Washington Tariff & Trade Letter

Vol. 43, No 14 April 3, 2023

Critical Minerals Pact with Japan and EV Tax Credit

The United States and Japan have struck a trade deal on critical minerals used in the production of electric vehicle batteries. The agreement is meant to reduce both countries' dependence on countries like China for critical minerals, senior Administration officials told reporters.

In a related move, the Treasury Department published proposed content rules for the critical minerals content required for eligibility for the electric vehicle tax credits in the Inflation Reduction Act.

Key Congressional lawmakers from both political parties chided the Administration, blasting the Administration for negotiating a trade deal without Congressional approval, echoing comments made to US Trade Representative Katherine Tai during hearings before the two trade committees last week.

"It's clear this agreement is one of convenience," **Senate Finance Committee Chairman Ron Wyden (D-Ore)** and **House Ways and Means Committee ranking Democrat Richard Neal (Mass)** said in a joint statement. "As we warned Ambassador Tai last week, the Administration does not have the authority to unilaterally enter into free trade agreements. Human rights, environmental rights, and economic opportunity are all closely interwoven, and had the Administration wanted to include meaningful labor or environmental protections in this agreement, they would've engaged Congress."

According to a joint fact sheet, the deal "supports workers and businesses in both countries' electric vehicle sectors and sets standards for other economies to emulate."

House Ways and Means Committee Chairman Jason Smith (R-Mo) complained that the agreement will result in the Administration handing out "US taxpayer dollars to foreign nations and risk American jobs solely to advance its radical 'green' energy agenda."

The United States currently is negotiating a similar agreement with the European Union. **European Commission Executive Vice President Margrethe Vestager** said on Thursday that she is optimistic that an electric vehicle battery minerals trade agreement can soon be reached with the U.S. that is similar in substance to Washington's deal this week with Japan, according to *Reuters*.

© Copyright 2023 Gilston-Kalin Communications LLC P.O. Box 7592, Arlington, VA 22207 All rights reserved. Subscription and corporate site license information 301.460.3060

www.wttonline.com

Editor: Frank Ruffing +1.703.283.5220. fruffing@traderegs.com

Vestager told reporters in Washington that European Union and U.S. negotiators are working on legal frameworks that would be different from the Japan deal. "And that is what has been holding up things, but we are quite optimistic that we can reach an agreement about the same sort of substantial scope as the Japanese,"

Japan, the EU and South Korea have been complaining that their EV auto and battery manufacturers would be discriminated against by the tax credit for electric vehicles included in last year's Inflation Reduction Act. Following is a fact sheet on the agreement.

The **Agreement establishes several new commitments** and areas for joint cooperation regarding electric vehicle battery critical minerals supply chains between the United States and Japan, including those related to:

- Non-imposition of export duties on critical minerals;
- Domestic measures to address non-market policies and practices of other countries affecting trade in critical minerals;
- Best practices regarding review of investments within their territories in the critical minerals sector by foreign entities;
- Measures that promote more resource efficient and circular economy approaches to reduce the demand for, and environmental impact of, virgin material extraction and related processes;
- Engagement, information-sharing, and enforcement actions related to labor rights in critical minerals extraction and processing;
- Remedying violations of labor rights at entities connected to critical minerals supply chains; and
- Promoting employer neutrality in union organizing and operations.

Content Rules for Tax Credit

Treasury Friday announced the proposed "30D" tax credits for electrical vehicles as provided in the Inflation Reduction Act, specifying content requirements for batteries and battery materials.

The Notice of Proposed Rulemaking (NPRM) provides clarity and certainty to manufacturers on the Inflation Reduction Act requirements that vehicles eligible for the clean vehicle credit undergo final assembly in North America and do not exceed a Manufacturers Suggested Retail Price of \$80,000 for a van, pickup truck, or sport utility vehicle, or \$55,000 for any other vehicle.

To be eligible for a \$7,500 credit, clean vehicles must meet sourcing requirements for both the critical minerals and battery components contained in the vehicle. Vehicles that meet one of the two requirements are eligible for a \$3,750 credit.

To meet the **critical mineral requirement** and be eligible for a \$3,750 credit, the applicable percentage of the value of the critical minerals contained in the battery must be *extracted or processed in the United States or a country with which the United States has a free trade agreement, or be recycled in North America—as mandated by the Inflation Reduction Act.*

• For 2023, the applicable percentage is 40 percent, gradually increasing to beginning in 2027, the applicable percentage is 80 percent.

