



## INCREASED ENFORCEMENT

On June 3, President Trump issued a sweeping [Executive Order](#) (E.O.) directing the Department of Homeland Security (DHS) and U.S. Customs and Border Protection (CBP) to strengthen enforcement of U.S. Customs laws, with a focus on importer accountability, increased supply chain scrutiny, increased penalty enforcement, reduced penalty mitigation, and increased data collection. The E.O. directs enhanced requirements for Importers of Record (IORs), including increased disclosure and bonding, and stricter rules for foreign IORs, including a prohibition on Informal Entries. It also directs the prioritization of enforcement actions involving forced labor, misclassification, undervaluation, and transshipment. As noted in the White House [Fact Sheet](#) and our [June 4](#) "What's New" update, the E.O. is expected to significantly increase compliance burdens across the import community. 91 [Fed. Reg. 35125](#) (June 10, 2026).

- Foreign-trade zone (FTZ) operators and other users of in-bond entries should watch for potential restrictions on in-bond movements.

- Many changes are to be implemented through rulemaking over the next 90–180 days, so clients should monitor the [Federal Register](#) for Proposed Rules. Contact [Marshall Miller](#), [Brian Murphy](#), or [Sean Murray](#) with questions.

## FTZ COMPLIANCE REVIEWS

Following President Trump's June 3 E.O., we understand that CBP has structured a new process for enhanced unannounced FTZ compliance reviews. The reviews are to involve coordination with CBP's Office of Field Operations (OFO) and may include up to ten (10) CBP Officers on-site, with follow-up requests for documentation such as late-filed Cargo Releases (CBPF 3461s) and Entry Summaries (CBPF 7501s), and records supporting HTSUS classifications, valuation, and origin. FTZ Operators should expect review of FTZ inventory system records versus on-hand inventory, FTZ Admissions, origin designations, and zone status designations. Because

## METALS 232 CHANGES

On June 1, President Trump issued a [Proclamation](#) that, effective June 8, modified Section 232 tariff treatment for steel, aluminum, copper, and derivative products. As outlined in our [June 2](#) "What's New" update, the changes reduced tariff rates (now generally 25% or 15%) for certain derivative products such as agricultural, construction, and material-handling equipment, while adding coverage of some new derivative products (e.g., steel racks and aluminum lithographic plates). The Proclamation also revises key eligibility rules, including lowering the threshold for "entirely" U.S. metal content from 95% to 85% and establishing specific treatment for USMCA-originating goods based on U.S. content. Contact [Brian Murphy](#) or [Sean Murray](#) with questions. 91 [Fed. Reg. 34085](#) (June 4, 2026).

## NEW 232 DUTIES?

Deadlines for action on Section 232 national security [investigations](#) into commercial aircraft and jet engines, wind turbines, medical equipment, robotics, drones, and other goods are approaching this summer.

## IEEPA REFUNDS

- The U.S. Department of Justice (DOJ) has appealed the U.S. Court of International Trade (CIT) order that CBP is required to refund International Emergency Economic Powers Act (IEEPA) duties on finally liquidated Customs entries for non-litigants. In a June 9 [hearing](#), the CIT judge urged the DOJ to drop its appeal. The plaintiff in the [V.O.S. Selections, Inc. v. U.S.](#) case has filed a motion to certify a class action.

- In the June 9 hearing, CBP told the judge that Phase 2 of the CAPE IEEPA tariff refund process, covering Reconciliation entries, is expected to be completed on June 29.

- Clients should be monitoring IEEPA refund requests. Some Customs entries are being re-liquidated multiple times, some are being rejected, and some importers are receiving Customs duty bills that appear to result from errors in processing refund claims. Contact [Brian Murphy](#) or [Sean Murray](#) with questions.

## 301 FORCED LABOR

- On June 2, the Office of the U.S. Trade Representative (USTR) [announced](#) its determinations in the Section 301 investigations [initiated](#) on March 12. USTR has [determined](#) that all 60 economies investigated failed to impose or effectively enforce a prohibition on the import of goods made with forced labor, which burdens or restricts U.S. commerce, rendering them subject to action under Section 301. USTR has proposed the imposition of additional tariffs on products of all 60 economies, subject to significant [Annex A](#) exceptions. The proposed action would apply 10% additional duties on 14 economies that have taken steps toward prohibiting forced labor imports, undertaken commitments in reciprocal trade agreements, or implemented partial regimes addressing such goods, and 12.5% additional duties on the remaining 46 economies. The full lists can be found in our [June 3](#) "What's New" update.

- U.S. Trade Representative Jameison Greer reportedly stated in a June 11 Organization for Economic Co-operation and Development (OECD) ministerial meeting that the U.S. will stand by its commitments in trade deals with the European Union and Japan to cap tariffs at 15%.

- A proposed textile and apparel mechanism would allow limited imports from certain economies at reduced Section 301 duty rates.

- Public [comments](#) on the proposed action are due by July 6, and a public hearing is scheduled for July 7. Clients are encouraged to file comments generally on the Section 301 action and/or specific to their subject imports. Contact [Marshall Miller](#), [Brian Murphy](#), or [Sean Murray](#) with questions. 91 [Fed. Reg. 34272](#) (June 5, 2026).

