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附件 1 CTPAT Conference Agenda

Customs-Trade Partnership Against Terrorism (C-TPAT) 2014 National **Conference**

C-TPAT: Partnering in Supply Chain Security and Facilitation for the 21st Century San Antonio, TX

Workshop and General Session Agenda

Day 1 August	26 th , 2014
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0700-0800 Registration/Networking (Coffee/Tea)

Workshops 0800-0900

Business Partner Relationships

Nuevo Esquema de Empresas Certificadas (NEEC)

Security Breaches and Internal Conspiracies

C-TPAT Membership Maintenance

Mutual Recognition

Container Display

0905-1005 Workshops

Business Partner Relationships

Portal 2.0 Workshop

Validation/Revalidation Results

C-TPAT Membership Maintenance

Mutual Recognition

Container Display

1005-1035 Health Break 1

Workshops 1035-1135

Business Partner Relationships

Security Breaches and Internal Conspiracies

Validation/Revalidation Results

C-TPAT Membership Maintenance

New C-TPAT Benefits Discussion

Container Display

1140-1240 Workshops

Security Breaches and Internal Conspiracies

Validation/Revalidation Results

Portal 2.0 Workshop

Mutual Recognition

Spanish Language C-TPAT Workshop

Container Display

1240-1400 Lunch (Not provided)

1400-1500 Workshops

- Business Partner Relationships
- Portal 2.0 Workshop
- Security Breaches and Internal Conspiracies
- C-TPAT Membership Maintenance
- Mutual Recognition
- *Container Display*

1505-1605 Workshops

- Business Partner Relationships
- Portal 2.0 Workshop
- Validation/Revalidation Results
- C-TPAT Membership Maintenance
- Mutual Recognition
- *Container Display*

1605-1635 Health Break 2

1635-1735 Workshops

- Business Partner Relationships
- Security Breaches and Internal Conspiracies
- Validation/Revalidation Results
- C-TPAT Membership Maintenance
- Nuevo Esquema de Empresas Certificadas (NEEC)
- *Container Display*

1740-1840 Workshops

- Security Breaches and Internal Conspiracies
- New C-TPAT Benefits Discussion
- Validation/Revalidation Results
- C-TPAT Membership Maintenance
- Spanish Language C-TPAT Workshop
- *Container Display*

^{*}Note that the Container Display workshop will be continuous and not a set presentation, but instead remain available throughout the day as an alternative to other "classroom" workshop sessions.

<u>Customs-Trade Partnership Against Terrorism (C-TPAT) 2014 National</u> Conference

C-TPAT: Partnering in Supply Chain Security and Facilitation for the 21st Century San Antonio TX

San Antonio, TX		
Day 2 August 27 th , 2014	4	
	General Session Day	
0700-0800	Registration and Networking (Coffee/Tea)	
0800-0815	Welcome	
	Ms. Augustine Moore, Acting Executive Director of Cargo and Conveyance	
	Security (CCS),	
0815-0900	Opening remarks	
	Mr. John Wagner, Acting Assistant Commissioner of Office of Field	
	Operations (OFO)	
0900-1000	State of C-TPAT Program	
	Mr. Ronald May, C-TPAT Acting Director	
1000-1045	New C-TPAT Program Benefits	
	Mr. Mike Ginn, C-TPAT Miami Field Director	
	Mr. George Rudy, C-TPAT Employee Assessment Branch (EAB) Supervisor	
1045-1100	Health Break 1	
1100-1215	Table Top Exercise	
	Mr. Chuck Forsaith, Director, Supply Chain Security, Purdue Pharma	
1215-1235	Short Break for Lunch Setup	
1235-1335	Working Lunch - Key Note Speaker	
	Mr. R. Gil Kerlikowske, U.S. Customs and Border Protection Commissioner	
1335-1435	Impact of Violence in Mexico on Trade	
	Mr. Roberto Atilano, Corporate Security Manager, TEVA Pharmaceuticals	
1435-1500	Health Break 2	
1500-1545	Portal 2.0 Presentation	
	Mr. Mark Marker, Functional Analyst at ManTech International Corp., and	
	Ms. Susan Scheungrab, Business Anyalyst at ManTech International Corp.	
1545-1630	Mutual Recognition	
	Mr. David Dolan, Office of International Affairs, Director – International	
	Organizations and Agreements Division	
	Mr. Mark Isaacson, C-TPAT Acting Buffalo Field Director	
	Mr. Steven Krupinsky, C-TPAT Branch Chief for International	
1630-1700	Closing Remarks	
	Ms. Augustine Moore, Acting Executive Director Cargo and Conveyance Security	
	(CCS)	
1700	End of Program	

<u>Customs-Trade Partnership Against Terrorism (C-TPAT) 2014 National</u> **Conference**

C-TPAT: Partnering in Supply Chain Security and Facilitation for the 21st Century San Antonio, TX

Day 3 August 28th, 2014

0700-0800 Registration/Networking (Coffee/Tea)

0800-0900 Workshops

- Business Partner Relationships
- Nuevo Esquema de Empresas Certificadas (NEEC)
- Security Breaches and Internal Conspiracies
- C-TPAT Membership Maintenance Mutual Recognition
- *Container Display*

0905-1005 Workshops

- Business Partner Relationships
- Portal 2.0 Workshop
- Validation/Revalidation Results
- C-TPAT Membership Maintenance
- Mutual Recognition *Container Display*

1005-1035 Health Break 1

1035-1135 Workshops

- Business Partner Relationships
- Security Breaches and Internal Conspiracies
- Validation/Revalidation Results
- C-TPAT Membership Maintenance
- New C-TPAT Benefits Discussion
- *Container Display*

1140-1240 Workshops

- Security Breaches and Internal Conspiracies
- Validation/Revalidation Results
- Portal 2.0 Workshop
- Mutual Recognition
- Spanish Language C-TPAT Workshop
- *Container Display*

1240-1400 Lunch (Not Provided)

1400-1500 Workshops

- Business Partner Relationships
- Portal 2.0 Workshop
- Security Breaches and Internal Conspiracies
- C-TPAT Membership Maintenance
- Mutual Recognition
- *Container Display*

1505-1605 *Workshops*

- Business Partner Relationships
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^{*}Note that the Container Display workshop will be continuous and not a set presentation, but instead remaining available throughout the day as an alternative to other "classroom" workshop sessions.

