. Until we do get that paperless certification process, that certification will continue to be required to move with the shipment and still come to FSIS personnel at the inspection facility. Obviously as we get more toward a paperless certificate as well, we will certainly provide guidance to



the trade and we will work with our partners such as Australia and New Zealand as to how that information and inspection certificate number will relate to an importer of record.

ENVIRONMENTAL PROTECTION AGENCY (EPA) – Roy Chaudet

13. Where would we locate the HTS applicable for EPA and FSIS?

For EPA pilots we've attached them in the file share. There's an excel file and there are two tabs in the excel file. One is for ozone depleting substances and one is for vehicles and engines

FSIS does not have the HTS list available publicly at this time. If trade thinks that's something that's applicable to them, we can certainly look into that.

14. Vehicles require both EPA and Department of Transportation reporting. Can testing be done for EPA if DOT is not participating yet?

The EPA PGA Message Set Pilot will only apply to EPA's vehicles and engines requirements and will apply only to the EPA clearance process. We do not know when the DOT will be ready to pilot the PGA Message Set for their reporting requirements.

15. How does the PGA Message Set Pilot for vehicles and engines coincide with the DIS pilot for vehicles and engines - Will filers provide documents via DIS and the data via PGA message set?

EPA would prefer that all filings be done using the PGA message set. However, an exemption letter for Vehicles and Engines declarations may be filed using DIS. In addition, those of you that participate in the future pesticide pilot will see that there is a requirement for a label image to be reported to the DIS system. We actually have forms that can be provided in the short term to DIS and I think that pilot is on hold temporarily at least for EPA. I think for long term, the PGA message set is what it's all about. Here's the reason why – with the DIS image we can't check the information. DIS is really a step better than paper. However to quickly clear cargo that meets EPA reporting requirements those automated checks really have to be done via the PGA message set filings.

16. Can you share statistics of the number of entries affected by these two PGAs reporting obligation -out of the 100% of ACE entries?

EPA is a small agency. We've estimated that the number of import entries a year, not lines but the actual entries is probably a little over a million a year. If you looked at all of those programs, minus hazardous waste, it's a little over a million transactions a year.



17. As a software vendor, I would normally create windows for data entry based on the current forms, since that is what is being used now. It would be EXTREMELY helpful to have a cross reference of the PGA data to the actual form. Will you be providing this information?

We actually have done that internally for our development efforts but have not documented it in an instructional crosswalk. If that will help the software developers that do it based on the form, we're all for it. Give us a little bit of time, but we will provide a document that lays out the crosswalk for the vehicles and engines form.

18. Are there any HTS numbers currently flagged for EPA?

CBP has not flagged HTS codes for EPA or any PGA at this time. This functionality is included in our product backlog but we do not have a timeline estimate as to when this capability would be available.

Keep in mind for some EPA import programs the HTS codes do not definitively identify the commodities that have reporting requirements (e.g., chemicals). We are looking to provide assistance on additional ways you can identify commodities subject to EPA reporting requirements. For the first two pilots (ODS and Vehicles and Engines), the HTS codes are fairly well defined.

19. Will the code be done on the Certification system first as part of the pilot - and is that the summer of 2013 date?

Vincent – CBP has a certification environment in the modernized system and all coding should move into that environment in order to start the testing process. That will be done at the end of the 12 week sprint cycle, at which time we will be ready to begin testing. As far as the exact release date, i.e. summer 2013, that is something that is will come from CBP management. That will take place in coordination with the trade community and the other government agencies.

20. What would be helpful is an Implementation Guide that mimics the PGA chapter specific for each PGA.

Vincent -. We will not have a specific capture for the PGAs. As we start releasing that set out into the public. I like to hear from the trade the feedback what we're getting on those entries and let us know. It uniformly it will be well thought out, easy to follow and you can let us know from there. I think it's going to be based on the appendixes.

EPA has a number of sample PGA message sets for our commodities. We would like to work with importers, brokers, and software vendors to help us understand if these samples are accurate. That is one of the key parts of the upcoming pilots is to work with Trade to better understand the use of the message set and for messaging that is provided as a result of automated processing.



21. If there is no specific date for CERT release, when can the trade plan to start effectively testing with CBP?

We expect to have a trade testing region ready for testing in late Spring/Early Summer 2013. The trade will be advised of the exact date through a CSMS message.