



EIB World Trade Headlines

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-Food Exports Notice- Immediate Action Required-

FDA Food Facility Registration Renewal Begins *(All Facilities Must Register by December 31, 2012)*

The Food and Drug Administration began the period for registration renewal for food facilities Oct. 22 at 12:01 a.m. The biannual registration renewal, required by the Food Safety Modernization Act, had been on hold pending release of related guidance documents, but FDA said it's ready for the registration renewals, which may be submitted either online, by mail, or by fax, after it finalized its guidance on additional food categories in food facility registrations. All food facilities must renew their registration by Dec. 31. Foreign facilities must designate a U.S. Agent that will be liable for foreign facility reinspection fees.

FSMA requires all food facilities to renew their registrations every two years, between Oct. 1 and Dec. 31, on even numbered years. All domestic and foreign facilities that manufacture, process, pack, or hold food for human or animal consumption in the U.S. are required to register, including those already registered with FDA. Food facilities that fail to register will be subject to import refusal.

(Continued below)

NEWSLETTER NOTES

*-Food Exports Notice-
Immediate Action Required-

*International Chamber of
Commerce Creating
Accreditation Chain for Country
of Origin Certificates

*ITA Issues FR Notice on Clean
Energy Business Delegation to
Japan

*CBP Posts September ACE
Trade Account Owner Update -
Includes Details of Reports in
Public Folder

*FIATA and EU Association
Weigh in on Mandatory
Container Weighing

*-Iran Sanctions-

*New Job Fair to Take Cue from
Speed Dating

New Mandatory Food Product Categories

The new registration includes new mandatory fields, such as additional food product categories that were previously optional fields on the food facility registration form like food product categories for animal consumption. A list of the food product categories is available in the FDA's guidance on "Necessity of the Use of Food Categories in Food Facility Registrations and Updates to Food Categories"

(<http://www.fda.gov/Food/GuidanceComplianceRegulatoryInformation/GuidanceDocuments/ucm324778.htm>), updated Oct. 19.

Facilities may complete the registration forms online (<http://www.access.fda.gov/>) between 7:00 a.m. and 11:00 p.m. ET.

Instructions for online registration are available (<http://www.fda.gov/Food/GuidanceComplianceRegulatoryInformation/RegistrationofFoodFacilities/OnlineRegistration/default.htm>).

Alternatively, facilities may register by mail, fax, or CD-ROM
<http://www.fda.gov/Food/GuidanceComplianceRegulatoryInformation/RegistrationofFoodFacilities/ucm073728.htm>.

Foreign Facilities Must Designate U.S. Agent Liable for Reinspection Fees

Foreign facilities must also designate a U.S. Agent for their facility and must include that agent's email address. Pursuant to FSMA, the U.S. Agent will now be liable for reinspection fees assessed on foreign facilities, which were set at \$289/hour if foreign travel is required for fiscal year 2013. FDA has said that it will not begin invoicing for reinspections until it finalizes its guidance on small business fee reductions.

Information available at <http://www.fda.gov/Food/FoodSafety/FSMA/ucm314178.htm>

Senator Baucus to Discuss FTA With The EU

In a press release, Senate Finance Committee Chairman Max Baucus (D-MT) announced he will push for new export opportunities for U.S. businesses and discuss a potential U.S.-EU free trade agreement (FTA).

As reported, Baucus is in Europe for a series of high-level meetings with leaders regarding the eurozone's ongoing fiscal crisis and its potential impact on the United States and the entire global economy.

The U.S. and the EU share the largest trade and investment relationship in the world. Despite the global economic downturn, the combined U.S. and EU economies account for more than 40 percent of global gross domestic product, 40 percent of world trade in goods and services, 60 percent of world foreign direct investment flows and 60-70 percent of global banking assets and financial services.