Workshop Description and Presenter(s)

Business Partner Relationships – Shawn Porter (C-TPAT HQ) - The C-TPAT program continues to emphasize business partner relationships as an effective measure in securing a supply chain. This work shop will discuss points of this important relationship, from how to properly screen a business partner to providing outreach/training to business partners. **(Grand Oaks E & F)**

Security Breaches and Internal Conspiracies — Raymond Monzon (C-TPAT Miami) - This presentation will review case studies of documented internal conspiracies to give the audience a better understanding of the roles conspirators play in security breaches. In addition, participants will be provided with industry best practices that can be applied throughout the supply chain resulting in minimizing the risk of internal conspiracies. (Cibolo Canyon 7)

Validation/Revalidation Results – Wayne Kornmann & Bryant Van Buskirk (C-TPAT Los Angeles) - This work shop will discuss actual validation and revalidation findings providing a real life sample of findings by Supply Chain Security Specialists. This will allow attendees to hear challenges facing other C-TPAT partners and how they overcame them. (Grand Oaks C & D)

C-TPAT Membership Maintenance — Harvey Vazquez (C-TPAT Newark) & Cherie Parsons (C-TPAT New York) - One of the most critical points to successful C-TPAT program participation is properly maintaining your membership, such as maintaining security profiles, business partner questionnaires, and timely completion of annual self-assessments. This work shop will address how to keep up with program obligations as well as create a C-TPAT committed culture within a company. (Cibolo Canyon 1 & 2)

Mutual Recognition – Steve Krupinsky (C-TPAT HQ) - This workshop will provide an update on Mutual Recognition Arrangements with various Customs Administrations throughout the world. C-TPAT Program Managers will also discuss the requirements and steps necessary to reach a Mutual Recognition Arrangements, as well as expectations and benefits. (Cibolo Canyon 3 & 4)

NEEC Program Presentation - Manuel Garza (C-TPAT HQ) & NEEC Representative — This workshop includes a presentation and discussion on the NEEC program and its developing relationship with C-TPAT via mutual recognition. There will be additional discussion on how NEEC is impacting trade in Mexico and future visions for the program. Partners will also have an opportunity to provide basic information to pre-apply for the NEEC program during this session. **(Cibolo Canyon 6)**

Portal 2.0 Workshop – Charles "Mark" Marker & Susan Scheungrab (ManTech International Corporation, Government Contractors) - Expanding on prior portal presentations, this workshop will describe functionality changes in the C-TPAT Portal and prepare users to manage their accounts throughout the continued advancement of the new Trade Portal. **(Cibolo Canyon 5)**

New C-TPAT Benefits Discussion – Mike Ginn (C-TPAT Miami) & George Rudy (C-TPAT HQ) – this workshop will be a discussion on the newest benefits of the C-TPAT program to include Aqua Lane, SAFETY Act and the Exporter component. Workshop presenters will provide updates and projections for future implementation/operation of these newest sections as well as answer questions. (Grand Oaks A & B)

Spanish Language C-TPAT Presentation – Carlos Ochoa (C-TPAT HQ) & Frank De Los Santos (C-TPAT Houston) - Presented entirely in Spanish, this work shop will discuss mutual recognition efforts with Mexico and what it means to C-TPAT partners in Mexico as well as why companies are being suspended/removed from C-TPAT, resources available to partners and an open Q&A session at the end. (Grand Oaks A & B)

Container Display – Mark Mahoney & Tom Greulich - (C-TPAT Buffalo) - C-TPAT Supply Chain Security Specialists will be available to provide a live demonstration of the 7- point inspection process and discuss hidden compartment detection techniques while utilizing the C-TPAT modified trailer. The trailer will be available throughout the conference and will not have a set presentation time. (Outside Level 1 Nelson Wolff Exhibit Ballroom entrance, directly in front of escalator)

Workshops will be scheduled for 1 hour, allowing for 5 minutes of transit time.

Seating for workshops will be first come, first seated.

All agenda items, topics and personnel are subject to change.

附件 2 Business Partner Relationships

Business Partner Relationships



Shawn Porter **Branch Chief Evaluations and Assessments Branch**

Objectives

- Identify practical, acceptable methods of screening business partners
 - Clients
 - Service providers
- Outreach and business partner education and verification





Benefits For Your Company

- Security issues addressed proactively reduce future problems
- Marketability
 - As part of company Outreach program you should explain the benefits to your clients of these extra steps you take to ensure the security of the joint supply chain



