

NAVIGATING GLOBAL TRADE SERIES

# STRATEGIES FOR BUSINESS RESILIENCE

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Webinar #2

APRIL 2025

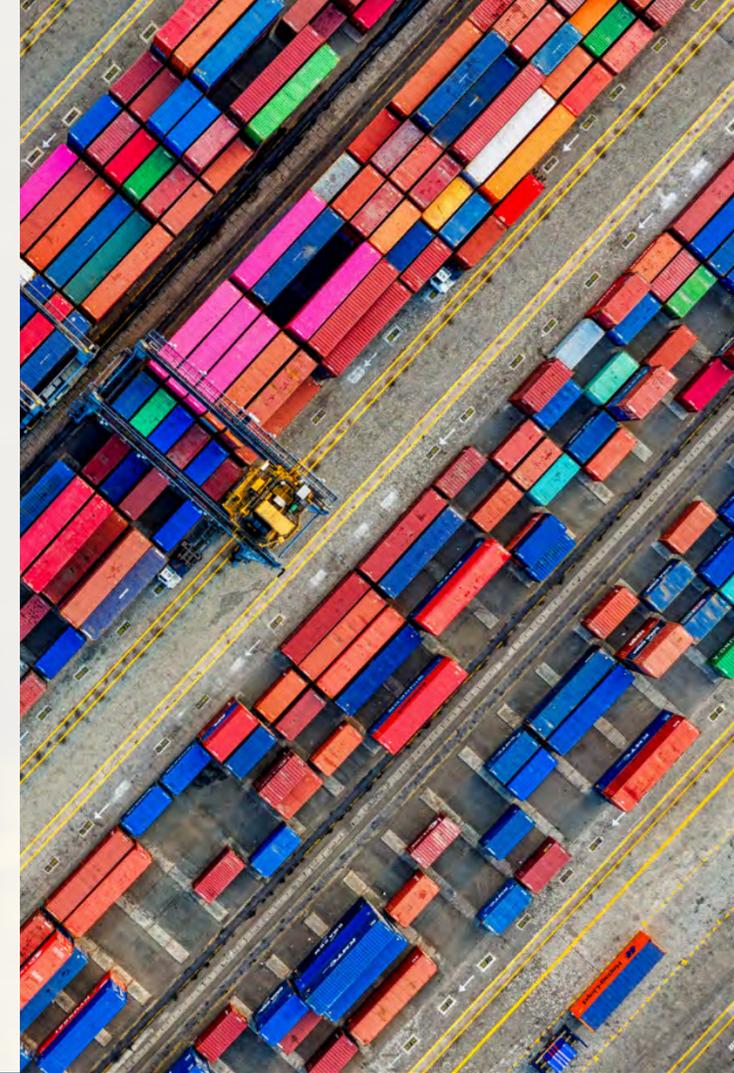


Navigating Global Trade Webinar #2

## STRATEGIES FOR BUSINESS RESILIENCE

# FOREIGN TRADE ZONE 176

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Hosted by



Mark Piekos - Executive Director

John Mink - Manager

Navigating Global Trade

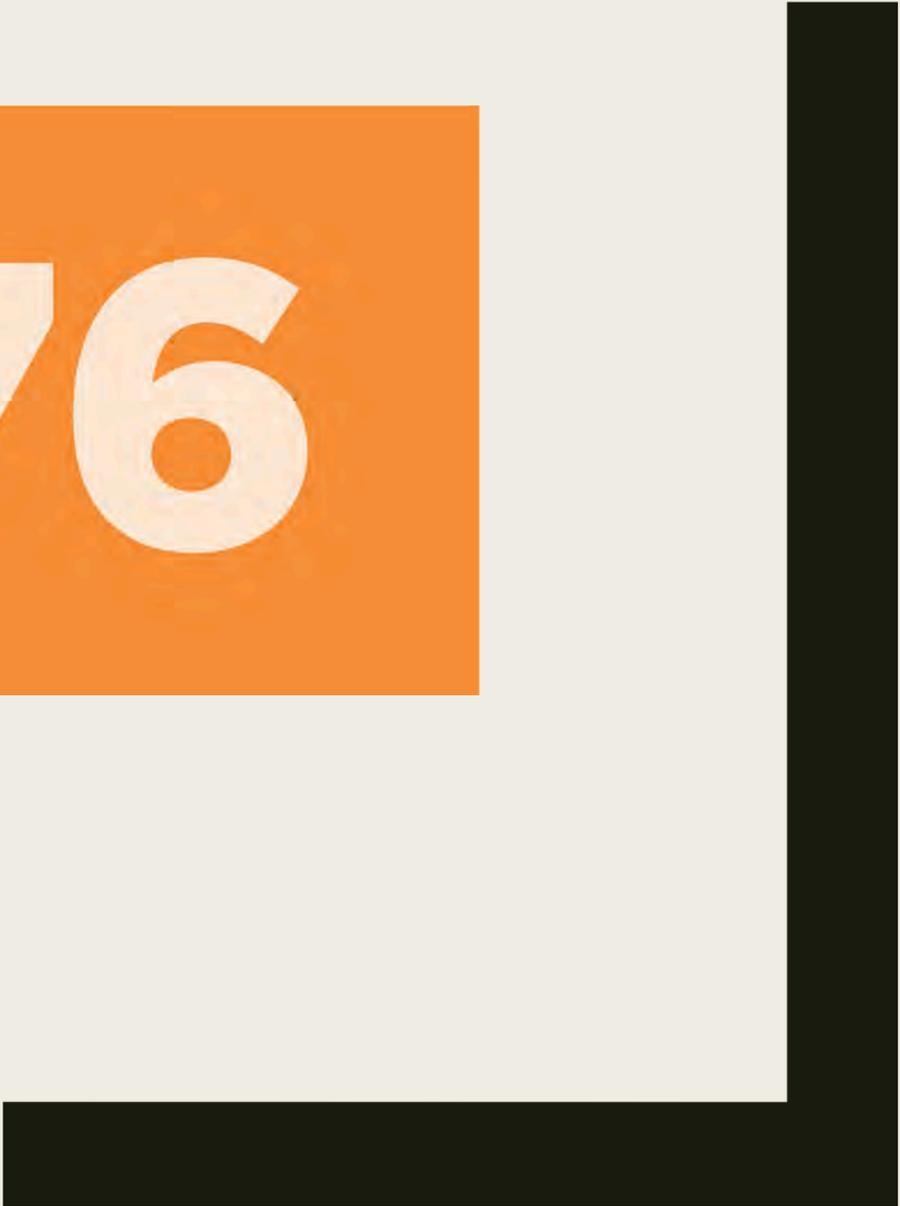
**STRATEGIES FOR BUSINESS RESILIENCE  
FOREIGN TRADE ZONE #176**

