



### Forced Labor 301 Recommends 10% Tariff on 13 Countries and EU and 12.5% on 46 Other Countries

The U.S. Trade Representative [said](#) it found 54 of its 60 investigation targets have no forced labor import prohibition, and that the other six—the EU, Canada, Ecuador, Indonesia, Mexico and Pakistan—have failed to effectively enforce their bans on goods made with forced labor.

The USTR said this lack of action burdens the U.S. economy, and it proposes imposing a 10% tariff on those six countries with forced labor bans, and on the U.K., which it says has a partial regime, as well as Argentina, Bangladesh, Cambodia, El Salvador, Guatemala, Malaysia, and Taiwan, which have all promised to act against goods made with forced labor as part of their Agreements on Reciprocal Trade.

The other 46 countries' goods should face 12.5% tariffs, the USTR says.

However, there will be many exceptions to these tariffs, including USMCA-compliant goods of Canada or Mexico; and textiles and apparel articles that enter duty-free as a good of Costa Rica, the Dominican Republic, El Salvador, Guatemala, Honduras, or Nicaragua under CAFTA-DR; tropical fruits and vegetables and spices; oil, gas and coal related products, numerous chemicals, minerals and ores; medicines; goods for the aerospace sector; goods already subject to Section 232 tariffs, metals in chapters 80 and 81, and semiconductor-related items.

Scottish whisky is subject to the tariffs.

As was done in the Bangladesh reciprocal trade deal, the USTR proposes that a tariff rate quota be granted to some apparel equivalent to the quantity of U.S. textile exports the apparel-producing country imports. It did not say whether it proposes tariff-free access within the quota, and solicited comments on how this mechanism should be set up, “including the U.S. and foreign products to be covered, the relative market opportunities for each side, and the tariff

rate (if any) to be applied to products subject to that mechanism, as well as whether a similar mechanism should apply to any other product or sector.”

Comments are due by July 6, and a hearing is scheduled for July 7. — *Mara Lee*

### Proposed Tariffs on Brazil Apply to Fewer Categories Than IEEPA Did; Brazil Threatens Retaliation

The Office of the U.S. Trade Representative is recommending 25% tariffs on what it [calls](#) “all goods of Brazil, with exemptions for certain goods,” but that list of exemptions covers more than 1,600 Harmonized Tariff Schedule codes across chapters 02, 05, 07-12, 14, 15,16, 18-22, 25-34, 36, 38-40, 44, 47, 48, 56, 68, 70-76, 79-81, 83-85, 88, 90, 91, 94, 96 and 98. Some of the items are only exempt if they are in the aircraft sector, which is a major export strength for Brazil.

Peter Harrell, a former National Economic Council supply chain expert in the Biden administration, wrote on [X](#) that the list of exempt products is larger than the Brazilian products that Trump exempted under the International Emergency Economic Powers Act, when a combined 50% rate was levied on Brazil.

Kellie Meiman Hock, a former career staffer negotiating with Brazil at USTR, said in a phone interview that under IEEPA, only about 25% of Brazil's exports to the U.S. were hit.

Many of Brazil's top exports to the U.S. last year—petroleum and coal products, coffee and spices, beef, orange juice, nuts, chemical wood pulp, and aircraft and their parts—are excluded from the action. Other major categories of exports from Brazil, including \$5.4 billion in iron and steel and more than a billion dollars' worth of heavy construction equipment, are exempt because they're covered by Section 232 tariffs.

Harrell wrote that the fact that USTR set the Section 301 rate at 25%, half of the previous 50%, suggests “that USTR

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might not simply recreate the IEEPA tariff rates with its current 301 investigations into countries' industrial over-capacity and forced labor import practices, but rather set rates that give USTR some negotiating leverage. Conversely, the large number of product exemptions demonstrate that the Administration remains concerned about the potential cost impacts of new tariffs at a time when inflation is already picking up."

