

Many Factors Weigh on Administration to Change China Tariffs, Lawyers Say

While the Biden administration faces very little legal constraint to continuing the Section 301 tariffs on the vast majority of Chinese imports, trade experts at the Wiley firm said that the administration is under pressure for a variety of reasons to make a decision on whether they are going to change their approach to the tariffs. So far, the Office of the U.S. Trade Representative has reinstated fewer than 500 exclusions, either due to the COVID-19 pandemic or to a limited review, and has not offered to renew the bulk of the 2,129 exclusions that were granted during the previous administration.

Importers didn't win on their central argument at the Court of International Trade, that the List 3 and List 4A tariffs were outside the administration's statutory authority, but USTR was directed to explain how it took comments into account, and to do so by late June.

Wiley partner Maureen Thorson said, during a [webinar](#) May 12 about the future of sections 301, 232 and 201 tariffs, that it's possible USTR will ask for more time on providing that explanation. But, she said, the CIT directive, and the formal review of whether the tariffs should continue past the four-year mark "create a group of pressures on the Biden administration to make a determination as to how they want to really implement and administer these tariffs on a going-forward basis."

Tim Brightbill, a Wiley partner in international trade, also talked about the China tariffs on the webinar. "So you have some elements of the administration expressing concern that the tariffs may be contributing to inflation. You have other elements of the administration that are trying to address the broader problem of China and the problematic aspects of the Chinese economy, from state-owned enterprises to subsidies to overcapacity, to the global Belt and Road Initiative," he said. "And agencies like the [Office of the] U.S. Trade Representative simply don't want to give

up the leverage of having Section 301 tariffs on hundreds of billions of dollars of Chinese goods until those problems are addressed."

When USTR does its review, it asks domestic industry if anyone is benefiting from the tariffs, and if any firm wants them to continue. Then, it must evaluate if the tariffs have been effective, and how they have affected consumers.

"There's no real statutory deadline for how long that review should take or what has to happen, if anything, if USTR finds the tariffs are ineffective or only partially effective," Thorson said. "One of the things that's not really clear right now is whether USTR is going to go through the tariffs on a line-by-line basis. Will they say, well, we got a request for continuation from a domestic producer of tennis balls. So we'll keep the tennis ball tariffs in place. But we didn't get any requests for continuation from a tennis racket producer. So we'll take them off tennis rackets."

She said there is judicial precedent that suggests USTR doesn't have to be that literal about retaining the tariffs.

Brightbill also talked about the changes that could come to Section 232 tariffs on aluminum and steel. He said he doesn't expect any more countries to get out from under the Section 232 tariffs on steel and aluminum, or to get to renegotiate their quota terms, at least not in the near future. Steel from Japan, the EU and the U.K. is subject to tariff rate quotas, product-by-product; South Korean and Brazilian steel, in comparison, is subject to hard-limit quotas.

"About 18% of steel imports generally are subject to Section 232 tariffs at this point," Brightbill said, because most imported steel comes in either under product exclusions, under the quotas, or from Canada and Mexico, which are not subject to any tariffs or quotas.

He did say that he expects the Bureau of Industry and Security could "streamline or simplify the [Section 232] product exclusion process, which is very burdensome for everyone

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involved,” as a result of the comments it received on the exclusion process. The Commerce Department received those comments through late March.

“There have been proposals to limit the president’s authority under Section 232. But I would say that while those proposals seem to have had some traction a couple of years ago, I think it’s less likely today that any type of legislation to limit the president’s authority with respect to national security would be enacted,” he said. The main champions of those bills—Sens. Rob Portman, R-Ohio, and Pat Toomey, R-Pa., and Rep. Ron Kind, D-Wis.—are all retiring at the end of the year. However, Sen. Mike Crapo, R-Idaho, who will be the chairman of the Senate Finance Committee if Republicans gain a majority in the Senate, has co-sponsored a reform bill. A bill that does not address current tariffs but still gives Congress more of a say on future actions does have sponsorship from Rep. Terri Sewell, D-Ala., and Rep. Jackie Walorski, R-Ind., both prominent House Ways and Means Committee members. — *Mara Lee*

Substantial Transformation Continues to Cause Uncertainty

As companies work to move assembly out of China so that the goods they export to the U.S. won’t be hit with Section 301 tariffs, they have to grapple with the fact that CBP may still consider a good made in Mexico, Malaysia, Vietnam or elsewhere to be a product of China if enough of its innards were made in China.