To meet the **battery component requirement** and be eligible for a \$3,750 credit, the applicable percentage of the value of the *battery components must be manufactured or assembled in North America*—as mandated by the Inflation Reduction Act.

• For 2023, the applicable percentage is 50 percent, gradually increasing to 100 percent by 2029

In addition, starting in 2025, battery minerals cannot come from a "foreign entity of concern," mainly China and Russia. Battery parts cannot be sourced in those countries starting in 2024; minerals can't come from those countries in 2025

Sen. Joe Manchin (D-WV) negotiated the terms in the new law that require battery sourcing in North America. In January, he introduced the American Vehicles Security Act of 2023 (S.63), which would compel Treasury to a strict interpretation of tax credit eligibility.

"The IRA is first-and-foremost an energy security bill, and the EV tax credits were designed to grow domestic manufacturing and reduce our reliance on foreign supply chains for the critical minerals needed to produce EV batteries," said Mr. Manchin introducing the bill.

Friday Mr. Manchin said "It is horrific that the Administration continues to ignore the purpose of the law which is to bring manufacturing back to America and ensure we have reliable and secure supply chains. American tax dollars should not be used to support manufacturing jobs overseas."

Other observers were sanquine. "We now know the EV tax credit playing field for the next year or so. March 2023 was as good as it gets.," notes **John Bozzella**, **president and CEO of the** *Alliance for Automotive* **Innovation.** "How many EVs meet all those requirements and qualify for the full \$7,500 credit now? My best guess: few of the 91 models currently for sale. Some EVs will certainly qualify for a partial credit. "Given the constraints of the legislation, Treasury's done as well as it could to produce rules that meet the statute and reflect the current market."

Second USMCA Action Against US-Owned Maquiladora

The US and Mexico announced a course of remediation to address repeated denials of rights at a **Troy Michigan-based VU Manufacturing's** automotive components facility in Piedras Negras, Coahuila, Mexico three miles from the US border.

This announcement marks the third time the United States and Mexico have agreed on a formal course of remediation under the United States-Mexico-Canada Agreement's (USMCA's) Facility-Specific Rapid Response Labor Mechanism (RRM), and the second time for this facility. As previously reported, **all USMCA Labor enforcement actions to date have involved US - owned factories violating Mexican labor law.**

Mexico has concluded that workers at the facility are being denied their right to freedom of association and collective bargaining.

Under the course of remediation, Mexico will, among other things:

- Initiate sanctions proceedings against individuals, labor organizations, or companies found to have violated Mexican law in connection with this matter;
- Link the Administrative findings of violations with proceedings in Mexican courts by filing the evidence gathered and findings made during the Government of Mexico's review of this matter with the courts;
- Invite the local Judicial Power in Coahuila, as well as other judicial authorities from across the country, to participate in training on collective bargaining issues;
- Ensure that complaints about anti-union threats and violence are properly investigated and addressed by the relevant authorities;
- Conduct workers' rights training at the Manufacturas VU facility and monitor the facility with regular inspections;
- Ensure Manufacturas VU makes and abides by a public, written statement committing to respect the rights of freedom of association and collective bargaining;
- Ensure U.S.-based company executives visit the facility to further assure workers of these commitments;
- Ensure the company takes appropriate action including termination against human resource staff found to have violated workers' rights;
- Ensure the company restructures its human resources department with new personnel who commit to not discriminate or engage in favoritism among unions; and
- Ensure the company will not impede La Liga Sindical Obrera Mexicana's (LSOM's) attempts to restore or exercise their right to represent workers for purposes of bargaining at the facility

The agreed-upon deadline for remediation is September 30, 2023.

This is the second RRM action involving VU Manufacturing. In June 2022, LSOM and CFO filed a separate RRM petition concerning this facility, and in July 2022, the United States Trade Representative invoked the RRM by requesting Mexico conduct its own review. Mexico subsequently found a denial of rights had occurred, but had been successfully remediated by the time of Mexico's report.

Remediation included a free and fair vote for representation at the facility, which LSOM won. USTR announced the successful resolution of that matter on September 14, 2022. Labor conditions deteriorated after that point, leading to the second petition, second request for review, and the course of remediation being announced today.

VU Manufacturing's primary focus is the cut and sew of "soft trim" vinyl products and assemblies for the Automotive, Marine, and Medical industries.

