

C-TPAT Security Guidelines for Air Freight Consolidators, Ocean Transportation Intermediaries and Non-Vessel Operating Common Carriers (NVOCC)

Security Guidelines for Consolidators

Consolidators must conduct a comprehensive assessment of their international supply chains based upon the following C-TPAT security guidelines. Where a consolidator out sources or contracts elements of their supply chain, such as a foreign facility, conveyance, domestic warehouse, or other elements, the consolidator must work with these business partners to ensure that pertinent security measures are in place and adhered to throughout their supply chain. The supply chain for C-TPAT purposes is defined from point of origin (manufacturer/supplier/vendor) through to point of distribution and recognizes the diverse business models C-TPAT members employ.

C-TPAT recognizes the complexity of international supply chains and endorses the application and implementation of security measures based upon risk analysis. Therefore, the program allows for flexibility and the customization of security plans based on the member's business model.

Appropriate security measures, as listed throughout this document, must be implemented and maintained throughout the consolidator's supply chains.

Business Partner Requirements

Consolidators must have written and verifiable processes for the screening and selection of business partners including foreign consolidators, customers, contractors, carriers, and vendors. Ensure that contracted service provider companies who provide transportation, cargo handling, and security services commit to C-TPAT Security Guidelines. Periodically review the performance of the service providers to detect weakness or potential weaknesses in security.

Security Procedures

Point of Origin

C-TPAT Consolidators must ensure business partners develop security processes and procedures consistent with the C-TPAT security guidelines to enhance the integrity of the shipment at point of origin. Periodic reviews of business partners' processes and facilities should be conducted based on risk and should maintain the security standards required by the Consolidator.

Participation/Certification in Foreign Customs Administrations Supply Chain Security Programs

Current or prospective business partners who have obtained a certification in a supply chain security program being administered by foreign Customs Administration should be required to indicate their status of participation to the C-TPAT Consolidator.

Service Provider Screening and Selection Procedures

The C-TPAT Consolidator should have documented service provider screening and selection procedures to screen the contracted service provider for validity, financial soundness, ability to meet contractual security requirements, and the ability to identify and correct security deficiencies as needed. Service Provider procedures should utilize a risk-based process as determined by an internal management team.

Customer Screening Procedures

The C-TPAT Consolidator should have documented procedures to screen prospective customers for validity, financial soundness, the ability of meeting contractual security requirements, and the ability to identify and correct security deficiencies as needed. Customer screening procedures should utilize a risk-based process as determined by an internal management team.

Container Security

Consolidators should ensure that all contracted service providers have procedures in place to maintain container integrity. Container integrity must be maintained to protect against the introduction of unauthorized material and/or persons. At point of stuffing, procedures must be in place to properly seal and maintain the integrity of the shipping containers. A high security seal must be affixed to all loaded C-TPAT importer containers bound for the U.S. All seals must meet or exceed the current PAS ISO 17712 standards for high security seals.

Container Inspection

Procedures must be in place to verify the physical integrity of the container structure prior to stuffing, to include the reliability of the locking mechanisms of the doors. A seven-point inspection process is recommended for all containers:

- Front wall
- Left side
- Right side

- Ceiling/Roof
- Inside/Outside doors
- Outside/Undercarriage

Container Seals

Written procedures must stipulate how seals are to be controlled and affixed to loaded containers. Procedures must be in place for recognizing and reporting compromised seals and/or containers to U.S. Customs and Border Protection or the appropriate foreign authority. Only designated employees should distribute container seals for integrity purposes.

Container Storage

Containers must be stored in a secure area to prevent unauthorized access and/or manipulation. Procedures must be in place for reporting and neutralizing unauthorized entry into containers or container storage areas.

Physical Access Controls

Access controls prevent unauthorized entry to facilities, maintain control of employees and visitors and protect company assets. Access controls must include the positive identification of all employees, visitors and vendors at all points of entry.

Employees

An employee identification system must be in place for positive identification and access control purposes. Employees should only be given access to those secure areas needed for the performance of their duties. Company management or security personnel must adequately control the issuance and removal of employee, visitor and vendor identification badges. Procedures for the issuance, removal and changing of access devices (e.g. keys, key cards, etc.) must be documented.

Visitors Controls

Visitors must present photo identification for documentation purposes upon arrival. All visitors should be escorted and visibly display temporary identification.

