

**Supporting Statement
Global Business Identifier (GBI)
1651-0141**

A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

In December 2022, U.S. Customs and Border Protection (CBP) launched a Global Business Identifier (GBI) Evaluative Proof of Concept (EPoC), now referred to as the GBI Test, which aims to determine a solution involving one or more identification numbers (identifiers) maintained by 3rd party organizations that will uniquely discern main legal entity and ownership; specific business and global locations; and supply chain roles and functions. While all GBI Test information is completely voluntary and optional, entry filers must signal their intent to participate in the GBI Test, by email as discussed in the *Federal Register* notice announcing the test and must obtain and submit (or indicate that they are in the process of obtaining) one or more of the GBI identifiers for parties including their shippers, manufacturers, sellers, exporter, distributor, or packager as part of their email. The identifiers provide additional information about trade entities and supply chain locations associated with U.S. imports and are provided to CBP for enrollment into the GBI Test and during the Entry process. CBP is actively working to expand the list of choices and identifiers over the duration of the GBI Test, while this approval will specify the currently available identifiers, CBP will submit non-substantive change requests to the Office of Information and Regulatory Affairs as new identifiers are added to the test so that the information collection request record can be an accurate reflection of available options.

An entry filer interested in becoming a GBI Test participant may provide the following applicant information via email to the GBI Inbox (gbi@cbp.dhs.gov): company/entity legal name, legal entity headquarters and/or manufacturing site address, business phone number (associated with provided address), company website, Manufacture/Shipper Identification Code (MID), Authorized Economic Operator (AEO) identification number, and information about supply chain entities for which they intend to transmit GBIs.

Once programming has been updated as per items listed in the proposed changes below, Automated Broker Interface (ABI) filers (including brokers and self-filers), participating in the test, will be required to complete a GBI enrollment process, via ABI, prior to submitting the identifiers on an electronic entry (ACE Cargo Release). Filers are responsible for any associated costs to obtain one or more of the identifiers and can submit identifiers for the following supply chain parties:

- Manufacturer / Producer Shipper Seller

- Exporter Distributer Packager
- [New data element] Intermediary
- [New data element] Source

In addition, a new optional data element consisting of a free text field will be made available for each of the optional parties; it will allow filers to input additional descriptions and information about the specific party type or the underlying entity.

By testing the identifiers, CBP will take its first step in determining whether to amend regulations to mandate the GBI solution. Furthermore, CBP will understand the utility of collecting and/or combining the identifiers' data and will be able to make an informed decision on whether to mandate the use of the GBI solution as an alternative for the Manufacturer/Shipper Identification Code (MID).

Proposed Changes:

U.S. Customs and Border Protection (CBP), Office of Trade (OT) is submitting this PRA update for changes proposed to enhance supply chain traceability and visibility in response to the growing complexity of global trade. Programming updates are also needed to reflect changes announced via Federal Register ([89 FR 9859](#)), published in February 2024, that clarifies the purpose and scope of the test which would include exploring opportunities to enhance supply chain traceability and visibility more broadly. That update also mentioned that the GBI Test would examine how CBP, Partner Government Agencies (PGAs), and the trade industry might leverage GBIs to comply with growing supply chain traceability requirements.

1. The first programming change involves a modification within the Global Business Identifiers (GBI) Enrollment database by allowing the trade to submit one or more of the unique GBI's and Data Universal Numbering System (DUNS)) for a supply chain entity, as opposed to all three as previously approved and announced via the July 21, 2023, Federal Register ([88 FR 47154](#)). Originally, the system was programmed to only accept an enrollment when all three global identifiers (LEI, GLN and DUNS) were provided as announced in the December 2022 Federal Register ([87 FR 74157](#)). Without this programming change, if all three global identifiers are not provided at enrollment for a specific party, the system will continue to reject the enrollment transaction.
2. After GBI Enrollment is modified to accept one or more identifiers instead of requiring them all,, a related programming update will enable trade participants the ability to modify or change a previous enrollment, including updating or adding additional GBI numbers, which may include a variety of global identifier types (LEI, GLN, DUNS). This programming change would provide more flexibility and utility to GBI participants by enabling GBI numbers to be provided voluntarily when they are known and encourages participants to obtain other GBI numbers as well as keep supply chain information current because they can easily add, delete, and modify GBI numbers associated to an enrollment.

