



“SHAP” TALK

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TRADE NEWS

10+2 Importer Security Filing Underway

Despite rumors that the implementation could be delayed pending a review of the program by the Obama administration, 10+2 commenced on January 26, 2009. The start date also happened to be the first day of the Chinese New Year, an act of timing that was probably not coincidental. With China as our largest trading partner for ocean cargo, starting the 10+2 program during the New Year will allow the trade to ease into the Importer Security Filing (ISF) without having to worry about goods departing from that part of the world.

The word from Customs & Border Protection (CBP) is “we do not expect perfection” during the first phase in year of ISF. Customs is not requiring a bond at this time for the ISF for importers who do not have a continuous bond. If the ISF is filed late or incomplete, that’s OK, but Customs does expect to see improvement as the year progresses. CBP will be issuing report cards to ISF filers based on compliance with the new regulations. The report cards will provide detail for compliance with each of the 10 importer data elements including timeliness. The report cards will have scores not only for the filer, but also for each importer based on the filer. Your report card scores will certainly be a mitigating factor once full enforcement with penalties begins in January 2010.

Samuel Shapiro & Company, Inc. is filing the ISF on behalf of our customers. Please see our website for more details of the 10+2 program.

<http://www.shapiro.com/html/isf.html>

CBP Issues Guidance on Penalties for Filing Electronic Export Information (EEI)

On January 2, 2009, U.S. Customs and Border Protection (CBP) published Guidelines for the Imposition and Mitigation of Civil Penalties for Failure to Comply with the Foreign Trade Regulations (FTR) in 15 CFR Part 30. This Guidance provides assessment and mitigation guidelines for violations of the FTR published by the Census Bureau on June 2, 2008.

<http://www.census.gov/foreign-trade/regulations/regs/regulations20080602-federalregister.html>

The Foreign Trade Regulations require mandatory filing of export information through the Automated Export System (AES) or AES Direct by the U.S. Principal Party in Interest (USPPI), the USPPI’s authorized agent or forwarder, or the authorized U.S. agent or forwarder of the Foreign Principal Party in Interest (FPPI) for all shipments where export information is required. Penalty Provisions are found in sections 30.71 and 30.72 of the FTR at the above link.

Penalties under the FTR may be issued to USPPI’s, FPPI’s, freight forwarders, authorized agents (including brokers and other parties to the export transaction, as

appropriate) and carriers. You must maintain records on file to show your diligence in an export transaction and to guard against issuance of a penalty.

The penalty guidelines are **effective on February 1, 2009 for violations occurring on or after February 1, 2009**. Penalties may be assessed against more than one person for a violation stemming from the same export transaction, and may be issued in an amount up to \$10,000.00.

The below penalty guidance gives U.S. exporters a clear message that they need to have an export compliance process in place to avoid penalties under the FTR. If you do not have a process in place or do not understand your responsibilities for filing Electronic Export Information, contact compliance@shapiro.com for assistance. Do not wait until you have a problem at hand to understand your export responsibilities.

Penalties for the Failure to File Electronic Export Information (EEI) In AES

A failure to file is defined as when the government discovers that there is no record in the Automated Export System for an export transaction by the date that the record is required; and that discovery is made and communicated to the USPPI, authorized agent, or other party before the violation is corrected (See 15 CFR 30.4 for the time periods for filing of the EEI). Any AES record filed later than 10 days after the due date is a failure to file. The Notice of Penalty will be issued at the maximum amount of \$10,000.

Failure to File Penalty Mitigation

1. First Recorded Offense—\$750 to \$2,500
2. Second Recorded Offense—\$1000 to \$3,500
3. Third Recorded Offense—\$1,500 to \$5,000
4. Fourth and Subsequent Recorded Offenses—\$2,000 to \$10,000

Note: The existence of one or more mitigating factors to the violation may result in mitigation at the low end of the mitigation range. If one or more aggravating factors exist, the penalty may be mitigated at the high end of the mitigation range. Mitigating and aggravating factors may be used to offset each other.

