



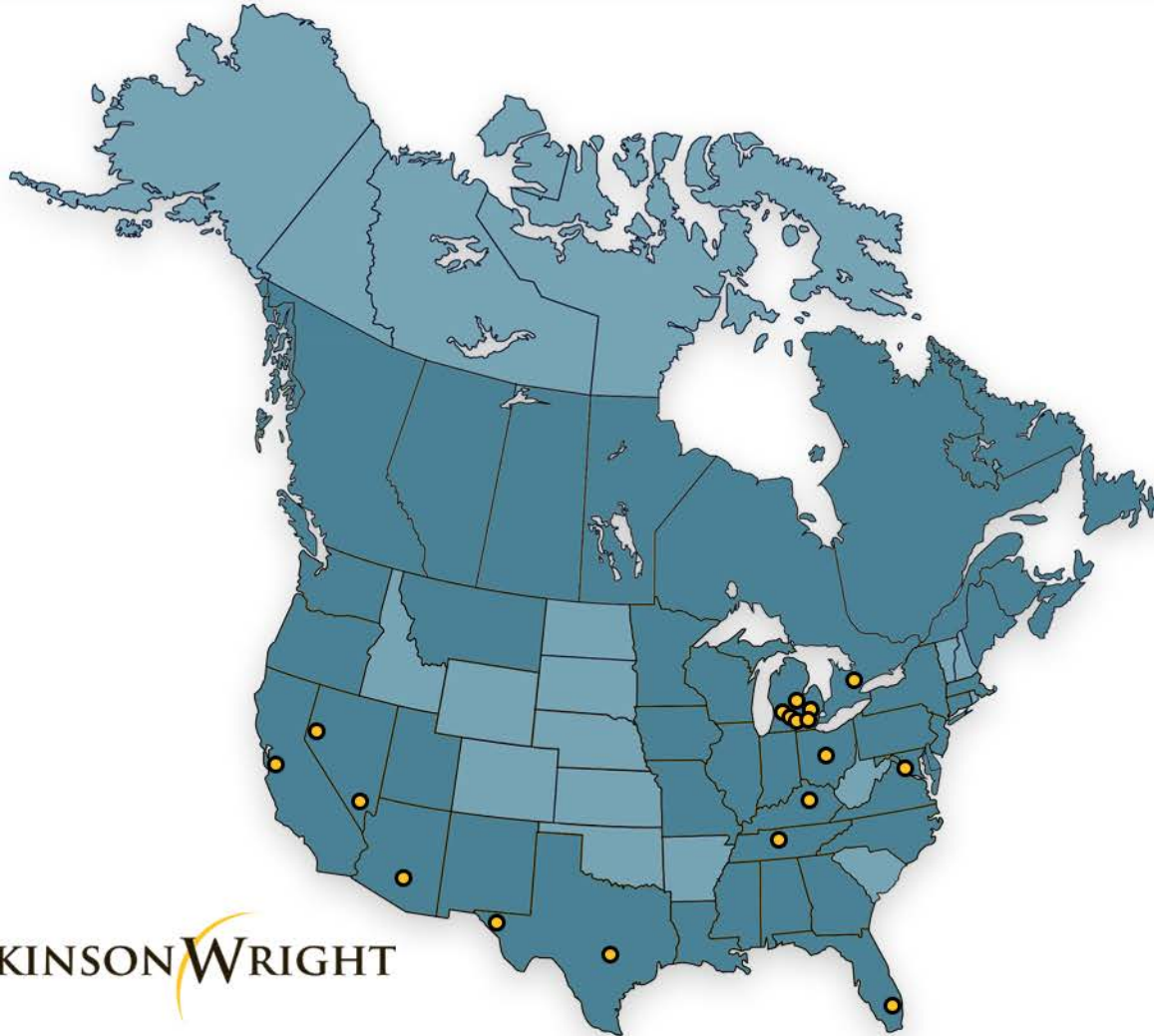
# Preparing for USMCA Day

## EPISODE I

DICKINSON  WRIGHT

# DICKINSON WRIGHT OFFICE LOCATIONS

## STATES AND PROVINCES BAR ADMISSIONS



### DICKINSON WRIGHT LOCATIONS

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- LEXINGTON
- LANSING
- LAS VEGAS
- NASHVILLE
- PHOENIX
- RENO
- SAGINAW
- SILICON VALLEY
- TORONTO
- TROY
- WASHINGTON D.C.

■ STATES AND PROVINCES  
WHERE DICKINSON WRIGHT  
HAS ATTORNEYS  
ADMITTED TO THE BAR



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In 2018, the American Lawyer magazine cited Dickinson Wright as the **fourth fastest growing law firm** on the Am Law 200 list, which is a ranking of U.S. law firms by the number of attorneys, profits per partner, and overall revenue. Dickinson Wright is currently ranked no. 128 on the Am Law 200.

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For a third year in a row, Dickinson Wright received a **perfect score of 100** on the 2020 Corporate Equality Index, a national benchmarking and survey report on LGBTQ corporate policies and practices administered by the Human Rights Campaign Foundation. Our score reflects our commitment to LGBTQ workplace equality for tangible policies, benefits, and practices in addition to demonstrating our overall commitment to a diverse and inclusive culture for all of our lawyers and employees.

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NASCO



COUNCIL OF THE  
GREAT LAKES REGION

BUILDING OUR FUTURE TODAY

Discover. Connect. Influence.



CANADA - UNITED STATES  
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# WHY NOW?

