

CLIENT ALERT

This Month in International Trade - August 2016

Sep.08.2016

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This news bulletin is provided by the International Trade Group of Crowell & Moring. If you have questions or need assistance on trade law matters, please contact [John B. Brew](#) or any member of the [International Trade Group](#).

Opportunities for Tariff Suspensions and Reductions

ITC to Launch Miscellaneous Tariff Bill (MTB) Webpage in Sep.; Petitions Begin Oct 14

The American Manufacturing Competitiveness Act of 2016 (AMCA), signed into law earlier this year, directed the International Trade Commission (ITC) to establish a process to receive and evaluate petitions for temporary duty suspensions or reductions in duties.

On August 25, the ITC announced that in early September it would launch a web page called “MTBInfo, which will be the “pre-launch site for all Miscellaneous Tariff Bill (MTB)-related information.”

Per the announcement, this page will:

- Be the first place to find “breaking” pre-launch news and information about the MTB process when it becomes available; and
- Provide educational information, filing/commenting tips, and contact information, and will serve as a repository for all official documents.

The ITC expects to issue its rules in September and is building a web-based MTB portal to be used for filing and commenting on MTB petitions. When the petition process launches on October 14, the MTB portal will become the main MTB page.

For more information, contact: John Brew, Frances Hadfield, Aaron Marx

USTR Initiates Annual Generalized System of Preferences (GSP) Product and Country Practices Review

On August 25, the Office of the U.S. Trade Representative (USTR) published in the Federal Register a notice requesting petitions to modify the list of articles that are eligible for duty-free treatment under the Generalized System of Preferences (GSP) program and to modify the GSP status of certain GSP beneficiary developing countries because of country practices. USTR is also accepting petitions requesting waivers of competitive need limitations (CNLs).

The GSP program provides for the duty-free importation of designated articles when imported from designated beneficiary developing countries.

Special Focus on Travel and Luggage Goods

USTR is also seeking public comments and will convene a public hearing to receive additional information and stakeholder views regarding the potential addition of travel and luggage goods products for more economically advanced GSP beneficiary countries.

The schedule for the hearing and the deadline for public comments are:

- *Tuesday, October 4, 2016, 5:00 p.m.:* Deadline for submission of comments, pre-hearing briefs and requests to appear at the hearing.
- *Tuesday, October 18, 2016, 9:30 a.m.:* The GSP Subcommittee of the Trade Policy Staff Committee (TPSC) will convene a public hearing on travel and luggage goods in Rooms 1 and 2, 1724 F Street NW., Washington DC 20508.
- *Tuesday, November 1, 2016, 5:00 p.m.:* Deadline for submission of post-hearing comments or briefs.

For more information, contact: John Brew, Frances Hadfield, Jini Koh

TOP TRADE DEVELOPMENTS

Obama Administration Continues to Push for TPP Approval

The Office of the U.S. Trade Representative (USTR) submitted a draft Statement of Administration Action to Congress for the Trans-Pacific Partnership (TPP) on August 12, fulfilling a procedural step for congressional consideration of the agreement. According to Trade Promotion Authority procedures, USTR must submit the draft Statement of Administration Action at least thirty days before it submits draft implementing legislation for TPP to Congress.

The submission is another signal that the Obama Administration is intent on submitting TPP for consideration by the lame-duck session of Congress following the November elections, despite little apparent progress in resolving substantive objections to the agreement from key Republican legislators and ongoing attacks on the trade accord delivered by the presidential campaigns of both Democrat Hillary Clinton and Republican Donald Trump. Many Members of Congress facing tough re-election races, including some who voted for Trade Promotion Authority last year, have come out in opposition to the agreement, likely due to political pressure.

President Obama had one last major opportunity to promote TPP in early September, on his trip to China for the G-20 Leaders' Summit on September 4-5 and to Laos for the U.S.-East Asia Summit on September 6-8, both of which were attended by other TPP countries and provided major platforms for the President to advocate for the agreement.

Though the outlook for TPP seems grim given the domestic U.S. political environment, it is clear that the Obama Administration believes quick consideration and passage by Congress remain possible after the election season.

For more information, contact: Evan Yu, Paul Davies, Dj Wolff

CBP Sheds Light on AD/CVD Evasion Investigations with New Regulations

U.S. Customs and Border Protection (CBP) has long had the authority to investigate and take enforcement actions against evasion of antidumping (AD) and countervailing duty (CVD) orders, including acting on tips received from interested parties.