3. The GBI Test is also expanding the available GBI supply chain entity party types from the original six optional parties (Manufacturer, Shipper, Seller, Exporter, Distributor, Packager), to include two new parties: "Intermediary" and "Source, along with optional free text fields for all the parties that will allow filers to voluntarily input additional descriptions and information about the specific party type or the underlying entity. These party types and the free text fields would be made available in the GBI Enrollment database as well as in ACE Cargo Release. Collectively, the updates aim to enhance upstream supply chain traceability and visibility while addressing the increasing complexity of global trade supply chains. All participation and data is voluntary.
4. As a demonstration of CBP's intent to expand the choices of identifiers available to filers over the duration of the Test, CBP is also working to add new voluntary GBI identifiers, beginning with the Altana ID (ALTA) maintained by Altana Technologies USG Inc. (Altana). At no cost to the government to access the underlying entity and product specific supply chain data associated with an ALTA, this identifier offers comprehensive insights across a product's supply chain, thereby enhancing traceability for CBP which may translate to facilitation benefits and reduced industry costs. CBP has initiated programming requests to create an ALTA GBI field in ACE and increase the current character limit in ACE allowed for GBI identifiers. The addition of the ALTA identifier alongside the current GBI identifiers will widen participants' choices and allow CBP to continue to evaluate the breadth and veracity of entity and supply chain information embedded within different types of identifier solutions already being leveraged by trade industry traceability stewards. It will also contribute to CBP's ongoing exploration of how traced supply chain information may be ingested and operationalized for risk management and facilitation purposes. CBP proposes adding more participants as the test continues, and with approval from OMB, will add these to the collection through a non-substantive change to the collection.

CBP encourages the trade to comment specifically on whether there are other comparable identifiers trade already has, or that it would be advantageous to trade to include.

Section 484 of the Tariff Act of 1930, as amended (19 U.S. Code 1484) and Part 141, Code of Federal Regulations, Title 19 (19 CFR Part 141), pertain to the entry of merchandise and authorize CBP to require information that is necessary for CBP to determine whether merchandise may be released from CBP custody. Provisions of the U.S. Code and CBP regulations, in various parts and related to various types of merchandise, specify information that is required for entry. For reference, Part 163, Code of Federal Regulations, Title 19 (19 CFR Part 163 Appendix A) refers to

a wide variety of regulatory provisions for certain information that may be required by CBP.

- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The GBI Test, led by CBP's Office of Trade, Trade Modernization Division (TMOD), is focused on exploring diverse use cases for global identifiers being tested within ACE. The Test will continue to assess the functionality and effectiveness of universal global business identifiers to address data gaps caused by the unreliability of the manufacturer or shipper identification code (MID), in addition to exploring opportunities to enhance supply chain traceability and visibility more broadly—including examining how CBP, Partner Government Agencies (PGAs), and the trade industry might leverage GBIs to comply with growing supply chain traceability requirements to gather valuable, practical insights. This initiative will build upon the programming and framework of the initial GBI test by expanding the range of identifiers, parties and data elements available, as well as removing a requirement that made it almost impossible to participate (the requirement for all three GBI numbers for each supply chain party).

In collaboration with the U.S. Food and Drug Administration (FDA), CBP is evaluating the data to determine to what extent data behind the GBI identifiers can enhance supply chain visibility and aid in making admissibility decisions without the need for enhanced examinations or requests for additional documents at time of entry. Participants from the trade industry contribute crucial feedback and insights, which help CBP, Partner Government Agencies (PGAs), and the broader trade community explore the potential of these identifiers to meet the growing demands for supply chain traceability.

Since December 2022, trade partners submit GBI data, with updates communicated through Federal Register Notices (FRNs) including FRN ([87 FR 74157](#)), ([88 FR 47154](#)), and ([89 FR 9859](#)). The primary goal is to enhance the U.S. government's ability to monitor imports and supply chains more effectively while reducing the burden of enhanced examination and documentation requests if the information is available ahead of time. The overarching goal of this initiative is to strengthen the U.S. government's ability to monitor imports and supply chains with greater precision and effectiveness, and redirect CBP's limited resources away from lower risk imports that have provided supply chain information towards those imports with higher risk and lacking that information.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

Application and Automated Broker Interface (ABI)

As a completely voluntary program, when an importer chooses to provide GBI numbers as part of the GBI Test, ABI Filers, including brokers and self-filers, are required to submit one or more identifiers for various parties such as the manufacturer, seller, shipper, exporter, distributor and packager.

New programming would add intermediary and source to the list of optional parties, along with additional free text fields for all the new and current parties. Changes to the ABI system are also necessary to match previous FRN announcements that modified the requirement for submission of all three entity identifier numbers to one or more. Because voluntary trade participants would now be able to file only one identifier during the enrollment process, an additional update is necessary to provide them with the means to edit previous enrollments with additional identifiers if they did not file all three initially. This approach enables CBP to intake critical and essential supply chain data efficiently, reducing the need for manual data entry and minimizing errors. By leveraging information technology, the process becomes more efficient and less burdensome for voluntary trade participants, ensuring that the U.S. government can monitor imports more effectively and address any gaps in the data.

