

## USA MARKET UPDATE

# PROPOSED CHANGES TO FOREIGN IMPORTER OF RECORD (FIOR) REQUIREMENTS

Important information for Australian exporters shipping goods to the USA



## USA MARKET UPDATE

### Proposed USA Customs Compliance Changes

*What Australian Exporters Need to Know*

#### What Australian Exporters Need to Know?

On 3 June 2026, the United States Government issued Executive order 14411, “Strengthening Customs Enforcement”, proposing significant changes to the way U.S. Customs and Border Protection (CBP) manages imports, particularly where businesses use a Foreign Importer of Record (FIOR).

While these changes are not yet in effect and remain subject to consultation and formal rulemaking, Australian exporters using a Foreign Importer of Record should begin reviewing their current import arrangements and be aware of the direction U.S. Customs is taking.

## What do the proposed changes mean?

- More stringent eligibility and compliance requirements.
- Higher customs bond and financial security requirements.
- Additional disclosure of ownership, business activities, supply chain information and expected import volumes.
- Increased customs audits, compliance checks and ongoing importer vetting.
- Higher penalties for non-compliance & potentially longer customs clearance times

## Key Operational Change

One of the most significant proposed changes is the removal of the simplified customs clearance process currently available for many lower-value shipments imported under a Foreign Importer of Record.

If implemented, these shipments may instead require a formal customs entry, increasing customs brokerage, documentation requirements and potentially both customs clearance costs and processing times.

## Who is likely to be affected?

These proposed changes are expected to primarily affect Australian businesses that:

- Export goods to the USA under DDP (Delivered Duty Paid) terms.
- Act as the Foreign Importer of Record.
- Regularly ship lower-value consignments directly to customers in the United States. (shipments valued at or less than USD2500.00)

**Businesses where the US customer acts as the Importer of Record are expected to experience little or no impact.**

## Implementation Timeline

The Executive Order has now been signed; however, the proposed reforms will be introduced progressively over the coming months as U.S. Customs develops and consults on the new regulations.

- 45 Days – Recommendations for additional customs legislation.
- 90 Days – Additional documentation requirements, stricter penalties and enhanced enforcement measures.
- 180 Days – Importer eligibility reforms, increased bonding requirements and enhanced importer vetting.
- 12 Months – Government review of the effectiveness of the new measures.

## What should Australian exporters do?

**There is no immediate action required.**

However, businesses currently using a Foreign Importer of Record should review their US import arrangements and be prepared for increased compliance, customs bonding and documentation requirements as further guidance is released.

## TCF Insight

TCF International is closely monitoring these developments through our trusted US partners and will continue to keep clients informed as further guidance is released by U.S. Customs and Border Protection.

If your business exports to the USA under DDP terms or currently acts as the Foreign Importer of Record, and you would like to discuss how these proposed changes may affect your supply chain, please contact your TCF representative.