Commercial Customs Operations Advisory Committee
Secure Trade Lanes Subcommittee
Pipeline Working Group
Draft Recommendations

September 2023

COAC

COMMERCIAL CUSTOMS OPERATIONS
ADVISORY COMMITTEE

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1. The COAC recommends the pilot include volunteer importers, shippers, producers, pipeline operators and customs brokers in the supply chain for pipeline-borne Canadian crude oil, who will replace all existing port arrival and in-bond data reporting to CBP with equivalents acquired directly or derived from Distributed Ledger Technology, Decentralized Identifiers and Verifiable Credentials.

2. The COAC recommends that the pilot be open to additional upstream and downstream participants in the supply chain for pipeline-borne crude oil who voluntarily adopt the technology as described when CBP deems it expedient to include them.

3. The COAC recommends CBP waive USMCA certification of origin requirements for importers whose entry summaries derive from data acquired from the software and traceable (at minimum) to a consolidation hub in the interior of Canada.

4. The COAC recommends the test ascertain: 1) operational gaps and performance issues with the software; 2) the necessity and viability of obtaining well-head information to preclude introduction of USMCA non-originating materials into the supply chain; 3) the advisability of extending the pilot to other modes of transportation; and 4) the position of competent authorities with respect to the USMCA implications of mandating the software's use in advance of USMCA's July 1, 2030 five-year review to enable promulgation of appropriate regulatory changes with the concurrence of these authorities.

5. The COAC recommends other pipeline-borne commodities be added to the pilot as CBP may deem practical.