Arthur Bodek, a partner in the New York office of GDLSK, moderated a panel called “Is This Product Still Chinese?” at the Georgetown Law International [Trade Update](#). He said a few years ago, a client that made digital thermometers wanted to know if the thermometer is assembled in China, and has a Chinese circuit board, can it still have a different country of origin, since the software and probe were not Chinese. “Much to our pleasant surprise, CBP agreed it was the probe and the software that was really the guts of it and made it work,” Bodek said.

This “guts” idea, or what Bodek also called a “heart and soul test,” is also about what component or subassembly is the essence of the finished good. “We had some very interesting conversations with CBP where it’s come down to one subassembly; if you move it from Column A to Column

B, that will tip the scales,” he said, but since that subassembly is Chinese, the good is still a product of China.

Which components represent the essence of the good is subjective, and he said CBP has said something is the essence that lawyers at his firms didn’t think qualified. Monika Brenner, chief of CBP’s Valuation & Special Programs Branch, acknowledged during the panel that these judgment calls are more subjective than the tariff-shift standard that is used under USMCA. “We have tried to get more uniformity; if you’re requesting a ruling from New York, we try to have them looked at at the headquarters level. We don’t want 50 different people making different decisions,” she said.

She also acknowledged that with global supply chains, sometimes no one country feels like it deserves the country of origin. She gave the example of vacuum cleaners. If the motor is from China and most of the other inputs are from Vietnam, but there are also another country’s inputs, it doesn’t feel like it should be China or Vietnam, she said. She said sometimes “none of them really seem to be the right answer” so “we do the best we can.”

Brenner said CBP tries to use the 1982 precedent of *Data General vs. U.S.*, which found that programming a foreign chip in the U.S. gave the item a U.S. origin, but added, “it would be nice if we had some newer law out there.”

Panelist Elyssa Kutner, a senior managing associate at Sidley, talked about a case could have an impact (see [ITT 02/24/2022](#)). Cyber Power Systems argued that CBP was wrong to seize goods that it said were made in the Philippines, and continued to mark them that way even though CBP had previously instructed them that the goods should have a Chinese country of origin and be subject to Section 301 duties. Judge Leo Gordon did not rule that the Chinese inputs underwent substantial transformation—he merely dismissed a request for an injunction—but Kutner homed in on his criticisms of the essence approach CBP has been using.

She said this test, in recent years, has “kind of taken on a life of its own. Some rulings seem a little bit extreme.” She said the printed circuit board drives the origin, even if there are hundreds of components and significant and complex machinery in a country other than the one where the PCB

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was made. “You could think of it as a pendulum,” Kutner said. “Perhaps it will swing back.”

She said Gordon said that country of origin rules, with 80 years of application in various applications, including the Generalized System of Preferences benefits program and drawback eligibility, “should be fairly straightforward to apply. It is not.” She said that he said the essence test is leading to seemingly disparate treatment.

Brenner said that Cyber Power did not provide some facts about its products at the time it protested the goods’ seizure. “Why are we rewarding the fact that you’re not giving us these facts?” she asked. She said linking country of origin to the PCB is a bright-line test. If a ruling on Cyber Power throws that out, “it’s really going to be a case-by-case analysis.” — *Mara Lee*

USTR Allows Another 6-Month Extension of Section 301 Tariff Exclusions for COVID Products

The Office of the U.S. Trade Representative will extend the exclusions from Section 301 China tariffs on goods used to treat COVID-19 for another six months, it said in a [notice](#) posted on the agency’s website. The exclusions were set to expire May 31 (see [ITT 11/10/2021](#)), but USTR said it will extend the 81 product exclusions through Nov. 30.

Lawyer Advises Documenting That Imports Have No Xinjiang Content

Sidley Austin Partner Ted Murphy noted in his [blog](#) that while it is not easy to document that imports do not contain Xinjiang content, “we believe that it will be easier (and quicker) for most companies to demonstrate that articles do not contain Xinjiang content (or production by yet-to-be listed entities), than it will be to rebut the presumption of forced labor (which is likely to be a long-drawn out process).”

Murphy’s post follows CBP’s posting of the “known importer” [letters](#) CBP recently sent to companies it knows have imported from Xinjiang in the past. Those letters warned that the presumption that goods made in Xinjiang are made with forced labor “will require the importer to not only use due diligence in evaluation of its supply chain, but also to respond completely and substantively to CBP requests for information regarding entries it may review.

