

CBP TO BEGIN 'FULL ISF ENFORCEMENT', PENALTIES FOR LATE FILINGS ON THEIR WAY!

CBP initiated the ISF (Importer Security Filing) Program with a staged enforcement and penalty strategy. The final stage or "full ISF enforcement" period is effective on May 14, 2015. Local CBP ports will be able to issue penalties for late ISF filings without prior approval from Customs headquarters OR without sending the previously required 3 warnings.

For the most part, CBP will continue to focus on repeat offenders and Importers who don't file ISF at all. CBP insists that the fines will be issued within 6 months of the violation; however CBP reserves the right to issue penalties for violations up to 6 years after the occurrence.

ISF filings are not required for: Household goods and personal effects, Government and military shipments, Carnets and informal shipments. The latest outreach by CBP can be found at: NEI ISF & ACE Webinar https://www.youtube.com/watch?v=H0O8_zA62FE

What can an Importer do to ensure compliance with ISF?

Don't rely on your shipper to file the ISF timely or relay the information to your broker. The shipper has no risk of penalty.

Take control of the transportation process of your imported goods – this is the most effective way of ensuring goods won't load without proper ISF reporting. When your Broker handles the forwarding and arranges the loading of goods overseas, they will have access to all required loading details and can best coordinate the timely and accurate filing of your ISF. The Broker can also communicate directly with the loading parties to ensure goods don't leave without ISF confirmation from Customs.

If you are allowing your shipper to arrange the transportation of your imported goods, you lose some visibility and assurance goods won't leave without ISF filing. Often overseas forwarders don't contact the U.S. Broker timely enough for a compliant ISF filing. When the shipper is arranging transportation be sure either the shipper or their appointed forwarder communicates closely **and timely** with your U.S. broker and advises required ISF information at least 72 hours prior to vessel loading. Advise your shippers of the penalties at risk for non-compliance.

For more information on how to minimize your risks and to ensure you have a comprehensive import procedure in place, contact Sandi Siegel, our Executive Vice President of Import and Logistics at sandi@medey.com or 414-294-211