CTPAT Job Aid

Seal Security Procedures

Last Updated: October 19, 2021

Seal Security Procedures

The sealing of trailers and containers to attain continuous seal integrity, continues to be a crucial element of a secure supply chain. Seal security includes having a comprehensive written seal policy that addresses all aspects of seal security, such as using the correct seals per Customs Trade Partnership Against Terrorism (CTPAT) requirements, properly placing a seal on Instruments of International Traffic (IIT), and verifying that the seal has been affixed properly.

IIT includes containers, flatbeds, unit load devices (ULDs), lift vans, cargo vans, shipping tanks, bins, skids, pallets, caul boards, cores for textile fabrics, or other specialized containers arriving (loaded or empty), in use or to be used in the shipment of merchandise in international trade.

At the point of stuffing/loading, procedures need to be in place to inspect IIT and properly seal them. Cargo in transit or "at rest" is under less control, and is therefore more vulnerable to infiltration, which is why seal controls and methods to track cargo/conveyance in transit are key security criteria.

Conveyances and IIT (as appropriate) must be equipped with external hardware that can reasonably withstand attempts to remove it. The door, handles, rods, hasps, rivets, brackets, and all other parts of a container's locking mechanism must be fully inspected to detect tampering and any hardware inconsistencies prior to the attachment of any sealing device. Consider using containers/trailers with tamper resistant hinges. Members may also place protective plates or pins on at least two of the hinges of the doors and/or place adhesive seal/tape over at least one hinge on each side.

CTPAT members must have detailed, written high security seal procedures that describe how seals are issued and controlled at the facility and during transit. Procedures must provide the steps to take if a seal is found to be altered, tampered with, or has the incorrect seal number, to include documentation of the event, communication protocols to partners, and the investigation of the incident. The findings from the investigation must be documented, and any corrective actions must be implemented as quickly as possible.

These written procedures must be maintained at the local, operating level so that they are easily accessible. Procedures must be reviewed at least once a year and updated as necessary.

Point of Sealing - Shipping:

If applicable to your business model –

All CTPAT shipments that can be sealed must be secured immediately after loading/stuffing/packing by the responsible party with a high security seal.

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Any packaged IIT that can be sealed must be sealed. Some packed ITT cannot be sealed, such as flatbed trailers, and other modes of transportation may vary with certain types that can be sealed and others that cannot. If a tank container has openings that can be sealed, they must be sealed and the party that fills the container is responsible for sealing it. When cargo is transported through sealable air cargo/IIT containers such as ULDs, high security seals must be used.

In cases where cargo is not transported in a ULD, security methods must be implemented to ensure, to the greatest extent possible, that the cargo is tamper-resistant and/or evident.

All seals used must be securely and properly affixed to IIT that are transporting CTPAT member's cargo to/from the United States.

Seals used must meet or exceed the most currently ISO 17712 standards for high security seals (qualifying cable or bolt seals are acceptable).

Documentation regarding the compliance standard must be maintained on file for verification (acceptable evidence of compliance is a copy of a laboratory testing certificate for ISO high security seal standard).

Upon receipt of seals, an inventory must be conducted~~,~~ and the seals must be logged in a seal log.

Management of seals must be restricted to authorized personnel and stored in a secured storage area.

Upon issuance of seals, the seal log must be updated with the seal usage information.

Company management or a security supervisor must conduct audits of seals that includes periodic inventory of stored seals and reconciliation against seal inventory logs and shipping documents. All audits must be documented.

As part of the overall seal audit process, dock supervisors and/or warehouse managers must periodically verify seal numbers used on conveyances and IIT.

All parts of a container/trailer's locking mechanism must be fully inspected to detect tampering and any hardware inconsistencies prior to the attachment of any sealing devices.

Only a designated person who has received seal security training may affix the seal to the IIT, 1) witnessed by another person to ensure it has been properly affixed and 2) using CTPAT's View, Verify, Twist, Tug (VVTT) Seal Verification Method to ensure the seal is the correct seal number, uncompromised, and properly affixed to the loaded container/trailer.

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The high security seal used must be placed on the Secure Cam position, if available, instead of the right door handle. The seal must be placed at the bottom of the center most vertical bar of the right container door.

Security Technology, such as a Closed-Circuit Television (CCTV) system should be used to monitor secure sensitive areas/access points such as seal storage areas and record the sealing process.