Senator Baucus press release:

<http://www.finance.senate.gov/newsroom/chairman/release/?id=52f1adf0-20ec-47c5-9ba9-5e639ca6605d>



CBP Issues FR Notice Extending ISA Eligibility to Importers who Pass Focused Assessments

U.S. Customs and Border Protection (CBP) recently announced they are expanding its Importer Self-Assessment (ISA) program to allow importers that have gone through other stringent government reviews to take advantage of the program. CBP will now allow companies that have gone through a CBP Focused Assessment (FA) audit to take part in ISA without additional reviews. CBP advised this change formalizes an informal and not widely known practice that CBP has had over the last couple of years. ISA is a voluntary program for resident importers that work with CBP to improve trade compliance.

Companies with two years of importing experience and are certified in the C-TPAT program, are eligible. ISA participants take responsibility for self-assessment, and they must control their environment and activities by assessing risk areas and communicating, informing and monitoring their customs operations. ISA has fewer members than other CBP trusted trade programs, due in part to the thorough government reviews of internal processes that some companies have found too burdensome to engage in. Under the new rules, companies that have successfully gone through a CBP Focused Assessment (FA) audit are eligible to transition into the ISA program without further CBP review within a year from the FA.

CBP noted that the FA is a more rigorous and thorough method of examining a company's internal systems for compliance with customs laws and regulations than the ISA review process. In addition, the company must also: be a U.S. or Canadian resident importer, a Customs-Trade Partnership Against Terrorism (C-TPAT) program member, have developed risk-based self-testing plan, and agrees to meet all of the ISA program requirements. An Application Review Meeting, which is normally required for ISA applicants, will not be required. CBP has posted instructions for applications for inclusion to ISA. Benefits to the ISA Program include:

*Entitled to receive entry summary trade data, including analysis support, from CBP.

(Continued above)

*Consultation, guidance, and training by CBP if requested and as resources permit (for compliance, risk assessments, internal controls, CBP audit trails, etc.).

*Opportunity to apply for coverage of multiple business units.

*Removal from Regulatory Audit's audit pool established for Focused Assessment (FA).

*A written notice from CBP of a possible violation of 19 U.S.C. 1592 or 1593(a). CBP will allow thirty days for the company to assess and, if necessary, to file a prior disclosure

*Assignment of a National Account Manager (NAM), who will ensure that issues, questions, and concerns are addressed in a timely fashion and are directed to the appropriate area.

*Expedited cargo release and internal advice/consultation from Regulations & Rulings, Office of International Trade.

*Priority consideration for applications to participate in the Centers of Excellence and Expertise tests.

CBP FR Notice (10/05/12)

http://ofr.gov/OFRUpload/OFRData/2012-24592_PI.pdf



U.S. Customs and
Border Protection

USITC Notice Indicates Start of Investigation of the U.S. and Global Olive Oil Markets

The International Trade Commission (USITC) launched an investigation into the competitiveness of the U.S. commercial olive oil industry in response to a request by the U.S. House Ways and Means Committee. The final report is due by 08/12/13, contents include:

*an overview of the commercial olive oil industry in the U.S. and major supplier countries, including production of olives for olive oil processing, planted acreage and new plantings, processing volumes, processing capacity, carry-over inventory, and consumption;

*information on the international market for olive oil, including U.S. and foreign supplier imports and exports of olive oil in its various forms, olive oil trade between the European Union and North African countries, and a history of the tariff treatment and classification of olive oil;

*a qualitative and, to the extent possible, quantitative assessment of the role of imports, standards and grading, prices, and other factors on olive oil consumption in the U.S. market; and

*a comparison of the competitive strengths and weaknesses of the commercial olive production and olive oil processing industries in the major producing countries and the United States.

A hearing in connection with the investigation has been scheduled for 12/05/12. USITC advised written submissions are due by 02/12/13.

USITC notice:

http://www.usitc.gov/press_room/news_release/2012/er1001kk1.htm

International Chamber of Commerce Creating Accreditation Chain for Country of Origin Certificates

A new accreditation chain for country of origin (CO) certificates issued by the national Chambers of Commerce was launched by the International Chamber of Commerce (ICC) World Chambers Federation (WCF). Julie Sonladuangchanh, a project manager announced, the CO Accreditation Chain aims to assist chamber leaders to harmonize CO certification standards and processes, to the benefit of the chambers, traders and customs administrations. By joining the accreditation chain, eligible chambers agree to follow the ICC WCF International CO Guidelines, which have been endorsed by many international organizations, and commit to issue COs with the highest level of quality.

