

## **CBP in Los Angeles Moves to the Next Level of Measured ISF Enforcement**

When ISF Enforcement began in July, U.S. Customs and Border Protection (CBP) in Los Angeles took a measured approach in placing holds on cargo that did not have an ISF on file 24 hours prior to delivery. The holds were only placed on those shipments that were on a regular Straight Bill of lading and not on consolidated shipments. The goal of this approach was to try to bring more shipments into a higher compliance level.

This approach has worked. There has been more than a 50% reduction in the numbers of shipments that are arriving without an ISF on file. As expected CBP in Los Angeles will now raise the bar for measuring the ISF's that are not on file. In a conference call with several trade associations in Los Angeles, DFO Todd Owen explained that CBP will now hold shipments that do not have an ISF on file **48 hours** prior to the arrival of the vessel beginning Monday, October 7, 2013.

CBP in Los Angeles will also start placing holds shipments for house bills of lading in consolidated containers. The containers will not be held at the terminals. CBP will initially place a "20" manifest hold on the container to show that the hold is an ISF hold. They will then allow a Permit to Transfer to move the container(s) to the consolidator's Container Freight Station (CFS). The CFS's at the ports are not automated with CBP for receiving manifest data that includes electronic holds and releases. CBP will have to send a manual hold in writing designating which house bill of lading must be held. The remaining house bills that did have the ISF on file timely will be released as under current practice.

Consolidated containers that are held for ISF purposes will not necessarily be designated for a Non-Intrusive Inspection (NII). When the cargo is held at the CFS, CBP will determine if an exam is necessary. CBP may decide to examine the cargo at the CFS or they may request it to be examined at a Centralized Exam Site. We will watch how this is set up.