1. Uniform Regulations Process Moving Quickly (last chance)

5

2. Benefits in USMCA for early-adopters

3. All companies will need to be tweaking, transitioning, and/or transforming



# Today's Speakers



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# Covid-19 Challenges for North American Supply Chains

## Mexico's list of essential activities differs from the US list

- Supply chains of essential products and services are not clearly defined in Mexican regulations
- Lack of alignment has disrupted North American supply chains

# Trade in intermediate goods from Mexico to the US

US Supply chains rely deeply on inputs from Mexican manufacturers:  
*Mexican exports of intermediate goods to the US exceeded US\$184 bn*

## Intermediate goods trade – 2017 – Million dollars

Sector	Imports	Exports
Machinery and mechanical appliances	20,289	28,467
Electrical equipment / electronics	18,769	51,688
Plastics and articles thereof	15,361	6,554
Auto parts	15,306	24,285
Organic and other chemicals	7,909	1250
Iron, steel and articles thereof	8,858	6,117
Medical equipment	4,051	13,343
<b>Total intermediate goods</b>	<b>153,587</b>	<b>184,280</b>



April 22, 2020

His Excellency Andrés Manuel López Obrador  
Presidente Constitucional de los Estados Unidos Mexicanos  
Plaza de la Constitución S/N,  
Centro Histórico de la Cdad. de México, Centro, Cuauhtémoc,  
06066 Ciudad de México, CDMX, México

Dear Presidente López Obrador:

As the leaders of companies with manufacturing facilities across Mexico, we appreciate the critical steps that Mexico is taking to slow the spread of COVID-19. It is in that spirit that we come to you, your government, Mexican state governors and local leaders as partners committed to taking all necessary measures to protect the lives of our employees across Mexico amid the COVID-19 pandemic.

We are, however, deeply concerned about the health emergency decrees issued by Mexico's Ministry of Health and state governments that have resulted in the forced or threatened shuttering of our companies' essential manufacturing facilities, as well as those of our suppliers, imperiling our ability to deliver critical supplies and daily essentials to citizens in Mexico and across North America.

This is a pivotal moment. We are working with urgency to arm our health care providers and other COVID-19 frontline workers with the resources they need to save and protect the lives of our fellow citizens. The shuttering of our companies' and suppliers' facilities in Mexico, however, threatens to undermine that effort.

We urge Mexico to recognize and reciprocate, for the purposes of determining if a manufacturer is designated as essential and critical, the guidance issued by the U.S. Department of Homeland Security's Cybersecurity and Infrastructure Security Agency (CISA), as a baseline, to the maximum extent possible. By doing so, Mexico will help ensure that (a) manufacturers of essential and critical products and components can continue operations in Mexico and (b) disruptions to the North American manufacturing supply chain are minimized at this critical time.

We assure you that the health and safety of our employees and communities in Mexico is our highest priority and that we are deploying every possible best practice procedure and process, including appropriate physical distancing and the utilization of personal protective equipment. Our employees recognize the important work that they are performing to support our critical infrastructure industries and essential services, and they are committed to delivering the very best products and services at this important time.

We stand ready to work with you as we respond collectively to the COVID-19 pandemic, and we look forward to our continued partnership in the days ahead.

Sincerely,

327 US CEOs have urged Mexico to align essential activities with the US and Canada

An aerial photograph of a city, likely New York City, showing a dense urban landscape with a large body of water (likely the Hudson River) in the background. The image is used as a background for the text.

DICKINSON WRIGHT

USMCA  
CUSMA  
T-MEC





# Actions required to address supply chain challenges

## Short-term

- Mexico needs to allow re-establishment of operations of all supply chains affected by the lack of alignment between the US and Mexican legislations.
- Although we have been able to address specific cases working with state authorities an integral holistic solution is needed.

## Medium term

- Mexico and the US should work to:
  - Establish common guidelines that allow an effective and immediate response to international emergencies like COVID.
  - Certify enterprises involved in essential activities and their supply chains so that they continue operating in international emergencies.

