

# Commercial Customs Operations Advisory Committee Secure Trade Lanes Subcommittee Executive Summary

December 2024

The logo for the Commercial Customs Operations Advisory Committee (COAC) features the letters 'COAC' in a large, bold, serif font. The 'C' and 'A' are blue, while the 'O' and 'C' are red. The letters are set against a white background.

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COMMERCIAL CUSTOMS OPERATIONS  
ADVISORY COMMITTEE

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

**Report of the Work of the COAC**  
**Subcommittee on Secure Trade Lanes**

**Trade Co-Chairs**

Angela Cook – General Motors Tax Staff - Global Customs  
Stephen Simmons – Canadian Pacific Kansas City Railroad

**Secure Trade Lanes Subcommittee Members:**

Brian Barber, Dave Corn, Tom Gould, Mary Hodges, Heather Litman, Kerry Novak, Julie Pojar, Cynthia Roller, Craig Seelig, Travis Skinner, Matt Zehner

**Background:**

The Secure Trade Lanes subcommittee has seven (7) active working groups focused on areas aimed at modernizing import/export processes, improving trade intelligence, and maximizing efficiencies. These groups are working to enhance trade partnership programs, improve management of imports and exports, and deploy authentication technologies to reduce supply chain barriers.

The following working groups make up the Secure Trade Lanes Subcommittee:

- 1) Export Modernization Working Group, chaired Cynthia Roller
- 2) Trade Partnership and Engagement Working Group, co-chaired by Angela Cook, Kerry Novak, and Julie Pojar
- 3) Cross-Border Recognition Working Group, chaired by Stephen Simmons
- 4) Pipeline Working Group chaired by Mary Hodges
- 5) De Minimis Working Group chaired by Craig Seelig
- 6) Centers Working Group co-chaired by Heather Litman and Cynthia Roller
- 7) Foreign Trade Zones/Warehouses co-chaired by Tom Gould and Julie Pojar

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

**Summary of Work**

The Secure Trade Lanes sub-committee has met three (3) times this quarter to discuss the ongoing efforts in the seven active working groups areas. This quarter there are four (4) recommendations to put forth.

**Export Modernization Work Group**

The Export Modernization Working Group (EMWG) has met on a bi-weekly basis since our last public meeting on September 18th with CBP, Census and BIS to continue to push for the development and rollout of the Electronic Export Manifest (EEM) for all modes of transport and progressive filing.

Our immediate attention this quarter is the continued push for the release of regulations for rail, air and vessel and to continue to build support for pilot participants with the release of the EEM

document on [CBP.gov](https://www.cbp.gov). We continued to discuss the impacts and expectations for progressive filing and our mapping of process flows.

The Drawback Task Force has met three times this quarter. This task force continues to focus on the punch list that has been developed, with a goal to modernize and streamline the drawback process. This quarter, the group had discussions regarding the drawback desk reviews and ruling processes.

The EMWG has no recommendations this quarter.

### **Trade Partnership and Engagement Working Group**

The Trade Partnership and Engagement Working Group (TPEWG) has met two (2) times since the September public meeting, and the COAC and CBP leads have met one (1) time to discuss priorities for the group and possible SOW updates. The TPEWG will continue to focus on program standardization, communication, member benefits, and an in-depth MSC review. In addition, the TPEWG is working on a robust review of previous recommendations and feedback given in prior terms.

The TPEWG has four (4) recommendations for the December public meeting.

### **Cross-Border Recognition Working Group**

Since the last COAC public meeting, the Cross-Border Recognition Working Group (CBRWG) has paused all meetings to determine if this working group shall be placed on hiatus.

The CBRWG will not have any recommendations for the December COAC meeting.

### **De Minimis Working Group**

The De Minimis Working Group met as part of the De Minimis Automation Task Force 11 times this past quarter including a two-day in person meeting. In these meetings the discussion centered mostly around the topic of CBP's enforcement of the \$800 limit per consignee per day, how each mode of entry will be impacted by CBP's forthcoming enforcement of the \$800 per person, per day de minimis limitation, and what processes are needed to ensure proper enforcement. The De Minimis working will have **27** recommendations for the December 11th public meeting.

### **Pipeline Working Group**

The PWG has not met since the September 2024 COAC public meeting. The PWG is pending the ability to conduct the pilot intended to operationalize DID/DLT technology for CBP oversight of pipeline-borne hydrocarbon importations. The first FRN covering the pilot was published on September 3rd, 2024.

### **Centers Working Group**

During the last quarter, the Centers Working Group (“CWG”) has narrowed its work to two Sub-Groups (“SG”) – 1) An Operations SG, that focuses on the Centers’ coordination with the Ports, FP&F, drawback, and broker management; and 2) A Structure SG, that considers the number of Centers, the branches within the Centers, and workload equity amongst the Centers. This includes consideration of potential structural changes to help with the Centers’ expanded responsibility in admissibility reviews, including UFLPA and EAPA investigations. Because communications are vital to all of the CWG’s work, the issues being addressed by the former Communications SG, will now be subsumed by the remaining two SGs.

At the September Public Meeting, the CWG made eight (8) recommendations, together those recommendations outline a framework for enhancing interactions between the Trade, the Ports, CBP Headquarters, and the Centers. The Centers WG is now focused on building out that framework. The Centers WG has no recommendations this quarter, but anticipates completing substantial work at the beginning of the new year.

### **Foreign Trade Zones/Warehouses**

The Foreign Trade Zones/Bonded Warehouse Working Group met two (2) times in October, two (2) times in November and is planning on meeting two (2) times in December. In these meetings the working group discussed potential recommendations regarding standardizing FTZ employee reporting in the ACE web portal and will support efforts by the broker modernization and other working groups on synchronizing employee recordkeeping processes throughout the customs regulations. The working group also discussed possible recommendations for modifications to the ACE web portal to allow for more efficient access to FTZ production authorities for the FTZ Board, FTZ operator and CBP to assist CBP in processing admission and entries to align with the FTZ Board approvals. The working group plans to submit recommendations on these modifications at the March 2025 COAC meeting. The working group continues to meet bi-weekly to discuss each Part of the FTZ regulations, 19 CFR 146. The working group is requesting new members with expertise in the petroleum industry be added for the review of Part 146 Subpart H—Petroleum Refineries in Foreign-Trade Subzones. When the working group concludes its review of Part 146 it plans on submitting a series of recommendations to CBP on revisions to the FTZ regulations. When the Working Group concludes its review of the FTZ regulations they plan to review the bonded warehouse regulations, the FTZ manual and the Bonded Warehouse manual.

The Foreign Trade Zones/Bonded Warehouses Working Group will not submit recommendations at the December 2024 Public COAC meeting.

### **Conclusion**

The Secure Trade Lanes Subcommittee will continue to leverage its existing working groups and trade subject-matter experts to provide feedback on the various challenges facing CBP and the Trade and collaborate to help CBP achieve its dual goals of trade facilitation and enforcement.