



“C-TPAT Foreign & Domestic Business Partners/Suppliers Requirements”

“Business Partners/ Suppliers” must develop and implement a comprehensive plan to enhance documented security procedures throughout their operations based on C-TPAT criteria as stated by U.S. Customs as follows:

Section I: Security Management System

Purpose: To ensure that individuals responsible for security have been identified, that security responsibilities have been clearly defined, that security policies and procedures are documented, that liaison and communication protocols with law enforcement have been established, and that random unannounced security assessments are performed.

Requirements:

1. Designate manager or supervisor with security responsibilities for the company. Reflect this in writing, such as job description or security procedure.
2. Establish written security policies and procedures to include physical security, access controls, personnel security, education and awareness, manifest and conveyance security and the handling of incoming and outgoing goods to identify overages and shortages or the introduction of un-manifested or illegal goods.
3. Conduct periodic internal reviews or audits of security operations. Document the results of these reviews.
4. Provide any subcontract transportation or other service providers with documented minimum security requirements.
5. Assign or designate a security representative for each facility.
6. Document processes for reporting and/or investigating security-related incidents. Include any reporting to law enforcement, if warranted.
7. Establish working relationship with local law enforcement agencies.
8. Establish internal and external communication systems to notify internal security personnel and law enforcement in the event of a security incident.
9. Based on internal reviews or audits, establish a security improvement plan, if warranted.

Section II: Human Resources

Purpose: To ensure that all employees are properly screened before hiring to the fullest extent allowed by law; to ensure that all employees receive security training; and to ensure that all terminated employees are restricted from entering the facility.

Requirements:

1. Conduct pre-employment background checks on all prospective employees to the fullest extent possible allowed by law in the country where employed. Include criminal checks wherever possible.
2. Conduct pre-employment background checks on all temporary or contract personnel to the fullest extent possible allowed by law in the country where employed. Include criminal checks wherever possible.
3. Establish a process for dealing with terminated employees or contractors which includes preventing subsequent access to the premises.
4. Conduct drug testing (as allowed by law in the country where employed) on all employees and temporary or contract workers.
5. Conduct security training as part of a new employee orientation as well as on an annual basis for all existing employees.

6. Issue employee conduct guidelines or other documented code of conduct instructions to all employees.
7. Establish a system which encourages and rewards employees for reporting anomalies and/or wrongdoings.
8. Provide key personnel with training in document fraud and computer security.

Section III: Physical Security and Access Controls

Purpose: To ensure that the facility has implemented effective physical security and access controls to prevent unauthorized access to the premises, buildings, and conveyances.

Requirements:

1. Establish written physical security standards.
2. Ensure the facility has adequate perimeter fencing or natural barriers.
3. Establish controls to prevent unauthorized vehicles from entering the premises.
4. Establish controls to prevent unauthorized individuals from accessing conveyances (trucks, trailers, and containers.)
5. Establish and document a visitor policy.
6. Provide means of identification (badges, passes, labels, tags or photo identification) for all employees and authorized visitors.
7. Ensure that all doors/windows/openings are locked to prevent unauthorized access to the facility after regular business hours.
8. Employ on-site security officers. Identify scope of coverage and patrols.
9. Establish controls to prevent unauthorized access to computer systems.
10. Place security warning signage throughout the facility.
11. Establish means to positively identify drivers through photo identification or other means.
12. Ensure that all buildings are constructed with materials that resist unlawful entry and provide protection from outside intrusion.
13. Establish a segregated waiting area for drivers within the facility.
14. Ensure that adequate exterior lighting is utilized, including any parking lots.
15. Monitor exterior buildings, docks, and yards with CCTV that is either monitored or has recording capabilities.
16. Establish inspection of personal belongings upon entry and exit from the facility for both visitors and employees.

Section IV: Education and Training Awareness:

A security awareness program should be provided to employees and include instruction on how to recognize internal conspiracies, maintaining product integrity, and determining and addressing unauthorized access. These programs should offer incentives for active employee participation in security controls.

Section V: Threat Awareness:

A threat awareness program should be established and maintained by security personnel to recognize and foster an awareness of the threat posed by terrorists and contraband smugglers at each point in the foreign-based logistical chain. This program should include routine briefings and issuance of memoranda illustrating smuggling trends, seizures and information on terrorist threats along routes or areas along the logistical chain.

Section VI: Shipping and Receiving Procedures

Purpose: To ensure that receiving and shipping practices prevent the theft of cargo or the introduction of un-manifested materials.

Container / Trailer / Reefer security

Container / trailer / reefer integrity must be maintained to protect against the introduction of unauthorized material and/or persons. At point of stuffing, procedures are in place to properly seal and maintain the integrity of the shipping containers / trailers / reefers. A high security seal is affixed to all loaded containers / trailers / reefers bound for the United States. All seals meet or exceed the current PAS ISO 17712 standards for high security seals.

Container / Trailer / Reefer Inspection

Procedures are in place to verify the physical integrity of the container / trailer / reefer structure prior to stuffing, which includes the reliability of the locking mechanisms of the doors, and the 7-point inspection process for all containers:

- Front wall
- Left side
- Floor
- Outside/Undercarriage
- Ceiling/Roof
- Right side
- Inside/outside doors



Container / Trailer / Reefer Seals

Written procedures stipulate how seals are to be controlled and affixed to loaded containers / trailers / reefers - and include procedures for recognizing and reporting compromised seals and/or containers to U.S. & Canadian Customs and Border Protection or the appropriate foreign authority. Only designated employees distribute container seals for integrity purposes.

Section VI: Shipping and Receiving Procedures Cont'd

Container / Trailer / Reefer Storage

Containers / trailers / reefers are stored in a secure area to prevent unauthorized access and/or manipulation. Procedures are in place for reporting and neutralizing unauthorized entry into containers or container / trailer / reefer storage areas.

Requirements:

1. Establish written security procedures for shipping and receiving operations which prevent cargo loss and/or the introduction of unauthorized or un-manifested material.
2. Establish a restricted-access area for shipping and receiving areas which allows only authorized employee access.
3. Establish procedures which require that all unauthorized persons be removed from the shipping and receiving area.
4. Ensure that loading and unloading of trucks, trailers and/or containers is supervised appropriately.
5. Maintain records of incoming and outgoing goods.
6. Ensure conveyance integrity for containers/trailers/railcars in order to prevent the introduction of unauthorized persons or materials.
7. Utilize containers/trailers that are of solid wall construction and in good working order.
8. Establish procedures to ensure that trailers/containers/railcars are properly sealed and or locked prior to leaving the facility.
9. Establish procedures which record and track use of seal numbers.
10. Establish procedures to ensure that manifests or bills of lading are complete, legible, accurate and meeting the requirements of advance notification (i.e. 24 Hour rule.)
11. Establish a segregated parking area from the shipping receiving area.
12. Log flow of incoming and outgoing traffic to the facility.
13. Monitor the shipping and receiving docks with CCTV.
14. Establish a procedure for detecting and reporting overages and shortages.
15. Establish procedures which require proper marking, counting, weighing (if necessary) for reporting on the bill of lading or manifest.
16. Retain control of all unused seals.
17. Establish anti-pilferage measurements.
18. Establish storage area for empty and full containers so as to restrict opportunity to introduce un-manifested or unauthorized materials or persons.
19. Establish a storage area for international, domestic, high-value and dangerous goods within cages, fences or restricted areas.

-END-