Hock, senior counselor at McLarty Associates who specializes in South America, agreed that the carve-outs are because the administration doesn't want to "hit the wallet of the U.S. consumers" when they order an acai bowl, buy a carton of orange juice, or a pound of coffee.

She said the administration's "inclination is to apply those tariffs as broadly as possible," but they've adjusted course as they realize by applying tariffs on industrial inputs, that increases the cost of manufacturing in the U.S.

"It has an impact not just on inflation but also on job creation," she said.

Harrell noted that the USTR found that Brazil was burdening U.S. commerce by its actions or inactions in all six areas of the investigation — digital trade and electronic payments; preferential tariffs; anti-corruption enforcement; IP protection; ethanol market access; and illegal deforestation.

The report complained that Brazil offers preferential treatment to hundreds of Mexican and Indian goods in the agriculture, motor vehicles and parts, minerals, chemicals, and machinery sectors, and says that's allowed because India and Mexico are developing countries (as is Brazil).

It said that Brazil imported \$1.8 billion in vehicles and parts from Mexico compared with \$1 billion from the U.S., and almost all the Mexican products entered duty-free, while U.S. vehicles and parts were subject to most-favored nation (MFN) rates between 14% and 35%.

The [press release](#) announcing the report, which was issued after 11 p.m. ET on June 1, quoted USTR Jamieson Greer as saying that meetings with top Brazilian officials have accelerated in recent weeks, and that President Donald Trump and he had "several constructive meetings." The report listed only two days in April as consultation.

Greer said, "However, we continue to have substantial differences in resolving the issues identified in this investigation. I look forward to continuing engagement with the Brazilian Government in advance of the July 15, 2026, statutory deadline for taking responsive action."

Lula da Silva, who had a positive meeting with Trump last month, issued an indignant [statement](#) on X about the report, which, according to an informal translation, said that the Bolsonaro family pushed for the investigation. Da Silva defeated Jair Bolsonaro in the last election; Bolsonaro tried to stop the transfer of power with an uprising and invasion of government buildings by his supporters. He was criminally convicted for those actions.

Da Silva noted that Bolsonaro's son, Flavio Bolsonaro, who serves in Brazil's senate, recently visited the White House.

"It is regrettable that all the dialogue and coordination work carried out by the Brazilian Government, including the personal involvement of Presidents Lula and Trump, is being sabotaged by purely electoral and familial interests," he wrote. He said in that personal meeting, Trump agreed that negotiators could seek a solution that would end the Section 301 investigation without tariffs.

He said there is no justification for tariffs, and noted that U.S. data shows that it sells more to Brazil than vice versa. "Just last year, the U.S. goods trade surplus with Brazil totaled \$14.46 billion. Including services, the figure rises to \$40.52 billion," he wrote.

"The main effect of these unilateral, politically motivated tariffs imposed on our country has been to inflict damage on the national economy and job and income generation, in addition to diminishing the role of the United States as our trade partner. In the first quarter of 2026, the U.S. share in Brazilian exports reached the lowest value in the historical series at 9.4%," he wrote.

He said he expects there will be no tariffs, and if there are, it may retaliate.

The 25% tariff, and the products it will apply to, is not yet certain. The USTR opened a public comment period June 1 that will last until July 1; there will be a public hearing July 6.

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Hock said she expects companies that are benefiting from carve-outs will speak up about wanting to keep them, and that companies that did not make the exemption list will argue for them.

In the first comment period, there were more than 295 comments and rebuttal comments. “Some of these comments were non-responsive or contained irrelevant information. Other comments did not address actionability of any of the specific issues raised in the Notice of Initiation, but requested either specific application or exemptions from tariffs for certain products or categories of products,” the USTR said.

The report said that many comments argued that various products, “such as beef, soy, corn, sugar, cotton, coffee, eucalyptus wood and derivative products, Amazonian timber and wood products, Yerba maté, nuts and dried fruits, carnauba wax, and others,” either contribute, or don’t contribute, to illegal deforestation.

