Omni Logistics

NORTH AMERICA

Customs & Trade: Monthly Insights

September 2026

North America Customs and Trade Compliance Insights is a monthly update covering key customs and trade compliance developments across the U.S., Mexico, and Canada.

Recent Tariff Activity

The U.S. trade landscape continues to evolve, with several new tariff measures. Below is a brief overview of recent developments that may impact importers and supply chains.

- **Section 232 Tariffs on Drones and Components:** New Section 232 tariffs have been announced on certain drone imports and related components, citing national security and domestic manufacturing considerations.

- **Section 232 Tariffs on Polysilicon, Solar Cells & Solar Modules:** Beginning December 4, Section 232 tariffs will apply to specified solar supply chain products, including polysilicon, solar cells, and solar modules.

- **Section 338 Canada Tariffs:** Implementation of the 50% Section 338 tariffs on certain Canadian-origin products took effect on August 22. Canada expected to enact tariffs on specific U.S. goods ranging from 15% to 50% on September 8, along with a tariff increase on steel and aluminum, totaling 50%.

- **Aluminum Smelter Incentive Program:** A new Section 232-related program will provide tariff incentives for companies investing in U.S. aluminum smelting capacity, supporting domestic production and supply chain resilience.

- **Section 201 Safeguard on Quartz Surface Products:** A new four-year tariff-rate quota (TRQ) has been implemented on certain quartz surface product imports following a USITC determination that increased imports have caused serious injury to domestic producers. The measure took effect August 15.

- **Section 232 Tariffs on Patented Pharmaceuticals:** New Section 232 tariffs on certain patented pharmaceutical products and ingredients took effect July 31 for specified manufacturers and will expand to additional covered products on September 29. Generic pharmaceuticals remain excluded.

Strengthening Customs Enforcement: CBP Implementation Measures

In response to Executive Order 14411, Strengthening Customs Enforcement, CBP is implementing new measures to enhance Importer of Record (IOR) oversight and improve the accuracy of importer data. Beginning September 18, CBP will introduce enhanced verification procedures for information submitted through CBP Form 5106 and conduct a comprehensive review of importer records. Additionally, CBP established a new "Inactive for Entry Purposes" status in ACE. It will automatically deactivate IOR accounts that have not filed an entry within the previous 366 days. Importers and customs brokers should review existing records to ensure all information on file is complete, accurate, and attributable to the IOR, as incomplete or inaccurate information may result in enforcement actions, including the voiding of an IOR number.

Read the full Federal Register notice.

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Great Transshipment Scam Report: What Importers Should Know

Following Executive Order 14411, Strengthening Customs Enforcement, the Administration has identified transshipment, country-of-origin misrepresentation, and tariff evasion through third countries as key enforcement priorities. CBP is expected to increase scrutiny of supply chains, routing patterns, substantial transformation claims, and supporting origin documentation as it strengthens customs oversight.

Importers should review origin determinations, supplier certifications, manufacturing records, and documentation processes to ensure they can substantiate country-of-origin claims and withstand potential CBP audits or inquiries.

Read the White House report, **The Great Transshipment Scam**, to understand key areas of increased CBP enforcement focus.

ACH Enrollment Remains Critical for CBP Payments and Refunds

CBP continues to urge importers to enroll in Automated Clearing House (ACH) processing, which is now the primary method for both making payments to CBP and receiving refunds. Many IEEPA refunds remain outstanding due to the lack of ACH enrollment by affected importers. To help ensure timely receipt of future refunds, importers should authorize ACH refunds through the ACE Secure Data Portal.

Notify **frn-achrefundsupport@cbp.dhs.gov** once enrollment is complete. Importers that are not enrolled to receive refunds via ACH may continue to experience refund delays or rejected refund payments.

For additional refund information, **review CBP's ACH Refund webpage**.

ACE Portal Updates: August 2026

CBP continues to enhance the Automated Commercial Environment (ACE) with several recent system updates and deployment changes. Upcoming key updates include:

- **SMS Two-Factor Authentication Coming to ACE Portal:** ACE Portal users can expect the addition of SMS-based two-factor authentication, with deployment scheduled for September 2026.
- **ACE Manifest Modernization Release 2 Accelerated:** The deployment date for ACE Manifest Modernization Release 2 is expected to go-live September 2026.

Mexico's Electronic Value Manifest (MVE) Implementation Update

The mandatory implementation date for the Electronic Customs Value Declaration (Manifestación de Valor Electrónica or MVE) has been extended to October 1, 2026. Additionally, through December 31, 2026, importers may submit a summary of valuation-related contracts and agreements in lieu of transmitting the complete supporting documents otherwise required with the electronic declaration.

Mexico importers should use this transition period to review valuation processes, identify data gaps, and prepare for full compliance.

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Canada Explores Stronger Forced Labor Requirements

Following Executive Order 14411, Strengthening Customs Enforcement, the Administration has identified transshipment, country-of-origin misrepresentation, and tariff evasion through third countries as key enforcement priorities. CBP is expected to increase scrutiny of supply chains, routing patterns, substantial transformation claims, and supporting origin documentation as it strengthens customs oversight.

The consultations are also seeking input on potential supply chain due diligence requirements and civil liability provisions that could require businesses to identify, prevent, and address labor exploitation risks within their operations and supply chains.

CAPE Phase 3 Refund Processing Delayed

CBP has postponed the deployment of CAPE Phase 3, originally scheduled for August 20, 2026, after identifying additional programming requirements needed to properly process IEEPA refunds associated with finally liquidated entries. Additional functionality is required to prevent incorrect duty calculations, and CBP is devoting all available resources to developing an updated solution.

Until a revised deployment date is announced, CAPE declarations should not be submitted for entries that are more than 80 days past their liquidation date. Importers pursuing IEEPA-related refunds should continue monitoring CBP updates for further guidance and implementation timelines.

Contact Our Customs Experts