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# CBP now voids importer numbers immediately over Form 5106 errors

The policy took effect Sept. 18 and can block goods from entering the United States until records are fixed

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U.S. Customs and Border Protection has begun enforcing a policy that allows the agency to immediately void an importer of record number when the information on CBP Form 5106 is inaccurate or incomplete, a change that can stop an importer from

entering goods into the United States.

The policy took effect Sept. 18 under a CBP general notice published in the Federal Register on Aug. 19 and later reprinted in the Customs Bulletin on Sept. 2. In that notice, CBP said its “enhanced enforcement, including immediate voiding of IOR numbers with inaccurate information on the CBP Form 5106,” would start on Sept. 18. The notice implements Executive Order 14411, “Strengthening Customs Enforcement,” signed June 3.

The importer of record number is a basic identifier in the customs system. If CBP voids it, the importer cannot use that number to enter merchandise into the country. For companies with cargo already on the water, at the border, or moving through ports and warehouses, that can create an immediate operational problem because entries may not clear while the record remains voided.

Form 5106 is the agency’s “Create/Update Importer Identity Form.” It is used to establish or update an importer’s identity in CBP systems and link that importer to a legal entity and tax identification number. In practice, many companies complete the form when they first begin importing and then do not revisit it for years. That has made the document an overlooked compliance risk as businesses move, change brokers, restructure, update tax IDs, or lose the employee whose contact information was originally listed on the form.

CBP’s notice makes clear that several pieces of information on the form must belong to the importer itself, not to a customs broker, registered agent, accountant, logistics provider, or another third party. Those fields include the physical address, email address, phone number, IRS Employer Identification Number, and Social Security number when an individual is the importer. The notice says inaccurate or incomplete information in those fields can now trigger immediate voiding.

That point matters because a common industry practice has been to use a broker’s address, email, or phone number for convenience, especially when a broker handles customs communications. Foreign importers sometimes rely on a U.S. agent’s address in the same way. Under the notice, those arrangements may no longer be safe if the listed information is not the importer’s own.

The change also appears to leave little room for correction after the fact. CBP's notice does not describe a warning letter, grace period, or 30-day window to fix a defective record before a number stops working. The agency's use of the word "immediate" suggests the enforcement action can come first, with correction efforts following after the importer's number has already been voided.

Another risk is the way importers are notified. CBP said written notice of a voidance will be sent to the email address most recently submitted by the importer to the agency, and the broker that last filed an entry for that importer may also be copied. If the email on file belongs to a former employee, an old broker, or an inbox that is no longer monitored, an importer may not see the notice in time. In that situation, the first sign of a problem may be a rejected entry, a delayed shipment, or a call from a broker saying merchandise cannot be cleared.

Customs lawyers and trade advisers have long warned that dormant identity records can become a hidden point of failure because the form does not update itself when a company changes offices, merges, changes ownership, or receives a new EIN. CBP's latest step turns that dormant risk into an enforcement issue. Businesses that have not reviewed their Form 5106 in several years, those that changed customs brokers, foreign importers that rely on agents in the United States, and companies that restructured or changed tax IDs appear especially exposed.

The rule may have direct consequences for the beverage trade, where import schedules are often tied to production runs, seasonal demand, distribution contracts, and storage planning. Importers of wine, beer, spirits, and other beverages could face shipment delays if their importer number is voided and there is no chance to correct the record before goods arrive. For alcohol products, a stoppage at the customs stage can also create added pressure across bonded storage, warehouse scheduling, and downstream deliveries to wholesalers and retailers.

The timing may be especially sensitive for smaller importers that entered the customs system recently. After the suspension of the $800 de minimis exemption earlier this year, many businesses that had not previously acted as formal importers of record had to move quickly to establish customs records and keep parcels moving. Companies that

completed Form 5106 under deadline pressure may now need to verify whether the information submitted was complete and whether it reflects the importer's own current details.

The legal stakes go beyond shipping delays. In its notice, CBP said inaccurate or misleading Form 5106 information is material to an obligation to pay money to the government. The agency also warned that submitting false information may expose an importer or associated individuals to penalties under 18 U.S.C. 1001 and to liability under the False Claims Act. That language signals that CBP is treating the form as more than routine administrative paperwork.

Importers whose numbers are voided do have a path to seek reinstatement. CBP said the importer of record, or a customs broker authorized to act on its behalf, may request reestablishment of the voided number by contacting the agency at the email address listed in the voidance notice. But the notice does not guarantee approval or set a timetable for how quickly CBP will act. Companies that never receive the notice because the email on file is outdated could also face delays in starting that process.

The practical effect is that importers now need to treat Form 5106 as a live compliance record rather than a one-time onboarding form. Trade professionals say that means confirming the physical address, email, phone number, and EIN or SSN on file match current corporate records and belong to the importer itself. For companies that rely heavily on a broker, the new policy is also a reminder that responsibility ultimately remains with the importer, because the number that can be voided is the importer's own.

CBP has tied the policy to a broader enforcement push under the administration's customs order, and the agency's language leaves little doubt that it expects records to be accurate, complete, and updated as needed. For importers moving regular freight through U.S. ports, even a small mismatch in an old identity form can now carry the risk of an immediate halt in entry processing.