CBP's evasion investigations, however, were a "black box" in that parties making allegations or providing CBP with information were not permitted to participate in investigations and were not notified of the existence or outcome of such investigations.

Further, there were no deadlines or formal procedures for CBP to adhere to in investigating AD/CVD evasion, and CBP's investigations, or lack thereof, were not subject to judicial review.

This has changed with the enactment of the Trade Facilitation and Trade Enforcement Act of 2015 (see [Crowell's Client Alert here](#)) and the resulting promulgation of regulations establishing a formal process for investigations into possible AD/CVD evasion.

On August 22, the Treasury Department and CBP [published in the Federal Register](#) interim regulations with a request for comments on new AD/CVD evasion investigation regulations. The interim regulations were effective as of August 22, 2016, but both Treasury and CBP will consider comments received before the October 21, 2016 deadline before issuing the final regulations.

Under the new law and its ensuing regulations, private parties are permitted to make AD/CVD evasion allegations and participate in CBP's evasion investigations. Further, CBP is required to provide certain notice and comply with new statutory deadlines for AD/CVD evasion investigations:

- Within 15 days of receiving an AD/CVD evasion allegation from other federal agencies or "interested parties"—U.S. importers, producers, or wholesalers; foreign producers or exporters; or unions and trade associations—CBP must initiate an investigation if the allegation reasonably suggests that evasion is occurring. Interested parties will be informed within five days if an investigation is not initiated.
- Within 90 days of initiation, CBP must determine if there is a reasonable suspicion of evasion. If so, the agency must suspend liquidation of the subject entries subsequent to the initiation, extend liquidation periods for entries imported prior to the initiation, and possibly require cash deposits or single entry bonds.
- Within 200 days of initiation, parties to an investigation may voluntarily provide factual information in order to support, negate, or clarify the evasion allegation. Other parties may submit rebuttal factual information within 10 days of the submission of factual information by another party.
- Within 230 days of initiation, parties may submit written arguments regarding the evasion determination based on facts on the administrative record. The party submitting arguments must serve a public version to the other parties, who can then respond within 15 days.
- Within 300 days of the initiation (with up to 60 additional days for complicated cases), CBP must make a final evasion determination.
- If CBP finds AD/CVD evasion occurred, interested parties will be notified within five days.
- The remedy will be focused on collecting duties that importers failed to pay by:
 - Identifying the applicable duty assessment rate or cash deposit rate.
 - Requiring cash deposits or single entry bonds.
 - Requesting the U.S. Immigration and Customs Enforcement (ICE) section of the U.S. Department of Homeland Security (DHS) pursue a criminal or civil investigation.
 - Other enforcement measures as CBP determines appropriate.

- If an interested party disagrees with CBP’s evasion determination, that party may request an internal *de novo* review by the CBP Commissioner. After the *de novo* review, the party may appeal to the U.S. Court of International Trade (CIT) which will determine whether CBP followed the proper procedures of the evasion investigation and review whether CBP’s investigation complied with statutory and regulatory procedures and whether its determination was arbitrary, capricious, or an abuse of discretion.

Though the new AD/CVD evasion law and regulations create a formal system for CBP’s evasion investigations, adding a degree of much needed transparency and accountability, they only shed some light on how CBP investigates evasion allegations. For example, many have raised the following criticisms regarding the statutory system itself and interim regulations for falling short on transparency, meaningful opportunities for participation, and accountability:

- It is not clear what CBP will share with the public and parties involved regarding the information that forms the basis for CBP’s determination. Neither the statute nor the interim regulations provide a system similar to the AD/CVD proceedings at the U.S. Department of Commerce (DOC) and U.S. International Trade Commission (ITC). In both agencies, confidential business information submitted is protected from public release, but counsel for the parties are provided access to such information to review, allowing for rebuttal.
- CBP claims that there is no judicial review of any decision to not initiate an investigation.
- Under both the statute and the regulations, judicial review is limited to whether CBP followed the enumerated deadlines and procedures, *i.e.*, not whether CBP’s evasion decision is supported by “substantial evidence.”

Further, there is still a significant loophole remaining on the new statutory deadline for CBP, namely that CBP may refer an evasion allegation to DOC for a scope ruling. During that time, CBP’s statutory deadlines for evasion investigations are tolled, and DOC does not have statutory deadlines for scope rulings (and typically can take well over a year to issue a final scope ruling).