**FEATURING**

**Carrie Zethmayr**

**Managing Director of Newmark and  
Administrator of Foreign Trade Zone #176**





**FTZ#176**

2025

# About Us



- The Greater Rockford Airport Authority (GRAA) is the grantee for FTZ #176, with authority to approve and facilitate sites to become activated with the National FTZ Board and Customs & Border Protection
- Zethmayr has a contract with the GRAA to administer the FTZ on its behalf; we facilitate all new site applications representing the interests of the GRAA

# Agenda

1. What is a Foreign Trade Zone (FTZ)?
2. How can an FTZ help me mitigate tariff impacts?
3. Prominent Industries and Operators
4. Application and Activation Process
5. Operating costs to an FTZ

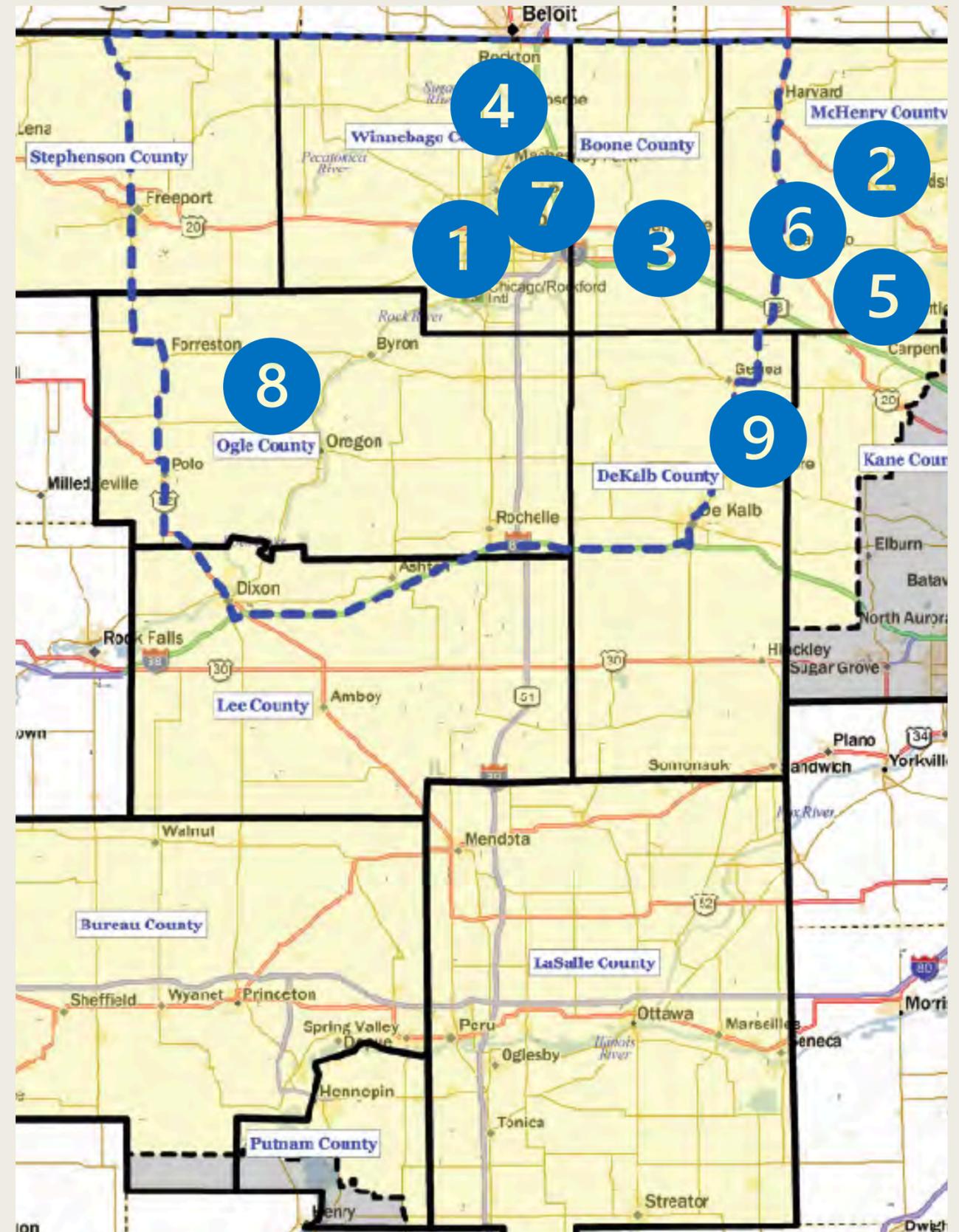
**To track updates on 2025 tariff notices, always refer to official sources rather than static information such as this time-stamped presentation.** Tariff notices are posted to the federal register: <https://www.federalregister.gov/>. As an example of the fluctuating environment, 10 presidential documents were posted on February 12, 2025 as of 12:30 pm referencing the search term “duties.”