Usability Testing:

A live survey session was conducted with five client representatives to assess their understanding and readiness of GBI. Overall, teams seem aware of the value of GBI in improving supply chain visibility and are working with brokers and vendors to include it in their filings. Some feedback and suggestions included having clearer guidance and examples to support filers. Another key takeaway was the need to better communicate the benefits of GBI to vendors. Some vendors don't yet see the value and asking why it's required. Participants suggested developing materials that clearly explained the "why" behind GBI and how it supports broader trade and security goals. Other recommendations include simplifying terminology for client reps administering the tests, adding more testers, offering short briefings or trainings for relevant teams/groups, building a shared FAQ or resource page and improving outreach to vendors and brokers to drive adoption.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

This information is not collected in any other form, and therefore is not duplicated elsewhere. Additionally, CBP modified the GBI identifier field to allow the trade to voluntarily file one or more unique identifiers during the enrollment process to reduce the enrollment requirements which previously required trade entities to file all GBI identifiers. CBP proposes to include new participants to the GBI test as it continues to provide many identifiers for the trade to test/use.

- 5. If the collection of information impacts small businesses or other small entities describe any methods used to minimize burden.**

This information collection does not have an impact on small businesses or other small entities. The program is completely voluntary.

- 6. Describe consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently.**

If data collection for the GBI Test is reduced or inconsistent, several key consequences could arise. The program's ability to enhance CBP's visibility into supply chains would be

compromised; gaps in tracking the origin and production of goods would increase the risk of abuse or non-compliance and trade fraud in the GBI Test. Infrequent data collection would weaken the program's usefulness in providing accurate and time data for risk assessments and ultimately admissibility decisions. Inaccurate or untimely data could inadvertently allow high-risk shipments to enter the U.S. market, jeopardizing consumer safety and national security.

Furthermore, delays in data collection would slow the development and refinement of the GBI program, hindering its ability to address emerging trade challenges and integrate with other initiatives, such as those involving PGA partners like FDA. Reduced engagement from trade partners could result in diminished feedback, weakening the program's collaborative efforts and its ability to meet the needs of the trade community. Additionally, insufficient data collection could undermine the government's ability to enforce trade regulations effectively, leading to more violations and potential revenue loss.

Finally, the program's capacity to innovate and modernize trade practices through the use of advanced data would be stifled.

7. Explain any special circumstances.

(2). This information is collected in a manner consistent with the guidelines of 5 CFR 1320.5(d).

8. If applicable, provide a copy and identify the date and page number of publications in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Public comments were solicited by two federal register notices (FRNs), a 60-day notice published May 28, 2025 (FR) on which no comments were received and a 30-day notice published August 28, 2025 (FR) on which no comments were received.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

There is no offer of a monetary or material value for this information collection.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

PIA and SORN coverage is provided by the following:

Privacy Impact Assessments (PIAs):

- DHS/CBP/PIA-003(b) - Automated Commercial Environment (ACE). CBP Privacy will update this PIA series to provide transparency on the GBI program.
- DHS/CBP/PIA-006 Automated Targeting System (ATS), and the
- Customs-Trade Partnership Against Terrorism (C-TPAT), February 14, 2013.

System of Record Notices (SORNs):

- DHS/CBP-001 Import Information System, SORN, July 26, 2016, 81 FR 48826,
- DHS/CBP-006 Automated Targeting System, SORN, May 22, 2012, 77 FR 30297
- CBP/DHS-018 Customs--Trade Partnership Against Terrorism (C-TPAT) SORN, March 13, 2013.

Data submitted and entered into ACE may include confidential commercial or financial information which may be protected under the Trade Secrets Act ([18 U.S.C. 1905](#)), the Freedom of Information Act ([5 U.S.C. 552](#)), and the Privacy Act ([5 U.S.C. 552a](#)). However, as stated in previous notices, participation in this or any of the previous ACE tests is not confidential and, therefore, upon receipt of a written Freedom of Information Act request, the name(s) of an approved participant(s) will be disclosed by CBP in accordance with [5 U.S.C. 552](#).

- 11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

There are no questions of a sensitive nature.