The Federation has notified all World Customs Organization Customs administrations of the implementation of the new Accreditation Chain. Chambers can adhere to the chain guidelines on a voluntary basis by agreeing to follow the internationally applicable and widely accepted standards.

ICC notice:

http://www.iccbooks.com/Product/ProductInfo.aspx?id=299&utm_source=French+email&utm_medium=email&utm_campaign=French+email

Export-Import Bank Issues FR Notice on Survey of Bank Practices and Competitiveness

Recently announced, the Export-Import Bank of the U.S. plans to ask about 300 U.S. exporters and commercial lending institutions that have used Ex-Im Bank's short-, medium-, and long-term programs over the previous calendar year to participate in the online survey to evaluate the services. Ex-Im is seeking comments on the paperwork burden.

Comments should be received by 11/05/12 via WWW.REGULATIONS.GOV or by mail to Office of Information and Regulatory Affairs, 725 17th Street, N.W. Washington, D.C. 20038 Attn: OMB 3048-0004

Ex-Im press release:

http://www.pdfdownload.org/pdf2html/pdf2html.php?url=http%3A%2F%2Fwww.ofr.gov%2FOFRUpload%2FOFRData%2F2012-24480_PI.pdf&images=yes

Export-Import - Helping Exporters While Decreasing the Deficit

The Export-Import Bank of the U.S. reported earnings over \$803 million for taxpayers above the cost of all operations in the fiscal year ending 09/30/12. The funds have been transferred to the U.S. Treasury General Fund. Chairman Fred Hochberg announced, although the books have not yet been fully closed on FY 2012, "it looks like we'll again have another record-setting year." From fiscal years 2008-2012 the bank sent a net amount of \$1.6 billion to the Treasury.

Ex-Im press release:

<http://www.prnewswire.com/news-releases/export-import-bank-earns-over-803-million-for-taxpayers-during-fiscal-year-just-ended-172823051.html>

ITA Issues FR Notice on Clean Energy Business Delegation to Japan

The International Trade Administration (ITA) will lead a delegation of U.S. companies to participate in a Renewable Energy Policy Business Roundtable in Tokyo, Japan scheduled for 12/03/12. The Department of Energy (DOE) will chair the round table. Following the roundtable, the delegation will travel to northeast Japan for site visits to learn firsthand the current condition of reconstruction after the March 2011 earthquake and tsunami and the role of renewable energy in those efforts. The ITA reported Japan's decision to phase out nuclear power creates business opportunities for U.S. clean energy companies. Participants must register online no later than 10/31/12. ITA advised that applications will be taken on a first-come, first-served basis.

ITA FR Notice:

http://www.ofr.gov/OFRUpload/OFRData/2012-24297_PI.pdf

Brazil Puts Tariff Hikes on 100 Products Into Effect on October 1, 2012

Since no MERCOSUR customs union members protested Brazil's action during the allotted 15-day period, Brazil's Ministry of Development, Industry, and International Trade announced effective 10/01/12, Brazil's temporary tariff hike on 100 products went into effect.

Products include tires, auto parts, kitchenware, footwear, and paper. The tariff increases of up to 25 percent will be in effect for a period of one year, after which they may be extended until 12/31/14.

The list of products affected:

http://www.desenvolvimento.gov.br/arquivos/dwnl_1346857723.pdf

Press release:

<http://www.mdic.gov.br/sitio/interna/noticia.php?area=1¬icia=11846>



Gotta Love New England!



Nuclear Energy Institute Issues Report on Disadvantages for U.S. Nuclear Exporters

The Nuclear Energy Institute (NEI) recently reported that the U.S. export control regime places companies at a "serious disadvantage" in the international nuclear energy export market. The report compared nuclear energy trade regimes in five leading supplier regimes with the U.S. export control regime. The report noted, "compared to the nuclear export control regimes of Russia, Japan, ROK and France, the U.S. regime is, in many respects, more complex, restrictive and time-consuming to navigate and fulfill."