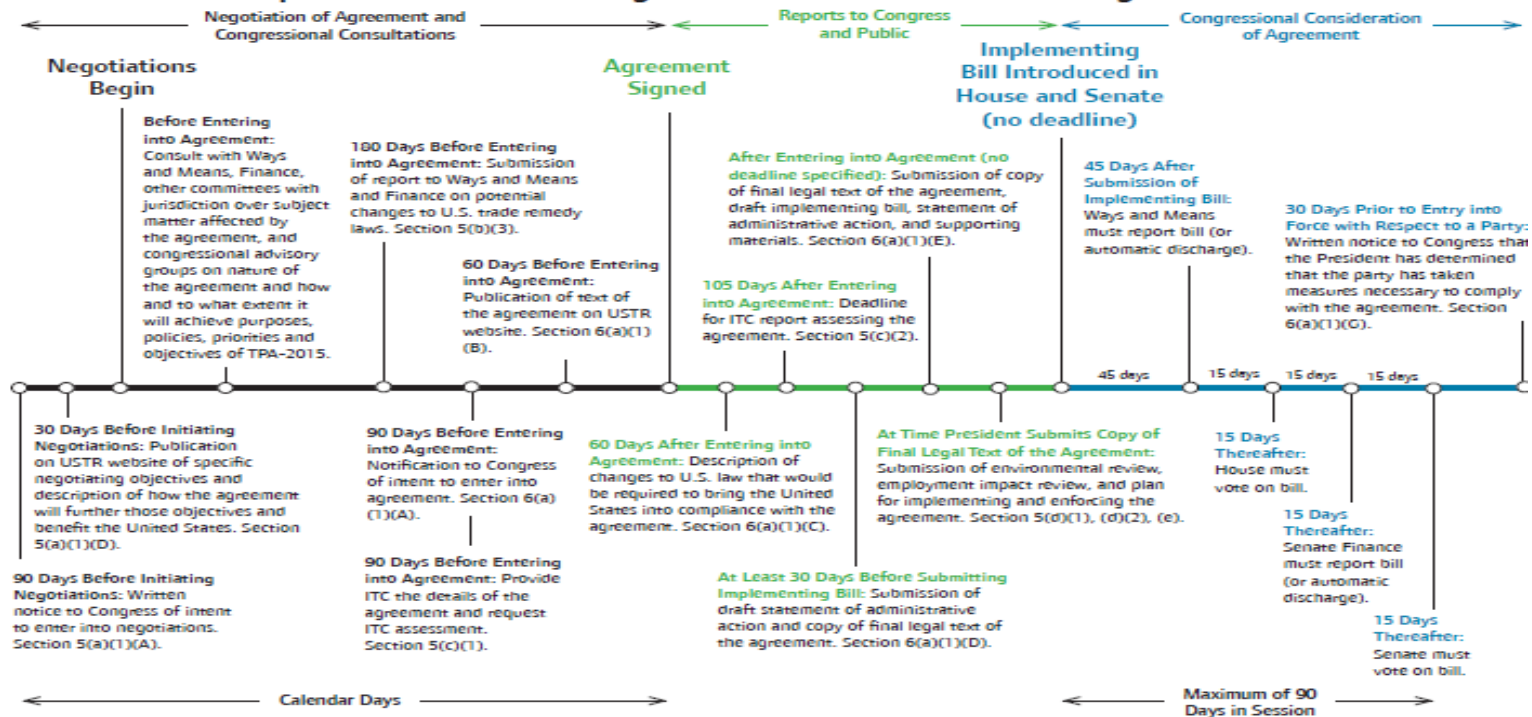


# USMCA IMPLEMENTATION #1: *WHEN?*

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# USMCA TIMELINES

## Timeline and Requirements for Trade Agreements Under TPA-2015 Legislation



Also required by TPA-2015, under Section 5(f), titled "Other Reports.":  
 1) **REPORT ON PENALTIES:** not later than one year after imposition of a penalty or remedy to which this Act applies, the President shall submit to the House Ways and Means and Senate Finance Committees a report on the effectiveness of the penalty or remedy applied, including its effectiveness and any adverse consequences on parties or interests not party to the dispute; and  
 2) **REPORT ON IMPACT OF TRADE PROMOTION AUTHORITY:** not later than one year after date of enactment, and not later than five years thereafter, the USITC shall submit to House Ways and Means and Senate Finance Committees a report on the economic impact of all trade agreements with respect to which Congress has enacted on implementing bill under trade authorities procedures since January 1, 1984.



# USMCA

Opening Round in D.C.