Examples of Mitigating Factors

- ◆ First-time USPPI or authorized agent, FPPI, carrier, etc.
- ◆ Voluntary self-disclosure of the violation, in accordance with 15 CFR 30.74 (Extraordinary Mitigating Factor).
- ◆ Clear documentary evidence of remedial measures undertaken to prevent future violations.
- ◆ Exceptional cooperation with CBP, Census or the Bureau of Industry and Security (BIS).
- ◆ The violation was an isolated occurrence.
- ◆ The party has provided substantial assistance in the investigation of another person.
- ◆ The party demonstrates that it has a systematic export compliance effort.

Examples of Aggravating Factors

- ◆ Several violations in the same export transaction (e.g., wrong port code; incorrect value; missing required data; violations of the regulations of other agencies, such as the Department of State or the Drug Enforcement Administration, in addition to the Census violation).
- ◆ Circumstances suggest the intentional nature of the violation (e.g., wrong value where invoices or other documents covering goods show correct value; claiming post-departure to avoid pre-departure filing when filer is not an approved post-departure filer).
- ◆ High number of violations in preceding 3-year period.
- ◆ Evidence of criminal conviction for a related violation, such as a BIS violation.
- ◆ The party exhibits a pattern of disregard for its responsibilities under U.S. export laws and regulations.
- ◆ The party exports as a regular part of its business, but lacked a systematic export compliance effort.

Penalties for Late Filing of Electronic Export Information (EEI) in AES

Late filing occurs when the AES record is filed beyond the due date for such filing (see 15 CFR 30.4 for the time periods for filing in AES). Any AES record filed later than 10 days after the due date will be considered a non-filing of the AES record and will be subject to the penalties listed above. Any AES record filed after the government discovers the violation and communicates the violation to the USPPPI or authorized agent will be considered a failure to file in the AES, also subject to the penalties listed above. These penalties will be issued to USPPPI's, authorized agents, or other person as appropriate; or the FPPI, its authorized agent or other person as appropriate if a routed transaction. The Notice of Penalty will be issued in an amount that reflects \$1,100 per each day late, up to a maximum of \$10,000.

Late File Penalty Mitigation

1. First Recorded Offense—\$250 per day to \$1,500
2. Second Recorded Offense—\$500 per day to \$2,500
3. Third Recorded Offense—\$750 per day to \$3,500
4. Fourth and Subsequent Recorded Offenses—\$1,100 per day up to a maximum of \$10,000

Note: If one or more mitigating factors exist, the mitigated penalty amount may be reduced from the prescribed amount, but no lower than \$250. If one or more aggravating factors exist, the mitigated penalty amount may be increased beyond the prescribed amount, but no higher than \$10,000.

Examples of Penalties for Other FTR Violations

- ◆ Incorrect value for shipment.
- ◆ Other incorrect information in the AES record, such as an incorrect USPPPI, consignee, end-user, commodity description, or port of export.
- ◆ Failure to cite license code or license number.
- ◆ Failure to obtain Power of Attorney for AES transmission.
- ◆ Failure to identify transaction as a routed transaction.
- ◆ Failure to correct information in AES as the changes become known to the filer.

- ◆ Failure to provide carrier with appropriate proof of filing citation or exemption legend by the time periods set forth in the FTR.
- ◆ Failure to retain all records relating to the export shipment for a 5 year period from the date of export.

These penalties may be issued against USPPI's, authorized agents, freight forwarders, and any other person as appropriate, or the FPPI or its authorized agent if a routed transaction, or other persons as appropriate. The Notice of Penalty will be issued at the maximum amount of \$10,000.

Other FTR Penalty Mitigation

1. First Recorded Offense—\$500 to \$2,500
2. Second Recorded Offense—\$750 to \$3,500
3. Third Recorded Offense—\$1,000 to \$5,000
4. Fourth and Subsequent Recorded Offenses—\$2,000 to \$10,000

Note: Mitigating factors as referenced above may result in a mitigated penalty at the low end of the mitigation range or a penalty below the minimum penalty amount, but no lower than \$500. Aggravating factors as referenced above may result in a mitigated amount at the high end of the mitigation range. Mitigating and aggravating factors may serve to offset each other.