# FTZ #176 Service area

The FTZ Service Area covers 11-counties which include 4 metropolitan planning districts and 9+ economic development organizations.

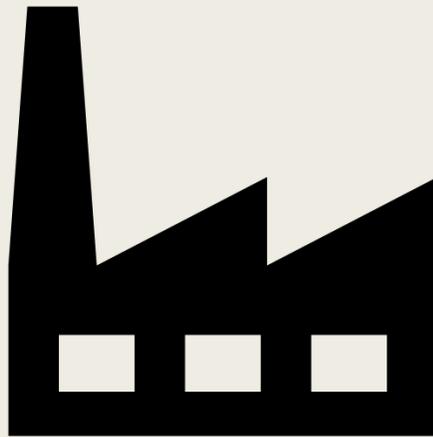
Current FTZ Operators include:

1. *Bergstrom*
2. *Brake Parts, Inc.*
3. *Capitol Warehousing*
4. *Cellusuede*
5. *Chicago Importing Company*
6. *Mitsubishi Logisnext Americas*
7. *PCI Pharma Services*
8. *Rivian Automotive*
9. *Staal & Plast*

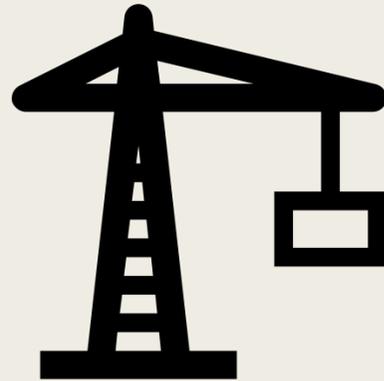


# What is an FTZ?

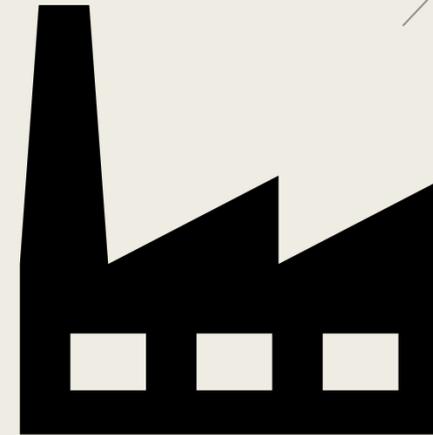
Your competitors pay duties here; their product sits at the port for 3 days



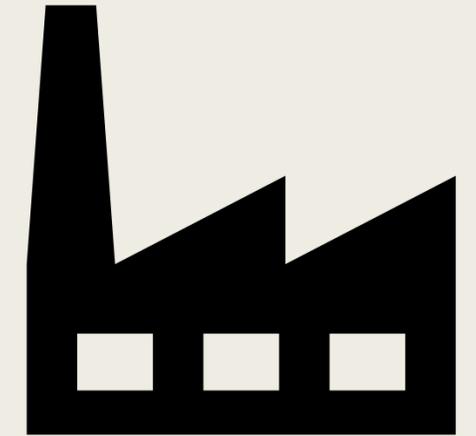
Your supplier in Korea



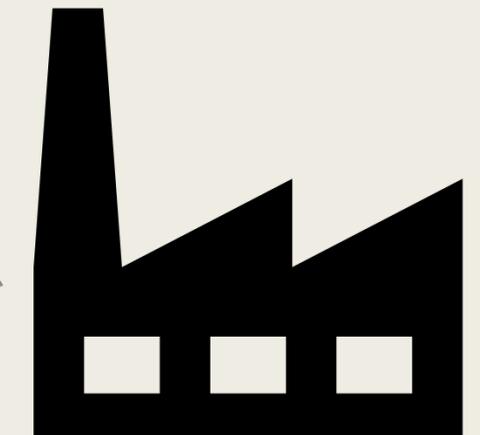
Port of Los Angeles



Your Foreign Trade Zone



Your Customer in Europe



Your Customer in Wisconsin

You only pay duties here, your product never sits at the port, and you only pay the duty on what you sell

# What is it?

- An area approved by the U.S. Department of Commerce and Customs & Border Protection to be considered outside of U.S. Customs Territory
- Typically we are referring to a specific industrial building where products are manufactured or stored
- As an FTZ, companies can import product directly into their facility without formal customs entry procedures or import duties
- An FTZ is subject to both local (port) and federal (U.S. CBP and U.S. Department of Commerce) regulation



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



# What are the benefits of having an FTZ?

Internal control of  
customs entry process



Reduce supply chain risk

## Defer

- Pay tariff when product enters U.S. Commerce, rather than when it is imported into country

## Reduce

- Production Authority\* (AKA Inverted Tariff Benefit) allows you to pay tariff on what you sell to U.S. market, rather than on its imported components

