

July 9, 2026

The Honorable Markwayne Mullin  
Secretary  
U.S. Department of Homeland Security  
Washington, DC 20528

The Honorable Rodney Scott  
Commissioner  
U.S. Customs and Border Protection  
Washington, DC 20229

**RE: Customs Enforcement Executive Order – Stakeholder Input Request**

Dear Secretary Mullin and Commissioner Scott:

On behalf of the undersigned organizations, we write regarding the June 3, 2026, Executive Order, *Strengthening Customs Enforcement*, and specifically request that the administration use notice-and-comment rulemaking processes regarding any changes to the current import processes. We support strong customs enforcement that combats unlawful trade, protects supply chain integrity and ensures a level playing field for legitimate businesses. At the same time, enforcement should be implemented in a manner that facilitates lawful trade by giving compliant importers and supply chain partners clear rules, predictable and cost-efficient processes, and efficient cargo movement.

These objectives are complementary: A modern customs regime is most effective when it targets bad actors while allowing low-risk, lawful trade to move efficiently, predictably and securely through U.S. ports of entry. We urge you to work closely with the trade community and implement the EO in a way to ensure this careful balance is not lost. The EO can achieve its objectives if the administration implements it in a careful and pragmatic way.

As DHS and U.S. Customs and Border Protection implement the Executive Order's significant changes — including new importer eligibility requirements, additional data and disclosure obligations, revised bond expectations and other enforcement measures — we urge you to view industry as a partner in this process. The trade community has substantial operational expertise and a shared interest in strengthening compliance, improving transparency and protecting the integrity of the supply chain.

Given the breadth and significance of the changes contemplated by the Executive Order, we urge CBP to use notice-and-comment rulemaking where appropriate to implement these new requirements, including publication of proposed rules in the *Federal Register*. A robust and transparent rulemaking process with broad stakeholder engagement will help ensure that any new framework is legally sound, operationally workable and appropriately targeted at the actors and practices that present the greatest risk. It will also allow stakeholders to provide practical feedback on compliance timelines, systems changes, documentation burdens, incremental costs and potential unintended consequences for lawful trade before any changes go into effect, particularly as changes concern both domestic and foreign importers of record. This iterative process would adhere to statutory requirements and ensure the final results address the concerns referenced in the Executive Order without punishing good actors.

Notice-and-comment rulemaking (e.g., a Notice of Proposed Rulemaking) is especially important here because the Executive Order could require substantial operational changes across the trade community and within CBP itself. Importers, brokers, carriers and other supply chain participants will need time to update internal controls, modify data systems, revise documentation practices, train personnel and adjust compliance processes to meet new requirements. By using an NPRM process CBP can seek feedback from interested parties regarding the proposed regulatory changes, identify where guidance or phased implementation may be needed, and better understand how changes could affect cargo processing, release times and costs for legitimate trade. That practical feedback will help the agency implement stronger enforcement measures in a clearer and more workable manner, without creating unnecessary delays or disruptions at the border.

We also encourage CBP to implement the Executive Order in a manner that advances trade facilitation for compliant parties. Enforcement tools are most effective when they are paired with clear rules, consistent administration and processes that would allow low-risk, lawful shipments to move efficiently through the system. Programs such as CTPAT and CTPAT Trade Compliance demonstrate the value of a risk-based approach that helps CBP identify trusted traders, focus resources on higher-risk shipments and preserve the efficient flow of legitimate commerce. Clear guidance, appropriate transition periods and meaningful opportunities for stakeholder engagement will be critical to achieving the Executive Order's objectives without creating unnecessary uncertainty, delays or added costs for legitimate trade.

Our organizations stand ready to work with DHS and CBP to help develop workable implementation plans and provide constructive input as these policies move forward. We respectfully urge CBP to work closely with the trade community while also providing for formal notice-and-comment rulemaking for significant changes under the Executive Order and to make full use of the Commercial Customs Operations Advisory Committee (COAC) as an additional forum for stakeholder engagement and practical implementation feedback. We appreciate your consideration and would welcome the opportunity to engage further with your teams as the agency evaluates next steps.

Sincerely,

Airforwarders Association  
Alliance for Chemical Distribution  
American Apparel & Footwear Association  
American Association of Exporters and Importers  
American Automotive Policy Council  
American Chemistry Council  
American Seed Trade Association (ASTA)  
Associated Equipment Distributors  
Automotive Body Parts Association  
Autos Drive America  
Border Trade Alliance  
Can Manufacturers Institute

Cleaning Equipment Trade Association-CETA  
Connecticut Business & Industry Association  
Consumer Technology Association  
Council of Fashion Designers of America (CFDA)  
Distilled Spirits Council of the U.S.  
E-Merchants Trade Council  
Footwear Distributors & Retailers of America (FDRA)  
Gemini Shippers Association  
Global Business Alliance  
Greenabl Shippers Association  
Hardwood Federation  
Industrial Fasteners Institute  
Information Technology Industry Council (ITI)

International Wood Products Association  
Jewelers Vigilance Committee  
MEMA. The Vehicle Suppliers Association  
National Association of Beverage Importers  
National Association of Manufacturers  
National Confectioners Association  
National Fisheries Institute  
National Foreign Trade Council (NFTC)  
National Industrial Transportation League  
National Retail Federation  
North American Association of Food  
Equipment Manufacturers (NAFEM)  
Off-Road Business Association (ORBA)  
Outdoor Power Equipment Institute

Performance Racing Industry (PRI)  
Plumbing Manufacturers International  
PRINTING United Alliance  
Retail Industry Leaders Association  
Semiconductor Industry Association (SIA)  
Snowsports Industries America  
Specialty Equipment Market Association (SEMA)  
Technology Trade Regulation Alliance (TTRA)  
The Borderplex Alliance  
The Fashion Accessories Shippers Association  
The Fashion Jewelry and Accessories Trade Association  
U.S. Fashion Industry Association  
US Council for International Business

CC: The Honorable Mike Crapo, Chairman, Senate Finance Committee  
The Honorable Ron Wyden, Ranking Member, Senate Finance Committee  
The Honorable Jason Smith, Chairman, House Ways & Means Committee  
The Honorable Richard Neal, Ranking Member, House Ways & Means Committee