Wyden Continues Auto Parts Rights Campaign

Senate Finance Committee Chairman **Ron Wyden** (D-Ore) is ramping up his investigation into auto supply chain links to forced labor in the Xinjiang region of China, after automakers failed to provide details about their supply chains following an earlier request.

The senator sent letters to eight major automakers and tier one suppliers seeking information about how the companies source materials and oversee their supply chains.

The new round of questions come after initial requests to the automakers last December failed to provide specific details about how corporations oversee supply chains to ensure no goods made with forced labor are used in autos.

In their responses, the automakers suggested that their suppliers bare the responsibility for making sure their supply chains do not include goods made with forced labor.

Letters were sent requesting further supply chain information from the eight automakers – American Honda, Ford Motor, General Motors, Mercedes-Benz USA LLC, Stellantis NV, Tesla, Toyota Motor North America and Volkswagen Group of America.

Request to Suppliers

The senator also sent letters to the automakers' immediate – or tier 1 – suppliers requesting information about how those companies source materials and monitor their supply chains. The suppliers are: Continental AG, DENSO Corporation, Magna International, Robert Bosch GmbH, and ZF Friedrichshafen AG.

"Information I have learned from the initial stages of the Committee's investigation raises serious questions about tier 1 suppliers' ability to ensure that sub-suppliers do not rely on forced labor," Sen. Wyden wrote in his letters to the suppliers.

"I recognize that tier 1 suppliers rely on complex supply chains to source thousands of parts from across the world. However, this complexity cannot cause the United States to compromise its fundamental commitment to upholding human rights and US law."

Finance's investigation was sparked by a report by researchers at the **Helena Kennedy Centre for International Justice at Sheffield Hallam University,** which found links between Chinese companies operating in Xinjiang and automakers that import parts from them, including batteries, wiring and wheels.

Yellen on Beneficial Ownership Reform

Treasury Secretary Janet Yellen announced Tuesday a <u>commitment</u> by the United States and more than twenty foreign governments to enhance beneficial ownership transparency. [edited for brevity]

"At the first Summit for Democracy in 2021, I described corruption as a 'common adversary' for democracies everywhere. Since then, we have all witnessed the dangers and damage that this adversary has inflicted across the globe.

Corruption has fueled the rise of kleptocratic regimes that are divorced from the interests of their own citizens. Corruption allowed Vladimir Putin and Russian oligarchs to squander their nation's wealth to fund

their illegal war against Ukrainian civilians. Last month, Corruption has also fueled political dysfunction in countries like Lebanon. It has subjected nations to cycles of deteriorating economic conditions.

We know that corruption's effects spill across borders. We have seen corrupt foreign officials bury stolen funds in U.S.-based shell companies; kleptocrats launder kickbacks through anonymous purchases of foreign real estate; and elites move corrupt proceeds through complicit or unwitting financial gatekeepers like attorneys or wealth managers.

I'd like to focus today on what we are doing both at home and with partners across the world to tackle corruption.

Domestic Efforts

Over the last few years, the Treasury Department has been hard at work building key infrastructure to fortify our financial system—and those investments will soon begin to pay off. By this time next year, it will be more difficult for corrupt and criminal actors to hide their identities and wealth behind anonymous shell companies in the United States.

Starting January 1, 2024, many companies formed or operating in the United States will be required to report information about their beneficial owners—that is, the real people who own or control a company.

Unmasking shell corporations is the single most significant thing we can do to make our financial system inhospitable to corrupt actors.

Treasury has a lot of work to do to realize this promise – including by advancing additional rulemakings that need to be calibrated carefully. The database must be highly useful to all of its stakeholders. It must also ensure that firms—some of them very small businesses—understand their obligations.

We're putting a particular focus on excluding corrupt actors from investing in, profiting from, and laundering money through investment firms as well as through purchases of U.S. real estate. By one estimate, illicit actors laundered at least \$2.3 billion through U.S. real estate between 2015 and 2020. And the real number is almost certainly much higher. Treasury is working to remove that anonymity – and capture information about residential and commercial transactions not covered by our Bank Secrecy Act or beneficial ownership regimes.

International Efforts

Without a strong and unified global approach, corrupt actors will continue to exploit financial loopholes and lightly regulated jurisdictions. We're particularly focused on raising international standards for anti-money laundering at forums like the Financial Action Task Force, or FATF.