“As your company has previously imported merchandise sourced from locations or entities potentially subject to the Act, you are being notified that any future entries of such merchandise may be subject to CBP enforcement action, including seizure, forfeiture and/or penalties, or other appropriate action under the customs laws. In any future CBP enforcement action related to such merchandise, CBP will take into consideration the fact that you have been provided this notice in determining appropriate administrative remedies,” said one version of the letter.

A version for CTPAT members said “subsequent entries of such merchandise also may result in suspension or removal from the Customs Trade Partnership Against Terrorism (CTPAT) program.”

Nonprofit Report Details Product Sectors Most Intertwined With Xinjiang

Data analysis nonprofit C4ADS highlighted nine products that are “produced in disproportionately high volumes in Xinjiang that are part of global supply chains,” in a new report [released](#) May 19. The [report](#) examines China’s Xinjiang region’s role in manufacturing those products: cotton, tomato products, pepper products, walnuts, rayon, calcium carbide, polysilicon, wind turbines, and beryllium. “These goods should be a focal point of international stakeholders’ response to the crisis in the region: if these goods are found to be produced by forced labor, or otherwise support oppression in Xinjiang, removing them from global supply chains can help end international support for these crimes,” the report said.

India, Philippines, South Korea, Indonesia, Thailand and 6 TPP Countries Will Negotiate IPEF

A half-dozen countries that negotiated the Trans-Pacific Partnership—including two that never ratified it—and Korea, the Philippines, Indonesia, Thailand and India agreed to start negotiating agreements with the United States on trade, supply chains, digital standards, anti-corruption, and tax and investment from the U.S. for decarbonization and infrastructure.

The TPP, which the U.S. quit before ever taking a ratification vote and which came into force through Japan’s leadership under the new name Comprehensive and Progressive

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Agreement for TPP, looms large over this effort, which is called the Indo-Pacific Economic Framework.

U.S. Trade Representative Katherine Tai told reporters on a [call](#) over the weekend that the TPP could not get through Congress, which is why it never came up for a vote. “I think that there’s a very, very strong lesson there: that TPP, as it was envisioned, ultimately was something that was quite fragile and that the United States was not able to deliver on. And that informs very much our thinking about bringing the Indo-Pacific Economic Framework, as it’s designed here, to the region—which is that trade is an important component of this, but not the only component,” she said.

U.S. Chamber of Commerce Vice President Myron Brilliant welcomed the opening of the IPEF, but also [said](#) that it’s “disappointing that the IPEF does not currently provide new access to foreign markets for American workers, farmers and companies, and it’s hard to see how it can be enforceable without such a provision. This framework seems bound to fall short of the high standards and robust benefits of the U.S. trade agreements negotiated with several regional economies [participating in IPEF], including Australia, Korea, and Singapore. In some instances, the administration is trying to use trade policy tools to achieve goals that would be better addressed by domestic policy reforms.”

Tai addressed that criticism, that countries will not be willing to offer much, because the U.S. is not lowering its tariffs, and that there won’t be much benefit for exporters because the IPEF countries also won’t lower theirs.

Tai said the average bound tariff in the U.S. is 2.4%. “In terms of where the value is that is left to be unlocked in the global economy right now, it is in the areas where we are engaging through this framework,” she said. She said the U.S. will ask countries to accelerate their compliance with the World Trade Organization’s Trade Facilitation Agreement. “We will see commitments with IPEF partners that facilitate agricultural trade through science-based decision making and the adoption of sound, transparent regulatory practices,” she said. She gave the example of the non-tariff barrier U.S. potatoes faced in Mexico until earlier this month.

National Security Adviser Jake Sullivan, on the same call, said the fact that this is not a traditional free trade agreement is a feature, not a bug. He said the range of countries

who want to be in the IPEF shows that countries are interested even without tariff liberalization, “including some with whom we haven’t had meaningful economic negotiations before.”

“We and our partners in the region agree that much in the coming decades will depend on how well governments harness innovation, especially the transformations underway in clean energy and the digital and technology sectors, while at the same time fortifying our economies from a range of threats from fragile supply chains, to corruption, to tax havens,” he said.

New Democrats Chair Rep. Suzan DelBene, D-Wash., said her state has much to gain from the negotiations. “This is a welcomed departure from the Trump administration’s misguided withdrawal from the Indo-Pacific and damaging unilateral trade war against China. The framework can bring together like-minded countries to collectively put pressure on China’s unfair trade practices and human rights abuses,” she said. That was also the argument for the TPP. “The framework can construct more resilient supply chains, raise labor standards, facilitate digital trade, open new markets for American farmers, ranchers, and fishers, and bolster regional efforts to combat climate change.”

