



ILMA Signs Letter Urging Deadline Extension for Comments on Import Review

ALEXANDRIA, VA (March 9, 2009) — ILMA has signed onto a letter with more than 30 industry organizations, urging the U.S. Customs and Border Protection (CBP) to extend the deadline for comments under the agency’s structured review of its interim final rule entitled, “Importer Security Filing and Additional Carrier Requirements.” This rule requires importers and carriers to submit additional information on cargo to CBP before cargo is brought into the U.S. by vessel. ILMA, and the other co-signing organizations, are seeking an extension so they have more time to adequately assess how the implementation of this rule will affect their members.

Under the interim final rule, which is known as “ISF 10+2,” importers and carriers must submit additional pieces of information to enter cargo into the U.S., along with the 10 data elements already required. The two additional data elements are: (1) a vessel stow plan used to transmit information about the physical location of cargo loaded aboard a vessel bound for the U.S.; and (2) container status messages, which report container movements and changes in status.

“We ask that the comment period be extended to afford industry sufficient time to implement the rule, collect data, evaluate the impact and formulate meaningful comments that will be beneficial to the government’s review of the flexibilities,” states the letter, which was authored by the National Association of Manufacturers (NAM). NAM represents more than 14,000 companies in a wide range of industrial sectors. ILMA is an association member of NAM. Other co-signees include the Alliance of Automobile Manufacturers, the Consumer Electronics Association and the U.S. Chamber of Commerce.

Specifically, the letter explains that, while members have been making good faith efforts to comply with the new rule since it went into effect on Jan. 26, 2009, more time is needed for companies to adequately determine and adopt updated best practices, and analysis of these changes may take several months. Extending the deadline for comments will also allow companies to examine seasonal changes in demand or other trends in trading that take time to develop.

“The bottom line is the more time companies have to assess how these changes affect them, the more helpful their comments will be,” ILMA Executive Director Celeste Powers said. “Signing this letter on behalf of our members, and among huge organizations like NAM, shows our commitment to making this process as beneficial to all involved as possible.”

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The Independent Lubricant Manufacturers Association (ILMA) was founded in 1948. ILMA's 300 members include independent lubricant companies that produce more than 25% of all lubricants and 80% or more of the metalworking fluids and other specialty industrial lubricants sold in the U.S., and key suppliers of raw materials and services to independent lubricant manufacturers.