Shawn Porter





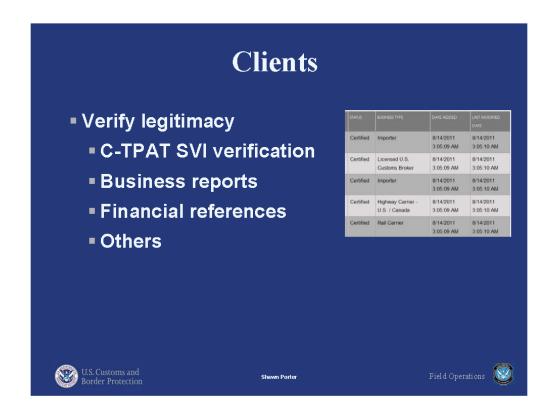
Definitions

- Business Partners
 - Clients
 - Companies who come to you and request your company's services
 - Service providers selected by you
 - Companies selected by your company who assist in the movement / transportation of merchandise, or who have access to the company's data



Shawn Porter





Outreach

- Explanatory letter on program benefits
 - Contact method for security inquiries
- Emailing appropriate MSC
- Site visits to provide presentations / education to partners
- Weblink from company's site to C-TPAT page on cbp.gov
- Refer partners to your assigned SCSS



Shawn Porter



Outreach Focus Topics

- Container inspections
 - Documented, 7 and 17 point



- Seal procedures
 - ISO 17712, written procedures
- Tracking and Monitoring
 - Documented, responsibilities for all
- Law enforcement notification
 - Have specific procedures and numbers



Shawn Porter





Business Partners ("Service Providers")

- First best option
 - C-TPAT SVI number verification
- Second best
 - Mutual Recognition Arrangement certificate
 - AEO, PIP, etc.
- Security questionnaire and physical verification conducted by company



Shawn Porter



Security Questionnaire

- Only as effective as you make it
- Only as effective as your partner believes it will be verified
- How do I design one?
 - Focus on the partner's function within the supply chain
- Why isn't there a standard one?



Shawn Porter





Designing the Questionnaire

Is it detailed enough?

- Is it appropriate to environment?
 - Focused on that partner's role
- Questions to ask other than the MSC
 - Other programs (TSA IACP)
 - Previous visits by C-TPAT
 - Visits by other companies/organizations



Shawn Porter



Statement of Attestation

- Written statement from company principal
- Acceptable under MSC
- Puts more work on you





Shawn Porter





How Do You Verify?

- Identify appropriate personnel to assign to the task
- Train those personnel
- Conduct a site visit to verify



U.S. Customs and Border Protection

Shawn Porter

Evidence Defined

- Written processes and completed documents
- Observations of processes being conducted



Shawn Porter





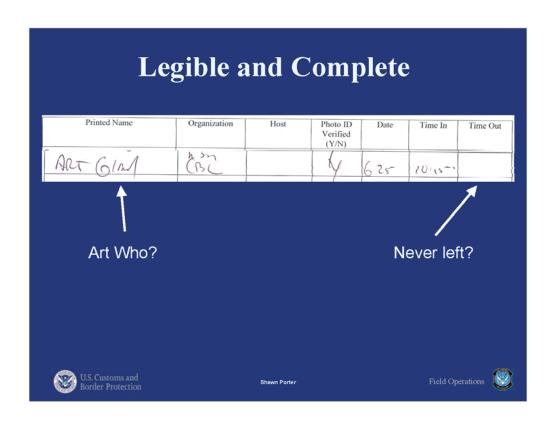
Documentation

- Two elements
 - Written process itself
 - Evidence process has been completed during each "transaction"
- Example:
 - Written seal policy
 - Review of delivery receipts for shipments selected by you show drivers have been writing seal verifications upon them.



Shawn Porter







Visit Preparation

- Training
- Risk Assessment
- Security Questionnaire completed by partner
- Minimum Security Criteria



Shawn Porter





After Visit

- Written Report
 - To company management
 - To business partner
- Issues identified
- Expected actions
- Timeframes
- Future follow up -- contracts



Shawn Porter



What We Discussed

- Different types of business partners
- How each type should be screened
- Methods of Outreach / Education
- Criteria elements to focus on
- Verification of partners' statements



Shawn Porter





Resources

- Minimum Security Criteria
 - On cbp.gov in multiple languages
- Public Document Library
 - Seal and Container Inspection Workshop
- Business Partners
- Supply Chain Security Specialist



Shawn Porter

Partner Screening and Outreach

- Information to aid in:
 - Screening different types of partners
 - Conducting Outreach and Education to partners
 - Verifying statements of partners
- Will also aid in preparing for your own validation



Shawn Porter





Business Partner Relationships



Shawn Porter **Branch Chief** Evaluations and Assessments Branch

附件 3 Security Breaches and Internal Conspiracies

Security Breaches & Internal Conspiracies



Workshop Objectives

- ➤ Internal Conspiracy Case Studies
- > Effective Preventive Measures
- ➤ Internal Conspiracies Defined
- ➤ Internal Conspiracy Indicators
- ➤ Best Practices



- Information received that drug trafficking organization (DTO) has built hidden compartments within the structures of multiple trailers to smuggle narcotics across the Canadian/ United States border.
- Trailers are loaded with narcotics prior to arriving at foreign manufacturer/ consolidator facility.
- Trailer inspections are conducted, cargo is loaded and a high security seal is affixed to the trailer door.
- Trailer shipments are monitored by the transport company via GPS and cell phone communication with the drivers.



Case Study #1







- Possible conspirators:
 - Transport company/ employee
 - Driver
 - Foreign manufacturer/ consolidator employee(s)
 - All of the above
- What preventive measures can a company implement to minimize this type of security breach?



Preventive Measures

- Conduct a comprehensive risk assessment of the company's international supply chain. Based upon a documented risk assessment process, non-C-TPAT business partners must be subject to verification of compliance with security criteria.
- Conduct on-site visits of service providers' facilities to verify security measures.
- For those business partners eligible for C-TPAT certification the company must have documentation indicating whether these service providers are or are not C-TPAT certified (monitor SVI number, AEO certificate, ISO 28000, etc.).
- Request drivers that have been issued a Free and Secure Trade (FAST) licenses. These drivers go through additional scrutiny by CBP.