## Eliminate

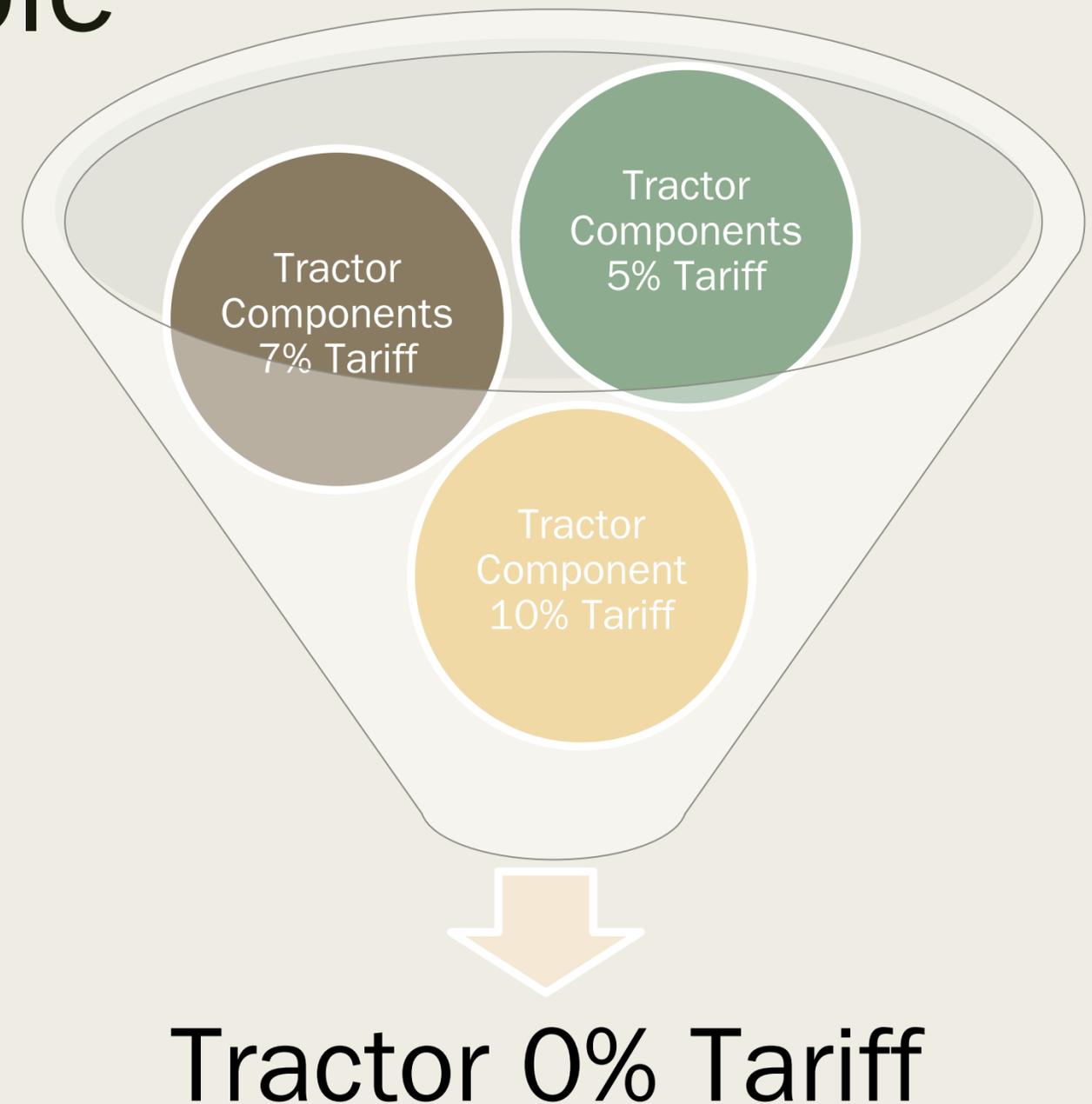
- Eliminate tariff\*\* on scrapped product
- Eliminate tariff on re-exports

*\*Requires individual approval from National FTZ Board; limited to imports with non-privileged foreign status.*

*\*\*Requires individual approval from CBP.*

# Inverted Tariff - Example

- Many heavy equipment (e.g. Caterpillar, John Deere) companies are FTZs, since many large equipment products (e.g. tractors) have 0% duty; equipment companies save multi-millions on zone-to-zone transfer.
- A smaller manufacturer of textiles benefits with a similar structure; their annual savings of over \$150,000 have an equal impact on their business due to their small size



# What are the benefits of operating a Foreign Trade Zone?

## **Other Cost Savings & Benefits**

- Reduced customs brokerage fees due to weekly entry (pay once weekly, rather than per shipment)
- Reduced Merchandise Processing Fees (MPF) – maximum \$538.40 / week instead of per shipment; due when products leave FTZ rather than upon import
- Harbor Maintenance Fee paid quarterly, rather than upon import
- Higher Internal Security - Stealing goods from an FTZ is a federal felony – and stiff penalties deter and reduce theft from an FTZ compared to a warehouse or manufacturing facility outside of an authorized zone

# How does an FTZ impact new 2025 tariffs?

Goods admitted into an FTZ are assigned one of four statuses. Imports specified in new tariffs are assigned Privileged Foreign (PF) Status.

