

September 2, 2026

CBP Is Putting Technology Behind Enforcement

What It Means For Your Entries — and What We'll Be Asking Of You

U.S. Customs and Border Protection is moving toward data- and technology-driven targeting, and that shift is now backed by funding, an executive order, and a rule CBP proposed today. For importers, the practical result is more scrutiny of entry data and the parties behind each shipment. There are multiple factors driving this, both legal and regulatory.

Congress Allocated Funding

The 2025 reconciliation law (Public Law 119-21) directs CBP to procure and integrate new nonintrusive inspection equipment and associated technology — **including artificial intelligence, machine learning, and other innovative technologies** — to detect illicit goods at ports of entry and along the borders. Those funds are available through September 30, 2029, giving CBP a multi-year runway to deploy detection and targeting tools.

The Direction Is Set

On June 3, 2026, the President signed Executive Order 14411, *Strengthening Customs Enforcement*. It directs heightened import-disclosure requirements, reinforces that importers of record must be correctly identified and accountable for the duties they owe, and calls on CBP to strengthen enforcement against customs fraud — including violations tied to forced labor, rules of origin, marking, intellectual property, revenue, and product safety.

CBP Is Already Acting On It

Two developments make this concrete:

1. On August 19, 2026, CBP announced enhanced procedures to verify the accuracy of importer-of-record information submitted on CBP Form 5106 — an initial step implementing Executive Order 14411.

2. Today, CBP issued an Advance Notice of Proposed Rulemaking, *Heightened Import Disclosures for Supply Chain Visibility*. In it, CBP states that it is evaluating artificial-intelligence-driven solutions to pinpoint illegal transshipment risk, and it asks the trade to comment on new requirements for identifying the parties behind imported goods, tracing supply chains with technology, and submitting foreign export documentation. Comments are due within 90 days of publication — on or about December 1, 2026 (Docket USCBP-2026-1058).

What this means for your shipments.

As CBP's targeting becomes more data-driven, importers are more likely to receive a CBP Form 28 (Request for Information) or a CBP Form 29 (Notice of Action). These are routine tools CBP uses to verify the value, classification, origin, or other details of an entry. Receiving one is not an accusation of wrongdoing — but it does require a timely, accurate, well-documented response, and the volume of these requests is rising.

Why We'll Be Asking More Of You

In this environment, accurate importer identity and entry data matter more than ever. That is why we may ask you to reconfirm the details behind your Power of Attorney and your company information before we file. Under the Customs Modernization Act, the legal responsibility for the declared value, classification, and rate of duty rests with the importer of record; our role is to submit accurate, complete filings on your behalf once your information is confirmed. Reconfirming those details up front is how we keep your entries clean and help you meet the reasonable-care standard CBP expects.

The Payoff Is Fewer Surprises

Accurate data submitted the first time means fewer holds, fewer post-entry corrections, and fewer unwelcome surprises for your finance team. We don't eliminate this complexity — we control it, from classification to clearance to post-entry follow-up.

If your business wants to weigh in on the proposed supply-chain-visibility requirements, comments may be submitted through [regulations.gov](https://www.regulations.gov) under Docket USCBP-2026-1058 within the 90-day comment window (on or about December 1, 2026). Questions

about legal strategy or your comment position are best directed to your customs and trade counsel; our compliance team is here for the operational and filing side.