- Container/ trailer locking mechanisms are attacked prior to arriving at foreign manufacturer facility.
- Container/ trailer inspections are conducted and documented at export warehouse.
- A high security seal is affixed to the container/ trailer door by an authorized company employee.
- Upon exiting the facility, shipment documents and affixed seal are verified by a security guard at the main gate.
- Container/ trailer shipments are tracked by the carrier via online website, GPS and cell phone communication with the drivers.



Case Study #2







- Possible conspirators:
 - Driver
 - Foreign manufacturer employee conducting container/ trailer inspections
 - Security guard(s)
 - All of the above
- What preventive measures can a company implement to minimize this type of security breach?



Preventive Measures

- Obligate carriers to provide containers/ trailers that have been inspected (7-point container inspection) and are free from security vulnerabilities.
- Conduct on-site visits of carriers' facilities to verify how container/ trailer inspections are conducted.
- Provide container/ trailer inspection training to specific individuals throughout the company's supply chain. (carrier, warehouse employees, security guards, etc.)
- Confirm hiring practices of security company providing guards.
 Make sure hiring practices are in line with foreign manufacturer requirements.
- Verify how container/ trailers are tracked by carriers' monitoring systems. Are notification alerts active. (on-line tracking, e-mails, GPS, Geo-fencing, etc.)



Internal Conspiracies

- Supply chain security is the responsibility of all C-TPAT certified companies from point of origin through point of distribution.
- Look at the entire supply chain as one security system NOT segmented with different layers of responsibility.
- Establish checks and balances.
- Verify all business partners and conduct documented on-site security verifications.
- Demand contractual obligations regarding established security practices.
- How can security vulnerabilities/ deficiencies be found if they are not being searched for?



Internal Conspiracies

- Definition when <u>people</u> work <u>together</u> by agreeing to commit a crime, fraud, or other wrongful act. A conspiracy may exist when the parties use legal means to accomplish an illegal result, or to use illegal means to achieve something that is unlawful.
- Money is the main motivator for the internal conspirator. For relatively "easy" work (removal, delivery, lookout) the reward is substantial.







Internal Conspiracies

Average price of illegal narcotics:

- Marijuana \$500 to \$1,000 per pound
 (Canadian marijuana can be 300%-600% more expensive)
- Cocaine \$15,000 to \$21,000 per kilo
- Heroin \$30,000 to \$40,000 per kilo
- Transportation costs, drug purity & risk of being captured are some factors that are calculated into the price.
- Global revenue from illegal drug market: 300 350 billion
- Proceeds of illegal drug trafficking are used to fund additional criminal acts like terrorism, purchases of unauthorized weapons/ ammo & human smuggling.



Internal Conspiracies

- Terrorists may use the same techniques that narcotic smugglers use or hire a DTO to smuggle for them!!!
- Risk of capture may be minimal due to:
 - High volume of container traffic not inspected/ scrutinized by Law Enforcement (lack of manpower).
 - Corrupted security personnel throughout the supply chain.
 Lookout "I didn't see or know nothing"
 - Company/ employees threatened and afraid of retaliation.
- Internal conspiracy is the cheapest and easiest method when attempting illicit activities....plenty of \$\$\$ to go around.
- For legitimate businesses imported goods and containers/ trailers are currently used as conveyances to smuggle contraband with the result being financial loss and bad publicity for the company.



Internal Conspiracies

The eight signs of terrorism:

- 1 Surveillance
- 2 Information Gathering
- 3 Tests of Security
- 4 Funding
- 5 Acquiring Supplies
- 6 People who don't belong
- 7 Trial Run
- 8 Deploying Assets







Conspiracy Indicators

- Conspirators will conduct surveillance and gather information about the facility's operations and security protocols.
- May take photographs and/or videos of the facility's physical security to include entrances, fencing, buildings, light poles and CCTV camera locations.
- Conspirators will <u>TEST</u> the company's security system to evaluate reaction or non-reaction times.







Conspiracy Indicators

- Internal conspirators will seek out information about the company's security procedures. May use social engineering tools to gather information about the company and employees.
- Will ask questions on how shipment routes are monitored, GPS system works, document routing, manifests, etc.
- Cargo transit routes and stops are of particular interest.
- Access to stow plans of containerized cargo will allow for quick and easy access to introduce illegal contraband.
- Gather information on employee schedules, work habits, lunch breaks, off-duty social life, home address, etc.
- By assessing the company's probable vulnerabilities the conspirator can determine a good opportunity for the breach to occur.



Conspiracy Indicators

Probe the company's security (Trial Run):

- May show up to work on day off
- Enter restricted and/or unauthorized areas without proper access/identification
- Enter the shipping warehouse with unauthorized personal items (backpacks, laptops, smart phones, etc.)
- Activate alarms and check for reaction time
- Change work schedule to evaluate security at another time
- May ship an un-related item with legitimate cargo
- Entering false information in the documents such as a bogus address, name, "fictitious" company, etc.
- Attempting to pick-up cargo without appropriate documentation and identification
- Drivers may stray off the authorized route to test GPS geo-fencing
- Planned delays during transport to TIME the company's response
- Unique markings/ tape on legitimate cargo boxes/ pallets



Conspiracy Indicators

- Acquiring company equipment:
 - Company uniforms, identification, access cards, keys & alarm codes to enter sensitive areas
 - Report company items lost or stolen in order to duplicate
 - Stolen high-security seals and/ or disposed cut seals
 - Obtaining company boxes/ crates/ pallets conceal the contraband
- All company personnel (not only security guards) should be on the lookout for suspicious people/ activity occurring around the facility!!!
- Train company employees to challenge and report unauthorized individuals to management/ security personnel.