Thus, though the new law and regulations governing AD/CVD evasion investigations have made improvements in bringing the “black box” of the past into the light, more work is required for a truly transparent and accountable process.

For more information, contact: John Brew; Alex Schaefer; Dan Cannistra; Benjamin Blase Caryl

CBP’s Informed Compliance Letters Cause Concern for Importers

U.S. Customs and Border Protection (CBP) recently began issuing Informed Compliance notification letters to the importing community. If an importer receives this type of correspondence, it may be an indication that CBP believes the importer is experiencing specific compliance issues.

Each letter includes selected Informed Compliance Publications (ICP) and criteria explaining the process of submitting Prior Disclosures. This information is meant to assist importers in understanding CBP’s laws and regulations.

CBP is encouraging recipients to proactively monitor import transaction data in the Automated Control Environment (ACE) Secure Data Portal and to conduct a self-review of import declarations and compliance procedures.

It also strongly encourages importers to take appropriate action to correct any discrepancies by filing prior disclosures, as any future violations identified by CBP may result in seizure and forfeiture of imported merchandise and/or higher assessment of monetary penalties.

If you have any questions about Informed Compliance Letter from CBP, please do not hesitate to contact one of Crowell's experienced Customs attorneys.

For more information, contact: John Brew, Alex Schaefer, Frances Hadfield, Jini Koh

New EU Task Force Must Quickly Catch up on Blockchain Developments

Since the European Parliament adopted a proposal for the European Commission to oversee a new task force on virtual currencies (VCs) last spring, the work of big banks and others to advance blockchain and distributed ledger technology (DLT) has continued apace. Accordingly, as the Brussels machinery gets back into gear following the summer hiatus, the activities of the new DLT Task Force will likely expand and accelerate, presenting opportunities for informed stakeholders to contribute to its understanding of the underlying technologies' full potential.

The European Parliament proposal calling for the establishment of the DLT Task Force is founded on the premise that VCs and DLT have the potential to contribute positively to consumer welfare and economic development in a variety of ways. Its author, European Parliament Member Jakob von Weizsäcker, emphasizes that the aim of the proposal is to avoid regulating too quickly and stifling innovation as a result and instead to allow the new Task Force to develop expertise in the underlying technologies and closely monitor developments.

Stakeholders have generally welcomed the proposal for its supportive approach of this dynamic environment, and the fact that it does not imply the establishment of a new regulator as such. But Weizsäcker has also noted that "a smart regulatory regime based on analytical excellence and proportionality must not be confused with light-touch regulation. Rapid and forceful regulatory measures need to be part of the tool kit in order to address risks before they become systemic if and when appropriate." Therefore, the time to engage with the Task Force is now.

Recent news reports have touted the efforts of UBS, Deutsche Bank, Santander, BNY Mellon and ICAP to develop a new form of digital cash that could become an industry standard to clear and settle financial trades over blockchain, as well as the creation by the R3 consortium and trial application by more than a dozen big banks of two DLT-based prototypes to address the challenges inherent in trade finance. However, the Task Force will benefit from stakeholders providing the broadest possible view of DLT's potential applications, including the creation of a record of events that may assist compliance efforts in import and export supply chains or other trade-related applications. Experience in engaging constructively with EU officials at these early stages in the development of regulation will be an important asset for stakeholders.

For its part, the U.K. Financial Conduct Authority (FCA), through its Project Innovate, has been offering regulatory compliance advice to companies trying to develop DLT-based products. The initiative includes a "regulatory sandbox" in which companies are able to test products with temporary FCA authorization. As a result, the FCA recently announced it is considering approving

the DLT-based, consumer-facing products of a number of firms. Experience drawn from this context should also be instructive when participating in upcoming EU-level efforts.

Therefore, realizing the significant promise of blockchain and DLT in the EU context requires as of now that stakeholders mobilize quickly to define and implement their policy strategy for engaging with the new DLT Task Force.

For more information, contact: Jeff Snyder, Charles De Jager

APEC Officials and Industry Meet in Lima Ahead of November Summit

Senior government officials and industry representatives from twenty one Asia-Pacific economies convened in Lima, Peru from August 15 – 28 to address a range of issues affecting trade and investment in the region and finalize outcomes for the Asia-Pacific Economic Cooperation (APEC) Leaders Meeting, November 19 – 20.

