Updated Trade Compliance Program Requirements

The Customs Trade Partnership Against Terrorism (CTPAT) Trade Compliance Program is a core trade compliance program for many importers as it allows them to assume responsibility for import management, while fostering a relationship with U.S. Customs and Border Protection (CBP). However, the new anti-forced labor requirements require trade professionals to perform substantial supply chain due diligence. Essentially, these requirements reshape the face of the CTPAT Trade Compliance Program.

These new anti-forced labor program requirements that are now part of the CTPAT Trade Compliance program (formerly ISA) necessitate that importers gain supply chain visibility, enhance internal anti-forced labor programs and share learnings – in addition to existing CTPAT requirements. For many importers, these additional steps will strain resources. But KPMG can help manage new and existing requirements – so importers can help focus on strategic priorities.

How KPMG can help

- Assess readiness of client's import activity, import controls, supply chain security, self-assessment program, eligibility questions, and social compliance.
- Assist with application(s) for any of the CTPAT programs including building Minimum Security Criteria, completing memorandum of understanding (MOU), participating in application review meetings (ARM), etc.
- Review supply chain mapping, identify compliance risks, and assess internal controls and social compliance programs.
- Document or enhance anti-forced labor program to address the newly added requirements in the handbook.
- Conduct a data driven risk portfolio targeting specifically forced labor entities and goods.
- Assist with operational annual compliance activities, including risk assessment, developing a reasonable size transactional sampling plan, automated trade data monitoring and portal updates.

With our experienced CTPAT and anti-forced labor professionals, KPMG can assist with a wide array of CTPAT services. KPMG has internally developed tools to assist clients with their annual security profiles, questionnaires, risk assessments, testing support and annual notification letter drafting/submission and anti-forced labor programmatic enhancement and validation/revalidation in a practical and efficient manner. KPMG has successfully implemented CTPAT programs for clients, helped clients in the process of certifications and validations and advanced the status of many clients.

Achieving import security and trade compliance is a complicated endeavor. Contact us to discuss how we can help you with regard to CTPAT programs.

Contact us

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