Best Practices

- Reporting suspicious activities for employees:
 - Phone numbers posted throughout facility (security guards, supervisors, local law enforcement, etc.)
 - Awareness posters on what to do and who to contact
 - Anonymous Hotline
 - Incentives (recognition, award, monetary, etc.)
- Reporting supply chain security incidents for company:
 - Establish a reporting "calling tree"
 - Company corporate security department
 - Foreign government agencies/ law enforcement
 - CBP at Ports of Entry (POE) http://www.cbp.gov/contact/ports
 - C-TPAT/ Supply Chain Security Specialist (important)



Best Practices

- Conduct tests of security protocols facility/ supply chain:
 - Access sensitive areas to see if confronted
 - Set off alarms and check for response time
 - Place suspicious backpack/ package inside facility to see if it is reported.
 - Turn off CCTV cameras and exterior lights to see if they are appropriately reported for repair.
 - Create incorrect shipping documents (packing list, bill of lading, etc.) and see if they are questioned prior to loading.
 - Apply wrong seal on container/ trailer and see if security guard verifies the seal number for accuracy before exiting the facility.
 - Escort shipment after exiting & see where it goes.



Best Practices

- Create a supply chain security team:
 - Meet with local law enforcement entities
 - Work with other companies in the same area/ industry
 - Periodic meetings to discuss security issues facing the company & possible improvements that can be made.
- Perform in-depth background checks for new employees to include social economic reviews. Periodic background checks should be conducted for vested employees especially if there is a change in duties or for cause.
- Establish property checklist for company items that are issued to employees upon being hired. Items like access badges, keys, uniforms, laptops & credit cards should be listed on the checklist. The checklist should be used to collect all items when the employee leaves the company.
- TRAINING (what to look for, challenging, reporting, etc.)



Summary

- ➤ Internal conspiracies are real & can happen at your company
- Financial gain is the main motivator for internal conspirators
- Establish robust security protocols (preventive measures) to minimize internal conspiracies/ security breaches at facility.
- Train company personnel to look for and properly report internal conspiracy indicators/ eight signs of terrorism.
- Regularly test security system(s) and establish corrective actions for vulnerabilities that are found.
- Incorporate security best practices throughout company's supply chain.





附件 4 Validation/Revalidation Results

C-TPAT Validation/Revalidation Results

September 2014

Wayne Kornmann – Director, Los Angeles C-TPAT Field Office

Bryant Van Buskirk – Supervisor, Los Angeles C-TPAT Office



Agenda

- Methodology
- Core Criteria Elements
- Validation/Revalidation Results
- Available Resources
- Questions





Methodology

Validation/revalidation results January – December 2013

Findings from over 2,100 validations:

- 578 Initial Validations
- 1,553 Revalidations
- Actions Required, Recommendations, and Best Practices

Emphasis on the following trade sectors:

- Importers / Brokers
- Consolidators / 3PLs
- Highway Carriers / Foreign Manufacturers



Nine C-TPAT Core Criteria

- Risk Assessment
- Business Partners
- Container Security
 - Inspection
 - Container Seals
 - Container Storage
- Physical Access Controls
 - Employees and visitors
 - Deliveries

- Personnel Security
- Procedural Security
- Security Training and Threat Awareness
- Physical Security
 - Cargo handling areas
 - Lighting, Key Controls
- IT Security
 - Password protection
 - Accountability



Importer - Strong Points

Physical Security

- Building structure
- Lighting
- Fencing & gates

Access controls

- U.S. facilities
- Escorting visitors
- Access limited to secure areas

Personnel Security

U.S. facilities

Procedural Security

- Reconciliation of departing cargo
- Reconciliation of arriving cargo



Importers – Areas of Concern

(Domestic)

Risk Assessment

- Not conducted / Not updated
- Results of risk assessment and follow-up not completed and/or not documented
- No written procedures outlining the risk assessment process, to include the parties responsible for conducting the risk assessment

Business Partner Requirements

- Importers were not verifying that non-C-TPAT partners were in compliance with C-TPAT criteria
- Written procedures were not in place to document the screening of business partners
- Documentation was not available indicating whether business partners had been screened





Importers - Areas of Concern

(Foreign Site)

- Written procedures were not in place for seals
 - to include controlling and affixing the seal to the loaded container and reporting compromised seals to law enforcement
- Seal logs were not maintained
- Written procedures were not if place for the issuance, removal and changing of access devices (keys, etc.)
- Procedures were not in place to identify, challenge and address unauthorized persons
- Employees were not aware of the procedures the company has in place to address a situation and how to report it
- Visitors were not required to present a valid photo ID upon arrival



Importers - Areas of Concern

(Foreign Site)

- Written procedures were not in place to verify the physical integrity of the container
- IT security policies, procedures and standards were not in place
- IT security training was not provided to employees
- IT system violators were not subject to disciplinary actions for abuse of system
- IT system passwords were not periodically changed
- Drivers delivering or receiving cargo were not positively identified before the cargo is received or released





Importers – Risk Assessment

Did the importer conduct a comprehensive risk assessment of the security practices used by the foreign business partner?

Initial Validation

- 35% of the importers had <u>not</u> conducted a risk assessment (Action Required)
- 12% met the criteria but had recommendations
- No Best Practices

Revalidation

- 17% of the importers had not conducted a risk assessment
- 6% met the criteria but had recommendations
- 15% exhibited Best Practices for this criteria
- 40% of Canadian based importers did not have a documented risk assessment in place



Importers – Risk Assessment

Did the importer conduct follow-up with business partners when security gaps, vulnerabilities or weaknesses are identified?