Fundamental aspects of the U.S. export control regime were established more than six decades ago, before the creation of the Nuclear Suppliers Group (NSG). The report stated, "during this time, the U.S. regime has evolved into a patchwork of requirements with layers of modifications."

But the Russian, Japanese, and Korean regimes are "relatively modern." According to the report, recent reform efforts will not alleviate these problems. While the Obama Administration has launched an effort to reform export controls, it is focused solely on controls administered by the Bureau of Industry & Security (BIS) and the U.S. State Department, which are applicable only to a small percentage of exports of nuclear power-related commodities and technologies.

NEI report:

<http://www.nei.org/resourcesandstats/documntlibrary/newplants/whitepaper/nuclear-export-controls-a-comparative-analysis-of-national-regimes-for-the-control-of-nuclear-materials-components-and-technology>

NEI press release:

<http://www.nei.org/newsandevents/newsreleases/report-us-firms-at-serious-disadvantage-to-compete-in-global-nuclear-energy-market/>

Update on Panama Canal Expansion Project

According to the Panama Canal Authority (ACP), five years after breaking ground, progress on the Panama Canal expansion is nearing the halfway point. ACP estimated that, as of 08/31/12, the expansion was 44.5 percent completed. Panama Canal Administrator Jorge Quijano reported ACP estimates that design and construction of the new locks is about one-third done. The locks gates are being fabricated in Italy and the first four gates should be shipped to Panama during the first quarter of 2013.

The last four gates should be in Panama in the first quarter of 2014. Concurrently the valves are being fabricated in Korea and are being incorporated into the lock structure. Flooding of the locks and final commissioning is planned to start in September 2014. Total expansion of the project is estimated at 44.5%.

Specific progress on each aspect of expansion is estimated by ACP and posted for review.

ACP report: <http://www.pancanal.com/eng/pr/press-releases/2012/09/25/pr453.html>

ITA Creates Website for Green Technology Exporters

The International Trade Administration (ITA) recently launched an "Environmental Solutions Exporter Portal". The portal is the first fruit of the U.S. Environmental Export Initiative (EEI), a cooperative effort between the ITA, Environmental Protection Agency (EPA), U.S. Trade Representative (USTR), and Department of Agriculture (USDA). According to ITA Under Secretary Francisco Sanchez, "our private sector partners have told us they need one place where they can go to find information on federal programs that support U.S. environmental exports.

This Portal now provides that resource." The website provides a catalogue of U.S. producers of green technologies, and includes an "Environmental Solutions Toolkit" that provides information to foreign consumers on solving environmental problems. It also provides exporters with access to services, including market research; export counseling; and financing.

ITA's website <http://export.gov/>
ITA Under Secretary Sanchez remarks:
<http://www.trade.gov/press/speeches/2012/sanchez-100112.asp>

Environmental Solutions Exporter Portal:
<http://export.gov/envirotech/>

CPSC Issues FR Notice Seeking Comments on Proposed Children's Sleepwear Reporting Rules

The Consumer Product Safety Commission (CPSC) is seeking comments on a proposed three-year extension of approval of a collection of information from manufacturers and importers of children's sleepwear. The information collection is in the Standard for the Flammability of Children's Sleepwear: Sizes 0 through 6X and the Standard for the Flammability of Children's Sleepwear: Sizes 7 through 14. CPSC advises that the standards and implementing regulations establish requirements for testing and recordkeeping by manufacturers and importers of children's sleepwear.

Commission staff estimates that about 83 firms manufacture or import products subject to the sleepwear flammability standards. The firms may perform an estimated 2,000 tests each, which take up to 3 hours per test, for a total annual burden of about 6,000 hours on each firm.

Comments are due 12/03/12 to Docket No. CPSC-2013-0002, via <http://www.regulations.gov>, or to Office of the Secretary, Consumer Product Safety Commission, Room 502, 4330 East West Highway, Bethesda, MD 20814.

