

CUSTOMER ADVISORY

Compliance Update
22 SEPTEMBER 2025



- [**Memorandum of Understanding \(MOU\) Issued Between the United States and the United Kingdom of Great Britain and Northern Ireland...**](#)

Affirming a common desire to enhance cooperation in science and technology matters that support initiatives of mutual interest that produce tangible benefits to their citizens; recognizing the complementarity of the work of the participants and their track record of joint research and innovation partnerships, their status as most trusted security and defense partners, their pro-innovation legal and regulatory regimes, their deep-rooted expertise in disruptive technologies, and the benefits of closer strategic cooperation; and welcoming a longstanding partnership to deliver on their joint objectives to maintain and strengthen their strategic leadership in science and technology, leveraging shared values, complementary capabilities, and coordinated policy approaches to address global challenges.

- [**Bureau of Industry and Security \(BIS\) Publishes Interim Final Rule \(IFR\) Process to Include Section 232 \(Sec. 232\) New Auto Parts**](#)

As required under [**Presidential Proclamation 10908**](#) (March 26th, 2025), the Commerce Secretary must establish a process to include additional automobile parts and accessories within the scope of Sec. 232. This [**IFR**](#) sets the inclusion process for additional parts subject to the tariffs in the proclamation. While BIS is issuing the rule, the International Trade Administration (ITA) will administer the process. A two-week comment window applies, expiring November 3rd, 2025. ITA will publicly post non-confidential versions of valid requests and, within 60 days of receiving each request after the window closes, will post a determination memo on [**regulations.gov**](#) indicating approval or denial and summarizing the rationale.

- While it remains unclear if or when [**International Emergency Economic Powers Act \(IEEPA\)**](#) refunds may be issued—or whether they will be automatic—following any affirmative United States Supreme Court (U.S. Supreme Court) decision, importers should consult their customs broker now to:



A member of the **KWE** Group

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1. Request monitoring of [liquidation](#) dates for entries on which IEEPA tariffs were paid;
2. Request monitoring of amounts paid under [IEEPA](#) to ensure accurate refunds;
3. File [protests](#) promptly for those entries to preserve refund rights if the ruling stands;
4. Note that [Post Summary Corrections \(PSC\)](#) are not yet available for these entries due to Automated Commercial Environment (ACE) system constraints.
5. Be aware that service charges may be associated with some or all the above.

Kindly also note the timelines below as points of reference:

- ✓ First affected tariffs were imposed on **February 4th, 2025.**
 - ✓ Liquidation is expected around **mid-December 2025.**
 - ✓ The protest deadline falls around **mid-June 2026.**
 - ✓ If refunds are ultimately permitted after the protest window has closed on your entry, only those who filed timely protests will be eligible. Once the protest window closes, retroactive refunds are unlikely.
 - ✓ We encourage all affected importers to review impacted entries carefully and consult with us at customs_compliance_group@kwe.com to ensure timely action.
- **Consumer Product Safety Commission (CPSC):** The mandatory eFiling deadline for most imported consumer products is less than a year away scheduled to take effect on July 8th, 2026. This means that importers will be required to **electronically file Certificates of Compliance** for regulated consumer products starting on that date. The eFiling requirements for products imported from Foreign Trade Zones (FTZ) will apply beginning January 8th, 2027. Refer to the [eFiling Final Rule](#) published on January 8th, 2025, for the official announcement.
 - **Customs and Border Protection (CBP) will deploy an enhancement in the ACE Production (PROD) environment on September 25th** to enable reporting of bond amounts with up to 10 digits for the Importer/Bond Query.
 - CBP is offering quarterly webinars throughout Fiscal Year (FY) 2025 on how to **report suspected trade violations** online. The fourth round of webinars will be held on September 23rd and September 25th. Registration is free and required to attend:
 - **Trade Violation Reporting (TVR)** – Tuesday, September 23rd, 2025, 1:30 p.m. EDT
 - **Enforce and Protect Act (EAPA)** – Thursday, September 25th, 2025, 1:30 p.m. EDT

STAY AHEAD – ONE FORWARDER, ONE BROKER, OVERALL COMPLIANCE

Informational document brought to you by KWE-USA Corporate Compliance



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