Initial Validation

- 23% of the importers did not follow-up on or have written processes in place to address vulnerabilities
- 6% met the criteria but had recommendations
- No Best Practices

Revalidation

- 13% of the importers did not follow-up on or have written processes in place to address vulnerabilities
- 3% met the criteria but had recommendations
- 4% exhibited Best Practices for this criteria



Importers – Business Partners

Did the importer have written and verifiable processes for the screening of business partners, including manufacturers, product suppliers and vendors?

- Initial Validation
 - 10% of the importers did not have written and verifiable processes for screening business partners
 - 6% met the criteria but had recommendations
 - 4% exhibited Best Practices for this criteria
- Revalidation
 - 13% of the importers did not have written and verifiable processes for screening business partners
 - 4% met the criteria but had recommendations
 - 9% exhibited Best Practices for this criteria



Importers – Business Partners

For business partners not eligible for C-TPAT certification, did the importer require their business partners to demonstrate that they are meeting C-TPAT security criteria at point of origin?

Initial Validation

- 31% of the importers did not have evidence that non-C-TPAT Business Partners were meeting C-TPAT security criteria
- No Recommendations
- No Best Practices

Revalidation

- 13% of the importers did not have evidence that non-C-TPAT Business Partners were meeting C-TPAT security criteria
- 3% met the criteria but had recommendations
- 1% had Best Practices



Brokers – Strong Points

Document Processing

Cargo discrepancies

Physical Access Controls

- Employees
- Deliveries

Cargo Handling Facilities (when applicable)

Physical Security

- Lighting
- Locking devices
- Physical barriers and fencing
- Alarms / Video Surveillance



Brokers – Areas of Concern

Risk Assessment - not conducted

Initial Validation – 23% / Revalidation - 20%

Business Partners – No written/verifiable processes to screen new partners

Initial Validation – 15% / Revalidation – 14%

Other areas not meeting C-TPAT security criteria

- A documented process was not in place for handling security related client-importer inquires – 14%
- The company did not convey to business partners the criticality of have security procedures in place (seals, container inspection, etc.) – 12%
- IT security 8% of brokers did not meet one or more IT security criteria
- Application information was not verified prior to employment 7%
- A logbook was not maintained for unknown visitors 3%
- Written procedures to identify/address specific factors (cash transactions, faxed power of attorney) that would trigger additional scrutiny – recommendations found in 25% of broker validations



Consolidators / 3PL – Strong Points

Physical Security

- Lighting; Locking devices
- Gates and fencing; Building structure
- Physical barriers cargo handling areas
- Alarms / Video Surveillance

Procedural Security

- Shipping and receiving
- Documentation processing
- Manifesting

Physical Access Controls

- Employees
- Visitors





Consolidators / 3PL – Areas of Concern

Risk Assessment - not conducted

Initial Validation – 24% / Revalidation - 19%

Risk Assessment - no follow-up when security deficiencies identified

Initial Validation – 23% / Revalidation – 15%

Business Partners – No written/verifiable processes to screen partners

Initial Validation – 18% / Revalidation – 15%

Other areas not meeting C-TPAT security criteria

- Written procedures were not in place for seals 11%
- Written procedures were not if place for the issuance, removal and changing of access devices (keys, etc.) – 8%
- Procedures were not in place to notify CBP or law enforcement if illegal or suspicious activities are detected – 7%
- IT security 6% of consolidators did not met one or more IT security criteria



Highway Carriers

Canadian Highway Carriers

Mexican Highway Carriers

Initial Validations & Re-validations

- Best Practices
- Actions Required
- Recommendations





Highway Carriers – Strong Points

Training

Integrated multi-business partner security training programs

Regular testing of security processes

Access Controls

Active employee rosters routinely updated/shared with critical Business Partners

Trailer Security

Unannounced verifications of conveyance inspection processes

Regular unannounced incident response exercises

Conveyance Tracking

Multiple party real time transit notifications

'Last Chance' Inspection points



Carriers – Areas of Concern

Most prevalent areas of Actions Required and Recommendations:

- Training
- Access Controls
- Trailer Security
- Conveyance Tracking
- Seals





Carriers – Areas of Concern

Training

- The carrier should offer security and threat related training to employees.
- The carrier should train drivers on how to search conveyances/trailers.
- The carrier should provide training on internal conspiracies. Employees need to know how to identify and report suspicious behaviors and activities.



Carrier – Areas of Concern

Access Controls

- Gates through which all vehicles and/or personnel enter or exit must be manned and/or monitored.
- Procedures for the issuance, removal and changing of access devices must be established and documented.
- Companies must have procedures in place to remove identification, facility, and system access for terminated employees.



Carriers – Areas of Concern

Trailer Security

- Conveyance inspections must be a regular security practice that is done each day, each trip.
- Trailers and tractors must be stored in secured areas.
- Procedures must be in place for reporting and neutralizing unauthorized entry into trailers, tractors or storage areas.



Carriers – Areas of Concern

Conveyance Tracking

- Highway Carriers must ensure that conveyance and trailer integrity is maintained while en route by utilizing a tracking and monitoring activity log or equivalent technology.
- Highway Carriers management must routinely verify that conveyance tracking and monitoring logs are maintained, and procedures are being followed and enforced.
- All transit activity should be monitored in real time.



Carriers – Areas of Concern

Seals

- A high security seal must be affixed to all loaded trailers/containers bound for the U.S.
- Procedures must be in place identifying how seals are to be controlled during transit.
- Seal procedures should be explained to all drivers. Highway Carrier management needs to ensure that the procedures are understood and are being followed.



