



**U.S. Customs and
Border Protection**

August 28, 2025

MEMORANDUM FOR: Dominic Mancini
Deputy Administrator
Office of Information and Regulatory Affairs
U.S. Office of Management and Budget

THROUGH: Hemant Baidwan
Acting Deputy Chief Information Officer
U.S. Department of Homeland Security

FROM: Diane J. Sabatino
(A) Executive Assistant Commissioner
Office of Field Operations
U.S. Customs and Border Protection

SUBJECT: Emergency Request under the Paperwork Reduction Act
Regarding Modified International Mail Duty Worksheet OMB No.
1651-0147

**DIANE J.
SABATINO** Digitally signed by
DIANE J. SABATINO
Date: 2025.08.28
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This memorandum requests emergency approval, pursuant to the Paperwork Reduction Act (PRA), from the Office of Management and Budget (OMB), Office of Information and Regulatory Affairs (OIRA), for the U.S. Customs and Border Protection (CBP) collection of information titled International Mail Duty Worksheet (OMB Control number 1651-0147). The U.S. Department of Homeland Security (DHS), on behalf of CBP, is seeking a revision to modify the collection for carriers that transport international postal packages to the United States as part, of or on behalf, of the international postal network to provide CBP with information necessary to implement Executive Order (EO) 14256, as amended.

To effectuate the President's Executive Order 14324 of July 30, 2025 (Suspending Duty-Free *De Minimis* Treatment For All Countries), the Secretary of Homeland Security has determined that appropriate action is needed to ensure collection of applicable duties as well as to modify the Harmonized Tariff Schedule of the United States (HTSUS) as set out in the Annex to this notice. All carriers delivering shipments to the United States through the international postal network, or other parties if qualified in lieu of such carriers, must collect and remit either the *ad valorem* or the specific duty. Carriers, or such other qualified parties approved by CBP, must apply the same duty collection methodology for all covered shipments, but may change their duty collection methodology once a month or on such other periodic time frame as CBP determines is appropriate, upon providing 24 hours advance notice to CBP. Carriers, or such other qualified

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parties, must remit to CBP the duties collected pursuant to sections 3(b) and 3(c) of Executive Order 14324 on a monthly basis or on such other periodic time frame as CBP determines is appropriate. CBP will provide separate guidance instructing carriers and other qualified parties on how to remit payments. The specific duty will be available for carriers and other qualified parties to select for a period of 6 months from the August 29, 2025 effective date of Executive Order 14324. After such time, all shipments to the United States through the international postal network must comply with the *ad valorem* duty.

CBP seeks to require submission of a worksheet through which carriers will submit the information required by, and other information necessary to implement, Executive Order 14324, as amended. The worksheet is where the carrier will declare its duty collection methodology (i.e., *ad valorem* or specific duty) for the given month, package count, country of origin, value (if applicable), and total duty amount. The second page will be utilized by the carrier to list the specifics of imported postal items.

CBP has taken all practicable steps to consult with interested agencies and members of the public in order to minimize the burden of the collection of information. The previously approved information collection collected similar information in a more limited scope. During the months that information collection has been in effect, CBP has been in constant communication with trade members and other federal government users of the information to ascertain what information is useful and easily obtained, and has designed this change to this information collection using that feedback. After the completion of the emergency approval period, CBP will undergo the usual PRA renewal process, involving federal register notices soliciting comments, and will make any further amendments to the information collection, as needed, at that time.

Emergency Justification

1. The Collection of Information Is Needed Prior to the Expiration of the Ordinary Statutory Time Periods under the PRA

To properly collect these duties, CBP must collect information using the International Mail Duty Worksheet from carriers and other qualified parties that transport international postal packages to the United States as part of or on behalf of the international postal network. These packages are transported to the United States on an ongoing basis and cannot be halted pending completion of the ordinary PRA review process. Emergency processing is therefore needed in order for CBP to immediately implement the postal duties to combat the national emergency of synthetic opioids. Although CBP already collects advance electronic data (AED) for certain inbound international mail shipments under the 19 C.F.R. 145.74, 19 USC 1415(a)(3)(F) provides that this information be used “exclusively for ensuring cargo safety and security, preventing smuggling, and commercial risk assessment targeting, and shall not be used for any commercial enforcement purposes, including for determining merchandise entry.” Thus, CBP is unable to use the AED collected under the STOP Act to implement the postal duties imposed by Executive Order 14324, as this information is meant for revenue collection.

2. The Collection of Information Is Essential to the Mission of the Agency

CBP is responsible for the collection of duties imposed by the United States. CBP will use the information collected on the International Mail Duty Worksheet to determine the amount of duty that carriers owe pursuant to Executive Order 14324. CBP can also use the worksheet as a reference when subsequently auditing carriers' liability for duties. Without this information, CBP would be unable to collect duties for mail shipments.

3. Public Harm Is Reasonably Likely to Result if Normal Clearance Procedures Are Followed

IEEPA authorizes the President "to deal with any unusual and extraordinary threat, which has its source in whole or substantial part outside the United States, to the national security, foreign policy, or economy of the United States." 50 U.S.C. § 1701(a). Once the President declares a national emergency relating to such a threat, IEEPA empowers the President to "regulate . . . importation . . . with respect to any property, subject to the jurisdiction of the United States." Proclamation 10886 formally declared a national emergency in order to address and abate the synthetic opioid crisis from the PRC, Canada and Mexico to the United States. This crisis, noted in EO 14195, is "killing approximately two hundred Americans per day, putting a severe strain on our healthcare system, ravaging our communities, and destroying our families," and synthetic opioid overdose "is the leading cause of death for people aged 18 to 45 in the United States." Executive Order 14324 states that it is still necessary and appropriate to suspend duty-free *de minimis* treatment under 19 U.S.C. 1321(a)(2)(C) in the manner and for the articles described below to deal with the unusual and extraordinary threats, which have their source in whole or substantial part outside the United States, to the national security, foreign policy, and economy of the United States. Following normal PRA clearance procedures would prevent CBP from getting PRA authorization for the International Mail Duty Worksheet urgently needed to properly gather all the necessary information, crucial to deal with the unusual and extraordinary threats which have their source in whole or substantial part outside the United States.

4. Conclusion

Following the normal clearance procedures under the PRA would prevent the swift implementation of Executive Order 14324, as amended, via the modified International Mail Duty worksheet and would thereby constrain CBP's ability to collect information needed to enforce the duties imposed under Executive Order 14324.

As discussed, CBP certifies that this request meets the requirements of 5 C.F.R. § 1320.13(a) and it is vital that this revised collection be implemented immediately. Thank you for your consideration.

Upon approval and after implementation of this collection, CBP will undergo the normal PRA process, including providing the opportunity for public comment, to renew the collection authority within six months or will discontinue the collection of this information.

Please contact C. Shane Campbell, Acting Executive Director, Cargo and Conveyance Security, at 202-818-9636 with any additional questions or concerns.