Beef, coffee, teak, mahogany, meranti, lauan, sapelli and Iroko wood, yerba mate, nuts, dried fruits and vegetable waxes were exempted from the action; eucalyptus wood and sugar are not.

“While discrete products and industries might not contribute substantially to illegal deforestation or otherwise make efforts to minimize contributions to illegal deforestation,” the report said, Brazil still has a problem with deforestation.

Hock said that Brazil absolutely has efforts to fight deforestation, and acknowledged its efforts aren’t perfect. “If you’re going to use 301 as a vehicle to attack countries that don’t have perfect track records on very challenging issues ... that’s an interesting use of the statute,” she said.

Hock said that while the administration has adjusted its tariffs, including by lowering tariffs on Section 232 derivative projects like agricultural and construction machinery, most of these adjustments are said to be temporary, and they have been released intermittently.

She said the releases of changes here and there creates an uncertain environment for businesses, which “breeds indecision.” — *Mara Lee*

## Trump Sets 232 Tariff Breaks for Mobile Industrial, Ag and HVAC Equipment on June 8

Agricultural equipment, mobile industrial equipment and machinery, and heating, ventilation and air conditioning equipment will all get breaks from Section 232 metals tariffs under a [proclamation](#) issued by President Donald Trump late on June 1. The tariff reductions take effect at 12:01 a.m. ET June 8.

On the other hand, the proclamation also adds steel racks and aluminum lithographic plates to the list of goods subject to 25% Section 232 tariffs on steel and aluminum derivatives, respectively. Those changes also take effect June 8.

Under the proclamation, tariff subheadings covering agricultural equipment and HVAC equipment will be added to the [Annex III](#) list of goods temporarily subject to a 15% Section 232 tariff until the end of 2027. The newly added subheadings had previously been subject to the 25% tariff on derivatives.

A [list of subheadings](#) covering mobile industrial equipment and machinery will be eligible for temporary tariff breaks if they are imported from certain countries or qualify for USMCA treatment. Such goods from countries that have signed tariff deals with the U.S., such as Japan, South Korea, Taiwan, the U.K. and the EU, among other countries, will face a 15% “all-in” rate inclusive of most-favored nation duties. For mobile and industrial equipment and machinery that qualifies for USMCA treatment, the normal 25% tariff will only apply to non-U.S. content, though the total Section 232 tariff can’t fall under 15%.

The temporary tariff reductions for mobile industrial equipment expire at the end of 2027. If none of the tariff breaks listed above apply, the good will be subject to the normal 25% tariff, or a 10% tariff if made entirely using U.S. steel or aluminum.

The proclamation also changes the threshold for when a good is made “entirely” of steel, aluminum or copper and qualifies for a 10% Section 232 tariff. Previously that threshold had been 95% U.S. metal. The proclamation lowers that threshold to 85%.

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## ‘Loophole’ Gives President ‘Unchecked’ Power for Section 301 Tariffs, Supreme Court Brief Says

The government’s recent Section 301 investigations, launched in response to the Supreme Court’s ruling against tariffs imposed under the International Emergency Economic Powers Act, have made the request for the Supreme Court to hear petitioners’ appeal of the court decision upholding lists 3 and 4A Section 301 tariffs “more important” and “more pressing,” according to the petitioners’ May 26 [reply brief](#) (*HMTX Industries LLC v. United States*, Sup. Ct. # 25-1012). The petitioners are led by HMTX Industries.

The U.S. Court of Appeals for the Federal Circuit upheld the tariffs on China in September, ruling that the duties were a valid exercise of authority under Section 307(a)(1) (C) of the Trade Act of 1974. The court added that the statute’s permission to “modify” Section 301 action where it’s “no longer appropriate” allows the U.S. trade representative to increase the tariffs if the original action is “insufficient” to achieve its “stated purpose” (see [ITT 09/25/2025](#)).

