



NCBFAA

National Customs Brokers & Forwarders Association of America, Inc.

www.ncbfaa.org

Uyghur Forced Labor Prevention Act (UFLPA) Region Alert Takes Effect March 18

Customs and Border Protection (CBP) on March 18 will deploy the [Uyghur Forced Labor Prevention Act \(UFLPA\) Region Alert enhancement to ACE](#). This enhancement will provide an early notification to customs brokers and their clients of goods that may have been produced in the Xinjiang Uyghur Autonomous Region and possibly excluded from import into the U.S. **This enhancement includes electronic data interchange (EDI) impacts. Customs brokers should carefully review this change and understand how it will impact their business operations. The NCBFAA Customs Committee provides members this insightful review of the UFLPA Region Alert.**

The Chinese postal code requirement for the Manufacturer (MF) Party and CBP's edit for the code exist in the release data set only (SE data). The release data set requires the name and address for the manufacturing party, not the MID. The MID is required with the entry summary data set at the line level, but depending on how your software works, the data for the summary may populate the release data set unless you are doing a true two-part process, filing the release, and then subsequently following up with an entry summary a few days later. The best practice is, whenever you are entering a Chinese name and address for the purposes of release, a postal code will be required for the MF Party. Generally, the party you enter in the release data set for the manufacturer should match the MID you enter for entry summary. The rules about whether you enter the actual manufacture, or the shipper or invoicing party have not changed, so if the goods are textiles, the actual manufacture name and address will be required in the release data set, and the MID for the actual manufacturer will be required for summary.

1.) Entry Processing (Cargo Release)

- a.) Postal Code will be required when transmitting an entry for the **MF (Manufacturer) Party**.
- b.) For the MF party, the name and address are transmitted in the cargo release data set (not the MID Code).
- c.) Postal Code is only required when the country is reported as China (CN) in the SE36 and/or SE56 record of the MF Party.
 - The SE30, SE35, and SE36 records are used to report a party at the header level.
 - The SE50, SE55, and SE56 records are used to report a party at the line level.

Example MF party name and address

SE30 MF SAMPLE COMPANY INC
SE35 STREET ADDRESS
SE36 CITY NAME 836200 CN

SE50 MF SAMPLE COMPANY INC
SE55 STREET ADDRESS
SE56 CITY NAME 836200 CN

d.) Cargo Release will receive a reject message if the postal code provided is missing or is not a valid Chinese postal code.

e.) Cargo Release will receive a warning message when a Xinjiang Uyghur Autonomous Region (XUAR) region postal code is provided.

ABI C/R Status Code statuses for the new Postal Code:

- POSTAL CODE REQUIRED FOR COUNTRY – SE DATA REJECTED
- INVALID POSTAL CODE FOR THE COUNTRY – SE DATA REJECTED
- UFLPA FLAG XUAR POSTAL CODE – SE DATA ACCEPTED WITH WARNINGS

Entry Summary Certified for Cargo Release Transmission

- The Manufacturer (MF) party is reported in the SE30/35/36 and/or SE 50/55/56, records.
- The MID Code is reported at the line level AE 47-Record.
- Entry could have a C/R reject/warning for Postal code in the MF Party based on the SE portion of the transmission.
- Entry Summary will accept, and cargo may reject (even if the MID code does not have an associated postal code).

Cargo Release Only Transmission

- The Manufacturer (MF) is reported in the SE30/35/36 or SE 50/55/56 records.
- MID Code is not sent for cargo release.

Entry Summary Only Transmission

- No Manufacturer (MF) party name and address transmitted in the AE.
- The MID Code is reported in the at the line level AE 47-Record

Entry Summary would be accepted for the MID Code (even if the MID code does not have an associated postal code, had an invalid or a Xinjiang Uyghur Autonomous Region (XUAR) Postal Code.

Country of Origin China

Country of Origin is not part of the new Postal Code alert. For example, goods are invoiced by a Hong Kong shipper but the country of origin is China. The MID reported is the shipper from Hong Kong, i.e. the MID starts with a "HK." The cargo release record will show the Hong Kong

shipper name and address, while the entry summary MID will start with HK. No postal code is required for either party.

Note: As noted above the rules for determining the “manufacturer” have not changed. This example assumes the goods are not textiles which require the reporting of the actual manufacturer. In that case a China manufacturer is reported and the postal code will be required.

2.) MID Add/Update

- Manufacturer Identification Code (\$I) application is used for creating or updating a Manufacturer Identification Code with a city located in China (CN).

