

**Commercial Customs Operations Advisory  
Committee  
Intelligent Enforcement Subcommittee  
Executive Summary**

September 2024

**COAC**

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COMMERCIAL CUSTOMS OPERATIONS  
ADVISORY COMMITTEE

**Commercial Customs Operations Advisory Committee (COAC)  
September 2024**

**Report of the Work of the  
COAC Subcommittee on Intelligent Enforcement**

**Co-Chairs**

**Heather Litman – GDLSK**

**Julie Pojar - Kohler**

**Matt Zehner – Roanoke Insurance Group**

**Intelligent Enforcement Subcommittee Members:**

Brian Barber, Angela Cook, Dave Corn, John Drake, Tom Gould, Mary Hodges, Kerry Novak, Cynthia Roller, and Travis Skinner.

**Background**

The following working groups make up the Intelligent Enforcement Subcommittee:

1. The Antidumping and Countervailing Duty (AD/CVD) Working Group, Chaired by Matt Zehner.
2. The Forced Labor Working Group, Co-chaired by Tom Gould and Kerry Novak.
3. The Intellectual Property Rights (IPR) Process Modernization Working Group, Chaired by Heather Litman.

All subcommittee objectives and scope are consistent with the official charter of COAC.

**Summary of Work**

The Intelligent Enforcement (IE) Subcommittee is responsible for looking at opportunities to enhance trade and government processes, policies, and programs, with the goal of strengthened compliance by the trade through CBP outreach. The IE Subcommittee currently consists of three active working groups. Each will have substantial tasks over the 17<sup>th</sup> term.

**Antidumping and Countervailing Duty Working Group (AD/CVD WG):**

The AD/CVD WG continues building upon the work and recommendations of the 16<sup>th</sup> Term and earlier COAC AD/CVD WGs. The AD/CVD WG intends to meet monthly. The AD/CVD WG met monthly from June to August.

The AD/CVD WG focuses its efforts on ways to facilitate imports of compliant importers and ways for importers to achieve high compliance. Additionally, the WG assesses the implementation status of the prior recommendations from this group, and where fully implemented, the WG will review the efficacy of the proposal. Where necessary, matters involving Sections 201, 232, and 301 will be discussed by this WG.

The WG applauds CBP's efforts to keep the trade informed of new AD/CVD investigations and for hosting a webinar for the trade on certifications. The WG also anticipates CBP will host an outreach event related to the scope of the aluminum extrusions investigations.

CBP is reviewing the certification webinar chat and post webinar submissions from the trade. The AD/CVD WG is forming a Task Force to address matters pertaining to certifications other than reimbursement certifications.

The AD/CVD WG does not have any recommendations to submit for the September 2024 public meeting.

### **Forced Labor Working Group (FLWG):**

The FLWG was able to meet twice this quarter as a full working group, once in July and once in September. The working group continued meaningful discussions regarding Isotopic testing requirements to aid CBP in the development of trade outreach materials. As mentioned with other working groups, COAC has been reviewing the disposition and viability of previous recommendations. The FLWG leads spent considerable time reviewing the previous 69 recommendations and provided feedback to the larger working group and CBP leadership for further discussion. The overall goal is to ensure previous term recommendations are given the appropriate level of consideration and attention.

The FLWG does not have any recommendations to submit for the September 2024 public meeting.

### **Intellectual Property Rights Process Modernization Working Group (IPRWG):**

At the June public meeting the IPRWG presented a number of robust recommendations. Those recommendations focused on automation of the CBP enforcement processes and enhancements to tools that allow rights holders to share information with CBP, so that the agency can better combat the illegal importation of counterfeit and piratical goods.

In the most recent quarter of the 17th Term, the IPRWG has continued its work to ensure that its past recommendations are fully implemented and to develop new recommendations designed to enhance communications between CBP, rights holders, and the trade community.

The IPRWG does not have any recommendations to submit for the September 2024 public meeting.

### **Conclusion**

The IE Subcommittee is eager to provide updates from the AD/CVD, Forced Labor, and IPR Process Modernization WGs at the September 2024 public meeting. Looking forward, we will continue to evaluate potential opportunities to enhance trade and government processes, policies, and programs, with the goal of strengthened compliance by the trade through CBP outreach.