Outstanding issues include a U.S. proposal for a permanent moratorium on customs duties for digitally transmitted products; the recommendations APEC Leaders will endorse regarding moves to examine a potential Free-Trade Area of the Asia Pacific; and specific actions economies will take to liberalize services trade in the region.

The meetings also provided opportunities for private sector representatives to engage with government officials on a number of issues with commercial impact including:

Chemical regulation: regulators and trade officials met with industry representatives to discuss the application of good regulatory practice principles in the chemical sector and implementation of the U.N. based global system for the classification and labeling of chemicals and hazard communication.

Environmental goods and services: trade and environmental officials worked with industry on draft guidelines to facilitate trade and investment in sustainable materials management (*e.g.* recycling, waste to energy) technologies as part of a larger initiative on reducing marine debris.

Digital/data economy: discussions were held on the impact of digital innovations on society, new private sector led initiatives to facilitate the use of big data in medical research, and the promotion of training in data science and data analysis.

Food safety: workshops were held on effective cooperation between industry and regulators with a focus on increasing transparency and improving public consultation on new or revised regulations as well as a new private sector led initiative on hand hygiene in food processing facilities.

Advertising: a public-private workshop to move forward self-regulation in advertising was held, opened by the Second Vice President of Peru, Mercedes Araoz.

Regulatory convergence for medical products: industry and regulators convened to advance a network of regulatory science centers of excellence to build regulator capacity in priority areas such as multi-regional clinical trials, biotherapeutics and supply chain integrity (in support of APEC's goal of regulatory convergence for medical product approvals by 2020).

High-level meeting on health: health ministers and industry representatives met in plenary and bilateral meetings to discuss priority issues including healthcare financing and addressing barriers in the healthcare product supply chain. Health officials also collaborated with the private sector on initiatives to promote women’s health and economic participation.

For more information, contact the C&M International APEC team (Kate Clemans, Patty Wu, Paul Davies, Ryan MacFarlane, Dj Wolff, Mike Schmitz, Andrew Blasi, Tracy Huang) or your regular Crowell & Moring contact.

NYDFS Requires Board or Senior Officers to Certify AML and Sanctions Compliance; Issues Additional Program Rules

On June 30, 2016, the New York State Department of Financial Services (NYDFS) adopted a final rule imposing new anti-money laundering (AML) and economic sanctions requirements on banks and other financial institutions regulated by the agency.

The rule applies to: (1) banks, trust companies, private bankers, savings banks, and savings and loan associations chartered under the New York Banking Law; (2) all branches and agencies of foreign banking corporations licensed under the Banking Law to operate in New York; and (3) check cashers and money transmitters licensed under the Banking Law (collectively, Regulated Institutions).

The rule requires Regulated Institutions to:

1. Maintain a “Transaction Monitoring Program” that is “reasonably designed” for post-transaction detection of violations of AML laws and to allow appropriate filing of suspicious activity reports as required under the Bank Secrecy Act (BSA).
2. Maintain a “Filtering Program” reasonably designed to interdict transactions prohibited by the U.S. Department of the Treasury’s Office of Foreign Assets Control (OFAC).
3. Provide an annual board resolution, or finding by one or more “senior officers,” that the Regulated Institution complies with all Transaction Monitoring and Filtering Program requirements.

For more information on this new rule, please see [Crowell’s Client Alert](#).

For more information, contact: Carlton Greene, Cari Stinebower, Mariana Pendás

FinCEN Finds Indications of Crime in Purchases of Luxury Real Estate, Expands GTOs to Six Major Metropolitan Areas

The Department of the Treasury’s Financial Crimes Enforcement Network (FinCEN) has looked under the hood of luxury real estate purchases in Manhattan and Miami, does not like what it sees, and now has expanded its investigation to include six major metropolitan areas.

On July 27, FinCEN announced new Geographic Targeting Orders (GTOs or Orders) temporarily requiring certain U.S. title insurance companies that receive the Orders to identify and report the natural-person beneficial owners of legal entities used to purchase high-end residential properties without external financing in six major metropolitan areas.

Title insurance companies that receive the GTOs also will be required to report details about the natural person that represents the legal entity making the purchase and about the legal entity itself. The new Orders took effect on August 28, 2016, and last until February 23, 2017.

