Client Advisory

May 17, 2022

FSVP & AIM No Longer Permitting "Unknown" As Data Elements

Dear Valued Customer,

Two government agencies will be ending their temporary policy of allowing importers to declare "unknown" for certain data elements. Importers subject to either import requirements will need to obtain the required elements prior to the deadlines listed below.

Foreign Supplier Verification Program (FSVP) to Require DUNS Number Instead of "UNK" (Unknown) Beginning July 24, 2022, the U.S. Food and Drug Administration (FDA) will end its temporary policy of allowing importers to declare "Unknown" as an entity identification code when a Unique Facility Identifier (UFI) number was not known at the time of entry. Importers of food will be required to obtain a nine-digit DUNS number and report it in the FDA FSVP entity field. CBP will reject any food entries that do not contain a valid DUNS number in the entity number field.

Please see FDA's published guidance for additional information: <u>Guidance for Industry: Compliance with Providing</u> an Acceptable Unique Facility Identifier for the Foreign Supplier Verification Programs for Food Importers Regulation

U.S. International Trade Administration to Require Country of Smelt for Aluminum LicensesEffective June 29, 2022, the U.S. International Trade Administration's (U.S. ITA) Aluminum Import Monitoring and Analysis (AIM) system will require that all license applications must declare the countries of the largest smelt and second largest smelt. Importers were previously allowed to enter "unknown" in those fields during the transition period of the AIM program.

Country of smelt for the largest and second largest volume of primary aluminum is defined as the country where the "largest volume of new aluminum metal is produced from alumina (refined aluminum oxide) by the electrolytic Hall-Heroult process".

Please visit the U.S. ITA's website on aluminum import requirements for additional information https://www.trade.gov/updates-aluminum-import-licensing.

Thank you for being our Valued Customer. If you have any questions, please do not hesitate to contact your C.H. Robinson commercial representative for further information.

Sincerely, C.H. Robinson

Our information is compiled from a number of sources that to the best of our knowledge are accurate and correct. It is always the intent of our company to present accurate information. C.H. Robinson accepts no liability or responsibility for the information published herein.