Foreign Mfg's – Strong Points

Training

Robust training programs

Access Controls

Positive identification and limited access at all points of entry

Drivers are positively identified before cargo is received or released



Trailer Security

Verifications of container physical integrity prior to acceptance

Loading and sealing is monitored

Employee Screening

Verifications of employment history and references

Contract workers subject to same hiring standards as regular full time employees

Foreign Mfg's – Areas of Concern

Most prevalent areas of Actions Required and Recommendations:

- Access Controls
- Employee Screening
- Trailer Security
- Reporting Procedures
- Seals





Foreign Mfg's – Areas of Concern

Access Controls

- Drivers delivering or receiving cargo must be positively identified before cargo is received or released.
- Companies must have procedures to remove identifications, facility and systems accesses for terminated employees.
- Video recordings and equipment should be secured.



Foreign Mfg's – Areas of Concern

Employee Screening

- Processes must be in place to screen prospective employees and to periodically check current employees
- Employment history and references must be verified prior to employment
- Companies should apply the same screening procedures to seasonal, temporary, and part-time employees that are used for regular/full-time employees



Foreign Mfg's – Areas of Concern

Reporting Procedures

- Employees must be made aware of the procedures the highway carrier has in place to address a situation and how to report it.
- The carrier must notify U.S. Customs and Border Protection of any structural anomalies with drivers, changes or hidden compartment discovered



Foreign Mfg's – Areas of Concern

Trailer Security

- Conveyance inspections must be a regular security practice that is done each day, each trip.
- On a random and unannounced basis, a Supervisor or Security Manager should search the conveyance after the driver has conducted an inspection
- Procedures must be in place for reporting and neutralizing unauthorized entry into trailers, tractors or storage areas.



Foreign Mfg's – Areas of Concern

Seals

- Written procedures must stipulate how seals are to be controlled and affixed to loaded containers and/or trailers
- A seal log must be maintained for seals that to be applied on loaded containers and/or trailers.
- Seals must be maintained in a secured location.



Final Thoughts

All procedures and processes should have:

- A system of checks and balances
- Accountability
- Oversight
- Verification process (audit)

Procedures and processes should be modified or updated if vulnerabilities are discovered, changes are made to the processes and "when necessary"



Available Resources

C-TPAT Portal Public Document Library

- 5-step Risk Assessment Guide (w/risk assessment resource list)
- Best Practice Catalog
- 2010, 2011, and 2013 C-TPAT Conference Presentations
 - Conveyance inspection / Seal security
 - Risk Assessment
 - Protecting your company's identity

Supply Chain Security Specialist / C-TPAT Field Office

Customs and Border Protection - www.CBP.gov

Department of Homeland Security - www.DHS.gov

U.S. Department of State - www.state.gov





附件 5 C-TPAT Membership Maintenance

C-TPAT Membership Maintenance

August 2014





Our Mission

We are the guardians of our Nation's borders.

We are America's frontline.

We safeguard the American homeland at and beyond our borders.

We protect the American public against terrorists and the instruments of terror.

We steadfastly enforce the laws of the United States while fostering our nation's economic security through lawful international trade and travel.

We serve the American public with vigilance, integrity and professionalism.

Roles and Responsibilities

- CBP
 - Supply Chain Security Specialist (SCSS)
- Industry
 - ❖ C-TPAT Partner



Supply Chain Security Specialist Roles

- Recruiter for C-TPAT Enrollment
 - Speaking Events
- Assists New Applicants in Application Process
- Review of New Applicants
 - Security Profile
 - Vetting
 - Determination Made
- Primary Point of Contact
- Establishes a Working Relationship



Supply Chain Security Specialist Roles

- Validates the Partner within a Year
- Determines Scope of the Validation
- Plans the Validation
- Conducts the Validation
- Documents the Findings
- Writes the Validation Report
- Account maintenance



Supply Chain Security Specialist Roles

- Approves/Disapproves the Validation Report Responses
- Works with the Partner to Implement Deficiencies
- Reviews Annual Security Profiles
- Researches Security Related Issues



C-TPAT Partners

- Company Profile
- Security Profile
- Document Uploads
- Reporting Requirements
- Revalidation



C-TPAT Partner Agreement

C-TPAT-PARTNER AGREEMENT TO VOLUNTARILY PARTICIPAT

This Agreement is made between Test (hereafter referred to as "the Partner") and U.S. Customs and Border Protection (hereafter referred

This Agreement between the Partner and CBP will enhance the joint efforts of both entities to better secure the international supply chain to the United States. CBP and the Partner recognize the need to improve and expand existing security practices in order to achieve a more efficient and compliant import process.

The Partner agrees to develop and implement, within a framework consistent with the listed C-TPAT criteria, a verifiable and documented rogram to enhance security procedures throughout its supply chain. Where the Partner does not exercise control of a production facility, listribution entity, or process in the supply chain, the Partner agrees to communicate the C-TPAT criteria to those entities.

- Commit to working with business partners and CBP to meet C-TPAT minimum security criteria.
 Using the online application process (the C-TPAT Security Link Portal), complete a supply chain security profile and update
- information regarding the company on an annual basis.

 Provide complete and accurate company information in response to C-TPAT inquiries
- Comply with C-TPAT program requirements to ensure integrity at each stage of the PartnerDs supply chain.
- Cooperate with the C-TPAT validation process including assisting the CBP Supply Chain Security Specialists (SCSS) in planning for and conducting site visits.
- Acknowledge and cooperate with re-validation procedure as deemed necessary by CBP
- Maintain security integrity throughout the partnership, conducting periodic self-assessments in line with the changing risks and complexity of international business and trade.



