International Container Security

Provided as a courtesy to business partners to facilitate security training of personnel involved in the supply chain via physical or electronic means.
The International Container Security course is designed to provide those new to or experienced with the container security role the knowledge to conduct inspections and verification duties.

Upon completion of training participants understand:

- Background and purpose of container security
- Who is responsible for container security
- Regulatory requirements of container security
- How to carry out container security processes
- How to detect and report incidents and suspicious behavior
- Identify next steps and additional references
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Module 1: Background, Purpose & Intended Audience

- In this module, you will learn……..
  - History and Purpose of Container Security Initiative
  - Purpose of Training
  - Intended Audience
An intermodal container is a large standardized shipping container, designed and built for intermodal freight transport, meaning these containers can be used across different modes of transport – from ship to rail to truck – without unloading and reloading their cargo.
History:
- On October 15, 2008, a law went into effect requiring ALL international shipping containers to have a high security bolt seal on all doors.
- As a member of the United States Customs and Border Protection’s (CBP) Customs Trade Partnership Against Terrorism (C-TPAT) Program, supply chain partners must ensure that “container integrity” is maintained to protect against the introduction of unauthorized material and / or personnel into the supply chain.

Purpose:
- Prevent the introduction of unauthorized material to the:
  - US Homeland
  - Supply Chain

Impact:
- Fines and penalties may be assessed by US Customs and Border Protection if container doors are not properly sealed
- Increased screening and delays at ports
- Loss of program certification
Module 1.2
Purpose of Training

- **Ensure compliance with**
  - US laws and regulations
  - Foreign Government laws and regulations
  - C-TPAT program requirements

- **Educate affected functions and personnel on**
  - Requirements
  - Process Overview
  - System access and use
Module 1.3
Intended Audience

- All parties involved in the supply chain of a container are responsible for its security from stuffing to unloading.

- This training should be required for the following persons:
  - Shipping / Receiving personnel; including 3rd Party Logistic Providers

- This training is also recommended for the following persons:
  - Contract Management personnel
  - Trade Controls personnel
  - Logistics personnel
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Module 2: Regulatory Requirements

In this module, you will learn

- Regulatory and program requirements
- Scope of container security initiative
Regulatory Requirements:

- **SAFE Port Act (2006)** – Congress passed, and the President signed, the Security and Accountability For Every (SAFE) Port Act.
  - Established a statutory framework for the Container Security Initiative and C-TPAT
  - Establishes minimum standards and procedures for securing containers
  - In August 2007, in accordance with the 9/11 Commission Act, a mandate requiring all containers in transit to the United States to use an ISO PAS 17712 compliant seal (Bolt Seal)

C-TPAT Program Requirements for Containers/Trailers:

- Inspect and secure containers for storage
- Properly seal and maintain integrity at point of stuffing (loading)
- Affix approved (ISO PAS 17712) high security seal to all US bound and US exported containers/trailers and maintain a process for controlling seals
- Document seal number on shipping paperwork; seal number must match paperwork
Module 2.2
Scope of Container Security Initiative

- Container Security Initiative includes all US imported and exported containers and truck trailers

Rail Containers

Truck Trailers

Ocean Containers
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In this module, you will learn:

- Roles & Responsibilities for US imported containers
- Process Overview
- Container security inspection process
Module 3.1
Roles & Responsibilities

This training outlines the process for maintaining compliance with U.S. law USC 6 Section 944 and Customs-Trade Partnership Against Terrorism (C-TPAT) criteria regarding ocean container bolt seal usage and monitoring.

Container Security Guidelines

Overall Roles & Responsibilities include:

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<th>Responsibilities</th>
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<tr>
<td>Personnel assigned to receive deliveries</td>
<td>1. Complete delivery vehicle inspection: Truck/Trailer, Railcar, Container</td>
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<td>2. Conduct container and seal inspection</td>
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<td>3. Release container</td>
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<td></td>
<td>4. Report Discrepancies/Suspicions</td>
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</table>
Module 3.2
Container Security Inspection Process

- Upon receipt of container, the responsible party must:
  - Verify that the bolt seal(s) shown on the report for the received container matches the bolt seal(s) on the
    - Container
    - Shipping paperwork
Module 3.3
Container Security Inspection Process

- **Upon receipt of container, the responsible party must:**
  - Verify that the right high security bolt seal is being used appropriately
    - Metal rod, threaded or unthreaded, flexible or rigid, with a formed head, secured with a separate locking mechanism. Must meet standard set by ISO PAS 17712

- Attaches through holes in the locking arm & hasp of door; removed with a bolt cutter.