**AUGUST 16, 2017**

US-Mexico-Canada Agreement

**SEPTEMBER 30, 2017**

**AUGUST 27, 2017**

US-Mexico Agreement

**NOVEMBER 30, 2018**

USMCA Signed

# USMCA



Protocol of Amendment

**DECEMBER 10, 2019**

Uniform Regulations  
by in-force day

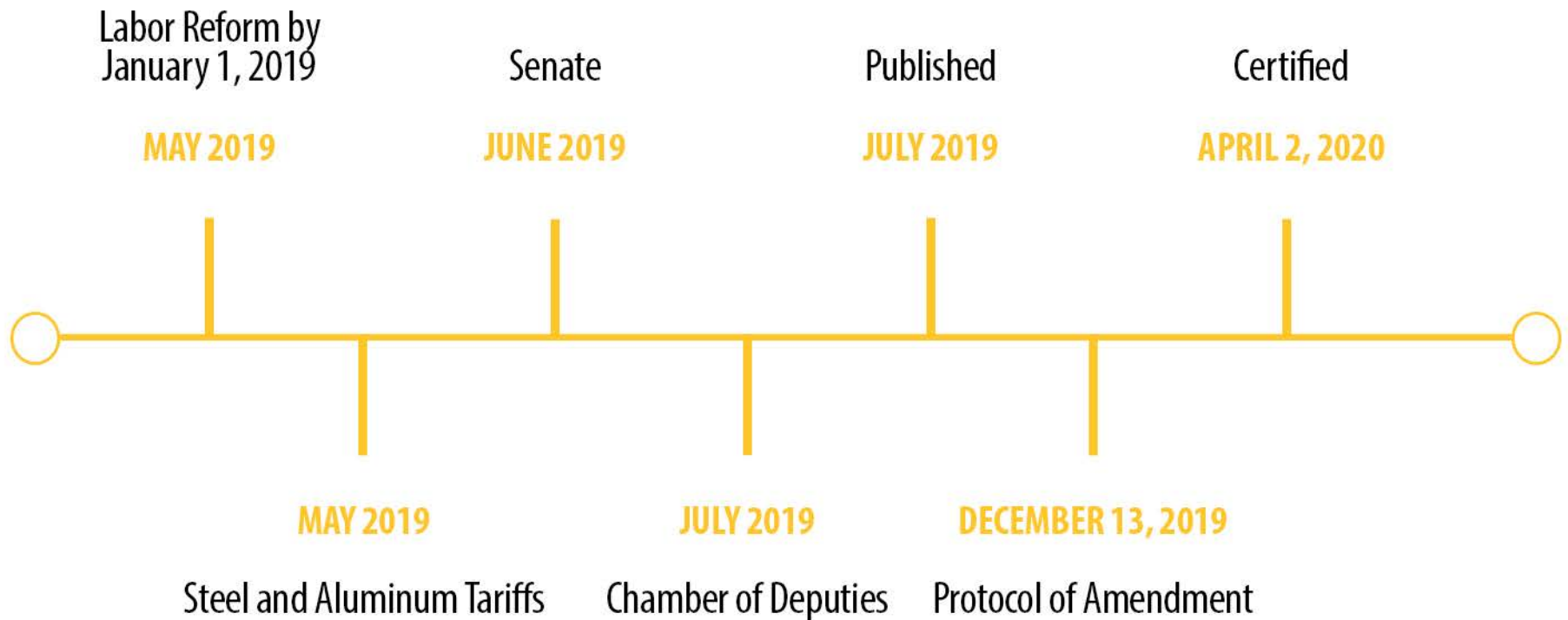


**APRIL 24, 2020**

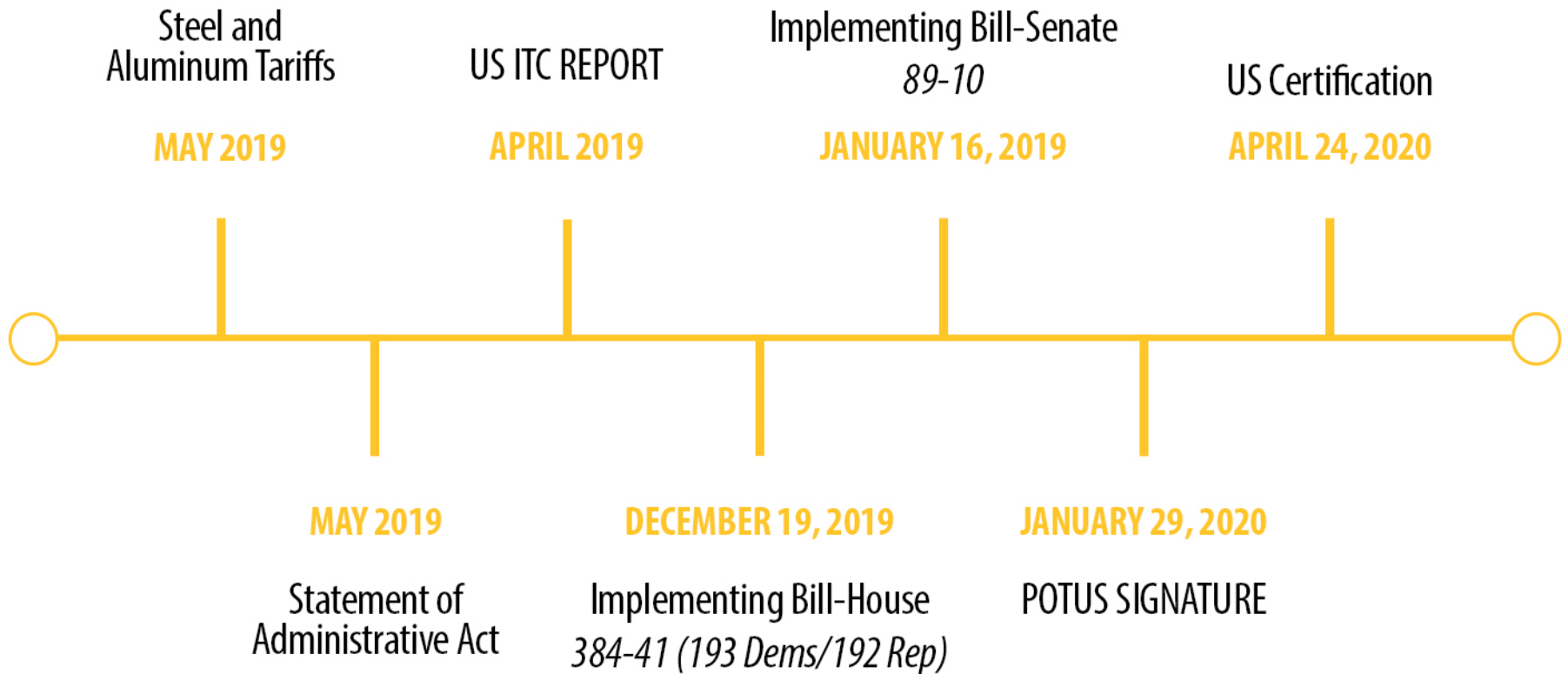
First Day of the  
Third Month Following  
the Last Notification