Deliveries (including mail)

Proper vendor ID and/or photo identification must be presented for documentation purposes upon arrival by all vendors. Arriving packages and mail should be periodically screened before being disseminated.

Challenging and Removing Unauthorized Persons

Procedures must be in place to identify, challenge and address unauthorized/unidentified persons.

Personnel Security

Processes must be in place to screen prospective employees and to periodically check current employees. Maintain a current permanent employee list (foreign and domestic), which includes the name, date of birth, national identification number or social security number, position held and submit such information to CBP upon written request, to the extent permitted by law.

Pre-Employment Verification

Application information, such as employment history and references must be verified prior to employment.

Background checks / investigations

Consistent with foreign, federal, state and local regulations, background checks and investigations should be conducted for prospective employees. Periodic checks and reinvestigations should be performed based on cause and/or the sensitivity of the employee's position.

Personnel Termination Procedures

Companies must have procedures in place to remove identification; facility and system access for terminated employees.

Procedural Security

Security measures must be in place to ensure the integrity and security of processes relevant to the transportation, handling and storage of cargo in the supply chain.

Documentation Processing

Procedures must be in place to ensure that all documentation used in the movement of merchandise/cargo is legible, complete, accurate and protected against the exchange, loss or

introduction of erroneous information. Documentation control must include safeguarding computer access and information.

Manifesting Procedures

To help ensure the integrity of cargo received from abroad, procedures must be in place to ensure that information received from business partners is reported accurately and timely.

Shipping & Receiving

Arriving cargo should be reconciled against information on the cargo manifest. The cargo should be accurately described, weighed, labeled, marked, counted and verified. Departing cargo should be checked against purchase or delivery orders. Drivers delivering or receiving cargo must be positively identified before cargo is received or released.

Cargo Discrepancies

All shortages, overages and other significant discrepancies or anomalies must be resolved and/or investigated appropriately. CBP and/or other appropriate law enforcement agencies must be notified if illegal or suspicious activities are detected.

Security Training and Threat Awareness

A threat awareness program should be established and maintained by security personnel to recognize and foster awareness of the threat posed by terrorists at each point in the supply chain. Employees must be made aware of the procedures the company has in place to address a situation and how to report it. Additional training should be provided to employees in the shipping and receiving areas, as well as those receiving and opening mail.

Additionally, specific training should be offered to assist employees in maintaining cargo integrity, recognizing internal conspiracies and protecting access controls. These programs should offer incentives for active employee participation.

Physical Security

Cargo handling and storage facilities in domestic and foreign locations must have physical barriers and deterrents that guard against unauthorized access. Consolidators should incorporate the following C-TPAT physical security guidelines throughout their supply chains as applicable.

Fencing

Perimeter fencing should enclose the areas around cargo handling and storage facilities. Interior fencing within a cargo handling structure should be used to segregate domestic, international, high value and hazardous cargo. All fencing must be regularly inspected for integrity and damage.

Gates and Gate Houses

Gates through which vehicles and/or personnel enter or exit must be manned and/or monitored. The number of gates should be kept to the minimum necessary for proper access and safety.

Parking

Private passenger vehicles should be prohibited from parking in or adjacent to cargo handling and storage areas.

Building Structure

Buildings must be constructed of materials that resist unlawful entry. The integrity of structures must be maintained by periodic inspection and repair.

Locking Devices and Key Controls

All external and internal windows, gates and fences must be secured with locking devices. Management or security personnel must control the issuance of all locks and keys.

Lighting

Adequate lighting must be provided inside and outside the facility including the following areas: entrances and exits, cargo handling, storage areas, fence lines and parking areas.

Alarms Systems & Video Surveillance Cameras

Alarm systems and video surveillance cameras should be utilized to monitor premises and prevent unauthorized access to cargo handling and storage areas.

Information Technology Security

Information Technology (IT) integrity must be maintained to protect data from unauthorized access or manipulation.

Password Protection

Automated systems must use individually assigned accounts that require a periodic change of password. IT security policies, procedures and standards must be in place and provided to employees in the form of training.

Accountability

A system must be in place to identify the abuse of IT including improper access, tampering or the altering of business data. All system violators must be subject to appropriate disciplinary actions for abuse.