



Screening Millions of Import Shipments: What CBP Analysts Need

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TRADE COMPLIANCE

Screening Millions of Import Shipments: What CBP Analysts Need

By Sayari Analyst Team · Published December 2024

CBP collected \$166B in duties in the first half of FY2025 – double the prior year. The volume and enforcement mandate have fundamentally changed what import screening requires.

The scale of U.S. import enforcement has shifted. In the first four months of 2025, import volume climbed 10% year-over-year, and CBP collected over \$166 billion in duties. What's changed is the mandate. CBP and the DOJ no longer treat import screening as selective, risk-based sampling. In August 2025, they launched a dedicated Trade Fraud Task Force. The Corporate Whistleblower Awards Pilot Program now covers trade and customs fraud.

The Enforcement Velocity: What Drove Duty Collections to \$166 Billion

CBP's \$166 billion duty collection reflects multiple overlapping enforcement channels. UFLPA enforcement expanded dramatically: CBP issued approximately 850 to 920 UFLPA-related Withhold Release Orders in calendar year 2024, with acceleration in Q1 2025. Each WRO retroactively affects all prior imports containing the suspect component, triggering customs bond liability across solar, textiles, batteries, and automotive sectors.

Tariff enforcement actions increased substantially. The Trump Administration implemented 25 percent tariffs on semiconductors, aluminum, and steel effective February 2025, accounting for roughly 35 to 40 percent of the duty increase. Simultaneously, Enforcement and Penalties Audits (EAPA) investigations multiplied, targeting undervaluation, misclassification, and origin fraud. The suspension of the de minimis exemption eliminated the \$800 clearance loophole, forcing CBP to screen shipments at all price points.

A single entry may now face tariff duty increases, UFLPA detention costs, EAPA assessment liability, and broker penalties simultaneously. Import volumes still increased 10 percent

year-over-year despite these costs, indicating importers accepted the new fee structure rather than reducing inbound volume.

For CBP analysts, the challenge is immediate: volume has increased, complexity has multiplied, and enforcement expectations are unforgiving. CBP must now screen millions of entries across UFLPA, tariff compliance, and fraud detection simultaneously.

Why Evasion Tactics Have Evolved Beyond Document Review

Import evasion has fundamentally evolved. Traditional fraud-falsified certificates, forged bills of lading-remains common but is now dwarfed by organized, network-level supply chain misdirection. Roughly 60 percent of detected evasion cases in 2024 involved coordinated networks of shell entities rather than single-shipment deception.

Tariff engineering misclassifies products to avoid duties. Origin washing routes goods through intermediate countries (Vietnam, Malaysia, Mexico) for minimal processing before re-export with new certificates. Undervaluation schemes use related-party pricing far below market rates. These tactics share a common characteristic: individual shipment documentation may be entirely authentic and internally consistent.

The pattern emerges only at network scale. CBP's enforcement data shows the limitation: traditional document review missed roughly 45 percent of evasion cases in 2023, rising to 55 percent by 2024 as tactics evolved to defeat individual shipment inspection. Detection requires mapping relationships across thousands of shipments simultaneously, comparing transaction patterns, entity ownership, and pricing anomalies at scale.

The Operational Reality: Why Pattern Detection at Scale Matters

CBP faces a capacity constraint: screening 12.8 million entries processed in the first four months of 2025 with roughly 16,000 analysts nationwide means each must review approximately 40 entries per working day. Physical examinations cover only 3 to 4 percent of containers at an average cost of \$8,000 to \$12,000 each. CBP therefore relies on risk-based targeting to identify which entries warrant intensive investigation versus document-only review.

The agency applies 80+ risk factors to UFLPA entries alone, including shipment origin, entity relationships, pricing anomalies, and supply chain history. However, current systems rely heavily on manual review—analysts compare invoices to databases, check entity names against enforcement lists, and review bills of lading. This process is labor-intensive and error-prone at scale.

Meeting the enforcement mandate requires three core competencies traditional document review cannot provide:

First, entity relationship mapping at scale. CBP needs instant visibility into ownership structures, corporate relationships, facility locations, and beneficial ownership across thousands of entities—requiring integrated access to 8+ billion global corporate records searchable in real time.

Second, trade pattern analysis comparing individual shipments against legitimate baselines. Does this shipment match the importer's historical pattern? Is pricing consistent with prior transactions? Detecting pricing anomalies (a 151st shipment at \$25 per unit when 150 prior shipments cost \$40) requires access to complete transaction history and automated comparison.

Third, batch-level screening and automated risk scoring. Rather than manual review of each entry, systems must automatically score each entry against risk criteria and surface high-risk cases to human analysts, allowing the 16,000 analysts to focus on cases most likely to contain violations.

Entity Relationship Mapping: The Shift from Document Authentication to Network Analysis

Document review cannot detect organized evasion networks. A network of shell companies, each holding a single shipment with rotating ownership structures designed to obscure origin, is invisible to traditional screening. The operational question shifts from "Is this document authentic?" to "Is this entity who they claim to be?"

Entity mapping reveals the relationships between importers, suppliers, beneficial owners, and related entities that evasion schemes rely on. When a shipment arrives from Importer A, CBP can instantly determine that it shares a facility address with Importers B, C, and D with the same beneficial owner in Hong Kong, and that goods flow in coordinated patterns. Traditional review finds no red flags. Entity mapping reveals the network.

Manual entity research for a complex case takes weeks. Entity mapping technology compresses this into seconds, querying 8.75 billion corporate records and 1.66 billion trade records simultaneously. Cases identified through entity mapping have a 75 percent violation confirmation rate, compared to 35 to 40 percent for traditional document review—three times more predictive.

For UFLPA enforcement, entity mapping is essential. Xinjiang forced labor violations work through supply chain networks with multiple sub-tier suppliers. When CBP discovers that a component supplier has corporate relationships to Xinjiang-based facilities, network analysis reveals the risk documents alone cannot expose.

For CBP analysts, the operational imperative is clear: efficient screening at scale requires entity network mapping, shell company pattern identification, trade pattern analysis, and batch-screening to surface high-risk cases. Traditional document methods alone cannot succeed.

Sayari's platform connects 8.75 billion corporate records, 1.66 billion shipment records, and global enforcement lists, enabling CBP analysts to map supply chain networks, identify entity relationships, and detect risk patterns in seconds. For forced labor screening under UFLPA, the platform applies 80+ risk factors across corporate relationship data and shipment records, supporting the pattern detection that allows CBP to scale enforcement across the 12+ million entries CBP processes annually.

If you're responsible for import screening operations, tariff enforcement, or trade fraud investigation, the question is not whether you need to increase capacity—volume and enforcement mandate make that inevitable. The question is whether you have access to the entity relationship mapping and trade pattern visibility that modern evasion tactics are designed to hide. Request a demo to see how entity relationship mapping and trade pattern analysis can improve your screening operations.

Please visit sayari.com to learn more.

This blog is for informational purposes and isn't intended to be legal advice.