As documented evidence of the properly installed seal, digital photographs should be taken at the point of stuffing. To the extent feasible, these images should be electronically forwarded to the destination for verification purposes.

Seal numbers should be electronically printed on the Bill of Lading (BOL) or other shipping documents. Requiring the seal number to be electronically printed on the BOL or other export documents, helps guard against changing the seal and altering the pertinent document(s) to match the new seal number.

Seal numbers assigned to specific shipments should be transmitted to the consignee prior to departure.

For certain supply chains, goods may be examined in transit, by a foreign Customs authority, or by CBP. Once the seal is broken by the government, a process must be in place to record the new seal number applied to the IIT after examination.

The driver must immediately notify dispatch when a seal is broken, indicate who broke it, and provide the new seal number.

The shipper must note the replacement seal number in the seal log.

If any discrepancies, altered or tampered seals are discovered, hold for an investigation, investigate the discrepancy and follow-up with corrective measures (if warranted).

A notification protocol must be in place to report compromised seals and/or containers to the assigned Supply Chain Security Specialist (SCSS), closest Port of Entry, any pertinent law enforcement agencies, and business partners that may be part of the affected supply chain. Notification to CBP must be made as soon as feasibly possible and in advance of any conveyance or IIT crossing the border. Notification procedures must include the accurate contact information that lists the name(s) and phone number(s) of personnel requiring notification, as well as contact information for law enforcement agencies.

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Point of Receipt - Receiving:

If applicable to your business model –

When picking up/receiving sealed IIT (or after stopping), verify the seal is intact with no signs of tampering.

Confirm the seal number matches what is noted on the shipping documents.

Prior to cutting the seal on inbound shipments, CTPAT's VVTT Seal Verification Method should be utilized to ensure the seal is the correct seal number, uncomprimosed, and properly affixed to the loaded container/trailer.

If any discrepancies, altered or tampered seals are discovered, hold for an investigation, investigate the discrepancy and follow-up with corrective measures (if warranted).

A notification protocol must be in place to report compromised seals and/or containers to the assigned SCSS, closest Port of Entry, any pertinent law enforcement agencies, and business partners that may be part of the affected supply chain. Notifications to CBP must be made as soon as feasibly possible. Notification procedures must include the accurate contact information that lists the name(s) and phone number(s) of personnel requiring notification, as well as contact information for law enforcement agencies.

Transportation:

If applicable to your business model –

When picking up sealed IIT (or after stopping), verify the seal is intact with no signs of tampering.

Confirm the seal number matches what is noted on the shipping documents

If any discrepancies, altered or tampered seals are discovered, hold for an investigation, investigate the discrepancy and follow-up with corrective measures (if warranted).

A notification protocol must be in place to report compromised seals and/or containers to the assigned SCSS, closest Port of Entry, any pertinent law enforcement agencies, and business partners that may be part of the affected supply chain. Notification to CBP must be made as soon as feasibly possible and in advance of any conveyance or IIT crossing the border. Notification procedures must include the accurate contact information that lists the name(s) and phone number(s) of personnel requiring notification, as well as contact information for law enforcement agencies.

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The driver must record any stops and note that inspections of the conveyance, IIT, and the seal were conducted.

After a stop, drivers must inspect the conveyance's sealing or locking devices for any signs of tampering prior to resuming the trip. These inspections must be documented.

In areas of high risk, and immediately prior to arrival at the border crossing, CTPAT members should incorporate a "last chance" verification process for U.S. bound shipments for checking IIT for signs of tampering to include visual inspections of conveyances and the VVTT seal verification process.

Less Than Truck Load (LTL) carriers must (at the minimum) use a high security padlock when picking up local freight in an international LTL environment where consolidation hubs are not used. At the last pick up site prior to crossing the border, the carrier must seal the load with an ISO 17712 compliant high-security seal.

LTL carriers must have strict controls limiting access to padlocks, keys, or combinations that open the padlocks.

Personnel must receive training on controlling/using seals during transit, and to look for signs of someone observing the movement of the conveyance and/or the goods.

Drivers must be trained on how to conduct the CTPAT seal verification process

For certain supply chains, goods may be examined in transit, by a foreign Customs authority, or by CBP. Once the seal is broken by the government, a process must be in place to record the new seal number applied to the IIT after examination.

The driver must immediately notify dispatch when a seal is broken, indicate who broke it, and provide the new seal number.

CTPAT Program

CBP.GOV/CTPAT
1300 Pennsylvania Avenue, NW Washington, DC 20229