While the government argued the Supreme Court should deny HMTX’s petition earlier this month, the petitioners argued the government abused “Section 307’s modest ‘modification’ power” and is likely to continue abusing the power with future Section 301 tariffs (see [ITT 05/13/2026](#)).

HMTX said the government initiated “over 75 Section 301 investigations in the span of two days,” which surmounts the rate the government typically launches investigations under the statute, as it launched “130 total in the first 46 years of its existence.”

“Once USTR takes action under Section 301, the government’s manifest desire to ‘replace the longstanding executive-legislative collaboration over trade policy with unchecked Presidential policymaking’ ... makes its use of the Section 307 loophole created by the Federal Circuit all but inevitable,” HMTX said.

As a result, the petitioners said the court should grant certiorari in its case and “take [the] opportunity to provide much needed guidance,” because the case’s record has been developed over six years and wouldn’t require the hurdle of waiting for challenges to be filed at the Court of Inter-

national Trade and reviewed by the Federal Circuit before reaching the Supreme Court.

HMTX said the alternative is to “wait until a challenge to one of those future ‘modifications’ requires it to address this question in the coming months—likely in an emergency posture, with all the ‘difficulty’ that entails.”

Regarding the arguments in its case, HMTX contested the government’s claim that the Trade Act doesn’t limit “the magnitude of its modification authority.”

Pointing to the Supreme Court’s *Biden v. Nebraska* decision, in which the court ruled against the government’s broad expansion of student loan forgiveness, the petitioners said that “an agency’s dramatic expansion of something it is already doing can be transformative.”

“Given the ten-fold tariff increase, however, USTR’s actions can only be understood as a ‘radical transformation,’” the petitioner said. “American consumers and business owners can attest that such a seismic shift is, in fact, ‘radically transformative.’”

These modifications conflict with HMTX’s reading of Section 307 that the statute “permits ‘moderate’ or ‘minor’ changes to, alongside the elimination of, existing Section 301 actions.”

Furthermore, the petitioners said the government’s modifications to the Section 301 tariffs “could not have passed muster under Section 301’s more robust procedures and standards.”

“Throughout this litigation, the government has contended that USTR’s appropriateness determinations are unreviewable, rendering any ‘limit’ to Section 307 modifications illusory,” the petitioners added. “And it cannot seriously ask this Court to believe a \$550 billion action would have been ‘appropriate’ in the first instance to eliminate a narrow band of intellectual property practices when USTR initially determined a \$50 billion action would be ‘commensurate.’”

HMTX said it is “hardly anomalous” that Congress’ intention with Section 301 was for “transformative increases” to be subject to further investigations instead of being implemented “through a Section 307 backdoor.”

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Finally, the petitioners invoked the major questions doctrine, arguing that “Section 307 delegates authority to an agency, rather than the President” and the Supreme Court “twice interpreted the statutory term at issue—‘modify’—not to grant the sort of extravagant power now asserted.”  
— *Jackson Lanzer*

### CBP Working on Solution to Process Reconciliation Entries

CBP is working on a “phased solution” to process unliquidated or liquidated entries flagged for reconciliation that are included on a Consolidated Administration and Processing of Entries (CAPE) declaration and for which an Entry Type 09 hasn’t been filed at the time of CAPE acceptance, according to a May 26 update on the CAPE frequently asked questions [webpage](#).

“The CAPE process does not prevent an entry from being reconciled; however, CBP suggests that the trade community hold reconciliation filings (Entry Type 09) unless the reconciliation filing deadline is close to expiring (less than 30 days) so that the CAPE declaration can be filed and processed first.”

CBP is also working on a solution for when a reconciliation entry is already on file and the reconciliation would result in higher International Emergency Economic Powers Act duties. In the meantime, it said, the trade community should file the reconciliation entry and deposit the duties and fees owed without the increased IEEPA duties.