A reporter asked Tai if, since the TPP failed because of lack of support in Congress, that means that the IPEF has been designed so that a vote wouldn’t be necessary? The Japan mini-deal lowered some tariffs, but at a small enough scale that it didn’t require congressional approval.

Tai didn’t answer directly, though she said she would be engaging with stakeholders in the business community, in labor unions and in environmental nonprofits, as well as Congress. When pressed on the question a second time, she said, “Let’s see where these negotiations take us, and let’s see where the discussions go. But ... regardless, we have to keep Congress close, and Congress needs to be a part of shaping what we do with our partners here.”

The top Republican on the House Ways and Means Committee and the ranking member of its trade subcommittee—Rep. Kevin Brady, R-Texas and Rep. Adrian Smith, R-Neb.—rejected that ambiguity. “The Indo-Pacific Economic Framework is a strong opportunity for the United States to raise standards and open markets for Ameri-

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can-made products and services, but the Administration's current plan isn't nearly ambitious enough," they said in a [statement](#). "They need to do more than simply include some Republican priorities, such as eliminating barriers to digital and agricultural trade, and they must obtain congressional approval as the Constitution requires."

Some business stakeholders both praised the opening of negotiations and signaled what their messages would be to U.S. government negotiators.

"The Indo-Pacific holds vast promise as the region's dynamic economic growth is allowing millions to join the global middle class. The U.S. Chamber of Commerce previously provided the Biden Administration with several priorities that American companies would like to see addressed in the Indo-Pacific Economic Framework, including digital trade, customs reforms, sustainability, and supply chains. We are engaging closely with the administration and regional economies to advance these goals," Brilliant said. "Some questions remain. Regardless, it's a positive step toward strengthening economic ties in the region, and we are rolling up our sleeves to work with the administration to maximize the IPEF's potential."

The Pharmaceutical Research and Manufacturers of America (PhRMA) said they will ask for decreased trade barriers to promote supply chain resilience and "stronger pro-innovation policies," which is code for fewer cost constraints by foreign government purchasers of drugs, or longer patent exclusivity for biological drugs. The latter was removed from the USMCA, with Tai leading the charge, as she worked for the Ways and Means Democrats at the time.

Sun Kim, director of South Korea's Research Center on Global Solidarity, People's Health Institute, was suspicious the U.S. might advance such priorities. "Any international negotiation, especially the ones that would heavily impact the people's health and living, should engage the people that will be affected, and their voices must be heard and included," Kim [said](#).

Taiwan was not invited to participate, despite congressional requests for them to be included. A reporter asked why, and Sullivan said choosing to deepen economic engagement with Taiwan one-on-one rather than including them in IPEF "puts us in the best position for us to be able to enhance our

economic partnership with Taiwan and also to carry IPEF forward with this diverse range of countries."

Analysts from the Center for Strategic and International Studies [wrote](#) May 23, the day of the announcement, "Perhaps the most surprising element of the launch is that the administration ultimately chose weaker language in exchange for a higher number of participants."

Sullivan said the fact that not every country has to sign on to every pillar of the IPEF allows the U.S. to accommodate a diversity of countries, advanced economies and emerging economies.

The CSIS analysts noted "these countries only committed to attending an initial scoping round of discussions, and whether this broad initial enthusiasm for the framework continues once negotiations commence remains an open question." They also said there's hope for early wins, particularly in trade and supply chain issues, and a goal to conclude negotiations in all areas within 18 months. — *Mara Lee*

More Port Delays Likely if Union Negotiations 'Go Poorly,' Chamber of Commerce Says

If the upcoming negotiations between West Coast ports and their dockworkers' union "go poorly," U.S. shippers and traders could face new, worsening logistics delays, the U.S. Chamber of Commerce [said](#) May 23. The chamber said "stakes are especially high" for talks between the International Longshore and Warehouse Union and the Pacific Maritime Association, which began May 10 and need to reach a resolution before their contract expires in July (see [ITT 11/24/2021](#)).

The ILWU has "significant leverage" in talks, the chamber said, partly because terminals are "under immense pressure to improve service levels and not have a repeat of last year," which saw "record" traffic flows and congestion at West Coast ports. But terminals are also seeking to move further toward automation, the chamber said, which could bring U.S. ports in line with the world's other major modern terminals and help them handle more capacity.

"This issue has created a clear battle line between the port terminals and the ILWU," the chamber said. "The union views automation as an existential threat to their members'

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livelihood by eliminating jobs.” The chamber said both sides are “hopeful” they can reach a new contract and that the negotiations will “not lead to service disruptions, despite history saying otherwise.”