CPSC contact: Robert Squibb, 301-504-7815, or rsquibb@cpsc.gov.

CPSC FR Notice (10/04/12)
http://www.pdfdownload.org/pdf2html/pdf2html.php?url=http%3A%2F%2Fwww.ofr.gov%2FOFRUpload%2FOFRData%2F2012-24491_PI.pdf&images=yes



CBP Posts September ACE Trade Account Owner Update - Includes Details of Reports in Public Folder

U.S. Customs and Border Protection's (CBP's) September Automated Commercial Environment (ACE), Trade Account Owner (TAO) update, provided descriptions of the various reports included in each of the ACE public folders. CBP reported entry summary filing in ACE has grown from 1% to nearly 11% during fiscal year 2012. CBP notes what the users see is based on their view as a broker or a carrier. As reported, the public folders include information on:

***Help** – This folder contains the Running ACE Reports User Guide associated with the importer, broker, carrier or surety view and the reports Data Dictionary which includes information on selected Account Management and Transactions reports.

***Account Management** – This folder includes account profile reports, aggregate and detail cargo entry and entry summary reports for ACS and ACE filed summaries, compliance reports, bond reports, broker permit and employee reports, a declaration report and quick view reports. What the users see is based on their view as an importer, broker or surety.

***Account Revenue** – This folder includes reports for entry summaries flagged for inclusion on a periodic daily or monthly statement. What the users see is based on their view as an importer or broker.

***Authorized Data Extract** – This folder includes extract reports that can be scheduled to run with up to 2 million rows of data provided. What the users see is based on their view as an importer or broker.

***Entry Summary** – This folder includes reports for ACE filed entry summaries only with one exception. The ESM 7025 CBP Form 28, 29, 4647 Status report which includes all entry summaries for which a form has been issued in ACE.

(Continued below)

***Multi-Modal Manifest** – This folder includes bill of lading reports, in-bond reports, manifest and equipment reports. What the users see is based on their view as an importer, broker or carrier.

***Reference** –This folder includes two reference reports for trade, the Public FIRMS code report and the UN Location Code report.

***Shared Reports** – This folder contains reports created by the account and saved to this folder where they are accessible by other authorized users of the account.

***Transactions** – This folder includes truck manifest reports including BRASS reports, carrier activity, in-bond and compliance reports as well as transactions details reports.

CBP also advised some data objects within the ACE reports aren't compatible with others, meaning the user won't be able to combine data by dragging and dropping items into the report. Incompatible objects will be grayed out. CBP noted while there's no report for post summary correction (PSC), the PSC data elements can be added, for example, to either the ESM 7008 or 7068 report. The data elements are located in the Summary Header and Line/PSC class/sub-class. In addition, CBP strongly encourages all ocean carriers to begin using the Document Image System (DIS) to file their manifests electronically and reduce the number of paper filings.

CBP advised this will result in a significant cost savings for ocean carriers as well as expedite the review and processing of ocean manifests. September updated noted it received 13 applications to participate in the recently expanded Simplified Entry (SE) pilot, and is currently conducting an internal review of these applications. CBP plans to announce the new participants in early October 2012.

ACE September TAO update:

http://apps.cbp.gov/csms/docs/18971_727041212/September_2012_TAO_Update_FINAL.pdf

CBP Updates Fact Sheet on Simplified Entry

U.S. Customs and Border Protection (CBP) recently posted a fact sheet on Simplified Entry (SE), which provides information on how the SE process works, advantages to the approach and the addition of other parts within the SE pilot. According to CBP, planned new functionalities for the SE pilot are:

- *Participating Government Agency (PGA) Message Set
- *Document Image System (DIS)
- *Single Transaction Bonds (STBs)
- *Automated corrections and deletions
- *Simplified Entry Reports
- *Remote Location Filing (RLF)
- *Expansion to the ocean mode of transportation