Carrier Penalties

Penalties may be issued against exporting carriers or other persons as appropriate for the following violations:

- ◆ Failure of carriers to adhere to requirements set forth in 15 CFR 30.45.
- ◆ Failure to provide the USPPI or authorized agent with changes to the date of export or the port of export.
- ◆ Failure to report the proof of filing citation or exemption legend on the required manifest.
- ◆ When filing an incomplete manifest under bond, the failure to file the manifest information within the prescribed time period after export ("late filing").
- ◆ When filing incomplete under bond, the failure to provide the list of proof of filing citations or exemption legends prior to departure from the port of exit.
- ◆ For carriers exempted from filing a manifest, the failure to file, upon request, the proof of filing citations or exemption legends.

The Notice of Penalty will be issued at the maximum amount of \$10,000, except for late filing of the manifest information. For late filing of the manifest information, the penalty will be issued at \$1,100 per each day late, up to a maximum of \$10,000 per violation, in accord with section 30.47(b) of the FTR (15 CFR 30.47(b)).

Carrier Penalty Mitigation

1. First Recorded Offense—\$500 to \$2,500
2. Second Recorded Offense—\$750 to \$3,500
3. Third Recorded Offense—\$1,000 to \$5,000
4. Fourth and Subsequent Recorded Offenses—\$2,000 to \$10,000

Note: Mitigating factors as noted above may result in a mitigated penalty amount at the low end of the mitigation range or lower, but not less than \$500. Aggravating factors as noted above may result in a mitigated amount at the high end of the mitigation range. Mitigating and aggravating factors may be used to offset each other.

There may be one redeeming feature for first offenders. Enforcement agencies may take alternative action to the assessment of penalties, including the alternative to educate and inform the persons involved in the transaction of the applicable U.S. export laws, issuance of warning letters, or company outreach. This is not a guarantee and the government will scrutinize your organization while deciding if they will issue a penalty or not. U.S. exporters need to be prepared and understand their obligation to file Electronic Export Information before this situation arises.

The penalty guidelines are found at:

http://www.cbp.gov/linkhandler/cgov/trade/legal/bulletins_decisions/bulletins_2009/vol43_01022009_no2/43genno2.ctt/43genno2.pdf

A helpful list of Foreign Trade Regulations Frequently Asked Questions (FAQs) may be found on the Census website at:

<http://www.census.gov/foreign-trade/regulations/faqs/index.html>

Draft Guidance for Industry Good Importer Practices Published by FDA

The U.S. Food and Drug Administration (FDA) is accepting comments until April 12, 2009 on a draft guidance publication entitled “Good Importer Practices.” FDA states the importance of importers having practices in place that can prevent or detect potential problems at critical points along the product’s life cycle to avoid placing the U.S. consumer at risk. The guidance document provides general recommendations to importers on possible practices and procedures they may follow for compliance with U.S. safety and security requirements. The recommendations include:

- ◆ Know the foreign firms that produce the product
- ◆ Know any other firms through which products pass (consolidators, trading companies, distributors)
- ◆ Understand the imported products and the vulnerabilities associated with them
- ◆ Understand the hazards that may arise during the product life cycle, including all stages of production
- ◆ Ensure proper control and monitoring of these hazards

The guiding principles for good importer practices include:

- ◆ Establishing a product safety management program
- ◆ Knowing the product and applicable U.S. requirements
- ◆ Verifying product and firm compliance with U.S. requirements throughout the supply chain and product life cycle
- ◆ Taking corrective and preventative action when the imported product or firm is not compliant with U.S. requirements

We highly recommend this document to all food and beverage importers. It contains great advice for any importer's compliance program, even if you don't import food.

The guidance document is available at:

<http://www.fda.gov/oc/guidance/goodimportpractice.html>

Lacey Act – A Hint of Things to Come?

A notice from the U.S. Department of Agriculture concerning implementation of the Lacey Act provisions was to have been published in the January 23, 2009 Federal Register, but was pulled by USDA, possibly for review by the Obama administration. As is standard practice, when a new administration comes into the White House, pending regulations are ordered for review. This is to prevent any “midnight legislation” being pushed through by the outgoing administration.

Our November 2008 Shap Talk covered the October 8, 2008 Federal Register notice with the scheduled phased implementation of various products for the plant and plant product declaration.