Likely July 1, 2020-  
January 1 in-force date

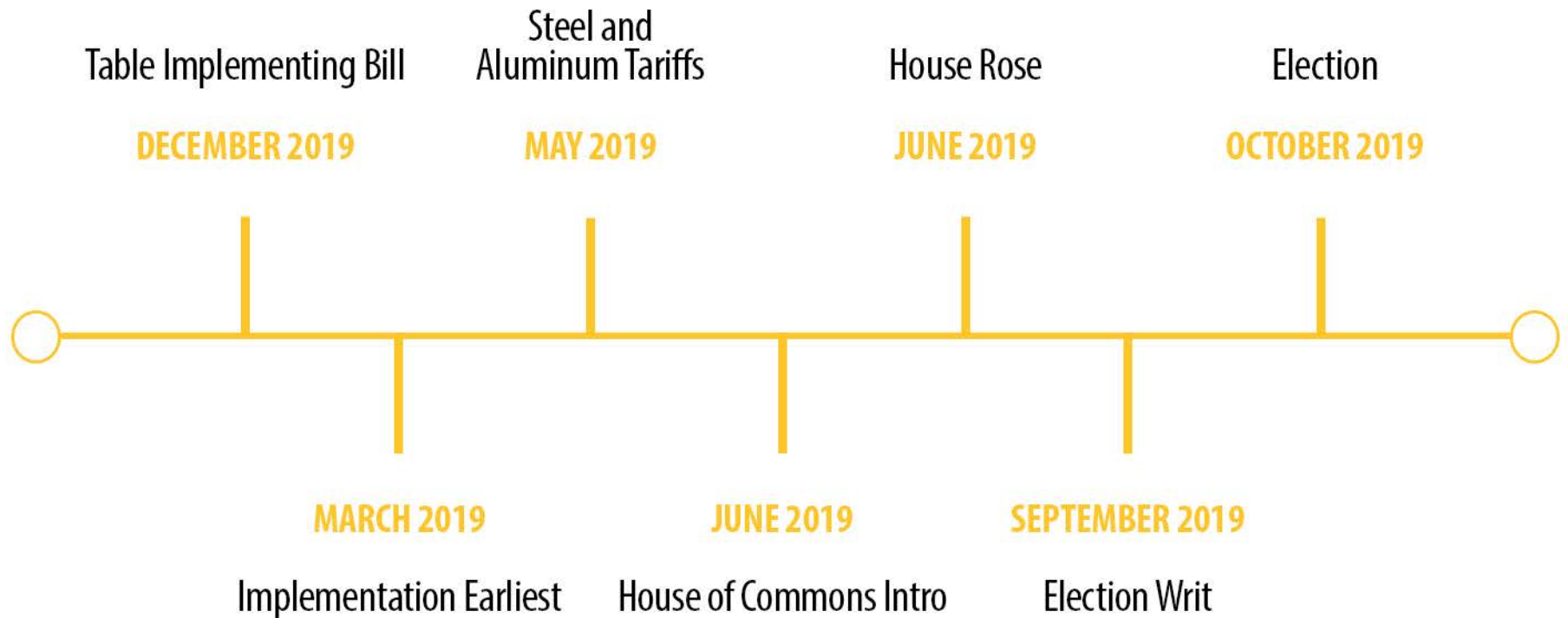
# USMCA IMPLEMENTATION-MEXICO



# USMCA IMPLEMENTATION-US



# USMCA IMPLEMENTATION-CANADA





# USMCA IMPLEMENTATION-CANADA

Tabled in Parliament

**DECEMBER 2019**

House of  
Commons

**MARCH 13**

Royal  
Assent

**MARCH 13**

**JANUARY 27**

Ways and Means Motion

**MARCH 13**

Senate

**APRIL 2**

Certified



# Implementation Agency Actions Examples

- Canada Border Services Agency (CBSA) Customs Notice 20-14 *Implementation of Canada-United States Mexico-Agreement* (April 3, 2020)
- US Customs and Border Protection (US-CBP) United States-Mexico-Canada Agreement *Interim Implementation Instructions* (April 21, 2020)
- USTR Alternative Staging Regime Request for Petitions in Federal Register (April 21, 2020)
- USTR Call for Labor and Dispute Settlement Panelists (closed April 20, 2020)



# Implementation Agency Actions Examples



- Mexico Alternative Staging Regime Public Comment (April 22 & 30, 2020)
- Global Affairs Canada (GAC) Notice re: Alternative Staging Regime (April 27, 2020)
- US Interagency on Automotive
- US Interagency on Labor (and Independent Mexico Labor Board)
- US Interagency on Environment

A graphic featuring a red maple leaf on the left, the American flag in the center, and the Mexican national emblem on the right. The text "USMCA IMPLEMENTATION #2: WHY?" is overlaid in white on a grey background.

# USMCA IMPLEMENTATION #2: WHY?

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# USMCA vs. NAFTA

USMCA's Chapters	Amended vs. NAFTA	USMCA's Chapters	Amended vs. NAFTA
Agriculture		Tariffs	=
Textiles & Apparel		Government Procurement (Access)	
Rules of Origin		Trade Remedies	
Origin Procedures		Temporary Entry for Business Persons	
Customs Administration & Trade Facilitation		Publication & Administration	
Sanitary & Phytosanitary Measures		Administrative and Institutional Provisions	
Technical Barriers to Trade		Dispute Settlement	
Sectoral Annexes		Recognition of the Mexican United States Property over Hydrocarbons	
Government Procurement (Only for U.S. & Mexico)		Digital Trade	
Final Provisions		State – Owned Enterprises and Designated Monopolies	
Investment		Small and Medium Enterprises	
Cross Border Trade in Services		Competitiveness	
Financial Services		Anticorruption	
Telecommunications		Good Regulatory Practices	
Intellectual Property Rights		Macroeconomic Policy and Exchange Rate Matters	
Competition Policy			
Labor			
Environment			
Exceptions & General Provisions			



# The “Renovation” of NAFTA to USMCA



## Templates

(“Fresh Coat of Paint”)