* Approved *
Bolt Seals

*** NOT Approved ***
Plastic, Wire, or Band Seal
Module 3.3
Container Security Inspection Process

- Bolt seals should appear intact without signs of tampering or loose application

Seal Verification and Inspection Process:

**V V T T**

**V** - View seal & container locking hardware

**V** - Verify seal number

**T** - Tug on seal to make sure it’s on right

**T** - Twist & turn seal to make sure it doesn’t unscrew
Module 3.3
Container Security Inspection Process

- Upon receipt of container, the responsible party must:
  - Inspect the container; container should show no signs of tampering or repair, by verifying the physical integrity of the container:

Must inspect (7pt Inspection)
1. Left side
2. Right side
3. Roof
4. Inside & Outside of doors
5. Outside undercarriage
6. Front wall
7. Interior Floor
Customs and Border Protection has identified areas where goods have been hidden and attempted to be smuggled in the country.
If there are ANY discrepancies or suspicions surrounding the integrity of the container or bolt seal(s) a more detailed inspection must be conducted.

Discrepancies / Suspicions may include:

- Seals which appear to have been tampered with, are loose or not attached correctly
- Containers which are fully or partially loaded which don’t have shipping and/or delivery paperwork and/or a seal
- Different seal number used on container than what is shown in report and/or shipping documentation
- Damage to container, locking mechanism(s), and/or seal(s)
- Incorrect seal used (e.g. plastic, wire, band, etc.)
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Module 4: Security of US Exported Containers

- In this module, you will learn........
  - Roles & Responsibilities for US exported containers
  - Container Stuffing Process Overview
    - Container and Trailer Inspection
    - Sealing of Container and Trailer
  - Container Security Discrepancy Process
Module 4.1
Roles & Responsibilities

- The delivery of empty containers used in the exporting of goods will follow the inspection procedures previously established and outlined in: section 3 of this training

- Overall Roles & Responsibilities include:

<table>
<thead>
<tr>
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</table>
| Assigned Personnel     | 1. Inspect delivery vehicle & trailer/container  
                          2. Release Delivery Vehicle  
                          3. Report Discrepancies/Suspicious                                           |
| Shipping/Stuffing Personnel | 1. Inspect trailer/container prior to stuffing  
                               2. Stuff trailer/container  
                               3. Seal trailer/container with Bolt Seal  
                               4. Record seal number on export documents  
                               5. Reporting Discrepancies       |
Module 4.2
Container Inspection Process

Prior to stuffing container, the responsible party must:
- Inspect the container; container should have no large gaps in the sides, floor, walls or ceiling, and the locking mechanism must be checked to ensure proper function:

Must inspect (7pt Inspection)
1. Left side
2. Right side
3. Roof
4. Inside & Outside of doors
5. Outside undercarriage
6. Front wall
7. Interior Floor
Prior to stuffing trailer, the responsible party must:

- Inspect the trailer; trailer should have no large gaps in the sides, floor, walls or ceiling, and the locking mechanism must be checked to ensure proper function.

Must inspect (17pt Inspection)
Module 4.3
Seal Control and Issue Plan

- Procedures must be in place to ensure seals are controlled, their use documented and include processes for recognizing and reporting seals which have been compromised.
  - Only ISO PAS 17712 approved seals may be used for international shipments
  - Seals should be recorded on a log and secured in such a manner as only authorized personnel have access to them
  - Seals should not be utilized in chronological order
  - When seals are checked out the log should reflect the shipment they are being used for
  - If a seal is found to be broken or defective in any manner it must be destroyed and recorded as such on the log (cut bolt seal with cutters)
  - The seal logs must be maintained per RIM requirements and made available to inspection teams upon request
  - If seals are stolen or come up missing they must be reported and documented and notification made as outlined in this training
Module 4.3  
Container & Trailer Sealing Process

- Bolt seals must be applied immediately after stuffing is completed and seal number must be recorded on export documents. Verify seal is secured to locking hasp.
- Bolt seals must only be accessible to approved and applied by trained personnel.
- Broken or damaged seals must be destroyed so they cannot be used by others.
Module 4.3
Container & Trailer Sealing Process

**View Seal & Container Locking Hardware**
- View seal & container locking mechanisms.
- Excessive damage to the seal or locking mechanisms must be reported to a Supervisor before opening the container.
- Look for loose bolt and hasp.

**Verify Seal Number**
- Verify seal number for accuracy.
- Seal number must match paperwork.

**Tug on Seal to Make Sure It’s On Right**
- Tug on seal to make sure it is affixed properly. Seals that come apart must be reported to a Supervisor before opening the container. The container might have contraband inside!

**Twist & Turn Seal to Make Sure It Doesn’t UnScrew**
- Twist & Turn seal to make sure it does not come off.
- If a Seal is threaded, it can be unscrewed to gain access.

Module 4.4  Container Security Discrepancies

If there are ANY discrepancies or suspicions surrounding the integrity of the container or trailer more detailed inspection should be completed, your supervisor notified of the situation and findings documented.

