

CUSTOMER ADVISORY

U.S. Compliance Update
08 OCTOBER 2025



KWE
Global Logistics Partner

- **REMINDER: Please review your denied-party screening practices to ensure compliance.** [United States Bureau of Industry and Security \(BIS\) Expands End-User Controls to Cover Affiliates of Certain Listed Entities.](#) On September 30th, 2025, BIS amended the Export Administration Regulations (EAR) to address diversion risks involving entities on the Entity List and other restricted end users. Under this Interim Final Rule (IFR), any entity that is at least 50% owned by one or more Entity List parties is automatically subject to Entity List restrictions. This is a marked change from the prior standard, which excluded entities not specifically named on the list regardless of affiliation. The IFR similarly applies restrictions to entities at least 50% owned by listed military end users (MEUs) and certain sanctioned parties. The 50% ownership standard aligns with longstanding U.S. Department of the Treasury practice to limit additional burden on the business community.
- [Section 301 \(Sec. 301\) Vessel Fees—Vessels Owned, Operated, or Built in China. Pursuant to Executive Order \(EO\) 14269](#) (issued April 9th, 2025), titled *Restoring America's Maritime Dominance*, which states it is U.S. policy to revitalize domestic maritime industries and workforce to promote national security and economic prosperity, U.S. Customs and Border Protection (CBP) provided key requirements for vessels owned, operated, or built in China—and for all foreign-built vehicle-carrier vessels—effective October 14th, 2025. The burden to determine whether a vessel owes the fee rests with the operator, not CBP. Refer to the Federal Register (FR) notice for phased fees.
- **Third-Party Logistics Providers (3PLs) May Enroll in the Customs Trade Partnership Against Terrorism (C-TPAT) program** - CBP Announced the Launch of a pilot program via



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[Federal Register Notice](#) to include 3PLs to participate. The pilot will include 10 asset-based 3PLs, and 10 non-asset-based 3PLs. According to CBP's announcement, with only 20 slots available, space is very limited and selected participants "will play a key role in helping CBP evaluate whether including both asset-based and non-asset-based 3PLs in CTPAT strengthens port security, combats terrorism, prevents supply chain breaches, and supports the program's overall goals." Participants will be selected on a first-come, first-serve basis.

- [Reminder—Automated Rejection of Manifest Filings with Insufficient Cargo Information: Enhancement deployed September 27th, 2025.](#)
- [CBP Publishes Updated Partner Government Agency \(PGA\) Error Code Dictionary: Released September 26th, 2025.](#)
- **Importers with Automated Commercial Environment (ACE) Portal Accounts Can Expect Automated Clearing House (ACH) Refunds.** No checks will be issued during the shutdown. The shift to electronic-only refunds is driven by an [Executive Order](#) from March 2025, not the shutdown itself. [See our notice from September 29th, 2025.](#) Interest amounts will be due either way.

STAY AHEAD – ONE FORWARDER, ONE BROKER, OVERALL COMPLIANCE

Informational document brought to you by KWE-USA Corporate Compliance



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