

Alert | International Trade



March 2023

US Customs to Require China Factory Postal Code to Ensure Imported Goods Not Made with Forced Labor

Starting March 18, 2023, all shipments manufactured in China will be required to enter the U.S. with the postal code of the factory. U.S. Customs and Border Protection (CBP) will be validating those imports to ensure the imported goods are not produced in the Xinjiang Uyghur Autonomous Region (XUAR).

The Uyghur Forced Labor Prevention Act (UFLPA) establishes a rebuttable presumption that goods, merchandise, articles, and wares that are produced, manufactured, or mined in whole or in part in Xinjiang are prohibited under 19 U.S.C. § 1307 and are not entitled to entry into the United States. Additionally, any goods manufactured, produced, or mined by entities on the UFLPA Entity List are also subject to this presumption.

Under the UFLPA Region Alert, being deployed March 18, 2023, all entries from China on CBP's Automated Commercial Environment (ACE) system, which CBP uses to collect data on imports into the United States, will go through the following three validations:

1. Postal code will be a required field.
2. Users will receive an error message if the provided postal code is not a valid Chinese postal code.
3. Users will receive a warning message when a postal code associated with the XUAR region is provided.

The ACE system will provide these validations when the manufacturer's country of origin for an entry is the People's Republic of China (CN), CN is selected as the manufacturer's country of origin when a Manufacturer Identification (MID) code is created, and when an existing MID with CN as its country of origin is updated.

Additionally, CBP will not release a list of Chinese postal codes or a list of postal codes in the XUAR as it deploys the UFLPA Region Alert. "Everyone needs to do the due diligence to know" their supply chains, and "part of that due diligence" is the knowledge of where a shipment came from, including the manufacturer's name and address, which includes the postal code, according to Katie Woodson from CBP's Forced Labor Division. If ACE produces a warning message, importers should be aware that the UFPLA will be triggered. Following that, shipments from that manufacturer could be detained.

Authors

This GT Alert was prepared by:

- [Laura Siegel Rabinowitz](#) | +1 212.801.9201 | rabinowitzl@gtlaw.com
- [Donald S. Stein](#) | +1 202.530.8502 | steind@gtlaw.com
- [Madeline Orlando](#) | +1 916.442.1111 | orlandom@gtlaw.com

Albany. Amsterdam. Atlanta. Austin. Berlin.~ Boston. Charlotte. Chicago. Dallas. Delaware. Denver. Fort Lauderdale. Houston. Las Vegas. London.* Long Island. Los Angeles. Mexico City.+ Miami. Milan.» Minneapolis. New Jersey. New York. Northern Virginia. Orange County. Orlando. Philadelphia. Phoenix. Portland. Sacramento. Salt Lake City. San Diego. San Francisco. Seoul.° Shanghai. Silicon Valley. Tallahassee. Tampa. Tel Aviv.^ Tokyo.* Warsaw.~ Washington, D.C.. West Palm Beach. Westchester County.

*This Greenberg Traurig Alert is issued for informational purposes only and is not intended to be construed or used as general legal advice nor as a solicitation of any type. Please contact the author(s) or your Greenberg Traurig contact if you have questions regarding the currency of this information. The hiring of a lawyer is an important decision. Before you decide, ask for written information about the lawyer's legal qualifications and experience. Greenberg Traurig is a service mark and trade name of Greenberg Traurig, LLP and Greenberg Traurig, P.A. ~Greenberg Traurig's Berlin office is operated by Greenberg Traurig Germany, an affiliate of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. *Operates as a separate UK registered legal entity. +Greenberg Traurig's Mexico City office is operated by Greenberg Traurig, S.C., an affiliate of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. »Greenberg Traurig's Milan office is operated by Greenberg Traurig Santa Maria, an affiliate of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. °Operates as Greenberg Traurig LLP Foreign Legal Consultant Office. ^Greenberg Traurig's Tel Aviv office is a branch of Greenberg Traurig, P.A., Florida, USA. ¢Greenberg Traurig's Tokyo Office is operated by GT Tokyo Horitsu Jimusho and Greenberg Traurig Gaikokuhojimbengoshi Jimusho, affiliates of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. ~Greenberg Traurig's Warsaw office is operated by GREENBERG TRAURIG Nowakowska-Zimoch Wysokiński sp.k., an affiliate of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. Certain partners in GREENBERG TRAURIG Nowakowska-Zimoch Wysokiński sp.k. are also shareholders in Greenberg Traurig, P.A. Images in this advertisement do not depict Greenberg Traurig attorneys, clients, staff or facilities. No aspect of this advertisement has been approved by the Supreme Court of New Jersey. ©2023 Greenberg Traurig, LLP. All rights reserved.*