They expand on GTOs FinCEN issued in January of this year for purchases of luxury real estate in Manhattan and Miami-Dade County (the January GTOs), which expired on August 27, 2016. The expanded GTOs deepen FinCEN's efforts to investigate and take action against the use of residential real estate for money laundering, and increase the likelihood that FinCEN eventually will issue new rules on real estate under the Bank Secrecy Act (BSA).

For more information, please see [Crowell's Client Alert](#).

For more information, contact: Carlton Greene, Cari Stinebower, Ade Johnson

AGENCY ENFORCEMENT ACTIONS

Bureau of Industry and Security (BIS)

- On August 12, [BIS entered](#) into a Settlement Agreement with Walter Anders and Terand, Inc. to settle eight (8) violations of the Export Administration Regulations (EAR). In 2012, Terand/Anders caused, aided, and/or abetted the export of 6,557 kg of U.S.-origin T300 carbon fiber to Singapore without the required BIS licenses. This product is controlled for nuclear proliferation reasons. Both parties have been denied export privileges for a period of eight (8) years.
- On August 19, [BIS issued](#) a final rule in the Federal Register extending the Temporary General License for ZTE Corporation and ZTE Kangxun until November 28, 2016. Both entities were added to the Entity List on March 8, 2016.
- On August 22, [BIS entered](#) into a Settlement Agreement with Spectrolab of Sylmar, California to settle one (1) violation of the Export Administration Regulations (EAR). In 2014, Spectrolab sold and transferred a Large Area Solar Simulator (LAPSS II) to Pakistan, knowing or having reason to know, that the intended user was Pakistan's Space and Upper Atmosphere Research Commission (SUPARCO), which was listed on BIS' Entity List. The company did not obtain a license for the export. Spectrolab was assessed a civil penalty of \$90,000.

Department of Justice (DOJ)

- On August 19, the [department issued](#) a press release announcing the sentencing of Wenxia Man (aka Wency Man) of San Diego to 50 months in prison for conspiring to export and causing the export of fighter jet engines, an unmanned aerial vehicle, and related technical data to the People's Republic of China.

Office of Foreign Assets Control (OFAC)

- On August 2, [OFAC issued](#) a Finding of Violation to AXA Equitable Life Insurance Company for violations of the Foreign Narcotics Kingpin Sanctions Regulations (FNKSR). Separately, on the same day, [OFAC also issued](#) a Finding of Violation to Humana, Inc., the parent company of Kanawha Insurance Company, also for violations of the FNKSR.

- AXA issued health insurance coverage to three individuals in 1992. In 2009, these same three persons were placed on the List of Specially Designated Nationals and Blocked Persons (SDN) pursuant to the FNKSR. AXA and its Third Party Administrator (TPA) failed to identify this and, as a result, both companies did not block the policies and their premium payments. The situation came to light in 2011 when a new TPA was installed and identified the individuals as designated.
- In the second finding, OFAC found that Kanawha facilitated and/or processed 34 payments totaling \$14,406.19, and serviced two health insurance policies in which one or more SDNs had an interest.
- In both cases, OFAC took into consideration that no company personnel, including managers or supervisors, appeared to have had actual knowledge of the conduct that led to the violations; both had not received a penalty notice or Finding of Violation from OFAC relating to substantially similar violations in the five years preceding the date of the conduct giving rise to the violations; and each cooperated with OFAC's investigation.
- On September 1, OFAC updated its List of Specially Designated Nationals and Blocked Persons (SDN), adding 37 individuals and entities for sanctions evasion and activities related to Ukraine. It also added 96 entities determined to be 50 percent or more owned by one of three companies listed on the Sector Sanctions Identification List (SSIL). These are the Bank of Moscow, Gazprombank, and Gazprom.

Securities and Exchange Commission (SEC)

- One August 11, the SEC announced Houston-based Key Energy Services agreed to pay \$5 million in disgorgement to settle charges that it violated the Foreign Corrupt Practices Act (FCPA). According to the SEC's press release, the violations arose from payments its Mexican subsidiary, Key Mexico, made to a contract employee at Petróleos Mexicanos (Pemex), Mexico's state-owned oil company. In determining to accept the offer, the SEC took into consideration the company's cooperation, remedial efforts, and current financial condition.

