U.S. Chamber of Commerce

1615 H Street, NW
Washington, DC 20062-2000
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July 14, 2026

The Honorable Markwayne Mullin
Secretary
U.S. Department of Homeland Security
Washington, DC 20528

The Honorable Rodney Scott
Commissioner
U.S. Customs and Border Protection
Washington, DC 20229

RE: Executive Order 14411, "Strengthening Customs Enforcement"

Dear Secretary Mullin and Commissioner Scott:

On behalf of the U.S. Chamber of Commerce, I write regarding President Trump's Executive Order 14411, "Strengthening Customs Enforcement" (Order). This Order is the most comprehensive directive on customs enforcement in recent history. The Chamber agrees with the Administration that updating customs authorities and practices is "long overdue" [1] and broadly supports efforts to stop counterfeiters and other malicious actors from circumventing U.S. customs laws. However, we are concerned that this Order may inadvertently harm the broader business community and therefore offer the following recommendations.

First, while the Order rightly emphasizes the importance of strong enforcement, we urge you to pursue solutions that give equal weight to facilitating legal trade and ensuring U.S. businesses can compete effectively in global markets. To that end, we encourage you to work closely with the U.S. business community. There is a long and successful working relationship between the U.S. Department of Homeland Security (Department) and the business community in identifying and addressing compliance gaps, while also creating opportunities for lawful traders, such as the Customs Trade Partnership Against Terrorism, which features prominently in the Order.

Second, we urge you to utilize notice-and-comment rulemakings and to engage broadly with the business community, including through the Commercial Customs Operations Advisory Committee, in implementing the Order. Fundamentally, the Order signals the Administration's intent to require importers to affirmatively certify compliance with U.S. customs laws during multiple points along the importation process, which may lead to increased legal exposure, higher compliance costs, and reduced global competitiveness. Key provisions such as the definition of "good standing," establishing specific minimum bond levels, the scope of disclosure

[1] Exec. Order No. 14411, 91 FR 35125 (2026) https://www.govinfo.gov/content/pkg/FR-2026-06-10/pdf/2026-11595.pdf

requirements, and the risk tiering methodology are significant new requirements that will potentially require significant time and resources for U.S. businesses to collect, verify, and report. While there may be good rationale for these proposed changes, we are concerned that these policy changes that are intended to target malicious actors may inadvertently hurt the broader U.S. business community, especially small businesses that frequently have fewer resources and lower minimum continuous bonds to adapt to these policies.

Finally, we urge you to work with Congress in enacting comprehensive customs reform legislation that not only updates U.S. Customs and Border Protection's (CBP) enforcement tools but also prioritizes a robust trade facilitation component that supports our nation's competitiveness. Customs reform should not only provide CBP with appropriate authority and tools to stop unlawful trade, but also facilitate lawful trade, protect good actors, and provide opportunities for the U.S. business community to engage CBP in advancing its critical trade mission.

Thank you for your attention to these concerns. We look forward to working with you and your team in implementing this Order.

Sincerely,

Neil L. Bradley
Executive Vice President, Chief Policy Officer,
and Head of Strategic Advocacy
U.S. Chamber of Commerce

CC: House Ways and Means Committee
Senate Finance Committee