



COMPLIANCE ADVISORY

September 1, 2026

KWE
Global Logistics Partner

CBP Advance Notice of Proposed Rulemaking

On September 1, CBP published an [Advance Notice of Proposed Rulemaking](#) (ANPRM) seeking industry feedback on new requirements designed to increase supply chain transparency for U.S. imports. The initiative stems from [Executive Order 14411](#), "Strengthening Customs Enforcement," signed on June 3, which directs CBP to address enforcement gaps, improve visibility into global supply chains, and combat customs evasion practices such as illegal transshipment.

Key proposals under consideration include:

- **Expanded disclosure requirements** identifying all parties involved in the manufacture, production, movement, and export of imported goods.
- **Enhanced collection of foreign export documentation** that exporters provide to their home-country customs authorities before shipment to the United States.
- Greater use of identifiers such as the **Manufacturer Identification Code (MID)** and potential adoption of **Global Business Identifiers (GBIs)**.
- Exploration of **technology-based supply chain tracing solutions**, including possible enhancements to the CTPAT program's requirements and benefits.

CBP is requesting comments on implementation considerations, including whether requirements should be phased in by:

- Entry type



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- Commodity or product category (with possible special consideration for critical medical products)
- Country of origin
- Mode of transportation

The agency is also seeking input on whether different timelines should apply to small businesses, foreign importers, CTPAT participants, and high-volume filers, as well as whether any proposals should begin as voluntary pilot programs.

CBP states that these measures are intended to improve its ability to detect and prevent illicit imports, customs fraud, and transshipment schemes that evade U.S. trade laws. Stakeholder comments are due within **90 days** of publication.

Potential Impact: If adopted, these requirements could significantly increase importer and broker obligations related to supply chain visibility, documentation retention, data reporting, and due diligence across international supply chains.

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