

CBP to Issue ‘Known Importer Letters’ in Preparation for UFLPA Enforcement

CBP plans to send letters to “identified as having previously imported merchandise that may be subject” to the Uyghur Forced Labor Prevention Act, CBP said in an April 12 [email](#). The UFLPA imposes a rebuttable presumption that goods from Xinjiang Uyghur Autonomous Region involve the use of forced labor as of June 21. Ahead June 21, CBP will use the “known importer letters” to “encourage those importers to address any forced labor issues in their supply chains in a timely manner,” it said.

Importers that don’t get a known importer letter may still face enforcement, the agency said. “If you do not receive a letter from CBP, this does not mean that your supply chain is free of forced labor,” it said. “All importers are expected to review their supply chains thoroughly and institute reliable measures to ensure imported goods are not produced wholly or in part with convict labor, forced labor, and/or indentured labor (including forced or indentured child labor).”

Under the UFLPA, the Forced Labor Enforcement Task Force Ahead is tasked with issuing guidance by June 21 and industry groups have asked for CBP to take a phased-in approach to enforcement (see [ITT 03/10/2022](#) and [ITT 04/08/2022](#)). “This is a difficult issue from many perspectives,” said Sidley Austin lawyer Ted Murphy in a [blog post](#). “CBP’s notice, however, is an indication that the guidance that will be forthcoming from FLETF and/or CBP is not likely to be as specific as many members of the trade community are hoping.”

There seems to be a race “to the starting line on an issue where the trade community and the [federal government] are in near total agreement on substance, but continue to talk past one another on process,” Murphy said. Murphy represents the Business Alliance for Customs Modernization, which recently filed [comments](#) asking for a “period of restrained enforcement.” — *Tim Warren*

Uyghur Forced Labor Guidance Likely Vague; Importers Should Begin Due Diligence Efforts Now, Lawyer Says

Upcoming and much anticipated guidance on compliance with the Uyghur Forced Labor Prevention Act (UFLPA) could very well be less detailed than the trade community would like, so importers should treat it like “gravy” and focus on starting now on due diligence efforts in preparation for the new law’s effective date in June, customs lawyer Richard Mojica of Miller & Chevalier said.

Speaking during a webinar put on by his law firm and the Midwest Global Trade Association on April 21, Mojica said the guidance, which CBP is in the process of developing (see [ITT 02/15/2022](#)), will likely be “helpful but only to a point.” It may be “high level,” and will prompt companies to do due diligence into their own supply chains,” Mojica said. But while it may provide “good data points to incorporate,” companies “need to start now, if we haven’t already, to incorporate due diligence so you are prepared to go above and beyond what the government is requesting,” he said.

The UFLPA, which takes effect June 21, 2022, creates a rebuttable presumption that goods made in Xinjiang were made with forced labor, and leaves it up to importers to demonstrate otherwise if their supply chain is connected to the Chinese province. It also requires the government to create a list of entities and products involved with forced labor. But though industry has called for the list to be made public, it’s still an open question whether it will be available as an aid to compliance efforts (see [ITT 03/16/2022](#)), Mojica said.

Importers should prepare for the new law by mapping their supply chains, especially for high-risk goods, as set forth in a State Department advisory issued in 2020 and updated in 2021 (see [ITT 07/14/2021](#)), said Mary Mikhaeel, also with Miller & Chevalier. They should also screen their suppliers to determine whether they have links to Xinjiang, and

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implement contractual provisions that require suppliers to cooperate with any UFLPA compliance efforts.

Meanwhile, the withhold release order remains CBP's "primary mechanism" for forced labor enforcement, Mikhaeel said. The threshold is "very high" for importers to get their products released once detained under a WRO, though Mojica said work with CBP on the process is starting to bear fruit.

While Mojica has been unable to obtain release of his clients' goods in many instances, a working relationship built with various CBP offices "over the past year or two" has also resulted in some success, he said. "We're moving toward an environment where there is a process that can lead to the release of merchandise," which has been a "very positive development." Recently, importers and CBP have been becoming familiar with high risk supply chains, resulting in a "mutual understanding" of collaboration to achieve the release of goods with documentation that supports it, Mojica said.

"A lot of the press is on detentions" in the hundreds and thousands of shipments, based on forced labor, Mojica said. "However, the real news for us, I think, is the fact that this process is starting to yield positive results."