### Chinese Inputs Unavailable in US May Get Tariff Break

U.S. Trade Representative Jamieson Greer declined to mention specific products he’d like to facilitate importing from China following talks between President Donald Trump and Chinese President Xi Jinping, but expanded the scope beyond what both he and Treasury Secretary Scott Bessent had previously said.

Bessent had said the U.S. intended to remove tariffs on \$30 billion worth of imports, such as fireworks and “very low-end consumer goods” (see [ITT 05/14/2026](#)).

Greer had described the imports that could receive tariff breaks as “consumer goods, maybe low-tech items,” on one Sunday [show](#), but on ABC’s “[This Week](#),” he expanded the list to “other inputs that we don’t have here,” and said,

“And we’ll talk about the tariff treatment for those things. But, you know, I don’t want to get ahead of any kind of final adjustments that might be made eventually.”

Greer had previously said that he would solicit comments on what products should be granted relief; if inputs that aren’t available end up as part of the scope of the Board of Trade, it would be more akin to the exclusions process that was available in the Section 301 actions in the first Trump term.

China, in its statement about the outcome of the meetings between President Donald Trump and President Xi Jinping, said, “Both sides agreed to establish a Trade Council and an Investment Council to discuss their respective concerns in the areas of trade and investment. The two sides will discuss issues such as tariff reductions on relevant products through the Trade Council and have agreed in principle to reduce tariffs on products of equal size of concern to each other.”

It also said, “Both sides agreed to promote the expansion of two-way trade in areas including agricultural products through arrangements such as mutual tariff reductions on a certain range of products.”

The White House put out a fact [sheet](#) about the summit on May 17, which didn’t mention tariffs, and which focused on promised purchases by Chinese firms and traders.

That fact sheet said:

- China approved an initial purchase of 200 American-made Boeing aircraft for Chinese airlines.
- China will purchase at least \$17 billion per year of U.S. agricultural products in 2026 (prorated), 2027 and 2028, in addition to the soybean purchase commitments that it made in October 2025.
- China restored market access for U.S. beef by renewing expired listings of more than 400 U.S. beef facilities and adding new listings. China will work with U.S. regulators to lift all suspensions of U.S. beef facilities.
- China resumed imports of poultry from U.S. states determined by the USDA to be free of highly pathogenic avian influenza.

China’s Commerce Ministry didn’t put a number on the planes, but rather seemed to [emphasize](#) that the U.S. won’t weaponize spare parts for U.S.-made aircraft engines, as it

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did during the trade war last year. “Both sides reached relevant arrangements on China’s purchase of aircraft from the United States and the United States’ guarantee of the supply of aircraft engines and parts to China,” its statement said.

China weaponized its near-monopoly on rare earths and rare earth magnets during that trade war, and the U.S. fact sheet said: “China will address U.S. concerns regarding supply chain shortages related to rare earths and other critical minerals, including yttrium, scandium, neodymium, and indium. China will also address U.S. concerns regarding prohibitions or restrictions on the sale of rare earth production and processing equipment and technologies.”

China’s statement was silent on rare earths. It emphasized some horticultural and agricultural exports it wants to send to the U.S. with fewer sanitary/phytosanitary restrictions, such as dairy, potted plants and “aquatic products.”

It closed by saying, “Both sides are still discussing the details of the outcomes. The trade teams from both sides will, in accordance with the consensus reached by the two heads of state, finalize the outcomes as soon as possible and work together to implement them, injecting more certainty and stability into future China-U.S. trade cooperation and the global economy.” — *Mara Lee*

### China: Future Section 301 Tariffs ‘Must Not Exceed’ 20%

Following “in-depth discussions” on tariffs last week between Chinese and U.S. officials, China appeared to indicate that some increase in its tariff rate would not trigger a trade war between the countries.

