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U.S. Customs and Border Protection ramping up as trade enforcement pressures mount

By Diana Shaw, Esq., Wiley Rein LLP

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U.S. Customs and Border Protection (CBP) is emerging as one of the most consequential enforcement agencies in Washington, with its traditional role in customs and tariff collection now intertwined with the Trump Administration's trade strategy and foreign policy.

Once largely seen as revenue collectors, customs officers and trade specialists are increasingly on the front lines of detecting fraud, monitoring supply chains, and policing compliance with U.S. trade laws.

The shift comes at a moment when tariffs and trade policy are dominating the headlines. With the Administration betting heavily on tariffs both as a negotiating tool and a source of federal revenue, CBP has become a linchpin for making those policies stick.

That pivot is changing not only how the agency is resourced and staffed, but also how businesses must calibrate their compliance strategies to guard against growing enforcement risks.

CBP's origins in tariff enforcement

CBP's roots in tariff enforcement stretch back more than two centuries. The agency traces its lineage to the creation of the U.S. Customs Service in 1789, when customs duties were the young nation's primary source of federal revenue.

For much of the 19th century, customs collectors stationed at ports of entry served as both tax officials and gatekeepers, ensuring imported goods were properly classified and duties paid. Tariff enforcement was not only an economic imperative but also a national security priority, with customs officers often doubling as frontline enforcers against smuggling.

The modern CBP was established in 2003 with the creation of the Department of Homeland Security, consolidating border functions that had previously been spread across several agencies. Counterterrorism quickly became a high-profile part of its mission, and, increasingly, it is CBP's role in immigration enforcement that has captured headlines and shaped the public's perception of the agency.

Trade enforcement back to the fore

However, the Trump Administration's shifting trade policies and tariff regimes have brought the customs and trade enforcement element of CBP's mission back to the fore. In addition to using tariffs as a strategic negotiating tool with other countries, the Administration has emphasized tariffs' revenue-generating potential.

CBP's statistics (https://bit.ly/3I6ZHT4) suggest that some of this potential is already being realized: As of June 30, 2025, CBP had collected more than $136 billion in total duty, taxes, and fees, compared with approximately $88 billion in fiscal year (FY) 2024 and $92 billion in FY2023.

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FY2025 has also seen a significant bump in the monetary results of CBP's trade enforcement activities. For instance, with three months left in the fiscal year, CBP had already collected approximately $163 million as a result of importer audits; in contrast, it collected a total of about $118 million in FY2024 and $114.5 million in FY2023.

Similarly, CBP has recovered nearly $26 billion so far in net revenue due to entry summary reviews — i.e., the reviews CBP conducts to ensure imported goods have been accurately classified and valued and that all applicable duties, taxes, and fees have been paid — a huge increase over the $667.5 million and $256 million recovered in FYs 2024 and 2023, respectively.

Staffing up for a bigger mission

To achieve numbers like this and meet its expanding customs and trade mission, CBP is looking to grow. Earlier this year, the agency put forward a request for $6.2 billion to ramp up hiring over the next five years, a sizable portion of which is earmarked to recruit and train an additional 5,000 customs officers.

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That request has garnered White House backing during an appropriations season generally characterized by budget cuts.

But the Congressional Budget Office's analysis (https://bit.ly/469NNjz) of CBP's budget request raised doubts as to CBP's ability to meet its hiring targets, noting that "[i]n recent years, because of background checks, training requirements, and other pre-employment processes, the time to recruit and hire new officers has ranged from 300 to 600 days."

Although CBP has historically struggled to meet its staffing needs, recent oversight reports suggest that CBP has made significant strides in overcoming some of the barriers that have traditionally made hiring difficult for the agency.

For instance, the Government Accountability Office (GAO) found in a recent report (https://bit.ly/3UWYkt9) that since 2018, CBP has bolstered its recruitment, hiring, and retention efforts and streamlined its hiring process, resulting in a general improvement in the key metrics CBP uses to assess its hiring process.

GAO further found that between FYs 2018 and 2024, CBP generally hired more CBP officers than it lost in the Office of Field Operations, the component in which most customs officers are based, which enabled it to meet its staffing targets for those positions in recent years.

So, while CBP's hiring goals are ambitious and some uncertainty remains, it appears that CBP is increasingly well-positioned to meet its expanding trade enforcement mission.

DOJ and CBP sharpen trade compliance focus

This positioning couldn't come at a more opportune time for the agency. CBP's trade specialists are now operating at the intersection of economic security, foreign policy, and supply-chain integrity — reflecting how tariff enforcement has evolved from a fiscal cornerstone to a critical component of the Administration's broader U.S. enforcement strategy.

One key element of that strategy appears to be the use of the False Claims Act (FCA) to prosecute customs fraud and tariff evasion. Once more regularly associated with healthcare and government contracting fraud, enforcement under the FCA is now being leveraged in customs fraud and tariff evasion contexts to an extent not previously seen.

Since March 2025, the U.S. Department of Justice (DOJ) has announced three settlements of FCA claims based on alleged customs evasion, as well as its intervention in two customs-evasion FCA lawsuits. These actions coincide with a realignment of resources at DOJ intended to better support the Administration's enforcement priorities, including the movement of attorneys from DOJ's Consumer Protection Branch to the newly formed Market, Government, and Consumer Fraud Unit (MGCF). Among other things, this unit will focus on customs fraud and tariff evasion.

DOJ's intensifying focus on these areas, coupled with CBP's expanding capacity, signals a strategic transformation, which should prompt businesses to reassess their risk profiles and compliance protocols, especially in supply-chain transparency and documentation. Staying on top of the evolving tariff landscape and updating internal customs controls will also be pivotal given the frequent shifts and pauses in tariff implementation.

Invest now or pay later?

Bottom line: As the growing number of CBP officers look to satisfy the Administration's revenue-generation goals through customs collection and trade enforcement, and as prosecutors test novel theories in trade-related cases, businesses face increased pressure to adapt compliance programs, strengthen supply-chain oversight, and monitor import practices to avoid costly investigations and penalties.

An ounce of prevention is worth a pound of cure. That generally proves to be true with compliance, and it's especially so when faced with the potential for treble damages under the FCA. Companies that make risk-informed investments in trade compliance now can mitigate the risk of far greater costs and disruptions down the line.

Diana Shaw is a regular contributing columnist on federal oversight and enforcement issues for Reuters Legal News and Westlaw Today.

About the author

Diana Shaw is a partner at **Wiley Rein LLP** and is based in Washington, D.C. She previously served as the acting inspector general for the U.S. Department of State, and as an assistant inspector general for special reviews and evaluations at the U.S. Department of Homeland Security. She can be reached at dshaw@wiley.law. The opinions expressed are those of the author. This article is for general information purposes only and should not be taken as legal advice.

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