Seal Requirements for Manufacturers

C-TPAT importers, carriers and manufacturers who wish to qualify for expedited processing and other related benefits under the U.S./Mexico FAST initiative will be required to adhere to the following procedures, protocols and standards with regards to the use of high security seals.

MANUFACTURER:

The manufacturer shall be responsible for the sealed container/trailer until such a time as the carrier assumes control.

Seals are to be affixed at manufacturer point of origin (loading). Seals will be of the high security type as per ISO guidelines (ISO/PSA 17712, Freight Containers-Mechanical Seals), adopted May 2003.

Establish verifiable security systems for cargo storage and handling facilities and container yards in order to prevent the improper manipulation and transportation or handling of cargo and/or containers/trailers.

Ensure a system is in place to verify seal numbers, weights and quantity of cargo received, when practical.

Safeguard the use of seals and maintain a log of seal numbers issued and used.

Ensure that all manifests and/or bills of lading or other documentation (including electronic data transmissions) submitted for cargo to be shipped are complete and includes all pertinent seal information.

Seal Integrity Responsibilities.

Seals are to be affixed by a responsible, designated representative of the manufacturing entity. (**NOTE:** A responsible, designated representative is defined as an employee who maintains a position of trust (i.e. security personnel) within the business and has received appropriate instruction and training in the proper use and application of high security seals).

Access to seals will be strictly controlled by the responsible party and shall be issued at random in order to avoid seals being affixed in sequential order.

Seals shall be stored in a secure location (locked cabinet, safe, etc.) until such a time as their use is warranted.

Access to such secure locations must be restricted to those parties responsible for the inventory and affixing of seals.

A log must be maintained in order to account for all seals under the control of the manufacturer/importer. **NOTE:** A standardized log is currently under development. In

the interim, any entity responsible for the sealing of cargo should use and maintain an accounting system of its own design.

CARRIER/DRAYAGE:

Upon receipt of container/trailer, ensure that all seal information is true and correct as reflected on manifests, bills of lading or other documentation related to the movement of cargo.

Establish verifiable security systems for cargo storage and handling facilities, container yards and conveyances operated by the carrier to prevent the improper manipulation and transportation of cargo and /or containers/trailers.

Establish procedures for reporting any discrepancies or anomalies related to seal integrity.

Seal Integrity Responsibilities.

Seals will be of the high security type as per ISO guidelines (ISO/PSA 17712, Freight Containers-Mechanical Seals), adopted May 2003.

All seals that are removed from a cargo container/trailer for legitimate intermediate examinations (customs inspection, conveyance damage surveys, law enforcement activity, etc.) must be placed in the container just inside the doors, in plain view, before a new seal is affixed to the container.

Establish a system for annotating and reporting any changes due to legitimate intermediate examination purposes as described above.

Seals are to be affixed by a responsible, designated representative of the carrier. **NOTE:** A responsible, designated representative is defined as an employee who maintains a position of trust (i.e. security personnel) within the business and has received appropriate instruction and training in the proper use and application of high security seals.

Access to seals will be strictly controlled by the responsible party and shall be issued at random in order to avoid seals being affixed in sequential order.

Seals shall be stored in a secure location (locked cabinet, safe, etc.) until such a time as their use is warranted.

Access to such secure locations must be restricted to those parties responsible for the inventory and affixing of seals.

A log must be maintained in order to account for all seals under the control of the carrier. **NOTE:** A standardized log is currently under development. In the interim, any entity responsible for the sealing of cargo should use and maintain an accounting system of their of their own design.

Establish a system to ensure verification of seal numbers and types and that all pertinent seal information is reflected on all manifests, bills of lading or other documentation (including electronic data transmissions) related to the movement of cargo.

IMPORTER:

Ensure that all related parties are aware of security guidelines and procedures as they relate to the use of seals and seal integrity.

Establish a system to ensure all related parties/business partners adhere to established security guidelines and procedures relating to the use of seals and seal integrity.

Establish procedures for reporting any seal discrepancies or anomalies to CBP.