“It is hoped that the U.S. side will honor its commitments: regardless of any future justification for imposing or replacing tariffs on China, the U.S. tariff level on China must not exceed the level jointly agreed upon in the Kuala Lumpur economic and trade consultations,” said an “[interpretation](#)” of the outcomes of the talks by a Chinese Commerce Ministry official, issued May 20.

That level was 20%, not including Section 232 and Section 301 tariffs. However, the current tariff level is 10%, under Section 122, plus the sections 232 and 301 tariffs and base-line rates. China’s Commerce Ministry made it clear that it

considers the current Section 301 investigations limited by that past trade truce.

While President Donald Trump told reporters tariffs didn’t come up in his meetings with Chinese President Xi Jinping at their recent summit, U.S. Trade Representative Jamieson Greer later explained that negotiators settled those issues ahead of the principals’ meetings.

The Chinese Commerce Ministry also gave more details on the Board of Trade, which it’s calling the Trade Council. It said China has agreed to discuss “a reciprocal tariff reduction arrangement covering products of equivalent scale—each side’s covered products amounting to USD 30 billion or more—with agreed-upon products of mutual interest potentially eligible for Most-Favored-Nation (MFN) rates or even lower.” It said it’s working to finalize this arrangement and to expedite its implementation.

Treasury Secretary Scott Bessent has said Halloween costumes and fireworks could be on the list; the USTR has said the government will seek input on what should be included, and that inputs not available in the U.S. could be within the scope, in addition to low-end consumer goods.

China said the trade truce should be extended, as it’s critical to stabilize trade relations. “During this round of consultations, both sides reaffirmed their commitment to fully implementing previous consultation outcomes,” China said. It noted that the truce included suspending Section 301 measures targeting China’s maritime, logistics and shipbuilding industries.

The Office of the U.S. Trade Representative didn’t respond to a request for comment on the Chinese statement. If the U.S. cannot hike new tariffs on China past 20% without retaliation, it will change the competitive landscape for manufacturers in the region, since countries like Indonesia, Cambodia, Malaysia and Bangladesh accepted a 19% tariff rate in reciprocal trade agreements, believing they would have a cost advantage compared with China. Before the Supreme Court struck down the reciprocal tariffs, Vietnamese exports faced a 20% reciprocal tariff rate.

About two-thirds of Chinese exports are also subject to Section 301 tariffs from the first Trump term, but the majority of those products only face a 7.5% tariff. — *Mara Lee*

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## Industry Not Prepared for Transition to CPSC eFiling, Trade Professionals Say

Much of the trade industry isn't ready for the Consumer Product Safety Commission's eFiling requirement to become mandatory in ACE on July 8, brokers and professionals said.

For many companies, resources are spread thin due to International Emergency Economic Powers Act tariff refunds and other changing tariff regulations, and thus not allocated toward preparing for the transition to eFiling. For foreign companies new to the space, brokers said a lack of education and software options may make the transition more difficult.

"The tariffs have put a lot of stress on this, the system and people, and so it's sometimes hard to get them to focus on a whole new project that's not related to tariffs," said Cindy Thomas, counsel for the National Customs Brokers & Forwarders Association of America Regulatory Agencies Committee.

The product registry CPSC will use as the more streamlined of the two options for eFiling has around 500 business accounts established, and 120,000 certificates have been filed. Preparing for eFiling takes a team, including those in customs and regulatory compliance, and product managers, Thomas said. She also said smaller importers may not be as aware that the CPSC requires a product safety certificate, which makes it difficult to catch up.

"Like all compliance transitions, it will take time for the industry to fully adjust. That is why we continue to focus on educating our members about the new requirements, ensuring companies are prepared for the transition and that compliance continues to move forward smoothly," Beth Hughes, vice president of the American Apparel and Footwear Association, said in a statement.