<http://www.shapiro.com/docs/ShapTalk/ShapTalk79.pdf>

The Federal Register notice withdrawn in January 2009 proposed to extend the length of each phase from 3 months to 6 months. The list of products for each phase was defined in more detail. For example, Phase II would cover only certain headings of HTS Chapter 44 (wood and articles of wood) instead of the entire chapter as proposed in October. The phase in schedule was to be revised based on a product's degree of processing and complexity of composition. The schedule also limits the products to be covered – headings in HTS chapters 44, 47, 48, and 94 only. The scope was significantly broader in the October notice.

The withdrawn notice also mentioned that the declaration would apply only to formal consumption entries and not to informal entries, personal importations, mail importations (unless subject to formal entry), carnets, and foreign trade zone and warehouse entries.

USDA was also proposing that the declaration would apply only to the product being imported and not to accompanying sundries such as tags, labels, manuals, and warranty cards.

All of the above information is subject to change, but it does appear that USDA is taking heed of public comments.

CPSC Expands Definition of “Accompanying” Requirement for Certificates of Conformity

The Consumer Product Safety Commission (CPSC) has updated its website with a revised frequently asked questions section that expands the definition of the “accompanying” requirement for certificates of conformity. The Consumer Product Safety Improvement Act of 2008 (CPSIA), which became law on August 11, 2008 for products manufactured on or after November 12, 2008, requires that the importer of a consumer product that falls under any CPSC rule, standard, ban, or regulation enforced by the CPSC provide a certificate of conformity. The certificate must accompany the product or shipment of products.

The CPSC has stated in their final rule that the certificate could be in paper or electronic form. An electronic format is acceptable if the certificate is identified by a unique identifier and can be accessed via the World Wide Web URL or other electronic means as long as the certification is created in advance of the shipment’s arrival and is available for review by the CPSC or U.S. Customs & Border Protection (CBP) with the shipment. The electronic certificate requires a means to confirm its creation or last modification date.

The CPSC website now states that the certificate can meet the “accompanying” requirement by being transmitted electronically to a Customs broker along with other Customs and commercial entry documents as may be required for the Customs entry before the shipment arrives. The certificate need not be presented with entry documentation to accomplish the Customs release of the shipment, but it must be available for review by the CPSC or CBP upon inspection of the shipment or product. In addition, a CPSC official has stated that a certificate provided to a Customs broker could also be in an e-mailed or paper format.

The updated referenced frequently asked question “Must each shipment be accompanied by a certificate?” and its answer can be viewed by visiting: <http://www.cpsc.gov/about/cpsia/faq/102faq.html#accompanied>.

CPSIA information can be viewed by visiting the CPSC website at: <http://www.cpsc.gov>.

Peru Free Trade Agreement Effective February 1, 2009

On January 16, 2009, President Bush issued a Presidential Proclamation implementing the U.S. Peru Trade Promotion Agreement effective February 1, 2009. Peru will lose its status as a GSP country, but it is still a member of the Andean Trade Preference Act (ATPA) and the Andean Trade Promotion and Drug Eradication Act (ATPDEA). According to the United States Trade Representative, on the day the Agreement goes into effect, 80 percent of U.S. industrial and consumer products and more than two thirds of current U.S. farm exports will enter Peru duty free.

The Proclamation may be found in the January 22, 2009 Federal Register at:
<http://edocket.access.gpo.gov/2009/pdf/E9-1573.pdf>

TRANSPORTATION UPDATE

Unprecedented Rise in Maritime Hijacking

The ICC International Maritime Bureau (IMB) Piracy Reporting Centre (PRC) has recently released its annual piracy report, which shows an unprecedented rise in maritime hijacking in 2008. The International Chamber of Commerce (ICC) reports that the increase is attributed to the number of attacks in the Gulf of Aden with 111 incidents reported on the east coast of Somalia and the Gulf of Aden. The Gulf of Aden is located in the Arabian Sea between Yemen on the south coast of the Arabian Peninsula and Somalia in the Horn of Africa.

In 2008, 49 vessels were hijacked, 889 crew were taken hostage and a further 46 vessels were reported being fired upon. Thirty-two crew members were injured, 11 killed and 21 missing. The missing crew are presumed to be dead. Guns were used in 139 of these incidents.