C-TPAT Company Profile

- Ensure that the following fields are accurate in the portal:
 - a) Report Company Name Change
 - b) Ensure Phone Numbers are Correct
 - c) List Addresses of Facilities (HQ, Warehouse, etc.)
 - d) Update Contact List
 - e) Verify IOR Numbers, SCAC Codes, Bond Numbers, etc.

If the information is not correct, please update and/or notify your SCSS to make the change.



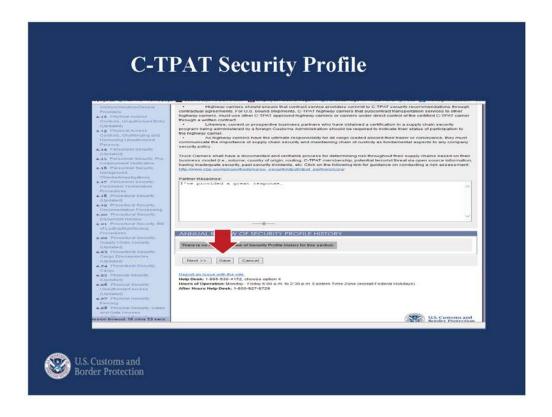


Security Profile

- Annual Security Profile Review
 - Update each section of the profile
 - Date Stamp Each Section Add New Information or State "No Change"
 - Save Each Section and Submit
 - As Policies Change Update the Security Profile
 - Upload supporting documentation







Business Partners

- Continue to conduct:
 - ☐ Internal/External Audits
 - C-TPAT Criteria
 - 3rd Party
 - □ Security Questionnaires
 - Address Deficiencies
 - □ Visits
 - C-TPAT Compliance
 - □ SVI Monitoring
 - Periodically
 - Contracts
 - C-TPAT Language



Risk Assessment

- Update Periodically:
 - Country of Export
 - Country Information Terrorism, Crime, Conditions, etc.
 - Threat Level
 - Cargo Flow
 - Describe Flow Factory Loaded, Consolidations, etc.
 - Threat Level
 - Business Partners
 - SVI Numbers if applicable
 - Security AEO certification



Document Uploads in Portal

- Documents to Upload C-TPAT Partner Document Exchange
 - Internal/ External Audit
 - Risk Assessment
 - Written Procedures
 - Business Partner Screening, Hiring Procedures, IT Policies,
 Container Security, Access Controls, Procedural Security,
 Reporting Procedures, etc.
 - Completed Documents Sample
 - ✓ Questionnaire, Container Checklist, Key Log, etc.



Reporting Requirements

- Notifying your SCSS:
 - Validation Report states "A procedure should be in place to ensure the SCSS is notified immediately in the event of a supply chain security breach and procedures should be in place to ensure this occurs".
 - a) Manipulated Containers
 - b) Seal Discrepancies if no resolution
 - c) Suspicious Behavior



Revalidation

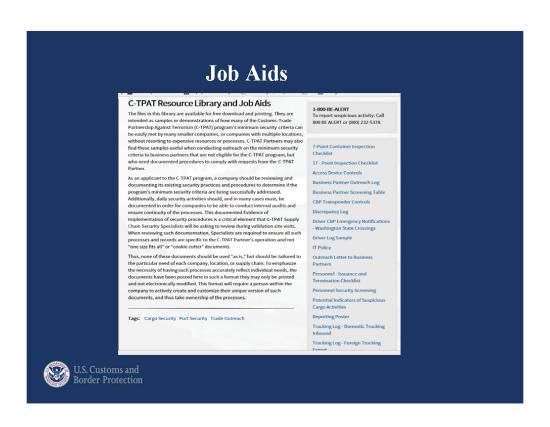
- Know your Supply Chain
 - Be Ready to Provide Information
 - Keep an Updated List of Suppliers
 - Name
 - Address
 - ❖ Contact Name and Number
 - High Risk Suppliers/Issues
 - Logistics
 - ❖ Freight at rest is freight at risk
 - ❖ Consolidator
 - Air

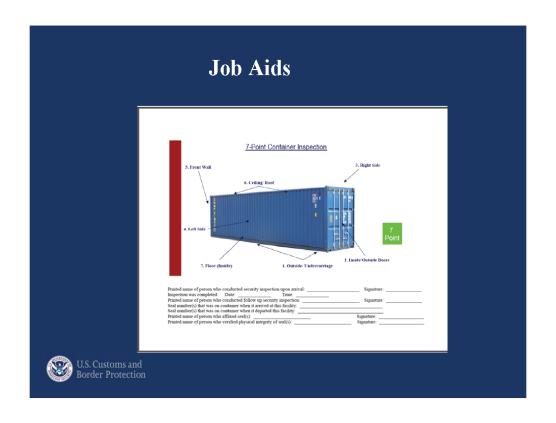


Information

- www.cbp.gov Type C-TPAT in search field
 - ❖ Eligibility and MSC
 - ❖ Annual Security Profile Review
 - ◆ SVI
 - ❖ Alerts and Bulletins
 - ❖ Job Aids
- C-TPAT Portal Public Document Library
- Your Supply Chain Security Specialist







Job Aids

Elements of an Access Device Control Policy

List all items that could be considered access devices that might be issued to employees:

(this includes metal keys, ID cards, separate proximity cards, combinations to locks, alarm codes, parking passes, uniforms, etc.)

What department and person (by title, not name) is responsible for authorizing the issuance of each type of access device

What department and person (by title, not name) actually issues each type of access device

Procedures for employees to report lost or stolen access devices. This must include:

Which manager employee reports lost/theft to



Questions?



Thank You!

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