New MID ADD

- All New MID created on or after March 18 will require a Postal Code for entities with an address with country China (CN).

Existing MID Update

- This new functionality will provide the ability to update an existing MID with a postal code.
- It is not mandatory to update existing China MID to add the Postal Code. It is dependent on the ABI software provider and how the software provider is using the MID query results to populate the MF party in the Cargo Release transmission.

3.) Postal Code Lookup Resources

[World Postal Code Search](#)

<https://worldpostalcode.com/china/>

<https://worldpostalcode.com/china/xinjiang/>

4.) Entry/MID receives the UFLPA Postal Code warning message

- If the entry/MID receives a warning message “UFLPA XUAR POSTAL CODE”, importer is to be made aware of the rebuttable presumption established by UFLPA.
- Importers may request an exception to the rebuttable presumption from CBP during a detention, after an exclusion, or during the seizure process as described in the [UFLPA Operational Guidance for Importers](#) on page 9:

o [More detailed FAQs](#)

o [Best Practices for Applicability Reviews](#)

o [Guidance on Executive Summaries and a Sample Table of Contents](#)

5.) What additional resources are available?

- For questions about UFLPA Region Alert, contact UFLPAINQUIRY@cbp.dhs.gov.
- Technical issues: Contact the ACE Help Desk by phone (866) 530-4172 or via email at ace.support@cbp.dhs.gov.

- Additional information about UFLPA is available here (<https://www.cbp.gov/trade/forced-labor/UFLPA>).

FAQs:

1. **Q:** What is the MF party?

A: The MF party is the manufacturing party. However, Customs has ruled the invoicing party, shipper, exporter, or manufacturer can be submitted as the MF party.

2. **Q:** For all products with a country-of-origin China (CN), is an MID indicating the name, address and postal code of the actual manufacturer required?

A: It depends if it is a textile or non-textile shipment, or if there are any other agency requirements that require you to declare the actual manufacturer. Per 19 CFR 102.23 (a) - Textile or apparel product manufacturer identification - the postal code referenced on the MID must be the address of the actual manufacturer. For non-textile shipments, importers can still list the third party in another country as the MID. The postal code enhancement alert would not apply.

Manufacturer/Supplier*: ([Entry Summary Instructions](#))

Record the entity that manufactures, produces, or grows the imported commodity. These entities produce or grow raw material or by labor, art, or skill transform raw material into some kind of finished product or article of trade. The transformation of the raw material may involve processing into finished goods, or the production of goods to be further assembled to create a finished product, or the assembly of goods into a finished product.

**Except when import laws, rules, and regulations of the United States require the identification of the manufacturer, a supplier may be reported in this field. The supplier may be the invoicing party or parties whose commercial invoice is required for entry, whether it is presented at entry.*

3. **Q:** What do valid Chinese postal codes look like?

A: Postal codes from China are six numerical digits. They do not include letters or any additional numbers or letters beyond six. Examples are 853012, 448331, and 663312.

4. **Q:** Will all shipments with the UFPLA zip code warning be detained automatically pending CBP's review of documents demonstrating that the imported merchandise complies with the UFLPA?

A: No, shipments will not be automatically detained. Shipments will only receive a warning flag if it is from the Xinjiang/XUAR region and these shipments are presumed to be made with forced labor. When shipments with UFLPA warning flag arrive in the U.S., they will be immediately excluded and the Port Director will issue an exclusion notice to the importer.

5. **Q:** If an incorrect Zip code is transmitted at the time of cargo release, how does the trade correct or report the incorrect Manufacturer Postal code was transmitted?

A: We can only send C/R corrections in limited scenarios. This is not something we can fix on a PSC.

Pending guidance from CBP.

If an incorrect postal code is transmitted at the time of cargo release, any time prior to the arrival of cargo, the filer can request and transmit a replacement or correction record and depending on various circumstances, the system will automatically accept the replacement record or a CBP personnel will need to review the request and decide whether to approve/deny the correction request. CBP understands there are circumstances where clerical errors may occur at time of transmission, so these requests are reviewed on a case-by-case basis. Correct, a PSC will not be allowed to correct this error.

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IMPORTANT NOTE: CBP's Trade Transformation Office (TTO) will hold a post-deployment support call for trade users on March 21 at 3 p.m. ET. A Teams Meeting Link will be provided (See [CSMS #55403002](#)). Participants are encouraged to join at the start of the call when CBP will provide a brief deployment status update. A Q&A segment will follow. Calls may end early if all questions have been addressed, CBP said.



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