



June 3, 2026 | Executive Order on Strengthening Customs Enforcement

On June 3, 2026, the White House issued an Executive Order titled "[Strengthening Customs Enforcement](#)." The order signals a more aggressive DHS/CBP approach toward importer accountability, foreign Importers of Record, customs broker due diligence, bonded cargo, supply chain transparency, penalties, and CTPAT-related compliance expectations.

MICA members should not assume that all requirements are effective immediately. Many details will depend on CBP regulations, notices, guidance, and implementation procedures. However, the direction of the EO is clear: the Administration is moving toward stricter importer accountability, stronger vetting of supply chain parties, more detailed documentation expectations, and higher consequences for noncompliance.

Members should begin reviewing their import programs now, particularly IOR structure, bond sufficiency, broker due diligence, foreign supplier documentation, cold-chain custody controls, and internal processes for responding to CBP inquiries.

Key Takeaways:

- 1. Importer of Record accountability will become more important.** CBP is expected to place greater emphasis on who is acting as Importer of Record, whether that party is financially and operationally accountable, and whether the IOR can support the accuracy of the entry. MICA members should review their IOR structure, bond coverage, broker relationships, and internal controls for classification, value, origin, admissibility, and recordkeeping.



2. **Foreign IORs may face heightened scrutiny.** Foreign suppliers or foreign companies acting as U.S. IORs may face additional requirements, especially where CBP believes the structure limits accountability or revenue protection. MICA members using foreign IOR models should review whether those structures remain practical, whether bond coverage is sufficient, and whether a CTPAT-validated customs broker or trusted U.S. compliance partner may become more important.
3. **Customs broker due diligence expectations are likely to increase.** The EO appears to reinforce CBP's expectation that brokers know their customers, identify red flags, verify IOR information, and maintain records supporting reasonable care. Importers should expect brokers to ask more questions about ownership, supply chain parties, foreign suppliers, manufacturers, product details, values, and supporting documents.
4. **Supply chain documentation may become more detailed.** MICA members already manage substantial documentation, including foreign inspection certificates, FSIS-related documentation, invoices, packing lists, bills of lading, origin information, and product descriptions. Going forward, CBP may require additional information regarding manufacturers, production details, foreign export records, supply chain parties, and certifications related to customs compliance.
5. **Bonded cargo and cold-chain controls may receive more attention.** Because MICA products often move through bonded facilities, cold storage warehouses, ports, and temperature-controlled logistics networks, members should expect greater attention to cargo accountability, in-bond integrity, release procedures, shipment visibility, and recordkeeping. Any gaps between CBP status and physical cargo movement should be carefully controlled and documented.



6. **Enforcement exposure may increase.** The EO emphasizes stronger enforcement and penalties with minimal mitigation. For MICA members, the highest-risk areas may include importer identity, valuation, classification, country of origin, admissibility, quota or special duty treatment, forced labor concerns, transshipment, and documentation discrepancies. Even routine errors could carry more consequences if CBP adopts stricter mitigation standards.
7. **CTPAT may become more valuable.** CTPAT is specifically referenced in the EO multiple times. This suggests that CBP may place greater weight on trusted-trader status, supply chain security controls, business partner screening, and documented compliance procedures. For MICA members and their business partners, CTPAT participation may become more important as CBP increases enforcement and looks for reliable, transparent supply chain partners.

Bottom Line:

The Executive Order is an early but important signal that the customs enforcement environment is moving toward greater scrutiny, stronger accountability, and more detailed supply chain transparency. While many specific requirements will depend on future CBP regulations, guidance, and implementation procedures, MICA members should begin reviewing their importer structures, broker relationships, bond coverage, documentation practices, supply chain controls, and overall compliance programs now.

Importantly, in the coming days, there will likely be significant commentary, analysis, and undoubtedly conflicting interpretations regarding the EO. Until CBP issues more formal guidance, **members should be cautious, avoid assumptions, and vet information carefully before making operational or customer-facing commitments.**

