

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

December 2024

COAC

COMMERCIAL CUSTOMS OPERATIONS
ADVISORY COMMITTEE

**Commercial Customs Operations Advisory Committee (COAC)
December 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, 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 17th term.

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

The AD/CVD WG continues building upon the work and recommendations of the 16th Term and earlier COAC AD/CVD WGs. The AD/CVD WG intends to meet monthly. The AD/CVD WG met monthly from September to November.

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 on certifications earlier this year. CBP is reviewing the certification

webinar chat and post webinar submissions from the trade. A Task Force, comprised of a subset of WG members, was created to assist with CBP's review.

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

Forced Labor Working Group (FLWG)

The FLWG held two meetings this quarter. The members discussed the pre-launch of the forced labor website and portal, and as part of the larger COAC recommendation clean-up project, the COAC leads were able to spend time reviewing recommendations previously closed by CBP that the COAC feels should still be under consideration. The members hope to set forth new recommendations covering these topics and submit those recommendations for the March 2025 COAC public meeting.

The FLWG does not have any recommendations to submit for the December 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 December 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 December 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.