In October and November there were 15 and 16 vessels attacked respectively. This is an increase of nearly 200% from 2007. In addition, 2008 saw the largest tanker ever being hijacked by Somali pirates, and successful attacks being carried out at greater distances from land than in previous years. All types of vessels were targeted. The pirates boarding the vessels were also better armed than in previous years and prepared to assault and injure the crew.

International navies are having an effective response against piracy in the region and can help to secure the safety and security of this major maritime trade route advised Captain Pottengal Mukundan, Director of the ICC International Maritime Bureau.

We would be remiss if we did not remind you that insuring your shipment is critical! You never know what the vessel may encounter during its voyage. Please contact us at insurance@shapiro.com.

For more information, visit www.icc-ccs.org. The IMB is part of the ICC Commercial Crime Services, which is a specialized division of the International Chamber of Commerce.

February 2009 Update

Samuel Shapiro & Company, Inc. now has a Global LCL program for both imports and exports to offer our customers competitive pricing and provide us with the technology that will support us and our customers. We can quote almost immediately and also have access from our website to sailing schedules.

Cargo volume is down due to the economic crisis, and as a result the number of container vessels not in service is likely to top 200 in the first quarter of 2009. There were 165 containers vessels idle just before Christmas. Ocean carriers are adjusting to the weakening cargo demand and decreasing freight rates.

2009 will be a growth year to 3PL's. Third-party logistics are in a key position as companies cut costs and outsource their logistics functions. In 2008 international transportation management, including freight forwarding, NVOCC common carriers and customs brokerage services fell by 7.5 percent. Projections are that this will increase in 2009.

DOMESTIC

The collection of the Clean Truck Fee (CTF) previously scheduled to begin on November 17, 2008, will now begin on February 18, 2009. The delay was necessary to allow the Federal Maritime Commission to further review the program. The CTF will be used to finance the purchase of new clean trucks thereby improving air quality in the San Pedro Bay. The West Coast Marine Terminal Operator Agreement (WCMTOA) created the not-for-profit company PortCheck to collect the Clean Truck Fee to provide financial assistance for the replacement of as many as 10,000 trucks during the next three years. Once the collection of CTF begins, the cargo owner (the party named on the bill of lading) is responsible for paying the CTF. The fee will be payable by credit card or electronic funds transfer, and must be paid before a container can enter or leave the terminals.

Cargo owners can visit the PortCheck page at , www.portcheck.org or www.pierpass-tmf.org. Cargo owners that are already registered in PierPASS offpeak terminal access system will automatically be uploaded into PortCheck. Cargo owners that are automatically uploaded from PierPASS into PortCheck will first have to accept the terms and conditions of PortCheck before their account will be extended into PortCheck.

Visit www.portoflosangeles.org/cleantrucks or www.polb.com/cleantrucks to learn more on the ports' Clean Trucks Program.

Railroads and steamship companies owning container chassis are now required to share safety responsibility with motor carriers. This is part of a federal highway bill now being enforced. The companies will have to register and file a motor carrier ID report with Federal Motor Carrier Safety Administration (FMCSA). They will also be required to establish inspection, repair, and maintenance programs. This also means they have to respond to driver reports about chassis defects and issues. This should result in fewer chassis being placed out of service and vehicle breakdowns due to chassis issues.

FAR EAST

Huizhou Quanwan International Container Terminals has planned its first dedicated container terminal. This port is close to the manufacturing area of Guangdong Province and will become a major international port.

Carriers in the CKYH Alliance, COSCO, "K" Line, Yang Ming and Hanjin have slashed transpacific, transatlantic and Asia/Europe capacity in response to declining demand, falling rates and "growing uncertainty in the world's economy." The capacity cuts come on top of those implemented in mid-October in the transpacific and Mediterranean-Far East trades by the four lines.

