

## MEMO TO CLIENTS

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## **CITES Permits**

The Conference of the Parties to CITES held meetings in September and October of this year. At the meetings they added most rosewoods to the Appendix II of the CITES requirements. This included the entire species of rosewood under species Dalbergia; three species under Guibourtia; and Kosso (also called African rosewood). This announcement does not change the Appendix I status of Brazilian rosewood that was already in effect.

The Appendix II status of most rosewoods means that they are not currently threatened with extinction, but may become so without trader controls. Trade in those woods will be allowed with the proper CITES certificates. Re-exportation of rosewood products from the United States will be allowed with the CITES permit. The U.S. Fish & Wildlife Service (USFWS) does recognize that companies in the United States already possess stockpiles of rosewood. Owners of the stockpiles will have to document that the wood was legally acquired prior to January 2, 2017.

These new requirements go into effect for rosewood products entered on or after January 2. Rosewood products shipped prior to January 2 that are not entered before that time will have to obtain a CITIES permit from the country of exportation. We have heard, but not confirmed, that there are some countries that are party to the CITES Convention that will not issue CITES certificates for rosewood until January 2.

The USFWS issued a letter that explains these changes. A link to this specific letter can be found **USFWS** the website on https://www.fws.gov/international/permits/byspecies/wood-and-other-tree-products.html

## Most Rosewoods Will Now Require U.S. Agent Confirmation for Food **Facility Confirmation is Required**

Foreign food suppliers' registrations are required to be refiled by the end of December. U.S. Customs and Border Protection (CBP) has issued a CSMS notice confirming the new requirement that the foreign facilities must have a U.S. Agent that confirms they do represent the facility. The U.S. Food and Drug Administration (FDA) will not issue a new registration or confirm a renewal unless the designated U.S. Agent has confirmed that they represent the registrant. Shipments from foreign facilities that have not completed their registration and have not had their U.S. Agent confirm back to FDA will find those shipments held at the U.S. Port of arrival.

A copy of the CSMS notice can be found on CBP's https://apps.cbp.gov/csms/viewmssg.asp?Recid= 22330&page=&srch argv=&srchtype=&btype=&s ortby=&sby=

## **CBP Issues a Brochure on Textiles and** Wearing Apparel As a Priority Trade Issue

U.S. Customs and Border Protection (CBP) has issued a brochure that explains why importations of textiles and wearing apparel are considered to be one of CBP's Priority Trade Issues (PTI). The PTI's represent high-risk areas that can cause high revenue loss and harm the U.S. economy.

The link to this brochure can be found on CBP's website at: https://www.cbp.gov/document/factsheets/textiles-and-wearing-apparel-prioiritytrade-issue-brochure

By Todd Boice, President

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