In October, the FATF agreed to undertake three major projects to enhance global anti-corruption efforts.

• First, it will enhance assessments of countries' implementation of the **United Nations Convention Against Corruption.**

- Second, it is addressing the use of "golden passports" by corrupt actors to hide their activities through the use of new identity documents.
- And third, it is working to reduce the ability of corrupt actors to take advantage of **financial gatekeeping professions** across all jurisdictions.

I am also pleased to launch today a commitment by the United States and more than twenty foreign governments and authorities participating in this summit to enhance beneficial ownership transparency. I want to specifically highlight the *Financial Transparency and Integrity Cohort*, which was launched at the first Summit. This cohort has brought together a broad range of stakeholders to consult and coordinate on anticorruption issues.

I'm confident that we can work to build a level playing field. This is our responsibility as democracies: to forge a world in which free institutions can thrive and in which those who play by the rules have the best chances of success." [full text]

More Polite Talk About Self-Disclosure and Declinations

Assistant Attorney General Kenneth Polite clarified the Department's new **Corporate Enforcement Policy** at the Global Investigations Review DC Spring Conference, Washington, DC, March 23. Remarks condensed for brevity [original]

Take, for instance, the revisions to the Criminal Division's **Corporate Enforcement Policy** that I announced at Georgetown in January. Since that announcement, many have focused on the policy's provisions regarding "immediate" voluntary self-disclosure and "extraordinary" cooperation and remediation. Do not lose sight of the CEP's larger context.

Since 2017, the then-FCPA CEP – which was extended to the rest of the division in 2018 – has provided that, absent aggravating factors, if a company voluntarily self-discloses misconduct, fully cooperates with our investigation, and timely and appropriately remediates, it can earn a presumption of a declination. But recall that "voluntary self-disclosure" is also defined to require, among other things, disclosure "within a reasonably prompt time after becoming aware of the misconduct."

The new CEP released in January does not disturb this well-trodden path to a declination. Instead, **our revisions provide an additional avenue toward a declination** for companies that voluntarily self-disclose, cooperate, and remediate but have aggravating factors and would otherwise be ineligible for a presumption of declination.

The much focused-upon terms in the revised CEP like "immediate" and "extraordinary," apply only when there are aggravating factors. Absent such circumstances, if companies voluntarily self-disclose, fully cooperate with our investigations, and timely and fully remediate, they can rely on a presumption of a declination. This has been, and remains, the case.

But we understand that companies may wish for more to guide their decision-making now. A company with aggravating factors that is contemplating self-disclosure may want to know what exactly it needs to do to receive a declination under the revised CEP.

That is why, when I announced the revisions in January, I noted that to receive credit for extraordinary cooperation, companies must go above and beyond the criteria for full cooperation set out in our policies – not just run of the mill, or even gold-standard cooperation, but truly extraordinary. And I noted some concepts – immediacy, consistency, degree, and impact – that will help to inform our approach to assessing what is "extraordinary."

The most effective remediation, however, includes conducting root cause analyses and taking action to prevent the misconduct from occurring, even in the face of substantial cost or pressure from the business.

This can require significant structural changes to a company to ensure compliance and legal personnel have adequate access to corporate decisionmakers and receive necessary information from the business. A company's remediation can also hold wrongdoers accountable, whether through termination, suspension, or recoupment of compensation.

Therefore, regardless of the specific acts taken, when assessing whether remediation has been "extraordinary," we will consider if the action has been comprehensive, tailored to the causes of the misconduct under investigation as well as other potential wrongdoing, and able to prevent it from recurring.

For that is our ultimate aim: to incentivize companies to invest heavily in designing and implementing effective compliance programs that can deter, prevent, and, if necessary, detect criminal conduct.

We have consistently decided *not* to offer prescriptive guidance but instead, through our Evaluation of Corporate Compliance Programs (ECCP), established criteria and questions that our prosecutors can ask when assessing these programs.

Compensation systems and the use of messaging applications may be more relevant for some companies than others depending on the organization's risk profile, geographic footprint, industry, and the like. While they are undoubtedly important, do not ascribe them undue weight. Do not forget all the other aspects that make an effective compliance program. The ECCP, by design, does not elevate any one aspect of compliance above any other.

Of course, our recently announced Pilot Program is new. Over the next three years, we will require companies that enter into criminal resolutions to implement compliance-related criteria in their compensation systems and will offer fine reductions to companies that seek in good faith to clawback compensation from appropriate individuals.