Companies Want More Direction From CBP to Prepare for Uyghur Forced Labor Prevention Act

Importers are hoping that the guidance from the federal government on how to comply with the Uyghur Forced Labor Prevention Act will help identify Chinese firms that are outside of Xinjiang but employ Uyghur or other minority Muslim workers through China's "poverty alleviation" programs. Goods from those factories will be presumed to be made with forced labor, but customs advisers from KPMG said identifying that nexus to forced labor in your supply chain is even more challenging than seeing if you have Xinjiang inputs several tiers down in your supply chain.

KPMG hosted a webinar on preparing for the UFLPA, which goes into effect June 21, to talk about what needs to be done to prepare for the law, which will put the burden of proof on importers to show their goods do not have a nexus to Xinjiang or Uyghur labor outside the region.

Jessica Libby, a principal in trade and customs in KPMG's Los Angeles office, said a survey of clients found fewer than 50% had a plan to deal with the changes. All of the respondents said they need greater clarity from Customs on its expectations around the new law. A plurality of respondents said the biggest challenge is "keeping apprised of the regulatory changes and sharing those updates across their organizations."

Pierfilippo Natta, a senior associate in trade and customs in KPMG's San Diego office, said KPMG clients have gotten Risk Analysis and Survey Assessments, or RASAs, and he said, "most likely, you won't be able to answer all the questions, but you will realize how burdensome it is to get all that information." He said a RASA can either be procedural, with a request to describe how the company investigates its supply chain and the labor in it, or transactional, with a request to map a supply chain for a specific entry, with a production profile for each manufacturer in it, and verifications of labor practices at all of those companies.

Natta said importers are starting "to see a little more flexibility from Customs because we see pending litigation." He said CBP is continuously adapting to private sector requests.

Elizabeth Shingler, a senior manager in trade and customs in KPMG's Richmond office, advised companies, "if you're going to invest in an on-site audit, be very thoughtful about it." She gave the example of when an in-person audit of a company wasn't enough to overcome the forced labor allegation, even under the current law, where the burden of proof is with CBP. She said that audit had conflicting dates in the documentation, the documentation was photocopied, which CBP thought was suspicious, and the auditors didn't seem to know how many workers were at the site. She said that management picked the individuals auditors could talk to, and sat in on the interviews.

Shingler said companies should do Google searches about what is being written about their company in regard to labor practices, and should select a few transactions and trace the supply chain for those goods as far as they can. "See what you can gather and then see how comprehensive you feel it is," she said. She said they should also issue supplier questionnaires, though the webinar acknowledged that Chinese firms will be reluctant to be forthcoming if there are connections to Xinjiang because of Chinese laws

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discouraging cooperation with laws aimed at punishing China's forced labor practices.

She said companies should be asking themselves: When is it time to end relationships with suppliers? — *Mara Lee*

Possible SIMP Expansion Would be 'Crushing' to Entry Process, NCBFAA Says

As a proposed expansion of import data required under the Seafood Import Monitoring Program heads to conference as part of the House-passed America Competes Act, the National Customs Brokers & Forwarders Association of America's Matt Lahar testified to Congress April 7 that the provisions would be a difficult lift for both importers and the federal government.

Additional data required as part of the entry process for imported seafood under the expanded SIMP "will be crushing to the entry process," Lahar told the House Committee on Natural Resources in [written testimony](#) submitted alongside his appearance at a hearing on seafood traceability and the recent import ban on Russia. "Complete supply chain information, with certifications for each and every entry, provided 72 hours before entry is wildly unrealistic. And it is without precedent."

The trade group had already criticized SIMP expansion in December, after the provisions were dropped from bipartisan infrastructure legislation but remained under consideration in a separate bill (see [ITT 12/20/2021](#)). Subsequently added to the House China package, it will be the subject of talks to hash out differences with the Senate-passed U.S. Innovation and Competition Act after Congress returns from a two-week break April 25 (see [ITT 04/07/2022](#)).

The provisions would require expanded, "complete chain of custody data" to be submitted 72 hours prior to entry, "with verification/certification by a competent third party of all major transfer points," according to Lahar's written testimony. "The bill also expands the scope of SIMP by including all species of seafood and seafood products and widens NOAA's mission by requiring data on labor conditions in the harvest and processing of seafood products," he said.

Some at the hearing tied SIMP expansion to the ban on Russian seafood imports, but Lahar told the committee

that "SIMP expansion would take years to implement" and "would have no impact on the Russian ban."

"Many if not most of these provisions would be impossible to implement for years, at best," Lahar said. "For example, they call for certification of all parties in a seafood supply chain. Yet, no country has such a certification program in place. Designing and implementing a meaningful certification program with controls in place to prevent fraud is difficult. It is never an overnight process. Nor has any thought been given to how those multiple certifications per supply chains would move through the supply chain."

