

CUSTOMER ADVISORY

C-TPAT Alert for Importers / Exporters
29 AUGUST 2025



KWE
Global Logistics Partner

- [C-TPAT Alert for Importers/Exporters on Illegal Transshipping – Published August 25th, 2025](#)

Customs Trade Partnership Against Terrorism (C-TPAT) members should be paying particular attention to the following red flag indicators/clues of illegal transshipment including:

- ✓ No substantial transformation occurring in the transshipping country. Repackaging the product does not constitute substantial transformation.
- ✓ Country of origin labeling does not match the manufacturing capabilities.
- ✓ Discrepancies in trade volume exports/imports reported to U.S. Customs and Border Protection (CBP).
- ✓ Routing through low-cost or Free Trade Agreement (FTA)-friendly countries without a logical supply chain reason.
- ✓ Uncommon or overly complex transaction structures with no clear and legitimate commercial purpose.
- ✓ Deviation from historical or normal trade activities, including dubious pricing of goods and services.

CTPAT exporters should also be aware of diversion risks through transshipment trade. Refer to the Bureau of Industry and Security (BIS) of the U.S. Department of Commerce published [seven best practices that guard against this type of risk](#).

- [August 29th, 2025 Onwards – De Minimis Entries for Ineligible Shipments to Be Rejected](#)



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- [Office of the United States Trade Representative \(USTR\) Further Extends Some Section 301 \(Sec. 301\) Exclusions Through November 29th, 2025](#)
- [Additional Parties Qualified for the Payment of Duty on International Mail Shipments](#)
- [United States Census Bureau \(Census\) Issues Clarification: Filing Requirements Regarding In-Transit Shipments and Other FTR Provisions; Correction](#)
- [FWS has announced inflation-based adjustments for civil monetary penalties effective for calendar year 2025.](#)

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