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The following comments are in regards to the Ocean Electronic Export Manifests:

Burden Hours: The estimated burden hours for Ocean EEM is listed as 1.5 mins per response. Ocean EEM mirrors the requirements of the inward Cargo Declaration (CF 1302) which lists the estimated burden hours as 30 mins per response. EEM filings require a significant amount of time to gather the newly required information, input the data, verify ACE receipts, submit departure notices, amend the EEM once actual Bill of Lading figures are known and submit any additional amendments as needed to reflect changes to the cargo or voyage details. We believe the Burden hours for Ocean EEM should be 30 mins to match the import side. There are only minor differences between the two requirements and the amount of data required and the process for submitting the manifests are almost identical.

CAMIR: CBP should continue to include the option of coding Ocean EEM in CAMIR. Many carriers have already completed their programming accordingly to this format.

Time requirements: The current CF 1302A must be filed within 4 business days of vessel's departure. EEM drastically changes the time requirements by at least 5 days, requiring the manifests to be submitted 24 hrs prior to loading. The time requirements have been very difficult for our clients to satisfy during the Pilot, so much so that most are no longer filing EEM until it becomes mandatory. It would be helpful to the trade if only a partial EEM was required initially with the vessel and loadport details only, and allow the remaining cargo details (Shipper, Consignee, Notify, etc) to be added up to 4 business days after vessel's departure.

Timing of amendments: In the tanker business it takes several days minimum for a CBP approved gauger to issue an out turn report with confirmed cargo figures. The receiver and destination port may also be unknown or unconfirmed for quite some time after a vessel loads and sails from the U.S. This information also frequently changes as the cargo can be traded many times while at sea. CBP should consider this when determining the time requirements for the original filing as well as the amount of time allowed to make amendments. It would be helpful to the trade if the time allowed for amendments matched the time requirements on the Shipper's side with the AES filings.

EEM Amendment regulations: When regulations are published, it will be very beneficial to the trade community if clear amendment guidelines are included. The trade should be advised which data fields are amendable and the time requirements of such amendments.

Country of Ultimate Destination: This data element should not be mandatory on Ocean EEM filings. Once the cargo passes the exporting vessel's cargo manifold and is discharged, the carrier no longer has any knowledge or responsibility for the cargo. One area of concern is with the lightering business. During ship to ship cargo transfers that take place offshore and outside of the US Customs Territory, the cargo is passed to another vessel that usually belongs to a different carrier. In these cases, once the exporting vessel discharges the cargo to another vessel, they are no longer involved with the cargo's movement. Their contract and responsibility with the Charterer ends. Hence, they will not have any further knowledge of the cargo movement, including any changes to the country of ultimate destination.