Status \ Benefit	Privileged Foreign (PF)	Non-Privileged Foreign (NPF)	Domestic (D)	Zone Restricted (ZR)
<b>Definition</b>	Product will be admitted and withdrawn from the zone as is, without any change in the zone for classification and duty payment purposes.	Product can be manufactured into another commercial item with a different tariff classification; allows zone users to pay duty rate of finished product instead of imported product.	Product is of U.S. origin; or foreign but already CBP cleared before arriving at the zone.	Merchandise brought into a zone for the purpose of exportation, destruction, or storage; may not be manufactured nor sent into U.S. Customs territory for consumption.
<b>Tariff Deferral</b>	Yes	Yes	N/A	N/A
<b>Tariff Elimination</b>	Warehousing: eliminate on all re-exports. Mfg: eliminate if re-exporting outside of USMCA*  Mfg: Can't eliminate on re-exports to USMCA*	Warehousing: eliminate on all re-exports. Mfg: eliminate if re-exporting outside of USMCA*  Mfg: Can't eliminate on re-exports to USMCA*	N/A	N/A
<b>Tariff Reduction via Inverted Tariff Benefit</b>	No	Yes, if production authorization is approved  No, if import is subject to quotas, ADCVD, other trade measures	N/A	N/A

\*The USMCA trade agreement requires that products manufactured in the U.S. clear U.S. customs before re-export to Canada or Mexico, that is why you can't eliminate U.S. import duties on re-exports of products that have undergone manufacturing in the U.S. when they are re-exported to Canada or Mexico. If the product is only warehoused in the U.S., the U.S. import tariff on re-exports to Canada and Mexico can be eliminated. The Canadian or Mexican importer will still need to pay the tariff on the product based on its Country of Origin.

# Constraints

- FTZ cannot be used as a loophole to circumvent federal policy; this means that imports subjected to Section 301 (imports from China) or Section 232 (imports of steel, aluminum from select countries) cannot be eliminated through the inverted tariff benefit; they can still be deferred and eliminated through re-export
- Per USMCA, product that is manufactured in the U.S. then sold to a customer in Canada or Mexico has to clear customs in the U.S. before shipping to Canada or Mexico; this means that the import tariffs on those manufactured products cannot be eliminated through re-export; there are other USMCA restrictions on foreign trade zones; the National Association of FTZs (NAFTZ) is advocating for the FTZs for America Act to remove those restrictions. Free trade agreements with all countries receiving re-exports need to be evaluated in terms of how they may impact FTZ benefits.
- Companies must apply for the inverted tariff benefit, which requires publishing their application in the federal register for 120-days; other companies can contest an application saying the material can be supplied domestically instead; this impacts highly protected industries such as textiles, sugar, and others

# Prominent FTZ Users

## If FTZs are so great, why isn't everyone doing it? They are...

FTZs account for 7% of U.S. exports, with over 3,300 companies operating FTZs that employ over 440,000 American workers.

Industry	Prominent Operators
Automotive	BMW, Mercedes, Nissan, Rivian, Subaru, Tesla, , Toyota, Volkswagen
Aerospace	Airbus, Gulfstream, Honeywell, Northrup Grumman, Pratt & Whitney
Clothing	Adidas, Columbia Sportswear, Ralph Lauren, Red Wing Shoe Company, Skechers, Tommy Bahama
Consumer Goods	Callaway Golf Company, Citizens Watch, Crate & Barrel, Fossil, GE Appliances, Home Depot, Hugo Boss, Ikea, Makita, Michaels, REI, Stanley Black & Decker, Sub-Zero Group
Electronics	Fujifilm, Mitsubishi Electronic Power Products, Panasonic, Ricoh Electronics, Sony
Heavy Equipment	Blount International, Caterpillar, CNH, Kawasaki, Komatsu, Kubota, Mitsubishi Logisnext America, Polaris, Yamaha
Petroleum	Chevron, CITGO, Marathon, Phillips 66, Shell
Pharmaceutical	Abbott Laboratories, Baxter Healthcare Corp, Catalent Pharma Solutions, Eli Lilly, Janssen Pharmaceuticals, Johnson & Johnson, Packaging Coordinators, Pfizer, Sanofi

# What does a feasibility study look like?

**FTZ#176**

DATE: \_\_\_\_\_  
 FTZ Candidate: \_\_\_\_\_  
 Completed By (Name): \_\_\_\_\_  
 Location of Potential Zone: \_\_\_\_\_

Required Question  
 Optional Question  
 Auto-Calculated

**FOREIGN-TRADE ZONE  
 PRELIMINARY FEASIBILITY ANALYSIS QUESTIONS**

The following list contains general information that will assist in determining potential financial benefits for your organization using foreign-trade zone procedures. If multiple locations may be considered, information should be provided as a breakdown for each facility being considered for foreign-trade zone designation.

This questionnaire contains items related to production equipment. If your company will be setting up a production line and will be importing components of the new production line, there may be savings opportunities associated with the production equipment; please complete items under PRODUCTION EQUIPMENT.

*If any information requested is not readily available for this preliminary feasibility analysis, please provide information that is readily available.*

*\*Items 1-11 Information necessary for basic preliminary feasibility analysis*

\$0	1	Total annual value of imported (durable) merchandise (auto-calculated from below inputs)
		a. Annual value of imported (durable) merchandise from Mexico
		b. Annual value of imported (durable) merchandise from Canada
		c. Annual value of imported (durable) merchandise from other countries, by country of origin (if known)
	2	Number of Customs entries made annually
	3	Total Annual Merchandise Processing Fee(s) paid, if known
	4	Annual Customs Broker Fee(s) paid, if known
See separate worksheet	5	Weighted average duty rate of imported merchandise
	6	Average number of inventory turns for previous year
	7	Percentage and/or value of foreign (durable) re-exports for the previous year
	8	Total annual value of imported merchandise shipped directly to the customer (drop shipments)
	9	Value of textile merchandise not subject to Visa or Quota, if any