Nor would CBP's current systems be able to handle the additional data elements, Lahar said. "There is already a limitation on the number of 'records' that can be reported per entry. And the system shuts down for maintenance all too frequently," he said. "For these very reasons, CBP is looking at ACE 2.0 because the current system cannot function as originally designed in today's trade environment. The system cannot handle the data requested." — *Brian Feito*

CRS Says SIMP Expansion Could Help Fight IUU Fishing

Given the depletion of fish in the ocean, and estimates that about 11% of U.S. seafood imports resulted from illegal, unreported and unregulated (IUU) fishing, a recent Congressional Research Service [report](#) said Congress may want to strengthen legislation tackling the issue.

The report said the Seafood Import Monitoring Program could be expanded to cover all species that are imported. "Congress may also consider increasing customs enforcement at the border and whether greater resources are needed to fully account for the seafood entering the country. Increased efforts to trace seafood may also serve several other purposes, such as improving seafood safety, stopping seafood fraud, and identifying seafood production related to human trafficking," the authors said.

They also said the U.S. might help developing countries improve vessel monitoring, develop fishing management and enforce those catch limits.

"Congress may also consider whether the Moratorium Protection Act provides an adequate means to identify and sanction vessels, companies, or countries that participate or

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condone IUU activities, or if such efforts could be strengthened,” the report said. It said Congress could also consider whether the MPA should cover forced labor on vessels, or whether that should continue to be tackled by the ban on imported goods produced with forced labor.

China is the leading country responsible for IUU fishing, the report said, but it also noted that China has been cooperating on negotiations to curtail subsidies to the fishing industry at the World Trade Organization. If those operations became less profitable, some overfishing might end, the report said. — *Mara Lee*

FDA to Require DUNS Number at Entry for All FSVP Importers July 24

FDA will require that food importers transmit their Data Universal Numbering System number for entries of food subject to the Foreign Supplier Verification Program regulations beginning July 24, it said in a [guidance document](#) released April 27. The agency will on that date end a grace period that has allowed importers to instead transmit “UNK” for unknown instead of a DUNS number since 2018 (see [ITT 05/10/2017](#)).

The grace period had been in place because FDA had “recognized that this was a new requirement and some factors may have prevented importers from” providing a DUNS number. However, “needs and circumstances have changed since FDA announced its temporary policy, as FSVP importers have now had ample time to familiarize themselves with the requirements,” the guidance said.

“Beginning July 24, 2022, the use of the entity identification code ‘UNK’ will no longer be an option,” FDA said. “Consistent with 21 CFR 1.509(a), the FSVP importer will be required to ensure that their valid, 9-digit DUNS number is provided in the Entity Number field. CBP will reject an entry line of a food subject to the FSVP regulation when the importer’s DUNS number is not provided in the Entity Number field,” it said. The policy will apply only to entries with the affirmation of compliance (AoC) code FSVP, indicating the food is subject to FSVP requirements.

In a [CSMS message](#) on the new FDA guidance, CBP said ACE deployment dates for the new policy “will be announced in a future message.”

The FDA guidance noted that importers may get a DUNS number from Dun & Bradstreet free of charge “within 30 business days or longer,” though a fee applies for faster delivery. “To obtain a DUNS number, please contact D&B directly by phone at 866-705-5711 or at <https://www.dnb.com/duns-number/get-a-duns.html>. If you already have a DUNS number, you should use that DUNS number as your importer identification UFI. You do not need to obtain a separate DUNS number for FSVP,” the guidance said.

Importers with multiple locations and therefore multiple DUNS numbers “may choose to provide the DUNS number that applies to the location at which you maintain your FSVP records,” FDA said. Importers also may provide the DUNS number for another location, as the FSVP regulations permit offsite storage of records as long as they can be provided within 24 hours of request. “Once chosen, the same DUNS number should be used for all of the importer’s FSVP entries, to the extent the DUNS number is applicable to an entry line,” FDA said. — *Brian Feito*

Democratic, Republican Staffers in Congress Question Which Elements Will Be in Trade Title

With negotiations expected to begin in earnest soon on the House and Senate’s trade packages, staffers in both chambers of Congress say there could be support for antidumping and countervailing duty reform and language around Section 301 tariff exclusions, but the likelihood of a dramatic de minimis change seems somewhat remote.