- 12. Provide estimates of the hour burden of the collection of information.**

INFORMATION COLLECTION	TOTAL ANNUAL BURDEN HOURS	NO. OF RESPONDENTS	NO. OF RESPONSES PER RESPONDENT	TOTAL RESPONSES	TIME PER RESPONSE
Electronic Submission of GBI Data and Enrollment Information	17	100	1	100	10 minutes

Public Cost

The estimated cost to the respondents is \$622. This is based on the estimated burden hours (17) multiplied by the average loaded hourly wage rate for importers (\$36.57). CBP calculated this loaded wage rate by first multiplying the Bureau of Labor Statistics' (BLS) 2024 median hourly wage rate for Cargo and Freight Agents (\$23.99), which CBP assumes best represents the wage for importers, by the ratio of BLS' Q4 2024 total compensation to wages and salaries for Office and Administrative Support occupations (1.4886), the assumed occupational group for importers, to account for non-salary employee benefits.¹

¹ Source of median wage rate: U.S. Bureau of Labor Statistics. Occupational Employment and Wage Statistics, "May 2024 National Occupational Employment and Wage Estimates United States." Updated April 2, 2025. Available at https://www.bls.gov/oes/2024/may/oes_nat.htm. Accessed June 17, 2025. The total compensation to wages and salaries ratio is equal to the total compensation cost per hour worked for Office and Administrative Support occupations (\$35.86) divided by the

CBP uses an annual growth rate of 2.42% based on the prior year's change in the implicit price deflator, published by the Bureau of Economic Analysis.²

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.

There are no additional record keeping, capital, start-up or maintenance costs associated with this information collection.

14. Provide estimates of annualized cost to the Federal Government. Also provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

The estimated annual cost to the Federal Government associated with the review of this information collection is \$1,010. This is based on the number of responses that must be reviewed (100) multiplied by the time burden to review and process each response (7 minutes) = 12 hours multiplied by the average hourly loaded rate for a CBP Trade and Revenue employee (\$84.17)³ = \$1,010.

15. Explain the reasons for any program changes or adjustments reported in Items 12 or 13 of this Statement.

There has been no change to the previously reported annual burden hours for this information collection. The programming updates here mirror the same estimates used previously. We anticipate a minimal impact to trade resulting from programming changes that make it easier to participate in the test and expand the available selection of optional and voluntary parties for which GBI numbers can be submitted.

16. For collection of information whose results will be published, outline plans for tabulation, and publication.

GBI Test data will not be published for statistical purposes.

17. If seeking approval to not display the expiration date, explain the reasons that displaying the expiration date would be inappropriate.

wages and salaries cost per hour worked for the same occupation category (\$24.09). See "Table 2. Employer Costs for Employee Compensation for civilian workers by occupational and industry group." Bureau of Labor Statistics, "Employer Costs for Employee Compensation – December 2024." Released March 14, 2025. Available at https://www.bls.gov/news.release/archives/ecec_03142024.pdf. Accessed June 17, 2025.

² To adjust to 2025 dollars, multiply by the 2023-2024 percent change in the Bureau of Economic Analysis's Implicit Price Deflators for Gross Domestic Product (125.230/122.273-1). See "Table 1.1.9. Implicit Price Deflators for Gross Domestic Product," Line 1 Gross Domestic Product, annual. Bureau of Economic Analysis. Updated May 30, 2025. Available at <https://apps.bea.gov/iTable/?reqid=19&step=2&isuri=1&categories=survey#eyJhcHBpZCI6MTksInN0ZXBzIjpbMSwyLDMsM10sImRhdGEiOltbImNhdGVnb3JpZXMiLCJtdXJ2ZXkiXSxbIk5JUEFfVGFibGVfTGZldCIsljEzIl0sWyJGaXJzdF9ZZWYyLiwiMjAxNiJdLFsiTGZldF9ZZWYyLiwiMjAyNCJdLFsiU2NhbGUuLCIwIl0sWyJTZXJpZXMiLCJBIl1dfQ==>. Accessed June 17, 2025.

³ CBP bases this wage on the FY 2024 salary and benefits of the national average of CBP Trade and Revenue positions. Source: Email correspondence with CBP's Office of Finance on July 15, 2025.

The information submitted by the trade for GBI is via ABI which differs based on the trade's respective submission system. CBP is unable to display the citations on the ABI system, however, CBP can display the citations in the informational GBI website, that also has links to other informational handouts. <https://www.cbp.gov/trade/programs-administration/gbi>

CBP will display the expiration date for OMB approval of this information collection.

18. "Certification for Paperwork Reduction Act Submissions."

CBP does not request an exception to the certification of this information collection.

a. Collection of Information Employing Statistical Methods

No statistical methods were employed.