## Questions:

- Total annual value of imported (durable) merchandise (auto-calculated from below inputs)
  - a. Annual value of imported (durable) merchandise from Mexico
  - b. Annual value of imported (durable) merchandise from Canada
  - c. Annual value of imported (durable) merchandise from other countries, by country of origin
- Number of Customs entries made annually
- Total Annual Merchandise Processing Fee(s) paid, if known
- Annual Customs Broker Fee(s) paid, if known
- Weighted average duty rate of imported merchandise
- Average number of inventory turns for previous year
- Percentage and/or value of foreign (durable) re-exports for the previous year
- Total annual value of imported merchandise shipped directly to the customer (drop shipments)
- Value of textile merchandise not subject to Visa or Quota, if any
- Total annual value of imported USMCA or other FTA-qualifying merchandise. If unsure which countries qualify for FTA ("free trade agreements"), provide breakdown of values per country
- Does company participate in the Duty Drawback Program? If yes, please list the annual dollar amount of drawback refunds from Customs for the previous year.
- Annual percentage or value of waste, rejected, and damaged foreign (durable) merchandise
- Annual value of domestically sourced merchandise
- Annual value of dual sourced merchandise (meaning sourced from overseas and domestic sources)
- Dollar value of average foreign inventory on hand
- Forecast of annual growth of durable imports over next 3 years
- HTS list of imported merchandise, if available
- HTS list of finished product (if manufacturing occurs), if available
- Approximation of U.S. value-added as a percent of finished products value (if manufacturing occurs)
- Interest rate (cost of capital; percentage)

# Application Process



Grantee

- FTZ #176 works with company to complete application
- FTZ #176 approves designation as FTZ; secures concurrence from CBP

National FTZ Board

- Grantee submits application to National FTZ Board
- Additional processing required for application for Inverted Tariff Benefit

US CBP

- Apply for activation with U.S. Customs & Border Protection
- Requires submittal of operating procedures

# Application Process - Timing

- **Foreign Trade Zone Benefits** are offered as a public utility, required by law to be offered with uniform treatment. The benefits and application process and fees are non-negotiable and can be accessed at any time by a company, regardless of investment or job creation.

Process	Time Required	Constraint
Application for designation with National FTZ Board	60-days	Company supplying information, Port authority meeting schedule
Production Notification Optional process	150-days	120-day comment period in federal register, Company supplying information for application
Activation with CBP	6 – 9 mo. Mostly concurrent to other processes	Company establishing internal operating procedures Customs & Border Protection responsiveness

# FTZ Activation and Operating Costs

FTZ Operating Costs (typical; every situation is unique)	Cost	Notes
<b>One Time Costs</b>		
Application fee to Grantee (GRAA)	\$2,000	Assumes ASF-MBM Application; 300+ Employees cost is \$3,000
Production authorization application fee to Grantee	\$2,000	Optional; 300+ Employees cost is \$3,000
Activation fee to Grantee	\$2,000	300+ Employees cost is \$3,000
Security investments	TBD	TBD; depends on readiness of facility; may include implementation of key card access, picture badges, etc.
Implementation Consulting; including but not limited to:		
Development of procedure manual	Hourly rate TBD	FTZ #176 can provide list of service providers for quote
Staff training	Hourly rate TBD	FTZ #176 can provide list of service providers for quote
FTZ Bond	\$ 5,000	\$250/\$50,000 of bond liability; typically requires \$1 Million in liability coverage
<b>Annual Fixed Costs</b>		
Annual Fee to Grantee	Ranges \$5 - 25k annually depending on employment	1 to 50 employees..... \$5,000
		51 to 150 employees..... \$10,000
		151 to 500 employees..... \$15,000
		501 to 1500 employees ..... \$20,000
		1501 or more employees..... \$25,000
Software fee	TBD	Potential expense if you are not outsourcing FTZ management
<b>Variable Costs</b>		
In-bond transportation	TBD	FTZ #176 can provide list of service providers for quote
Admission processing fees	TBD	FTZ #176 can provide list of service providers for quote
Entry fees	TBD	FTZ #176 can provide list of service providers for quote
Ongoing staff-training/consulting as needed	TBD	FTZ #176 can provide list of service providers for quote

# Common Myths

- **Myth #1** - The foreign-trade zone is geographically limited to a pre-approved zone  
*Reality – as a potential FTZ operator, forget the zone map exists; we can get you activated*
- **Myth #2** – The FTZ is a warehouse at the airport where a company can store its product  
*Reality – The foreign-trade zone is your facility, your warehouse, and you control the inventory*
- **Myth #3** – My product has to be imported through a specific port-of-entry to use the FTZ  
*Reality – Your product come into the U.S. through any port by any means, and never has to pass through the FTZ grantee port-of-entry*

# Economic Impact

- Foreign-trade zones level the playing field between onshore and offshore manufacturing and warehouse operations, making domestic manufacturing more competitive
- There are restrictions in place that prevent manufacturers from using FTZ as a loophole around intentional federal trade policy; tariffs are still due on product that enters U.S. Commerce, that tariff is deferred and, in some cases, modified to reflect the product that actually enters U.S. Commerce
- Reducing costs of domestic manufacturing reduces costs for consumers, enhances competitiveness of U.S. exports, and encourages job growth in our regional economy

# Economic Impact

Transparent and readily available economic impact metrics are available to download at <https://ftzrockford.com/ftz-rockford/economic-impact/>

**FTZ#176**

About FTZ Sites | How to Apply for FTZ | **Economic Impact** | Success Stories | News & Blog | Resources | Contact Us

## ECONOMIC IMPACT METRICS

The purpose of the Foreign Trade Zone program is to increase economic activity, employment and capital investment in the United States. This is accomplished by reducing costs and optimizing supply chain operations. The below data reflects:

- Employment** – this reflects the total number of people employed in FTZ #176 zone operations. An increase in employment indicates growth in number of people with employment tied to FTZ activities.
- Total Value of Shipments** – this reflects the total revenue coming into the foreign trade zone operation, inclusive of both domestic and international sales. An increase in the total value of shipments reflects an increase in revenue to FTZ #176 operators.
- Exports** – This reflects the total value of exported product from FTZ #176 sites and subzones. An increase in exports reflects positive GDP to the United States.

