

## D. J. Powers Company, Inc.

#### CTPAT SEAL PROCEDURES BEST PRACTICES

Below is a listing of seal procedures for various types of companies involved in different links and activities within the supply chain. Note many of these items are above and beyond the minimum security criteria, and some have been previously identified as Best Practices. Included are seal requirements for companies that are not eligible to be direct Partners of the C-TPAT Program, such as domestic highway carriers in the U.S. and other countries. This information is included as part of the minimum security criteria for importers and others is to ensure all business partners and links in the supply adhere to the minimum security criteria.

### 1. U.S. Importers – Point of Sealing

- Seals must be compliant with ISO 17712 standards for high security seals.
- Documentation regarding the compliance standard must be maintained on file for verification.
- Upon receipt of seals, an inventory must be conducted and the seals must be logged in a seal log.
- Seal inventories must be conducted at least once per year during the internal audit.
- Seals must be assigned to a designated employee/department and stored in a secured storage container.
- Upon issuance of seals, the seal log should be updated with the seal usage information.
- A designated person who has received seal security training must affix the seal to the loaded container/trailer, 1) witnessed by another person to ensure it has been properly affixed and 2) using CBP's View, Verify, Twist, and Tug (VVTT) method to ensure the seal is the correct seal number, uncompromised, and properly affixed to the loaded container/trailer.
- Compromised seals and/or containers must be reported to CBP or the appropriate foreign authority.

### 2. Manufacturers - Point of Sealing

- Seals must be compliant with ISO 17712 standards for high security seals.
- Documentation regarding the compliance standard must be maintained on file for verification.
- Upon receipt of seals, an inventory must be conducted and the seals must be logged in a seal log book.
- Seal inventories must be conducted at least once per year during the internal audit.
- Seals must be assigned to a designated employee/department and stored in a secured storage container.
- Upon issuance of seals, the seal log should be updated with the seal usage information.
- A designated person who has received seal security training must affix the seal to the loaded container/trailer, 1) witnessed by another person to ensure it has been properly affixed and 2) using CBP's View, Verify, Twist, and Tug (VVTT) method to ensure the seal is the correct seal number, uncompromised, and properly affixed to the loaded container/trailer.
- Compromised seals and/or containers must be reported to CBP or the appropriate foreign authority.

#### 3. Exporters – Point of Sealing

- Seals must be compliant with ISO 17712 standards for high security seals.
- Documentation regarding the compliance standard must be maintained on file for verification.
- Upon receipt of seals, an inventory must be conducted and the seals must be logged in a seal log book.
- Seal inventories must be conducted at least once per year during the internal audit.
- Seals must be assigned to a designated employee/department and stored in a secured storage container.
- Upon issuance of seals, the seal log should be updated with the seal usage information.
- A designated person who has received seal security training must affix the seal to the loaded container/trailer, 1) witnessed by another person to ensure it has been properly affixed and 2) using CBP's View, Verify, Twist, and Tug (VVTT) method to ensure the seal is the correct seal number, uncompromised, and properly affixed to the loaded container/trailer.
- Compromised seals and/or containers must be reported to CBP or the appropriate foreign authority.

#### 4. U.S. Importers – Point of Receipt

- Prior to cutting the seal on inbound shipments, CBP's View, Verify, Twist, and Tug (VVTT) method must be used, with a witness, to ensure the seal is 1) the correct seal number, 2) uncompromised, and 3) properly affixed to the loaded container/trailer.
- Cut seals must be disposed of in a separate container, the contents of which are inaccessible, and must be delivered to or picked up by a recycling company on a regular basis to ensure proper destruction.
- Cut seals must be destroyed on-site, if possible.

#### 5. Consolidators handling inbound for U.S. importers – Point of Receipt

- Prior to cutting the seal on inbound shipments, CBP's View, Verify, Twist, and Tug (VVTT) method must be used, with a witness, to ensure that the seal is 1) the correct seal number, 2) uncompromised, and 3) properly affixed to the loaded container/trailer.
- Cut seals must be disposed of in a separate container, the contents of which are inaccessible, and must be delivered to or picked up by a recycling company on a regular basis to ensure proper destruction.
- Cut seals must be destroyed on-site, if possible.

#### 6. Consolidators receiving from U.S. exporters - Point of Receipt

- Prior to cutting the seal on inbound shipments, CBP's View, Verify, Twist, and Tug (VVTT) method must be used, with a witness, to ensure the seal is 1) the correct seal number, 2) uncompromised, and 3) properly affixed to the loaded container/trailer.
- Cut seals must be disposed of in a separate container, the contents of which are inaccessible, and must be delivered to or picked up by a recycling company on a regular basis to ensure proper destruction.
- Cut seals must be destroyed on-site, if possible.

#### 7. Importers who do not physically handle seals

• All partners who, at any point have any contact with a seal (attach, remove, in-transit etc.) must have written seal policies describing requirements to ensure seal integrity, proper usage, verification of numbers, reporting tampering/theft, and disposal or destruction.

#### 8. Cross-border highway carriers

- Carriers must verify the seal number and location of the seal is the same as stated by the shipper on the shipping documents.
- Carriers must verify the seal is intact, and if it exhibits evidence of tampering along the route, note and report in writing to interested parties within the supply chain as well as to proper authorities.
- Carriers must properly document the original and second seal numbers (if a second seal is needed).
- If a seal is removed in-transit to the border 1) a second seal must be placed on the trailer, 2) the seal change must be documented, 3) the driver must immediately notify the dispatcher that the seal was broken, by whom, and the number of the second seal, and 4) the driver must make immediate notification to the shipper, the customs broker, and/or the importer of the placement of the second seal.
- If a seal is removed or tampered with in-transit, the driver must report it to CBP or the appropriate foreign authority, depending on where the compromise occurred.

# 9. Domestic highway carriers (within either U.S. or another country) (manufacturer or exporter to point of export)

- Carriers must verify the seal number and location of the seal is the same as stated by the shipper on the shipping documents.
- Carriers must verify the seal is intact, and if it exhibits evidence of tampering along the route, note and report to interested parties within the supply chain as well as to proper authorities.
- Carriers must properly document the original and second seal numbers (if a second seal is needed).
- If a seal is removed in-transit to the border 1) a second seal must be placed on the trailer, 2) the seal change must be documented, 3) the driver must immediately notify the dispatcher that the seal was broken, by whom, and the number of the second seal, and 4) the driver must make immediate notification to the shipper, the customs broker, and/or the importer of the placement of the second seal.
- If a seal is removed or tampered with in-transit, the driver must report it to CBP or the foreign authority, depending on where the compromise occurred.

## 10. Domestic highway carriers (within either U.S. or another country) (location of import to point of receipt/seal cutting)

- Carriers must verify the seal number and location of the seal is the same as stated by the shipper on the shipping documents.
- Carriers must verify the seal is intact, and if it exhibits evidence of tampering along the route, note and report to interested parties within the supply chain as well as to proper authorities.