On de minimis, Senate Finance Committee Chairman Ron Wyden, D-Ore., has expressed some interest in making changes, but he also has defended the \$800 threshold’s utility. He issued a statement that said, “I am taking a close look at Representative Blumenauer’s proposal. De minimis has a role to play in allowing American small businesses to get the inputs they need, but using it to bypass tariffs for a multi-million dollar fast-fashion business or avoid any scrutiny as to the content of shipments is not what we had in mind. We will be working with Representative [Earl] Blumenauer [, D-Ore.,] in the conference process and beyond to make sure the de minimis law is doing what it is intended to do.”

In interviews on background with *International Trade Today*, staffers wanted to emphasize how much compro-

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mise has already been done with the Generalized System of Preferences benefits program language. A House Democratic trade staffer said that there's a lot of overlap between House and Senate language on GSP, and said, "I think all those differences are bridgeable."

A Senate Republican staffer said the House should recognize Senate Republicans already made changes to GSP to satisfy Democratic concerns about the environment and gender equality. "Senator [Mike] Crapo [R-Idaho] demonstrated a lot of leadership here by getting a 91-4 outcome. It wasn't easy," he said.

Renewing the GSP and Miscellaneous Tariff Bill is usually not controversial. They expired at the end of 2020. The Senate renewal continues the MTB program as it has been—goods are chosen by the International Trade Commission, who requested them is public, and members may object to any item on the record. The House renewal, which had no Republican support in the Ways and Means Committee, would change future cycles so that end-use goods are not eligible.

A House Democratic trade staffer argued that the Senate's U.S. Innovation and Competition Act (USICA) "is not as pro-competitive as it was originally thought to be." She said that given how many MTB goods are imported from China, it's a legitimate question to ask if this really counters China's economic manipulation. She said the administration has not weighed in on which version of MTB it prefers.

A Republican Senate staffer questioned House Ways and Means Trade Subcommittee Chairman Rep. Earl Blumenauer's characterization that a third of the MTB list is end-use products. He pointed to chemicals that can be bought off the shelf, but are used as manufacturing inputs.

"If they have a problem with microwaves, object," said the Senate Republican staffer, referring to one of the consumer products on the MTB list. He said Republicans have never blocked the removal of an item after an objection.

Some Democratic constituencies also have criticized the Senate bill for requiring a broad Section 301 tariff exclusion process, and for the criteria Crapo laid out for granting exclusions. However, that language gave the Office of the

U.S. Trade Representative broad latitude to make its own decisions on expanding exclusions.

The House Democratic staffer said the caucus is not unanimous in its position on requiring exclusions, since some members represent companies that want exclusions. Still, she noted the administration could change its tack on tariffs as the fourth anniversary of the first round of tariffs approaches.

Treasury Secretary Janet Yellen told Bloomberg TV on April 22 that cutting Section 301 tariffs is "something we're looking at" to fight inflation. According to press reports, a national security adviser said on April 21 that it could make sense to remove tariffs on lists 3 and 4A, on goods such as bicycles or apparel, because they have no strategic importance, and said that doing so could fight inflation.

The Senate bill did not include changes to trade remedy laws known as Level the Playing Field 2.0, but several expected Senate conferees, both Republicans and Democrats, were co-sponsors of that bill. The House companion bill is in the House's trade title.

A House Democratic trade staffer said she doesn't think Level the Playing Field Act is some new controversial approach, or that its planks "haven't been talked about before. For many, this is just a long time coming." She said those voices who are opposed may represent companies that benefit from cheap imports, and it's important to examine "who's objecting, and the reason why."

A senior Senate Democratic aide said that the time and money it costs companies to file successive AD/CVD cases is definitely a problem, and there is bipartisan recognition of that. She said that Commerce Department staffers have given proponents of the bill technical assistance, looking into World Trade Organization rules' compatibility, feasibility and how to preserve due process while making the changes.

A Republican Senate staffer noted that the original Level the Playing Field Act went through markup, and said that some senators have process concerns about making such changes without a markup. He said he has questions about how they'd estimate how cross-border subsidization distorted prices. He asked, "How would you calculate the denominator?"

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He said he wants to know more about what products would have or would benefit from changes to the law for successive or concurrent trade remedy cases. If solar panels are an example, he said, there's already an antidumping circumvention petition. He asked: How would a circumvention petition and a successive AD case work together?

The top Republican on the House Ways and Means Committee, who will be a conferee, is against Level the Playing Field 2.0. The Senate Republican aide said it's important to Senate Republicans that House Republicans get a voice in these negotiations. And he said that the fact that Ways and Means ranking member Kevin Brady, R-Texas, introduced USICA's trade title with all Republicans on the committee shows that the Senate approach already has three of the four sides on board.