	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
<b>Employment</b>	1,541	1,953	1,845	2,071	2,142	2,581	2,199	2,582	2,457	2,543	3,671
<b>% Increase y / y</b>	-2%	27%	-6%	12%	3%	20%	-15%	17%	-5%	4%	44%
<b>% increase 5-Year</b>	Not avail.	Not avail.	Not avail.	26%	36%	67%	13%	40%	19%	19%	42%
<b>Value of Shipments</b>	\$ 268,617,013	\$ 323,549,092	\$ 69,870,077	\$ 65,981,884	\$ 150,812,540	\$ 577,413,776	\$ 599,650,894	\$ 680,414,159	\$ 1,101,721,928	\$ 1,815,792,267	\$ 2,248,754,476
<b>% Increase y / y</b>	93%	20%	-78%	-6%	129%	283%	4%	13%	62%	65%	24%
<b>% increase 5-Year</b>	Not avail.	Not avail.	Not avail.	-57%	9%	115%	85%	874%	1570%	1104%	275%
<b>Exports</b>	\$ 46,611,598	\$ 62,890,644	\$ 23,641,566	\$ 13,963,711	\$ 115,671,283	\$ 93,928,107	\$ 72,206,038	\$ 90,358,351	\$ 164,072,473	\$ 184,334,201	\$ 196,600,801
<b>% Increase y / y</b>	108%	35%	-62%	-41%	728%	-19%	-23%	25%	82%	12%	7%
<b>% increase 5-Year</b>	Not avail.	Not avail.	Not avail.	-31%	416%	102%	15%	282%	1075%	59%	109%

2023-Indicators [Data Export](#)

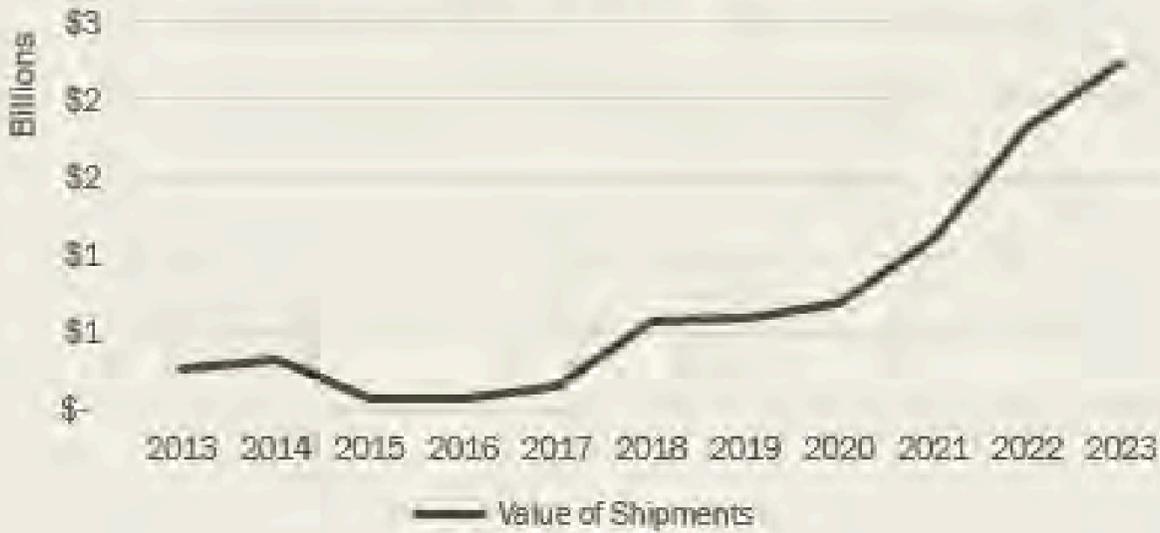
Source: FTZ #176 Annual Reports submitted to National FTZ Board. Data is aggregated and does not reflect any individual company's information. Updated April 2024; next release April 2025.

# Economic Impact

Zethmayr LLC began zone management in 2018 since then:

- Employment in FTZs has grown 42%
- Value of shipments from FTZs has grown 289%
- Value of exports from FTZs has grown 109%

