

THE CARMICHAEL C MPASS

"WHEN THE TIDES OF TRADE SHIFT, WE'RE YOUR COMPASS."

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Important Guidance From CPSC Distributed July 7

On July 7 CPSC released important guidance regarding the correct usage of several aspects of the eFiling Product Registry. To ensure our clients have everything they need to be successful now that CPSC eFiling has begun in earnest, we are distributing that information to you. To view the complete brief from CPSC, click [here](#). A short summary is provided for you below.

In addition to these clarifications and updates, CPSC has advised that the Product Registry (and API) will be unavailable this Saturday, July 11th from approximately 7AM to 2PM Eastern Daylight Time (EDT) for scheduled maintenance. Please take this into consideration when maintaining or updating your product registry.

Trade Party: A stored manufacturer, laboratory, or point of contact for use on certificates of conformity. Create each trade party only once and reuse its unique identifier (GLN or Alternate ID) on future certificates. Only create a new trade party if the trade party's information changes. Avoid duplicate entries, as they can impact performance and may lead to account suspension.

CPSC-Accepted Laboratories: Never add CPSC-Accepted labs as new trade parties. Instead, reference them using their 4-digit CPSC ID only. Incorrectly adding these labs may prevent them from being recognized as Independent Third-Party Laboratories (ITLs).

Laboratory Records: Laboratories should be listed once per certificate unless documenting component testing, where multiple records for the same lab are appropriate. An optional but recommended flag has been added to indicate a laboratory test sub-record is a component test.

Certificate Versioning: Use the update feature to maintain a history of recertifications for the same product. Create new certificates when distinct product/manufacturer combinations that require separate certifications exist.

Import Status: Use `getImportStatus` to determine whether an import is in progress or complete. After completion, use `getImportLog` to review record-level success, errors, and rejection details. Wait at least two seconds after initiating an import before checking import status and avoid excessive polling.

General Requirements: Certificate data should be submitted in English only, avoid duplicate collaboration invitations, keep certificates under the 5,000-character limit, batch large uploads for efficiency, and respect the API rate limit of five requests per second.

Most of the above guidance applies to all methods of data entry including API, CSV uploads, and the Product Registry user interface. If you have questions or concerns, reach out to efilingsupport@cpsc.gov.

President Trump's Threat to Halt Trade with Spain Averted

At the NATO summit in Turkey President Trump told reporters that he would tell the USTR to stop all Trade with Spain for Spain's delays in meeting the NATO commitment of 5% of GDP to the mutual defense. The meetings ended with all NATO countries agreeing to the mutual assessment.

Are You CTPAT?

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CTPAT is open to members of the trade community who demonstrate excellence in supply chain security practices.

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Reminder: Section 122 Scheduled to Expire July 24, 2026

As a reminder, the temporary 10% duties implemented under Section 122 of the Trade Act of 1974 are scheduled to end 150 days after implementation. These tariffs began on February 24, 2026, making the expiration date July 24. Under Section 122, these duties can only surpass the 150-day limit if they are extended by an Act of Congress. Currently, we have not had word of a continuance or replacement for these tariffs. We are actively looking for guidance from CBP on this issue. As soon as we have guidance, it will be distributed to our clients.



National Customs Automation Program Test to Begin ACH Payments of PSC Increases

As part of CBP's move towards electronic payments, CBP's NCAP test program will begin welcoming ACH payments of increases in estimated duties, taxes, and fees resulting from PSCs.

Beginning on August 5, test participants may no longer make payments for such increases via check or cash. Instead, payments will be made electronically via ACH. Any test participants wishing to make electronic payments before this date may do so.

To make electronic payments, test participants must first enroll in either the ACH Debit process or ACH Credit process. To pay via ACH Debit or Credit, test participants must follow the regular payment process implemented by CBP for ACH payments. For questions regarding the enrollment process, contact ACH-CUSTOMS@cbp.dhs.gov.

It should be noted that the full amount of the increase may be paid electronically by ACH before liquidation or participants can wait to be billed at liquidation of the entry before they make payment. Subsequent PSCs cannot be submitted until the increased duties, taxes, and fees of the previous PSC are paid in full. It should also be noted that interest payments on the increased estimated duties, taxes, and fees resulting from a PSC will not be accepted prior to liquidation. Any interest owed must be paid to CBP once the entry is liquidated.

Those wishing to view the full details of this update may do so by visiting the [federal register](#). We have not seen the final instructions on this new program. We expect the PSC, which is a retransmission of an entry summary to have the same option of a single pay statement or to be added to a Periodic Monthly Statement (PMS) as long as the PSC entry is tied to a statement to guarantee payment. We expect guidance very soon and will share it when it becomes available.

Section 232 Investigation Launched on Coal

On July 2 the Commerce Department [announced](#) the initiation of a Section 232 investigation into the effects of anthracite and metallurgical coal on national security. The investigation covers HTS numbers **2701.11.0000** and **2701.12.0010**.

The Commerce Department will be seeking comments no later than July 21 on the extend domestic coal production can meet domestic demand, the feasibility of increasing domestic capacity, whether tariffs or quotas are necessary to protect national security, and the impact of foreign practices on domestic producers.

Importers wishing to make comments on this investigation may do so using the [federal rule making portal](#).

CAPE Filing Update - Warehouse Entries

CBP has released guidance via CSMS regarding the filing of CAPE declarations for warehouse entries. Beginning July 7, warehouse entries (type 21 and 22) are no longer accepted on CAPE declarations. Warehouse withdrawals (type 31, 32, 34, 38), on the other hand, will continue to be accepted. The reason for this is duties are paid on warehouse withdrawals, not on warehouse entries.

The liquidation of warehouse entries will continue to be performed by CBP as usual once all withdrawals have been made and the warehouse entries are ready for liquidation. At that time, CBP will process any approved CAPE refunds for the IEEPA duties.

Warehouse entries previously submitted via CAPE declaration without the accompanying withdrawals will not be reliquidated with refunds of IEEPA duties. Filers should instead submit CAPE declarations for the warehouse withdrawals on which duty was paid.

No Section 232 Tariffs Coming for Aircraft and Related Parts - For Now

A [proclamation](#) released by President Trump on July 9 has announced that, for now, no Section 232 tariffs are being ordered for commercial aircrafts and related parts.

According to the proclamation, the investigation did find that imports of commercial aircrafts, jet engines, and associated parts are being imported in quantities that threaten to impair national security. The Secretary found that the US aircraft industry is too reliant on foreign supply chains and that imported parts pose safety and security risks because of quality control and counterfeiting. However, despite these findings, the Secretary recommended no immediate tariffs be imposed under Section 232 and instead recommended the President negotiate with foreign jurisdictions to address the threats to national security.

The President, after examining the findings, concurred with the Secretary's findings and has elected not to pursue Section 232 tariffs at this time and instead will attempt to negotiate agreements or continue current negotiations to address the threatened impairment. An update on the status of such negotiations will be made within 180 days of the proclamation. Depending on the status and outcome of negotiations, alternative remedies may be considered in the future.



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