

**Commercial Customs Operations Advisory
Committee (COAC)
Secure Trade Lanes Subcommittee
Partnership Programs and Industry
Engagement Working Group
Recommendations**

June 29, 2022

COAC

COMMERCIAL CUSTOMS OPERATIONS
ADVISORY COMMITTEE

COAC Public Programs and Industry Engagement Working Group Recommendations

1. COAC recommends that CBP guidance should support that CTPAT-TC members follow a risk-based approach for supply chain mapping. The PPIE WG recommends that the business mapping requirement be further defined to include mapping of only those regions, suppliers, etc. that importer feels pose the most risk for forced labor.
2. COAC recommends the Mission Statement requirement be modified and included as part of the Code of Conduct requirement.
3. COAC recommends that CBP clarify in writing the type of training required/accepted for business partners to ensure enforcement consistency across CBP and the CEE/NAMs. COAC also recommends CBP provide documented implementation guidance and training on the finalized Forced Labor CTPAT Trade Compliance minimum requirements to ensure understanding and consistent interpretation amongst Importers, CBP Port staff, National Account Managers and Centers of Excellence and Expertise. Following training sessions, CBP should provide training documentation publicly, for future reference and review by participants in the CTPAT Trade Compliance Program and/or those considering applying.
4. COAC recommends that the portion of the requirement dictating that partners incorporate the same Code of Conduct as their CTPAT-TC member, be removed. Business partners should be permitted to develop their own Code of Conduct to meet the forced labor requirements so long as the Code of Conduct clearly demonstrates that the business partner understands the forced labor requirements.