## Modernize

(“Upgrade the Fixtures and Appliances”)



## Rebalancing

(“Knocking Down Walls”)

# Fresh Coats of Paint



- 1. Small and Medium-Sized Enterprises**
  - NAFTA Trilateral SME Dialogue
- 2. Competition**
- 3. Technical Barriers to Trade**
- 4. Anti-Corruption**
- 5. Good Regulatory Practices**

# Fresh Coats of Paint



6. **Sanitary and Phyto-Sanitary Measures (SPS)**
7. **Telecommunications**
8. **Environment**
9. **Financial Services**
10. **Chemical and Food Patents/Formulas**

# “Upgrading the Fixtures”



## 10. Digital Trade in Goods and Services

- “TPP Plus Proposal”

## 11. Customs and Trade Facilitation

- “Platinum Standard”
- Locks In Beyond the Border and Technology/Risk Assessments

## 12. Energy

# “Upgrading the Fixtures-Digital”



- **No Duties on Digital Data Flows**
- **No Data Localization (includes financial services)**
- **Patent Protection (expands definition and no limits for processes of known product)**
- **Patent delays (5 yrs date of filing 3 yrs exam request)**
- **Copyright extended to 70 yrs and some provisions to compensate producer /performer**

# “Upgrading the Fixtures-Digital”



- **Limited use of GIs**
- **Notice and Takedown vs. Notice and Notice**
- **No ISP liability for 3<sup>rd</sup> parties**
- **No source code**
- **Trade Secrets Act in Canada – Criminal Code?**
- **Border Control Measures / CBSA**
- **Cyber Security**



# “Upgrading the Fixtures-Digital ???”



- **Privacy Issues (APEC CBPR)**
- **Digital Services Tax**
- **Government to Government Enforcement**
- **Subnational Government Enforcement**
- **Safe Harbors / Health, Safety, Security Exceptions**
- **Nearshoring / On-Shoring Going South**

# E-Commerce (De Minimis)



<b>US</b>	<b>USD800.00</b>
<b>CAN</b>	<b>CAD40.00 (tax) &amp; CAD150.00</b>
<b>MEX</b>	<b>USD50.00 (tax) &amp; USD117.00</b>

# Knocking Down the Walls



**PRIORITY #1**

**Close the Back Door to  
China through Mexico  
and Canada**

**PRIORITY #2**

**Rebalance Trade with  
Mexico**

**PRIORITY #3**

**Settle All of the  
Family's Business in  
North America**

# Close the Back Door



## PRIORITY #1

### Close the Back Door to China through Mexico and Canada

- Auto ROO w/ metals & components
- Dispute Resolution (former Chapters 20 & 19)
- Sunset
- Government Procurement
- Non-Market Economies, SOEs, Currency

# Mexico Rebalance



## PRIORITY #2

### Rebalance Trade with Mexico

- Auto ROO w/ labor value content
- Investment (Chapter 11)
- Labor
- Textiles
- Facility Specific Rapid Response Labor Mechanism

# Settle the Family's Business in NA



## PRIORITY #3

### Settle the Family's Business in North America

- Seasonality (dropped)
- Pharma/Biologics (dropped)
- IP
- Dairy in Canada
- Wheat Grading in Canada




# Settle the Family's Business in NA



## PRIORITY #3

### Settle the Family's Business in North America (cont.)

- Wine Sales in Canada
- Super Bowl Commercials in Canada
- Mexican Trucking
- Environment

The background of the slide features a stylized representation of the USMCA (United States-Mexico-Canada Agreement) flags. On the left is a red maple leaf, in the center is the United States flag, and on the right is the Mexican flag. The text is overlaid on this background.

**USMCA IMPLEMENTATION: *How?***  
**THREE MAJOR ISSUES**

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The background of the slide features a stylized representation of the flags of the United States, Canada, and Mexico. On the left is a red maple leaf. In the center is the American flag with stars and stripes. On the right is the Mexican flag with a green field and the national coat of arms. The text is overlaid on this background.

**USMCA IMPLEMENTATION: *How?***  
**LABOR**

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# USMCA brings much needed certainty but it also presents important challenges, particularly, related to labor issues

- Chapter 23: the most ambitious labor chapter ever negotiated in an FTA
- New labor obligations: strengthened dispute settlement mechanisms and possible trade sanctions for:
  - The governments of Mexico, US and Canada
  - Enterprises of the three member countries (on a facility-specific basis)
- Rapid Response Labor Mechanism allows sanctions on covered facilities, including:
  - Suspension of preferential tariff treatment, penalties and denial of entry of goods / services
- **It is critical for firms with a presence in Mexico to:**
  - Design and implement a plan to mitigate labor risks before they occur; and
  - Be able to respond quickly if they materialize
    - Complying with USMCA will depend not just on the company



**Labor Chapter: Mexico shall not fail to effectively enforce its labor laws through a sustained or recurring course of action or inaction in a manner affecting trade or investment in the North America region**

**Freedom of association and the right of collective bargaining.**

**The elimination of all forms of forced or compulsory labor.**

**The abolition of child labor, prohibition of the worst forms of child and other labor protections for children and minors.**

**The elimination of discrimination in the workplace.**

**Acceptable employment conditions: minimum wages, hours of work, safety and health conditions.**

**Compliance of the Mexican labor reform by the private sector.**

**Enforcement of the Mexican Labor Reform by the Federal Government**

The **Government of Mexico** shall address **violence or threats of violence cases against workers**, directly related to the exercise of worker's labor rights in a manner that affect trade or investment in the North America region (**a single failure to address would be enough to file a case**).