CBP notice:

http://www.cbp.gov/linkhandler/cgov/newsroom/fact_sheets/trade/ttfs/sefs.ctt/sefs.pdf

NRF Port Tracker Issues Report on October Container Traffic

According to the monthly Global Port Tracker report by the National Retail Federation (NRF) and Hackett Associates, import cargo volume at U.S. ports is expected to increase 9.9 percent in October. U.S. ports followed by Global Port Tracker handled 1.42 million Twenty-foot Equivalent Units (TEU) in August; up 6.7 percent from July and 3.3 percent from August 2011. NRF estimates since most holiday merchandise will be in distribution centers by the end of October; monthly cargo volume will drop off for the remainder of the year but will remain above 2011 levels. After the holidays, January 2013 is forecast to stay at 1.28 million TEU, down one-half of 1 percent from January 2012, and February is forecast at 1.19 million TEU, up 9 percent from a year earlier.

NRF

report: http://www.nrf.com/modules.php?name=News&op=viewlive&sp_id=1435

ITA Posts Fact Sheet on Final AD/CVD Duties on China Solar Cells

As reported, the International Trade Administration (ITA) will impose combined antidumping and countervailing duty (AD/CV) duties of 23.75 to 254.66 percent as a result of its final determinations in the AD/CV duties investigations of crystalline silicon photovoltaic cells, whether or not assembled into modules, from China (A-570-979 / C-570-980). The ITA's finding of critical circumstances for most Chinese exporters' means that AD and CV duties will be collected, for the most part, retroactive to 90 days before the respective preliminary determinations were published.

According to a fact sheet, the ITA found dumping margins ranging from 18.32 percent to 249.96 percent, and subsidy margins ranging from 14.78 percent to 15.97 percent. The ITA reported it will reduce the dumping margins by the amount of export subsidies determined by the CV duty investigation, or 10.54 percent, as required by law. The fact sheet reports that AD cash deposits will range from 7.78 percent to 239.42 percent, so combined AD and CV cash deposits for subject merchandise will range from 23.75 to 254.66 percent. The ITA noted in its fact sheet that the International Trade Commission (ITC) is scheduled to make its final injury determination by 11/23/12.

Should the ITC find injury, the ITA will issue antidumping and/or countervailing duty orders. If the ITC finds in the negative, the ITA will not impose AD and/or CV duties. Complete details and comments from respondents are posted for review.

ITA notice:

http://ia.ita.doc.gov/download/factsheets/factsheet_prc-solar-cells-ad-cvd-finals-20121010.pdf



FIATA and EU Association Weigh in on Mandatory Container Weighing

The International Federation of Freight Forwarders Associations (FIATA) and the European Association for Forwarding, Transport, Logistics and Customs Services recently endorsed a joint position paper on mandating container weighing in ports. The organizations announced in the paper that they have "considered with great interest" the recent debate on Misdeclaration of weights in container transport.

Some maritime interests, with the support of the Danish and Dutch governments, have called for the International Maritime Organization's (IMOs) Safety of Life at Sea regulations to be changed to ensure that the actual weight of a loaded container is verified prior to vessel loading.

FIATA noted the discussion is too focused on a relatively small risk instead of taking a wider look at the whole process of shipping containers. The focus of those who started the debate should be on lashing the containers on the stack; carriers' maintenance procedures; and the fact that it's common practice that around 10% of all containers loaded on a ship will end up on a stack different than on the stowage plan.

The groups questioned whether there's enough evidence about the scale and causes of misdeclared container weights to justify new rules. Weighing all containers "is neither practical nor desirable." At the conference, FIATA's Multimodal Transport Institute also approved a paper on transport emissions that will "catapult FIATA to the core of the political debate on sustainable logistics."