Congress is closely monitoring the talks. Republicans in March asked the administration to use all available tools to help union workers agree to a new contract on time (see [ITT 03/18/2022](#)). A Republican-sponsored bill introduced earlier this year would revise the National Labor Relations Act to define a labor slowdown by port unions as an unfair labor practice and say that labor unions’ negotiations against port automation are also an unfair labor practice (see [ITT 03/25/2022](#)).

Reform Competitive Need Limitations in GSP, 54 Representatives Say

A group of 54 members of the House led by Rep. Stephanie Murphy, D-Fla., and Rep. Jackie Walorski, R-Ind., are asking leadership of both chambers to make changes to Competitive Need Limitations in the Generalized System of Preferences benefits program proposed by the pair in H.R. 6171 (see [ITT 12/10/2021](#)).

Their May 20 [letter](#) says that the geostrategic significance of GSP is higher now because the U.S. government desires that companies decide to move their supply chains out of China. “In addition, because GSP has a downward effect on prices, it is especially vital at a time of rising inflation for American consumers. GSP expired at the end of 2020, and we strongly support its reauthorization,” they wrote. To bolster GSP, they wrote, it should change CNL rules. “CNLs are arbitrary dollar-value caps that Congress has not adjusted in 25 years. Essentially, if U.S. imports of a GSP-eligible product from a GSP beneficiary country exceed the annual CNL threshold, then that country product loses GSP benefits,” they wrote. “It is critical to bear in mind that, when a country’s product loses GSP, China is often the main beneficiary. Chinese exports become more competitive vis-à-vis GSP beneficiary country exports, and prices increase for U.S. manufacturing inputs and consumer goods.” — *Mara Lee*

Senate Passes Resolution for UK FTA

A nonbinding resolution to pursue a free trade agreement with the U.K. passed the Senate through unanimous

consent. Sen. Mike Lee, R-Utah, hailed the passage in a May 26 news [release](#). “The United States and the United Kingdom are the closest of allies and the most natural of economic partners. Since the British people have reclaimed the right to negotiate their own trade agreements, I have advocated for a robust trade agreement between our nations. I am overjoyed and encouraged to see the Senate pass this resolution calling for such a mutually beneficial agreement. Free trade between our nations would be good for Britons, for Americans, and particularly for Utahns who have such close economic ties to our friends across the pond,” he said.

U.S. Trade Representative Katherine Tai, when asked if this administration will continue to negotiate an FTA with the United Kingdom, said that an FTA “is a very 20th century tool,” even as her counterpart said Britain wants a deal with the U.S. to liberalize trade (see [ITT 03/22/2022](#)). However, Tai acknowledged there is appetite in Congress for an FTA with the U.K.

CPSC Hopes to Start ‘e-Filing’ PGA Message Set Pilot in 2023, Mandate Use by 2025

TUCSON, Arizona—The Consumer Product Safety Commission aims to begin a pilot program in 2023 with wide participation from importers to test “e-filing” of certificate of compliance data elements, with an eye toward making the PGA message set mandatory in 2025, said Sabrina Keller, deputy director of CPSC’s Office of Import Surveillance, during a panel of the National Customs Brokers & Forwarders Association of America annual [conference](#) May 2.

The long-awaited “beta” pilot will be based on a plan the full commission approved in 2020, building on lessons from the CPSC’s “alpha” e-filing pilot in 2016 (see [ITT 01/27/2017](#)). The commission will continue its certificate “registry” approach, and will require all seven of the data elements it required under the alpha pilot, Keller said. CPSC also will limit the scope of the requirements to products filed under about 300 Harmonized Tariff Schedule subheadings, she said.

CPSC hopes to publish a *Federal Register* notice “next month” on the beta pilot, which it began to develop late last year, Keller said. CPSC will look for 30-50 importers to participate in the test, and hopes for “variety” among

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participants, she said. The commission also will host a public workshop in fall 2022 to “gather more industry input,” Keller said.

Even prior to the beta pilot’s launch, CPSC will run a smaller pilot with nine importers and brokers to advise on the “IT aspect” of e-filing,” Keller said. CPSC then expects its beta pilot to “kick off with active filing in 2023,” while it continues its rulemaking process through 2023 and 2024, she said. “E-filing will be final and effective and mandatory in 2025,” she said.

Keller noted that the data elements CPSC will require with its new PGA message set are not new to importers, who are already required to provide them to the government on certificates of compliance. “The only difference here is that they are electronically filed at the time of entry.” — **Brian Feito**

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