Discrepancies / Suspicions may include:
- Damage to goods and goods packaging
- Missing seals, mismatched seal numbers, damaged goods in containers
- False walls or compartments are identified or suspected within the container
- Goods are found in/on the container or trailer which are not the property of Boeing
- Trailer or container has gaps in the interior/exterior of the body large enough for unauthorized items to be added to interior or allow goods to be affected by weather
- Requests to add undocumented goods or materials to the container are made
- Damage to container, locking mechanism(s), or door hinges which are believed to allow unauthorized access

Reporting of discrepancies/suspicious is outlined in module 5
Module 4.4
Driver Suspicious / Unusual Behavior

- Assigned Personnel must also be aware of suspicious or unusual behaviors of the delivery driver(s) when interacting during inspection. Some observable physical characteristics or behaviors which are atypical are:
  - Driver clothing/uniform not associated with commercial vehicle owner
  - Agitated movement of the head or body or facial gestures that deviate from that of normal behavior
  - Agitation / nervousness about the process which is going to take place (i.e. the inspection, showing ID or passport)
  - Over dressed or under dressed for occupation or situation (i.e. wearing a suit, or bulky clothing not confirming with weather
  - Very inquisitive about what and why were doing what were doing, asking questions about staffing and requirements for process.
Module 4.4
Security Is Everyone’s Responsibility

- Who or what you saw
- When you saw it
- Where it occurred
- Why it's suspicious
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Module 5: Incident/Suspicious Situation Reporting

- In this module, you will learn........
  - Process for reporting container security discrepancies and/or suspicions
  - Information required for Container Security Discrepancy reports
Module 5.1
Reporting Discrepancies & Suspicions

Container Security

- All container security discrepancies and suspicious situations must be immediately communicated to your Supervisor or Manager as well as documented in writing (email, word document)
  - Shipping and Receiving personnel
    - Notify on duty Supervisor or Manager
    - Document the situation including all pertinent information regarding the discrepancy or suspicion

CAUTION

International Containers/Trailers should NOT be allowed onto property or utilized for shipping until discrepancy/suspicion is resolved
Module 5.2
Container Security Documentation

Required information for discrepancy reporting:

- WHO, WHAT, WHERE, WHY, WHEN
  - The better the information you provide the faster the situation can be resolved

- Container Number, Seal Number, Bill of Lading

- Delivery Company Name, Driver Name, Contact information and manner in which identified (Passport, Drivers License)

- Delivery Vehicle Type: Semi truck with Container Trailer, Tractor/Trailer, Panel Van, Rail Car and any identifying characteristics (license plate, logo, color, make and model)

- Please include any documentation provided with shipment such as: Master Waybill, House Waybill, Export Paper work, Customs forms, delivery directions

- Any photographs which show or indicate the cause or reason for detailed inspection measures to take place (cut seal, hole in side of container, damaged goods in container, vehicle)
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Module 6
Container Security Stuffing Safety

- Ensure you are aware of potential hazards in the work area
  - Uneven pavement or work surface, damaged flooring, low light
  - Slip and trip hazards such as ice, water, oil, grease or tools on the ground
  - Watch out for leaking or dripping materials from truck or trailer
    - If you identify a hazardous condition notify your supervisor or manager
  - Watch out for mirrors, open doors and hatches from vehicles and trailers
  - When opening trailer and container doors ensure there is enough swing space for them to open fully
Module 6.1
Container Security Stuffing Safety

- Utilize proper tools & resources to conduct container security inspection measures
  - Gloves/Eye Protection
  - Other required safety clothing (high-visibility vest or jacket, helmet or bump cap)
  - Undercarriage mirrors, creepers and lights
  - Bolt cutters or lock cutting tools (manual or powered)
  - DOT Emergency Response Handbook
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Module 7:
Next Steps & Additional References

- In this module, you will learn........
  - Additional Resources
Module 7.1
Additional Resources

Resources:
- DHS Container Security Initiative (CSI)
- C-TPAT
- Conveyance Inspection Procedures and Sealing Process
- Boeing C-TPAT Security Guidelines
- Boeing Container Security Guidelines
- 7 Point Container Inspection
- 17 Point Container Inspection
- Seal Verification & Inspection process
- ISO PAS 17712
Supply Chain Security

- Supply chains are intricate, with many touch points and vulnerabilities.

- Everyone in the supply chain is responsible to secure it.

- Be alert for suspicious activity and report concerns immediately.

- Integrate security into daily operations, use job aids to ensure compliance and recordkeeping.

- Supply chain security is achieved through a multi-functional approach with integrated security procedures.
The preceding course is provided as a training aid to promote and encourage a healthy security posture by providing a sample of effective procedures.

This information is intended to support business partners in meeting the requirements of Boeing’s Supply Chain Security Program.

Business partners must refer to their Boeing contract and supplemental documents to review all security requirements.

Refer directly to the US Customs and Border Protection C-TPAT website for the security criteria, instructions and support in meeting C-TPAT program requirements.
Questions?