FIATA position paper on container weight:

http://www.fiata.com/uploads/media/FIATA_Position_Paper_-_on_the_Mandatory_Verification_of_Container_Weights.pdf

FIATA paper on emissions:

http://www.fiata.com/uploads/media/FIATA_Position_Paper_-_CO2_and_other_Emissions_in_Freight_Transport_and_Logistics.pdf

FIATA press release:

<http://www.fiata.com/index.php?id=34>

-Iran Sanctions-

United States Adds Multiple Oil, Banking and Shipping Companies to Sanctions List

-SNR Denton

-Michael Zolandz, Thomas F. Walls, Peter Feldman and Emma Radmore

-Iran, USA

-July 18 2012

On July 12, 2012, the United States added a substantial number of oil, banking, and shipping companies to the list of Specially Designated Nationals ("SDN list") subject to US economic sanctions. The designation of this latest group of entities was made by the US Treasury Department, in coordination with the US State Department. It is part of a continuing effort to expose the use of front companies and other illicit methods employed by Iran to circumvent international sanctions. The move is intended to further limit the Iranian government's ability to finance its nuclear weapons program.

This action by the US comes as Iran reportedly faces unprecedented challenges in exporting crude oil to its overseas customers. The European Union embargo on Iranian oil that became effective on July 1, 2012, prohibiting the import, purchase or transportation of Iranian crude oil, petroleum and petrochemical products.

The sanctions also ban the provision of financing or financial assistance (direct or indirect), including financial derivatives, insurance and reinsurance, related to the import, purchase, or transport of Iranian crude oil, petroleum and petrochemical products. (This prohibition on financial services also extends to non-EU third country purchases of Iranian crude oil, petroleum and petrochemical products.)

The EU restrictions, along with a similar United States that recently went into effect, have forced Iran to stockpile significant amounts of crude oil that it currently cannot sell. Iran reportedly is nearing the capacity of its onshore storage facilities, so it must store substantial quantities of crude oil on container vessels at sea.

(Continued above)

Within this context, the US has sought to increase the economic and political pressure on Iran, in part by exposing - and imposing sanctions on - Iranian front companies in the oil, banking, and shipping sectors. On July 12, the US made several such identifications pursuant to US Executive Order 13599 ("EO 13599"). EO 13599 was issued on February 6, 2012. It freezes¹ the property and interests in property (within US jurisdiction) of "the Government of Iran"² - EO 13599 also generally prohibits US persons from doing business with the Government of Iran.³

Notably, the provisions of EO 13599 apply to an entity regardless of whether the US Government has publicly identified that entity as "the Government of Iran" and added it to the SDN list. To help US persons better understand - and meet - the potential compliance challenges posed by this framework, from time to time the US announces identifications of certain entities and individuals who are considered by the US to be "the Government of Iran" for sanctions purposes. The July 12, 2012 announcement is particularly notable both because of the large number of designations made and the specific designation of the National Iranian Tanker Company.

Among the key aspects of the July 12 announcement are the following:

Oil

The US exposed several front companies involved in Iran's efforts to remain engaged in the international petroleum markets by evading the requirements of sanctions regimes imposed recently by the US, European Union, and other nations that seek to drastically curtail Iran's ability to export crude oil. The US identified four front companies for the Naftiran Intertrade Company ("NICO") or the National Iranian Oil Company ("NIOC"). Both NICO and NIOC were added to the SDN list in 2008 and are central to Iran's ability to conduct oil sales. The front companies identified by the US on July 12 are located in Switzerland, Hong Kong, Malaysia, and Dubai. All four are in key geographic areas of focus for the US Government as it seeks to enforce sanctions against Iran.

(Continued below)

Financial Services

The US identified 20 additional Iranian financial institutions that are blocked under EO 13599. US authorities are mindful that many non-US financial institutions also screen their customers and counterparties against the SDN list, so the addition of these financial institutions to the list is intended to have more global ramifications beyond merely prohibiting US persons from dealing with the designated banks. This reflects the ongoing efforts by the US to further isolate Iran from global markets, and to prevent Iran from obtaining access to international trade and investment.

Shipping

The July 12 actions by the US also targeted Iran's shipping fleet, which reportedly is used by Iran to evade international sanctions on its oil exports and on its involvement in weapons of mass destruction activities. Several major news outlets have recently reported on Iran trying to camouflage its ships by repainting and/or re-flagging its vessels, as well as by turning off ships' GPS transponders contrary to international maritime law and custom.

