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U.S. Will Tighten Customs Rules for Foreign Importers on Jan. 5, 2027

Companies that act as importers of record must join CTPAT or hire validated customs brokers, with full compliance by May 6, 2027

Saturday, November 21, 2026



Foreign companies that serve as importers of record for goods entering the United States will face new customs compliance rules starting January 5, 2027, a shift that could force many importers to change how they clear cargo and which brokers they use

at U.S. ports.

The Wine & Spirits Shippers Association, in a logistics update published Friday, November 20, said U.S. Customs and Border Protection is moving ahead with an interim final rule that sets new conditions for foreign importers of record, often called foreign IORs. Under the rule, those importers generally must either be validated participants in the Customs Trade Partnership Against Terrorism, known as CTPAT, or use a licensed customs broker that has CTPAT validation when entering merchandise into the country.

The association said the rule also adds reporting requirements for CBP Forms 3461 and 7501, which are used in the entry and release process. Customs brokers may seek delayed compliance for some provisions, but full compliance is required by May 6, 2027, according to the update. Comments on the interim rule are being accepted through January 5, 2027, while comments on a separate CBP proposal dealing with supply chain disclosures are due by December 1.

The change matters because many overseas sellers and supply chain operators rely on foreign IOR structures to move goods into the United States without shifting the importer role to a domestic buyer. For those companies, the new rule could require either enrollment in a security validation program or a change in customs representation. Trade groups said that means businesses should begin checking their entry procedures, documentation practices and broker relationships well before the rule takes effect.

For the beverage business, the effect could be especially practical. Wine and spirits shipments often move through layered import arrangements that involve foreign producers, U.S. warehouses, customs brokers and temperature-sensitive freight schedules. If a foreign importer is not validated or is not working with a validated broker when the rule takes effect, entries could face delays or other disruptions. That creates a risk for importers of wine, beer and spirits that depend on steady port releases and tightly timed distribution.

The association framed the customs change as part of a wider period of uncertainty for global shipping and beverage trade. In the same update, it pointed to a growing tariff dispute affecting Scotch whisky shipments to India. According to the group, Indian

customs authorities are imposing an effective 162.5% duty and tax on bulk Scotch imports, even after a UK-India trade agreement that took effect in July cut whisky tariffs from 150% to 75%. The dispute centers on how bulk whisky used for blending is classified, and more than 80 containers tied to major spirits companies have reportedly been held at Indian ports.

The trade group also said the Office of the United States Trade Representative has extended the suspension of Section 301 maritime fees aimed at China-built and China-operated vessels through January 9, 2027. The pause gives carriers and importers temporary relief, but it does not remove the broader uncertainty over future shipping costs. For beverage importers, that means the new CBP rule is arriving at a time when companies are already dealing with changing freight rates, vessel availability and trade policy risks.

WSSA’s November 20 update also described wider logistics pressures that could affect import planning in the coming weeks and months. It said security conditions in the Strait of Hormuz remained highly volatile after additional tanker attacks on November 16 and 18, pushing up risk exposure and increasing the chance of carrier surcharges and schedule changes. It also said carriers are continuing to move more Asia-Europe cargo back through the Suez Canal, with more than 50% of capacity on that route now using the canal instead of sailing around Africa. That shift has freed roughly 500,000 TEUs of global container capacity, although the association said a full normalization could still take another six to 12 months.

In Europe, the group said recent rainfall had improved water levels on the Rhine River, allowing barges to carry heavier loads after months of restrictions tied to low water. Even so, it said the river system has not fully returned to normal and demand remains high because of seasonal shipping volumes.

The update also noted labor tensions on the U.S. West Coast ahead of a Saturday, November 21 contract deadline involving ILWU Local 26 and the Pacific Maritime Association. WSSA said Local 26, which represents about 250 security watchmen at the ports of Los Angeles and Long Beach, had indicated it was not willing to extend its contract beyond the expiration time of 12:01 a.m. on Saturday, November 21, after

talks on Tuesday, November 17, did not produce an agreement. The association warned that if Local 26 were to strike, the stoppage could spread to other ILWU labor at the ports and disrupt terminal operations, vessel handling, container pickups and inland transportation.

Against that backdrop, the new CBP requirements add another compliance issue for importers that depend on predictable cargo entry into the United States. Companies using foreign IOR arrangements may need to decide whether to pursue CTPAT validation themselves or move entries to a broker that already meets the standard. For some importers, that review may also involve contract changes, data reporting updates and a closer look at who is legally responsible for the shipment at the time of entry.

WSSA said it held a webinar on the subject on Tuesday, November 17, and plans to continue providing guidance to members as the requirements develop.