Thomas said brokers are working to bring attention to the eFiling deadline, and have been since last summer. She said a lot of people may not have the bandwidth for it, but have to make room with the upcoming deadline.

"Now is better than tomorrow, but yesterday would have been better," she said.

William Jansen, a broker at Seko Logistics, said a lot of foreign importers aren't always educated on CPSC requirements, and many importers have scarce resources due to tariffs and other compliance issues.

Jansen gave the example of Australian and European companies that grow quickly through social media and take advantage of the growth and start selling new items, such as sunglasses, which have FDA requirements. He said the same thing will now happen with items like children's apparel, which are subject to CPSC regulation.

Most customs clearance data in the e-commerce sector comes from their warehouse management systems.

"Do you think they have CPSC data in their warehouse management system level? Some do, very few do," he said.

Jansen said it's time intensive to enter data elements for every style a company has, especially if they haven't historically done so. He said many importers have been focused on the end of de minimis and changing tariffs, so they feel blindsided by the eFiling requirement. Their systems aren't built for this type of regulatory compliance.

"Trying to learn the new data requirements and then implement in systems that just weren't built for compliance is the issue," he said.

He said companies need to put together a plan, whether that's setting aside resources to modify current systems or maintaining some product database. He said he wasn't sure where the industry would land on those processes.

"You don't have time to wait until everyone else does," Jansen said.

Tim O'Meara is the owner of Comverex, which is a software provider that helps clients aggregate data to prepare for eFiling. He said the challenge for readiness is ensuring that brokers will be able to receive and process data on an automated basis by July 8. He said he sees two main challenges, one being data aggregation by the importer and the second being the brokers' ability to process that data into ACE. He also said importers will need to tell their brokers which partner government agency (PGA) message set to use for each entry.

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Importers have to identify all sources of their data, standardize it and make it accurate. For a smaller importer, they may get it done in a few months if the importer is fast, O’Meara said. He’s been working to prepare some clients for as long as two years.

“There’s always a heavy lift on the side of the importer to go back and review data sources, get that data cleansed,” he said.

O’Meara said July 8 is too close for importers who haven’t started aggregating their data to be ready. He said brokers also should be engaging their software providers to ensure software updates are implemented in time for eFiling.

“We do find frequently that when we engage a new broker, we’re engaging a new software provider, and that software provider sometimes is very much behind where they should be,” he said.

The eFiling requirement allows CPSC to analyze the data and select which shipments they’ll target with a better targeting mechanism, O’Meara said.

“While CPSC might not be in a position on July 8 to hold everything that is not properly eFiled, they will certainly be focusing on those shipments that are not properly eFiled,” he said.

O’Meara said that while July 8 is a critical deadline, it’s also a starting point.

“Regulatory changes always take time in adoption, and we think there will be a scaling of adoption into the end of 2026,” he said. — *Kalie Walker*

**FDA Launches ‘Import Educational Resources’ Page**

The FDA launched an “Import Educational Resources” [page](#) on its website, with a central access point for import educational materials, including videos, guides and an index for importers and brokers navigating FDA requirements, according to an agency [bulletin](#).

**New and Revised FDA Import Alerts for May 22**

On May 22, the FDA posted new and revised versions of the following Import Alerts (after not having posted new ones for a number of days) on the detention without physical examination of:

- [99-49](#): Devices without a Unique Device Identifier and/or Matching Global Unique Device Identification Database (GUDID) Record ([here](#))
- [99-43](#): Ready-to-Eat Human (RTE) Food Products that appear to have been Prepared, Packed or Held Under Insanitary Conditions ([here](#))
- [99-08](#): Processed Foods for Pesticides ([here](#))
- [98-06](#): New Tobacco Products, other than electronic nicotine delivery systems, or ENDS, without required Marketing Authorization ([here](#))
- [76-01](#): Medical Instruments from Pakistan ([here](#))
- [12-13](#): Dairy Products manufactured under Insanitary Conditions ([here](#)).

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