For the first time, the US identified and listed as a Specially Designated National the National Iranian Tanker Company ("NITC"), a major international container company that purports to be privately held, but which the US now officially views to be owned or controlled by the Government of Iran. In addition to adding NITC to the SDN list as a corporate entity, the US also designated 58 of NITC's vessels and 27 of its affiliates.

The July 12 announcements also included designations related to the Islamic Republic of Iran Shipping Lines ("IRISL"). These additions to the SDN list were made pursuant to US Executive Order 13382 ("EO 13382"), which authorizes sanctions on persons involved in Iran's weapons of mass destruction proliferation activities. In addition to the asset blocking measures and the restrictions on doing business with US persons outlined above, EO 13382 also prohibits any persons designated under its authority from receiving a visa to enter the United States.

(Continued above)

The US Government designated seven new vessels because of their affiliation with IRISL, bringing the total number of IRISL-related blocked vessels to 155. The US also updated its SDN listings for 57 IRISL-affiliated vessels that, since their original listing, have been renamed and/or re-flagged. Additionally, the US added to the SDN list a Dubai-based company that acts or purports to act on behalf of IRISL.

As the international sanctions against Iran continue to intensify, active monitoring of the policy landscape remains critical. The evolving structure of the various restrictions on Iran's oil exports and vessel fleet makes it especially important to employ enhanced due diligence measures to mitigate risk. Similarly, given the EU's embargo on Iranian crude oil, petroleum and petrochemical products, attention should be focused on EU Member States and other countries that may impose new national sanctions regimes.

New Job Fair to Take Cue from Speed Dating

Wednesday, October 10, 2012 10:48 PM EDT
By Steve Collins
Staff Writer

BRISTOL — A new push to promote Central Connecticut's manufacturing aims to match skilled workers with job opportunities at companies that are struggling to find employees who possess the experience and training necessary.

The Connecticut Manufacturing Job Match program was created to lend a hand to businesses that are having a hard time filling vacancies, especially smaller firms that don't have the administrative personnel to weed through applications.

(Continued below)

"There was a strong need for focus" on the problem, said U.S. Rep. John Larson, an East Hartford Democrat whose 1st District includes Bristol, Southington, Berlin and Newington. The manufacturing focus that is central to the new "Connecticut. Dream It! Do It!" initiative offers "a very important month for us," New Britain Mayor Timothy O'Brien said during a kickoff ceremony at Bristol's Clarion Hotel Thursday.

Mayor Art Ward of Bristol said Larson deserves a lot of credit for pushing to create the new job matching program. "A lot of people out there are frustrated," Ward said. Cheryl Derr, who works for Integrity Manufacturing in Farmington, said that "hiring costs a lot of money" and is difficult for small companies that struggle to find the skilled workers they need.

She said that having state experts provide a helping hand is "a win-win for both of us." Pat Downs of the Connecticut Center for Advanced Technology said companies and workers can register online, creating databases of skills sought as well as the prospective employees who might possess them. She said the job match program then matches them, checks people and creates a scenario where a worker can quickly interview with a number of companies. Larson said the "speed dating" type offers a real opportunity for everyone involved.

Downs said about 50 people have already registered and a third them have found good jobs — and the program is just getting under way. "We really need to get more young people interested" in the high-tech jobs that manufacturers desperately need to fill, O'Brien said.

Larson said this could be the time for "a rebirth of manufacturing in Central Connecticut" because of major defense contracts locked in for many years. "This is a historic opportunity to grow manufacturing in our region," O'Brien said. "If we do this now, we'll create a real bedrock for the future."

For more information or to register, check out the state Department of Labor's website at ct.gov/dol and look for the Manufacturing Job Match icon.

The next job match "speed interviewing" event is slated for 8 a.m. to 1:30 p.m. Nov. 15 at Generale Ameglio Hall, 13 Beaver St., New Britain. It is for the towns of Berlin, Bristol, New Britain, Plainville and Southington.

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