## FORCED LABOR GUIDANCE

CBP has released a revised version of its Forced Labor Enforcement Operational Guidance for Importers [document](#). CSMS #[68927213](#) (June 12, 2026).

## CHINA BOARD OF TRADE

USTR has [announced](#) a process to potentially modify existing tariffs on China imports and the establishment

the reviews are unannounced, FTZ Operators should ensure that site security and FTZ personnel are prepared in advance and available to ensure records are current and readily accessible. Contact [Marshall Miller](#) or [Amanda Ward](#) with questions.

#### USMCA NEGOTIATIONS

• The U.S. and Mexico have [concluded](#) their first bilateral negotiating round in the 2026 joint review of the U.S.-Mexico-Canada Agreement (USMCA). This initial round focused on key priority areas, including automotive rules of origin, steel and aluminum, and broader economic security, while reaffirming U.S. objectives to reduce the trade deficit with Mexico and strengthen North American supply chains. A second round scheduled for June 16-17 in Washington, D.C. is expected to include agriculture, followed by a third round in Mexico City during the week of July 20.

• On June 10, President Trump stated that he does not support USMCA renewal.

#### TAIWAN AGREEMENT

On May 28, the U.S. International Trade Administration published a Notice with amendments to the Harmonized Tariff Schedule of the United States (HTSUS) to give effect to certain trade and tariff elements of the January 15, 2026 memorandum of understanding (MOU) between the U.S and Taiwan. The HTSUS modifications went into effect on May 1, so importers may consider Post Summary Corrections (PSCs) to recover excess duties paid. 91 [Fed. Reg. 31818](#) (May 28, 2026); CSMS [#68762890](#) (May 27, 2026).

#### SECTION 232 TRANSPARENCY

Senators Gary Peters (D-MI) and Susan Collins (R-ME) have [introduced](#) a bill that would require the Commerce Secretary to publish summaries of its Section 232 investigations into the national security risks presented by certain imported goods.

#### LOW SPEED VEHICLES

On April 6, CBP [announced](#) an investigation into several low-speed vehicle importers for conspiring to evade antidumping and countervailing duties (AD/CVD) on products of China by falsifying country of origin and incorrect tariff classifications. CBP has imposed interim restrictions, including requiring the payment of duties before release, the suspension or extension of entry liquidation, and reviewing the bond sufficiency of the importers under investigation.

#### CONTAINER CONSPIRACY

On May 19, DOJ [announced](#) that four of the largest shipping container manufacturers, and seven Chinese executives, have been [indicted](#) for conspiring to restrict the output of

#### SECTION 122 LITIGATION

The DOJ has appealed the May 7 CIT decision in [Burlap and Barrel, Inc. v. U.S.](#) that struck down the Section 122 tariffs. On June 11, the U.S. Court of Appeals for Federal Circuit (CAFC) granted the DOJ's motion for a stay pending appeal, issuing an [order](#) allowing collection of Section 122 tariffs while the case is appealed.

#### CHINA 301 LITIGATION

On June 15, the U.S. Supreme Court [denied](#) the plaintiff's petition for a writ of certiorari in the [HMTX Industries](#) case disputing the legality of the implementation of the China Section 301 Lists 3 and 4A. Contact [Brian Murphy](#) or [Sean Murray](#) with questions.

#### FTZ ASF SUNSET REMINDER

FTZ Operators and Grantees are reminded to monitor site usage under the FTZ Board Alternative Site Framework (ASF) in light of the three to five year sunset provisions in 15 C.F.R. § 400.13. Under current FTZ Board procedures, refile and securing FTZ Board approval for sites that have sunset is more difficult and time-consuming. Contact [Marshall Miller](#), [Amanda Ward](#), or [Bridget Beran](#) with questions.

#### FTZ CAUCUS

Congressman Aaron Bean (R-FL) and Congresswoman Marilyn Strickland (D-WA) have [launched](#) the bipartisan Congressional U.S. Foreign-Trade Zones (FTZ) Caucus, a House-led initiative focused on strengthening U.S. manufacturing, supporting domestic jobs, and enhancing supply chain resilience through the FTZ program. The caucus will serve as a forum to educate policymakers on the economic role of FTZs, including their impact on exports, reshoring, and domestic investment. The caucus is intended to provide lawmakers with ongoing briefings and resources regarding FTZ operations and their economic significance. Contact [Marshall Miller](#) or [David Ostheimer](#) about ideas for engaging your Congressional representatives with the caucus.

#### CBP FORM 4647

Effective June 8, the CBP Agriculture & Prepared Products (APP) Center of Excellence and Expertise began issuing CBP Form 4647 (Notice to Mark and/or Notice to Redeliver) electronically to Trade Account Owners (TAOs) that have selected "Portal" as their communication method in ACE. TAOs that have not selected "Portal," or do not have ACE Portal access, will continue to receive notices by mail. TIN [#68877326](#) (June 8, 2026).