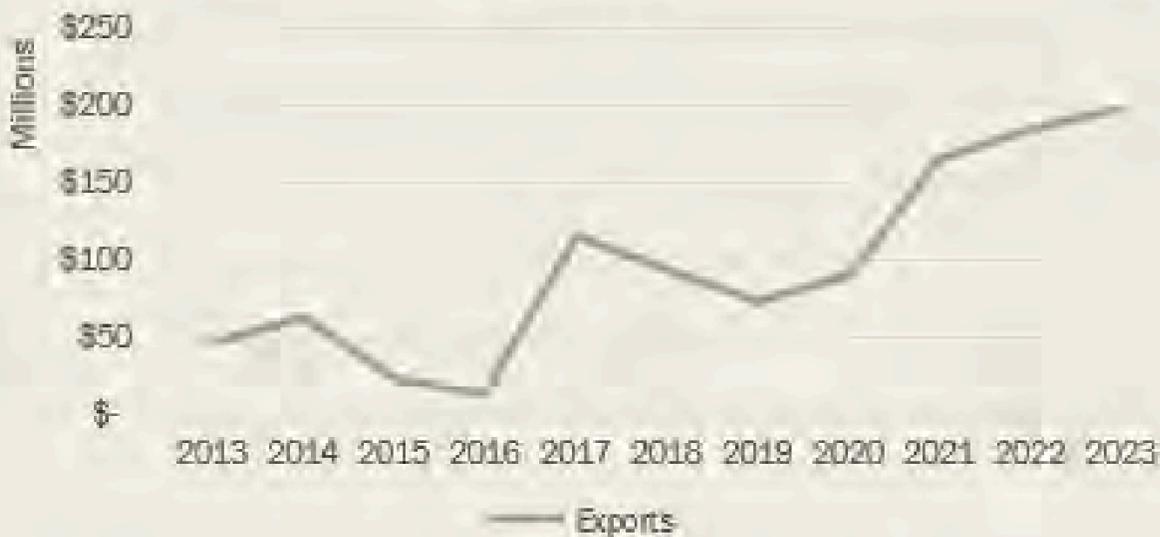
Total Value of Shipments From FTZ #176 Sites and Subzones

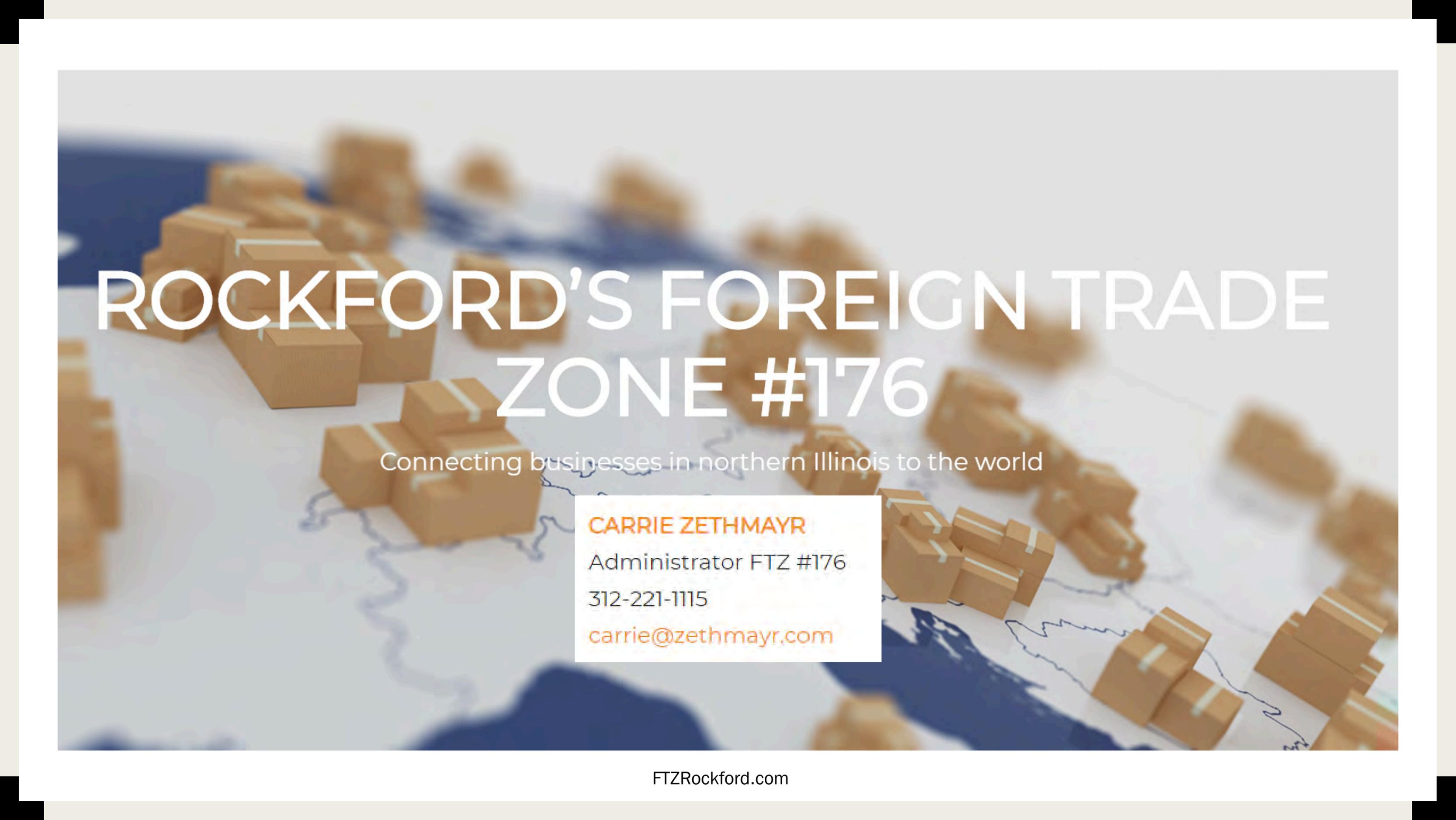


Total Employment in FTZ #176 Sites and Subzones



Total Value of Exports from FTZ #176 Sites and Subzones





# ROCKFORD'S FOREIGN TRADE ZONE #176

Connecting businesses in northern Illinois to the world

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Navigating Global Trade

**STRATEGIES FOR  
BUSINESS RESILIENCE  
FOREIGN TRADE ZONE 176**



# THANK YOU



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