

PUBLICATION

U.S. Customs and Border Protection Teams with Consumer Product Safety Commission in Voluntary Product Safety Program

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U.S. Customs and Border Protection (CBP) recently announced a pilot program in conjunction with the Consumer Product Safety Commission (CPSC) to partner with importers to strive to maintain a high level of product safety compliance in a joint venture to prevent unsafe imports. Recent headlines involving tainted imported products ranging from toys to pet food and infant formula; and actual product recalls of toys, cribs and children's sleepwear, have substantially increased the inspection of imported products. The increased scrutiny delayed deliveries as a result of the heightened enforcement activity from certain countries of origin.

Participating Companies Benefit in Potential Cost Savings and Favorable Consumer Recognition

The announced program is an expansion of the CBP Importer Self-Assessment (ISA) program. The ISA program is a trade facilitation partnership with trade compliant companies designed to reduce both CBP and company resources required during the entry and post-entry process. As a practical matter, this means a reduction in the number and extent of inspections of imported product at the port of entry and a reduction in the number and extent of CBP "focused assessments" or audits conducted at the importer's place of business. Since CBP has determined, based on FY 2007 statistics, that ISA participants have a 99.4 percent compliance rate, it is seeking to expand the voluntary participation by importers. The ISA program is based upon the premise that the establishment of strong internal importer compliance controls is assuring to CBP that such importers achieve the highest levels of compliance.

The joint program with CPSC is open to ISA participants and offers CPSC benefits beyond those provided by CBP alone. CPSC will provide a product-specific point of contact for the participant, reduced product testing, "front-of-the-line" testing when a product is identified for testing, and participation in CPSC's "Fast-Track Product Recall Program." Additionally, CPSC will acknowledge the company's participation in the "Fast-Track Product Recall Program" so the participant has potential consumer benefit as well as agency benefits from this pro-active approach.