For years, our prosecutors have considered how we can best achieve our mission and put those ideas into practice. We have used these experiences to determine how we can encourage good corporate citizenship, incentivize the investment in robust compliance programs, and further our primary goal of individual accountability.

Maybe it is the company that, even though it has a history of misconduct, decides to self-disclose new wrongdoing to achieve a potential declination. Perhaps it is the Chief Compliance Officer who convinces the CEO to invest in additional personnel to adequately respond to internal reports of wrongdoing. Or maybe it is the executive who sees our recent insider trading case and decides to think twice before hitting "Sell."

The point is that through our words and actions, we can effectuate change. Change rooted in transparent, effective, and predicable government action, which serves to benefit us all.

Wells Fargo Fined for Lax Sanctions Compliance

The Treasury and Federal Reserve have jointly fined Wells Fargo Bank nearly \$100 million for failing to prohibit sanctions violations conducted on its trade finance platform *Eximbills* over a period of seven years. The San Francisco Bank. agreed to pay OFAC \$30 million to settle its potential civil liability for 124 apparent violations of three sanctions programs. The Federal Reserve fined Wells Fargo an additional \$67.8 million for inadequate oversight.

For about seven years beginning in 2008 and ending in 2015, Wells Fargo, and its predecessor, Wachovia Bank ("Wachovia"), provided a foreign bank located in Europe with software that the foreign bank then used to process trade finance transactions with U.S.-sanctioned jurisdictions and persons.

Wells Fargo did not identify or stop the European bank's use of the software platform for trade-finance transactions involving sanctioned jurisdictions and persons for seven years despite potential concerns raised internally within Wells Fargo on multiple occasions following Wells Fargo's acquisition of Wachovia.

Wachovia specially designed a customized version of Eximbills for Bank A to "host" on Bank A's own systems, in part so that Bank A could use Eximbills to handle international trade finance instruments involving OFAC-sanctioned jurisdictions and persons. Nonetheless, Bank A's use of the Hosted Eximbills platform continued to rely on Wachovia's (and then Wells Fargo's) technology infrastructure at the bank's branch in Hong Kong and data facility in North Carolina to manage the 124 non-OFAC- compliant transactions.

A lack of clear communications within Wachovia resulted in different interpretations about whether OFAC prohibitions would be implicated by Wachovia's provision of the Hosted Eximbills platform to Bank A. Regardless, Wells Fargo's senior management should reasonably have known that Bank A was using the Hosted Eximbills platform to engage in transactions with OFAC-sanctioned jurisdictions and persons

Wells Fargo compliance and legal personnel reviewed the trade insourcing business, including by retaining a third-party consultant to review certain relevant anti-money laundering and sanctions controls. This review did not identify any sanctions compliance risks specific to the Hosted insourcing business, but one of the consultant's main conclusions was that contracts with insourcing clients contained inconsistent anti-money laundering and sanctions compliance clauses, a finding that prompted Wells Fargo to begin the process of reviewing and standardizing its insourcing contracts.

In July 2014, an internal audit report found that the insourcing business line needed corrective action because the agreements with various clients were negotiated individually, which resulted in inconsistencies. However, Wells Fargo's internal audit team did not specifically review the Hosted Eximbills platform business because the audit team relied on the relevant business line's self-assessment that the software platform was not high risk.

*** Briefs ***

Vice President Kamala Harris announced new initiatives aimed at boosting trade with Tanzania as she continued her visit to African countries to promote closer economic ties and offer an alternative to China. During a meeting with Ms. Harris, Tanzania President Samia Suluhu called for a 10-year renewal of the African Growth and Opportunity Act – which remains the biggest US trade initiative with the continent. [Full Report]

WTO Director-General Ngozi Okonjo-lweala told US business leaders to diversify their supply chains to business-friendly developing countries that have not seen the benefits of trade. The Director-General also emphasized the importance of the WTO putting more emphasis on services trade, which is growing quickly and has implications for efforts to deal with climate change. "The future of trade in services is green and it should be inclusive," she stated. [Full Report]

AUKUS Oversight Bill Passes House. "The second pillar of AUKUS is cooperation on advanced capabilities. The purpose is to collaborate on high tech research and the application of systems such as hypersonics, undersea capabilities, quantum technologies, artificial intelligence, and much more," said House Foreign Affairs Chairman Michael McCaul. "This legislation focuses on ensuring the State Department is authorizing technology transfers quickly to fully support implementation of this vital pillar." The Bill, H.R. 1093 passed the house 393 – 4. [Full Report]