# Commitments on freedom of association and collective bargaining subject to the covered facility- specific investigation and penalties (Annex 23-A)

**Right to form unions and elect union leaders**

**Right to organize, form and join the union of their choice.**

**Right to engage in concerted activities for collective bargaining.**

**Prohibition for employers to:**

- Interfere with union activities.
- Exercise coercion against workers for union activity.
- Discriminate against workers for union activity.
- Discriminate against workers for union activity.

**Personal, free and secret vote**

**Election of union leaders.**

**Negotiation of collective bargaining agreements.**

**Revisions of collective bargaining agreements.**





# In a non-compliance scenario, Mexico and the Mexican private sector could be subject to dispute settlement mechanisms

## **State to State Dispute Settlement Mechanism (Chapter 31)**

### **Applicable to all labor obligations**

1. Consultations (30 days)
2. Panel proceedings (over a year)
3. Non – compliance with panel reports: Suspension of benefits

## **Facility – Specific Rapid Response Labor Mechanisms (Annexes 31-A and 31-B)**

### **Applicable to rights of free association and collective bargaining**

1. Investigation by the STPS and consultations with US or Canada (80 days)
2. Panel proceedings (60 days)
3. Imposition of remedies, including supply chain (tariffs, penalties. 3<sup>rd</sup> violation: denial of entry)
4. Mexico could request a panel if it considers the US or Canada have imposed excessive remedies. If the panel finds a misuse of the mechanism, Mexico could prevent the US and Canada from using the mechanism for the next 2 years.
5. Coverage might be extended to other labor provisions in the event a Chapter 31 panel rules against Mexico on a non-compliance dispute of a labor obligation of Chapter 23.

# Priority sectors for surveillance of RRLM labor compliance in Mexico

## 10 priority sectors subject to the Rapid Response Labor Mechanism

### USMCA – Annexes 31-A / 31-B

Aerospace products & components

Autos and auto parts

Industrial baked products

Steel & Aluminum

Cosmetic Products

Glass

Pottery

Plastic

Forgings

Cement



## 8 priority subsectors for surveillance and compliance of the US' Interagency Labor Committee

### US' Implementing Bill

Aerospace

Auto parts y auto assembly

Industrial bakeries

Steel & Aluminum

Electronics

Call centers

Mining

# Firms, unions and suppliers could all face labor-related challenges

## Firm

- Thorough understanding of **USMCA's compliance mechanisms** and the consequences of non-compliance (*Board, Management and Human Resources*)
- Process to **monitor work environment** and identify issues quickly (*KPIs, anonymous hotline*)
- Holistic and **independent perspective** on:
  - Employee satisfaction with company and union leaders
  - Work environment in Mexico including potentially hostile unions
- Identification and monitoring of **key stakeholders in the U.S.**
- **Engagement with Mexican Government** while labor reform is implemented, and institutions are created (*Centro de Conciliación*)

## Supplier

- **Understanding** of USMCA labor compliance requirements
- **Contracts** that protect the firm in case of supply chain interruptions due to USMCA labor sanctions

## Union

- **Union leaders** willing and able to make necessary changes
- **Understanding** of USMCA labor requirements
- **Transparency** in reporting union fees and expenditures
- Updated **union statutes** that comply with labor reform

# Mitigating the risks requires a plan of action in the US and Mexico

## A. Mexico Action Plan



1. **Train employers on USMCA obligations and potential non-compliance consequences**
2. **Conduct compliance audits focused on freedom of association and collective bargaining**
  - Review documents (*collective bargaining agreement, election protocols, union statutes etc.*)
  - Track employee satisfaction with company and union leaders
  - Analyze work environment and identify rival unions
  - Set up process to receive anonymous claims e.g. *Hotline*
3. **Address compliance gaps and implement best practices**
4. **Evaluate suppliers and assess risk of supply chain interruption**
5. **Coordinate with MX Government and MX Private Sector**
  - Awareness strategy on “best practices” (Legislators, Governors)
  - Coordinate with Federal Labor & Economy Ministry (STPS, SE)
  - Align with Business Coordinating Council (CCE)

## B. US Action Plan



1. **Identify key US stakeholders**
  - Identify potential allies and adversaries (companies, unions, legislators)
  - Document previous labor conflicts and their resolution
2. **Monitor stakeholders in the US**
  - Monitor implementation of compliance mechanisms / committees in the US
  - Track stakeholder actions and claims filed in the US
3. **Raise awareness through advocacy campaign**
  - Document progress on implementation of Mexican labor reform obligations
  - Lobby decision makers and key stakeholders
  - Communicate with allies and adversaries

*The plan of action summarized here can be completed in 6-8 weeks*

The background of the slide features a stylized representation of the USMCA (United States-Mexico-Canada Agreement) flags. On the left is a red maple leaf, in the center is the United States flag, and on the right is the Mexican flag. The text is overlaid in white on a semi-transparent dark background.

# USMCA Auto ROO Overview & Alternative Staging Regime

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# Automotive Rules of Origin



## New USMCA Automotive Rules of Origin:

- Higher Regional Value Content (RVC) thresholds:
  - Increases from 62.5% to 75% in a four-year transition period.
- Mandatory requirements – Four year transition period:
  - **Core parts** must be originating:
    - RVC of 75%.
  - 70% of purchases of **steel and aluminum** in the North America region must be originating.
  - Production must meet a **Labor Value Content (LVC)**:
    - 40% of high-wage (\$16/hr) material, manufacturing, technology and assembly expenditures.

