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BPE Global Hot Topic – November 2015

Can you "check the boxes"?

Are your Trade Compliance Program Goals completed for 2015?

The end of the year is rapidly approaching, and you are most likely focusing on importing and exporting product to make year-end revenue goals. Which means there is huge pressure to ensure everything is classified with a proper HS number, ECCN number, and licenses are in place or applied for, so there will be no cross-border delays in the supply chain.

This is also the time of year to assess what your goals were for your compliance program, and determine if you are on track, or if you have slipped on your planned schedule and need to take some rapid fire action to address commitments and ensure you make those year-end goals.

At BIS Update many of you visited BPE Global's booth, and it seemed it was heavy on the minds of many a trade compliance professional, that although they had actively worked on their trade compliance program in 2015, some of their goals had slipped. The most frequent admissions were failure to conduct planned training, planned auditing, or continuing to have a long list of products pending HS or ECCN classification. Having worked many years in industry, with the same responsibilities, I completely understand how this happens. The question that arises is "Do I move this to next year's calendar, or is there something I can do now to get this addressed?"

I am sure you are well aware by now that BPE Global is a big advocate of risk management. A key element of risk management beyond being able to identify and track the risks you identify is prioritization.

Time is of the essence so, here is what we suggest. Set aside an hour for yourself (and if you have a team, include them!), turn off the ringer on your phone, and close your email, so you aren't tempted to look at your inbox, go hide in a conference room, and white board the following:

1) **Prioritize the unaddressed 2015 goals.** Which are way past the deliverable date? Which do you feel are super important to accomplish? What may not be a priority for you, but is a priority for upper management?

2) **Identify of those goals which remain unaddressed those which present the most risk to your company.**

3) **Identify potential resources.** Is there unspent money in your budget to retain external resources? Remember that spending now may also be strategic to next year's budget allocation. Also, can you delegate the tasks to another function (i.e. Audit – involve an Internal Audit or Quality group who

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otherwise may be in a quiet period in December.) Training is another area where it may be helpful to leverage a relationship (i.e. work with your HR team to deploy new hire or all employee training or partner with another functional group that may also be in a quiet period in December such as Engineering, IT, or Marketing.)

Addressing unaccomplished goals now will certainly not only feel better than pushing them out until 2016, but immediately reduce identified risk now. We understand that for many of you this past year may have been a busy year or a year of growth based on your responses to our benchmark survey reports. We highly suggest that you take a moment to review our benchmark reports if you haven't yet, to understand where you fit amongst your peers in the areas of best practices and concerns.

The benchmark survey showed that Trade Compliance Managers continue to take on increasingly more global roles, with a broader scope of regulations to comply with, requiring more headcount or budget for resources. Identifying what trade compliance goals you may be able to execute over the next month will not only show management that you have executed to your commits, but poise your function to be considered an integral part of your company's success.