EU President Ursala von der Leyen defined the challenge of China and Europe's response to it, deftly avoiding a single mention of the United States, telling listeners "the point here is that we do not want to cut economic, societal, political or scientific ties." At an event sponsored by two Brussels think tanks, Ms. Von der Leyen said "China's changing policies may require us to develop new defensive tools for some critical sectors," and "We will focus on free trade agreements where we do not yet have them." [Full Report]

Commerce has added eleven entities to the Entity List under the destinations of Burma, China, Nicaragua, and Russia. In this rule, BIS also amends the EAR to explicitly confirm that the foreign policy interest of protecting human rights worldwide is a basis for adding entities to the Entity List. The department also published a proposed rule to explicitly confirm that the protection of human rights throughout the world is a foreign policy interest and BIS's may add parties to the Entity List for human rights-related reasons. [Full Report]

The United States and 23 other countries have agreed to a voluntary code of conduct pledging to use export control tools to prevent the proliferation of goods, software and technologies that enable human rights abuses. The code of conduct is part of the Export Controls and Human Rights Initiative launched at the Summit for Democracy. It is intended to counter state and non-state actors' misuse of goods and technology that violate human rights. [Full Report]

Directorate of Defense Trade Controls (DDTC) continues to seek comments on the proposed electronic gathering of voluntary self-disclosures of export control violations. as part of an IT modernization project designed to streamline the collection and use of information by DDTC, a discrete form has been developed for the submission of voluntary disclosures. [Full Report]

11

Paraguay firm must still pay under Tobacco Settlement. OFAC issued General License No. 7, issued under Global Magnitsky Sanctions Regulations, authorizing transactions pursuant to the 1998 United States Tobacco Master Settlement Agreement for Paraguay's largest tobacco company. Tabacalera del Este S.A. (Tabacos). In January OFAC designated former Paraguayan president Horacio Manuel Cartes Jara for involvement in corruption and also designated Tabacos for being owned or controlled by Cartes. [Full Report]

Associates of Syrian President Bashar al-Assad were named by OFAC and UK officials for the production or export of Captagon, a dangerous amphetamine. "Syria has become a global leader in the production of highly addictive Captagon, much of which is trafficked through Lebanon," said OFAC Director Andrea M. Gacki. "With our allies, we will hold accountable those who support Bashar al-Assad's regime with illicit drug revenue and other financial means that enable the regime's continued repression of the Syrian people." [Full Report]

Money Transfer Company Fined for Lax Screening. OFAC announced a settlement with Uphold HQ Inc. for maintaining accounts in sanctioned countries over a five year period. Uphold is a global multi-asset digital trading platform founded in 2014 and based in the United States. Violations included processing transactions for customers who self-identified as being located in Iran or Cuba and for employees of the Government of Venezuela. [Full Report]

Make Memes not War. Norwegian munitions firm Nammo is finding its ability to expand production of anti-tank and artillery rounds for Ukraine limited because the local electricity supplier has contracted all future capacity to a data center to hosting Tik-Tok, according to reporting in the *Financial Times*. The FT notes that Nordic region's lower electricity costs and cooler climate are attractive to the data center industry, breeding concern that other energy-intensive industries will be forced out.

*** Calendar ***

Tuesday, April 4

David Malpass, outgoing president of the World Bank Group

10:00 AM The Atlantic Council GeoEconomics Center is hosting a virtual event featuring David Malpass, president of the World Bank Group

Wednesday, April 12

Dr. Ngozi Okonjo-Iweala, Director-General of the WTO

9:30 AM WITA Welcomes Dr. Ngozi Okonjo-Iweala, Director-General of the WTO. Wednesday, April 12, 2023

Thursday, April 13

U.S.-China Economic and Security Review Commission

9:30 AM "China's Pursuit of Defense Technologies: Implications for U.S. and Multilateral Export Control and Investment Screening Regimes."

Monday, April 17 through Wednesday April 19

CBP /Trade Facilitation and Cargo Security (TFCS) Summit

Virtual Registration will close Friday, April 14, 2023, at 4:00 p.m. Eastern Time

April 3, 2023	Washington Tariff & Trade Letter	