For more information, contact: Edward Goetz

OTHER AGENCY ACTIONS

Bureau of Industry and Security (BIS)

- On August 23, BIS published in the Federal Register a proposed rule which would align the time limit of License Exception Temporary Imports, Exports, Re-exports, and Transfers (in-country) (TMP), which authorizes, among other things, certain temporary exports to Mexico, with the time limit of Mexico's Decree for the Promotion of Manufacturing, Maquiladora and Export Services (IMMEX) program.
 - Currently, TMP allows for the temporary export and re-export of various items subject to the Export Administration Regulations (EAR), as long as the items are returned no later than one year after export, re-export, or transfer if not consumed or destroyed during the period of authorized use. Other than a four-year period for certain personal protective equipment, the one-year limit extends to all items shipped under license exception TMP.

- However, the one-year period does not align with the time constraints of Mexico's IMMEX program, which allows imports of items for manufacturing operations on a time limit that may exceed 18 months.
- This rule proposes to amend TMP to complement the timeline of the IMMEX program. Under this proposed amendment, items temporarily exported or re-exported under license exception TMP and imported under the provisions of the IMMEX program would be authorized to remain in Mexico for up to four years from the date of export or re-export.
- Comments must be received by October 24, 2016.

Bureau of Industry and Security (BIS) and Directorate of Defense Trade Controls (DDTC)

- On August 17, BIS published in the Federal Register a final rule revising the destination control statement in the Export Administration Regulations (EAR) to harmonize the statement required for the export of items subject to the EAR with the destination control statement in the International Traffic in Arms Regulations (ITAR). DDTC's corresponding amendment to the ITAR was published on the same day.
 - Both rules are effective November 15, 2016.

Directorate of Defense Trade Controls (DDTC)

- On September 1, DDTC implemented Revision 4.4a of the Guidelines for Preparing Electronic Agreements. The updated guidelines, as well as a preamble with a summary of changes may be found here.
- Effective September 6, DDTC will only be uploading licensing submissions (*i.e.*, DSP -5, -6, -61, -62, -73, -74, and Batch Schemas) and posting licenses (Approved, Approved with Provisos, RWAed, and Denied) at 6:30 AM and again at 5:30 PM.

Office of the U.S. Trade Representative (USTR)

- The interagency Trade Policy Staff Committee (TPSC) will be convening two public hearings and seeking public comments to assist the USTR in the preparation of its annual reports to the Congress on:
 - China's compliance with commitments made in connection with its accession to the World Trade Organization (WTO). This hearing will be held in Washington DC on Wednesday, October 5, 2016.
 - Russia's implementation of its commitments as a member of the WTO. This hearing is scheduled for September 30, 2016.

U.S. Customs and Border Protection (CBP)

- On August 8, CBP announced in the Federal Register its plan to modify the National Customs Automation Program (NCAP) test by establishing Automated Commercial Environment (ACE) Protest Filer Accounts.
- On August 12, CBP issued a second Federal Register Notice announcing its plan to conduct an ACE Protest Test beginning on August 29.
 - During the test, participants will be able to submit additional arguments and supporting information electronically with their electronic protest in ACE.

- In addition, participants will be able to submit requests for further review, requests for accelerated disposition, requests to set aside denial of further review, and requests to void denial of a protest electronically in ACE.
- On August 29, CBP published a proposed rule in the Federal Register to amend CBP regulations regarding the requirement to file a Toxic Substances Control Act (TSCA) certification when importing into the customs territory of the U.S. chemicals in bulk form or as part of mixtures and articles containing a chemical or mixture.
 - The proposed regulations include an electronic option for filing TSCA certifications, consistent with the Security and Accountability for Every Port Act of 2006 and also propose to clarify and add certain definitions, and to eliminate the paper-based blanket certification process.
 - Comments must be received on or before September 28, 2016.
- On August 30, CBP issued a Federal Register Notice announcing that the Automated Control Environments (ACE) will be the sole electronic data interchange (EDI) system authorized by the CBP Commissioner for processing electronic drawback and duty deferral entry and entry summary filings. This notice also announced a name change for the ACE filing code for duty deferral and the creation of a new ACE filing code for all electronic drawback filings, replacing the six distinct drawback codes previously filed in ACS.

For more information, contact: Edward Goetz

CROWELL & MORING SPEAKS

Cari Stinebower will be speaking on September 8 at the American Bar Association's 2016 Business Law Section Annual Meeting in Boston. She will be discussing Anti-Money Laundering, Sanctions, and Terrorist Financing Laws and Regulations.

For more information, please contact the professional(s) listed below, or your regular Crowell & Moring contact.

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