# Alternative staging regime

## Would grant producers of passenger vehicles or lights trucks:

- A longer period of transition to meet new rules of origin

1

**RVC** not less than 62.5%  
for vehicles and auto parts

2

**LVC** not to be reduced by  
more than 5% of the  
production capacity

3

**Steel and Aluminum**  
requirement must be met

- Case by case analysis:
  - By the importing Party of production plan submitted by producer to comply with new rules of origin.
- Applicable to 10% of producer's production in North America during 12 months prior to entry into force, or to the production average during the previous 36 months



# Alternative Staging Regime

**April 22, 2020** - The Mexican Ministry of Economy published for public comments:

- Procedures for the submission of petitions by North American Producers of Passenger Vehicles or Light Trucks to Use the Alternative Staging Regime.
  - Same requirements and deadlines as USTR's procedures.

**April 29, 2020.**- Mexican Ministry publishes final procedures in the the Diario Oficial de la Federación.



# Alternative Staging Regime

## Mexico's procedures for submissions to use the alternative staging regime

- **July 1<sup>st</sup>, 2020.-** Deadline to submit petition with draft alternative staging plan.
- **August 31<sup>st</sup>, 2020.-** Deadline to submit petition with final alternative staging plan.
- Submission & questions must be sent to:
  - [solicitudes.rta@economia.gob.mx](mailto:solicitudes.rta@economia.gob.mx)

# Alternative Staging Regime



- **Mexico's procedures for submissions to use the Alternative Staging Regime** .- Petitions must contain information on:
  - Cover Letter
    - Request for Use of the Alternative Staging Regime.
    - Statement of Period of Alternative Staging Regime.
    - Commitment to Meet Requirements During and After Expiration of the Regime.
    - Understanding of Requirement to Notify Modifications to Plan.
  - Corporate Information
  - Assembly capacity
  - Production

# Alternative Staging Regime



- **Mexico's procedures for submissions to use the Alternative Staging Regime** .- Petitions must contain information on:
  - Sales
  - Vehicle Models
  - Steel & Aluminum
  - Wages
  - Detailed and Credible Plan
  - Certification





# Alternative Staging Regime

## Mexico's procedures for submissions to use the Alternative Staging Regime

- **Procedures for Reviewing and Accepting Petitions**
  - The Ministry of Economy shall review the petitions submitted by producers and shall inform the petitioner in writing of its determination:
    - When reviewing a petition, the Ministry of Economy shall verify that it complies with the requirements established in Article 8 of the Automotive Appendix.
  - An authorization by the Ministry of Economy to use an alternative staging regime applies only to the producer's eligibility to use the regime for imports into Mexico. Vehicle producers will need to provide a similar petition to the US or Canada, under its respective procedures, in order to have the petition approved by each of the Parties to the USMCA.



# Certification of Origin

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# Certification of Origin



- General Note 11 in HTSUS will apply to USMCA (GN 12 for NAFTA). “S” tariff
- Generally, concepts relating to origin determination such as Wholly Obtained or Produced Goods, Product-Specific Rules of Origin, Regional Value Content (RVC), tariff-shift remain similar with some minor exceptions.
- NAFTA Marking Rules in US are eliminated.
- De Minimis is 10% (increase from NAFTA)



# USMCA Rules of Origin

- General Note 11 in HTSUS will apply to USMCA (GN 12 for NAFTA). “S” Special Program Indicator. Canada’s MUST changes to UST Code 10 and MXT Code 11.
- Generally, concepts relating to origin determination such as Wholly Obtained or Produced Goods, Product-Specific Rules of Origin, Regional Value Content (RVC), tariff-shift remain similar with some minor exceptions.
- NAFTA Marking Rules in US are eliminated.
- More reliance on substantial transformation analysis



# USMCA Rules of Origin

- Non-Textile De Minimis Raised to 10%
- Sets Defined
- Merchandise Processing Fee Issues (MPF) at the time of entry
- Advance Rulings/US-CBP rulings under NAFTA need to be revisited.



# Certificates of Origin

- USMCA eliminates NAFTA prescribed Certificates of Origin (COO) and requires 10 data elements to be provided by producer, importer, or exporter. Flexibility but places burden on companies for certifying, recordkeeping and designing new documents.

## RESULT

- Will need to verify entire supply chain, including all components.



# Certificates of Origin

- This becomes critical as importers of record will need to investigate entire supply chain; particularly in autos and textiles.
- US-CBP is redefining substantial transformation in a series of recent rulings relating to 301.
- US-CBP also is revoking past decisions on Chapter 98 (repairs, alterations, returns) (e.g., wheel grinding).
- Effect is what was NAFTA may not be USMCA duty-free

# Strategies-Checklist

- Assemble documents from purchasing/procurement, customs brokers, financial team./accounting on how currently using USMCA (Certificates of Origin a great start)
- Look at all Purchase Orders, Standard Terms and Conditions
- Review IP Portfolio
- Look at 3PL, transportation (incl. reverse logistics), and broker contracts
- Independent Customs Self-Assessment – Check China
- Adopt a Know My Supplier's Suppliers Mindset



# Episode II

## **USMCA Customs Compliance and Automotive Rules of Origin**

**Thursday, May 14, 2020**

**4:00-5:30 PM ET**

# Contact Information



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