#### CHINESE MILITARY LIST

of a U.S.-China "Board of Trade." USTR is seeking input into specific China product eligibility for potential tariff reductions to MFN rates, and the design and operation of the Board of Trade, which would serve as a formal framework through which the U.S. and China could manage trade flows and outcomes. Comments are due by July 10. See our [June 5](#) "What's New" update for more information. 91 [Fed. Reg. 34269](#) (June 5, 2026).

#### BRAZIL 301

On June 1, USTR [announced](#) a Section 301 determination that certain Brazilian acts, policies, and practices related to digital trade and economic payment services, unfair preferential tariffs, anti-corruption enforcement, intellectual property protection, ethanol market access, and deforestation are unreasonable or discriminatory and burden or restrict U.S. commerce. USTR has proposed a 25% tariff on Brazilian-origin goods, with certain exemptions. See our [June 2](#) "What's New" update for more details. Comments are due by July 1. 91 [Fed. Reg. 33854](#) (June 4, 2026).

#### VIETNAM 301

USTR has initiated a Section 301 investigation into Vietnam's acts, policies, and practices related to intellectual property protection and enforcement. USTR proposes to identify Vietnam as a priority foreign country, which may lead to additional tariffs or other trade measures. Comments are due by July 2. 91 [Fed. Reg. 33285](#) (June 3, 2026).

#### QUARTZ SURFACE PRODUCTS

USTR extended the deadline to June 10 for submitting [responses](#) in the ongoing safeguard action on quartz surface products (QSP). The USITC previously determined that increased QSP imports are a substantial cause of serious injury, or threat thereof, to domestic industry, and recommended tariff rate quota safeguard measures. A public hearing will be held on June 16, as USTR and the Trade Policy Staff Committee (TPSC) continue evaluating stakeholder views before making recommendations to the President. 91 [Fed. Reg. 34877](#) (June 9, 2026).

#### AD/CVD FALSE CLAIMS ACT

On May 12, the DOJ [announced](#) that Perfectus Aluminum and four related warehouse operations have agreed to pay \$549.5 million to settle allegations of False Claims Act violations involving an alleged conspiracy to avoid paying antidumping and countervailing duties on aluminum extrusions imported from China.

#### FDA CONTACT POINTS

standard unrefrigerated shipping containers and fix their prices from at least November 2019 to January 2024. The alleged violations of the Sherman Antitrust Act carry penalties of up to 10 years in prison and a \$1 million fine for individuals, and a maximum penalty of \$100 million for corporations. The fines may be increased based on the gain derived or loss suffered.

#### MEDICAL DEVICES LIST

The Office of Foreign Assets Control (OFAC) has published a list of medical devices that may not be exported or re-exported to North Korea under the General License for certain medicine and medical devices. 91 [Fed. Reg. 35400](#) (June 11, 2026).

#### OFAC CONSULTING PENALTY

Service providers and consultants should [consider](#) a June 1 OFAC settlement agreement. FTI Consulting agreed to pay \$1.05 million to settle its potential civil liability for violations of OFAC sanctions when it provided economic consulting services to a law firm related to a civil lawsuit in Singapore concerning VTB Bank, an OFAC-sanctioned Russian bank.

On June 8, the Pentagon [announced](#) additions to its list of "Chinese Military Companies," which are Chinese companies operating in the U.S. that are determined to aid the Chinese military. The [list](#) now contains 188 entities. Notable additions include Alibaba Group (tech company and e-commerce marketplace), Baidu, Inc. (internet search provider), and BYD Co. Ltd. (vehicles). Contact [Sean Murray](#) with questions.

#### HAND CARRY CHARGES

Two National Institutes of Health (NIH) researchers have been criminally [charged](#) by the U.S. Attorney's Office for the Eastern District of Michigan with conspiracy to smuggle monkeypox into the U.S. and making false statements to CBP officers upon arrival at the Detroit airport. The researchers arrived from travel originating in the Republic of Congo and told officers that their black case contained diagnostics and test equipment, but investigation revealed that it contained 113 vials of biologic materials. If convicted, the researchers face up to five years in prison. Contact [Sean Murray](#) with questions on hand carries.

The Food and Drug Administration (FDA) has issued new points of contact [guidance](#) for the FDA ImportShield Program (FISP), which was launched in August 2025 to provide a streamlined FDA nationwide import review process.

#### CHEMICAL CLASSIFICATION

A CIT decision classifying a chemical mixture as an "other" chemical preparation in HTSUS 3824.99.28 (6.5%) provides useful interpretations of the tariff terms "paint," "varnish," "chemical," "chemical reaction," "reaction," "reaction initiator," "accelerator," "catalyst," "preparation," "allied," and "industry" for classification purposes. [Lanxess Corp. v. U.S.](#), CIT Slip Op. [26-58](#) (June 9, 2026).

FTZ STATISTICS	
FOREIGN-TRADE ZONES BOARD	
ACTIVITY AS 6/15/2026	
	Approved
Zones	312
Subzones*	917
	Pending
Zones	3
Subzones	20

\*From [Fed. Reg. Notices](#)

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