In contrast, a senior Senate Democratic aide said many House proposals do interest Senate Democrats, but that they recognize they have to think about what can get Republican votes in the Senate to cross the 60-vote threshold. — *Mara Lee*

Trade Groups, Chamber, Major Chemical Companies Ask for Fully Retroactive MTB

More than 200 companies, along with local and national trade groups are asking congressional leaders to make sure that the renewal of the Miscellaneous Tariff Bill reimburses importers for tariffs paid on MTB products back to Jan. 1, 2021.

"Since the previous Miscellaneous Tariff Bill expired on December 31, 2020, manufacturers and other businesses have paid more than \$500 million in tariffs, or \$1.3 million per day, on goods that are not available in the United States," they [wrote](#).

The top Republican on the House Ways and Means Committee, Rep. Kevin Brady, R-Texas, has said, "I do think that there could be bipartisan support for increased retroactivity. You know, I think we all proposed four months' retroactivity the first half of last year, now the program has lapsed for another year"

The letter also said they oppose the House version of MTB, which would not allow consumer products on future lists.

They called it a "broad and arbitrary" restriction, and said it "would be difficult to implement." They said the analysis of the International Trade Commission that undergirds the list ensures that the products on the list are not produced domestically. "Furthermore, the existing process allows for Congress to object to the inclusion of individual petitions in the final MTB," the groups wrote. — *Mara Lee*

'Little Political Appetite' for New Tariffs, US-China Commission Told

Direct negotiations with China are, "at this point, unlikely to yield meaningful results" in curbing Beijing's unfair trade practices, Emily Kilcrease, senior fellow at the Center for a New American Security, told the U.S.-China Economic and Security Review Commission in [written testimony](#) at a hearing April 14. "China has little incentive to commit to binding rules that will require structural changes to a system they believe works for their economic and political objectives," she said.

In the context of "unsuccessful direct engagement" with China, the U.S. "will need to rely more heavily on defensive measures to mitigate the harm of China's practices," Kilcrease said. A "fresh" Section 301 investigation "may be under consideration" at the Office of the U.S. Trade Representative "to focus specifically on China's subsidies practices," she said. What "remedial action" would emerge under a new Section 301 investigation "remains unclear," Kilcrease said. There's "little political appetite" in the U.S. or among its allies "for further tariff escalation," she said. One benefit of a new Section 301 investigation may be that it would allow the Biden administration to "adjust" the existing tariffs on Chinese imports, she said.

USTR "will be forced to issue an opinion this spring on whether or not to renew the initial tranche of tariffs, which will otherwise automatically expire," Kilcrease said. July 6 is the fourth anniversary of the List 1 tariffs taking effect on Chinese imports, and the 1974 Trade Act requires their expiration after four years unless they're extended through a notice and comment rulemaking.

The Information Technology and Innovation Foundation thinks USTR should craft a new Section 301 investigation into China's cloud services restrictions and its other unfair digital trade practices, "as these are among the most clearly

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egregious examples whereby China targets U.S. firms,” Stephen Ezell, vice president-global innovation policy, [told](#) the commission. “An investigation could be broad and include other Chinese digital/cyber sovereignty initiatives, such as discriminatory cybersecurity regulations.”

Beyond using Section 301 tools, the U.S. can work with “like-minded countries” to create a “collective ‘bill of particulars’ that enumerates the vast extent of Chinese innovation-mercantilist policies,” and does so “in great detail,” Ezell said. The U.S. and its allies “can also collaborate in advocating for improved transparency and surveillance” at the World Trade Organization, he said, “which matters because the lack of transparency in Chinese trade-related policymaking acts as a considerable, and growing, nontariff barrier to trade.” — *Paul Gluckman*

FMC Publishes Instructional Video on Complaint Filing Process

The Federal Maritime Commission recently [published](#) an [instructional video](#) to help industry file shipping complaints. The video explains which processes are “most beneficial to achieving a complainant’s desired outcome,” including how members of the public can report information that may trigger an investigation or initiate formal civil litigation that can provide wronged parties with damages and restitution, the FMC said.

California Ports Continue to Postpone New Surcharges

The Los Angeles and Long Beach ports again [postponed](#) by a week a new surcharge meant to incentivize the movement of dwelling containers (see [ITT 10/28/2021](#)), the two ports announced April 29. The ports had planned to begin imposing the fee in November 2021 but have postponed it each week since. The latest extension delays the effective date until May 6. — *Ian Cohen*

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