Meanwhile, the alliance's Mediterranean-Asia-America Pendulum service will be terminated from early 2009. That service, which employs thirteen 5,500-TEU vessels, represents around 13 percent to 15 percent of the CKYH carriers' capacity in the Pacific Southwest trade, but the lines said they will attempt to offset the shortfall by using other services, like the South China Service (SEA), as a substitute. Lastly, including the Asia/Europe portion of the MAP pendulum, the carriers are taking roughly 9 percent of their capacity out of their Asia/North Europe trade by also terminating their China North Europe (CNX) service as of January 2009. The CNX service uses eight 4,000-TEU vessels. The earlier capacity cuts included suspension of the All Water East Coast (AWE) Central Loop, which reduced CKYH capacity in that trade by 18.5 percent, and the East Med Express (EMX). The member lines said they are also "conducting an extensive study to further restructure the Asia-East Mediterranean services, including the Aegean Sea Direct Express (ADX) service."

Chinese New Year is the week of January 25th this year. China and Hong Kong as well as many other countries in that region will be closed for the entire week. The prior week vessels traditionally get overbooked so plan accordingly, booking cargo in advance. There will also be delays once the New Year celebrations are over and all shippers are back to work.

Maersk Line will close one of its two global service centers in China in response to the slowdown in container traffic. The Guangzhou center, which handles logistics and customer service, will be closed by mid-2009 with the loss of about 700 jobs. A second center in Shenzhen will continue operations and also expand, taking on some employees from Guangzhou.

SOUTH AMERICA

After months of uncertainty in the Brazil the turbulent market we have been experiencing the past few months is finally returning to normal. Space allocation with the steam ship lines has eased up in the past month which has greatly reduced issues with bookings, as well as containers rolling.

It is our hope that this improvement in the market will allow for more Service Contracts to be established with key carriers that will increase the validity of rates from the current month to month updates, to longer term validity. However, expect

BAF to continue fluctuating on a monthly basis for the foreseeable future, as well as our inland rates which will fluctuate based on fuel.

NORTHERN EUROPE/MED

Antwerp had an increase in container volume in 2008 of 6 percent. This placed it third among European container ports.

Predictions are that the Trans-Atlantic trade will recover more quickly than other trade lanes as the dollar continues to strengthen and Europe sinks deeper into recession. Export growth will slow and Imports will decline at a slower rate.

AIR FREIGHT

The Transportation Security Administration (TSA) is responsible for ensuring the security of all modes of transportation, including cargo placed aboard airplanes, particularly passenger carrying planes.

Approximately 12 million pounds of cargo is transported daily on passenger aircraft. TSA worked with Congress to significantly strengthen security of air cargo through the 9/11 Bill which was signed into law in August 2007. The Implementing the Recommendations of the 9/11 Commission Act of 2007, 29 U.S.C. 44901 (2007) (9/11 Act) requires that TSA develop a system to screen 100% of cargo transported on passenger aircraft by August 3, 2010, with an interim requirement to screen 50% of such cargo by February 3, 2009.

Measures in place today assure the safety of air cargo on passenger planes through a risk-based, layered security approach. TSA employs 300 transportation security inspectors who are exclusively dedicated to the oversight of air cargo. An additional 150 air cargo inspectors were to be added by the end of 2008. TSA also has hundreds of TSA-certified canine teams that spend at least 25 percent of their work day in the cargo environment. TSA is committed to the goal of screening 50 percent of all air cargo on passenger carrying aircraft by February 2009 and 100 percent by August 2010.

What does all this mean for cargo shipping by air domestically or internationally (export from U.S.)? Expect additional costs for screening by an approved Certified Cargo Screening Facility (CCSF) or the air carrier, with the possibility of delays. Along with the screening, TSA is requiring all shippers to complete a "consent to screen" form prior to your forwarder moving the cargo. If you have any questions, please contact compliance@shapiro.com.

SAMUEL SHAPIRO & COMPANY, INC. NEWS

Employee of the Month

As previously featured in “Shap” Talk, Samuel Shapiro & Company, Inc. has been sharing with you the names of employees who have been recognized for their exceptional efforts and contributions to our Company. At Shapiro, we continually work to develop, challenge, and inspire all of our employees to grow individually and with the Company. This month, we would like to recognize Jamie Johnston, Dulles Account Coordinator, for her outstanding performance and contributions.

We encourage you to provide us with employee feedback! Please email us at hr@shapiro.com.

WE WANT TO HEAR FROM YOU!

Do you have suggestions for an article? Is there a topic you'd like us to cover in a future issue? Please let us know! Send your feedback to shaptalk@shapiro.com.