

UNITED STATES CUSTOMS SERVICE

TREASURY DECISIONS

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Department of the Treasury -- Office of the Secretary

Standards for Security of International Cargo

TEXT:

There are published below for information of the public recommended physical and procedural standards for the security of imported merchandise and merchandise for export.

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Department of the Treasury, Bureau of Customs

STANDARDS FOR CARGO SECURITY

PHYSICAL SECURITY STANDARDS

All cargo handling and storage facilities should provide a physical barrier against unauthorized access to cargo. Usually this will require a covered structure with walls, and apertures which can be securely closed and locked. In addition, fencing may be needed:

1. To prevent unauthorized persons and vehicles from entering cargo storage and handling areas,
2. As sole protection for open storage of bulk cargo or large articles which cannot be easily pilfered or removed without mechanical handling equipment or which have their own inherent security (containers).

BUILDINGS

General Standard:

All buildings used to house cargo and associated support buildings should be constructed of materials which resist unlawful entry. The integrity of the structure must be maintained by periodic inspection and repair. Security protection should be provided for all doors and windows.

Recommended Specifications:

1. Equip all exterior doors and windows with locks.
2. Protect all windows through which entry can be made from ground level by safety glass, wire mesh or bars.
3. Similarly safeguard all glassed-in areas where shipping documents are processed.
4. Construct all delivery and receiving doors of steel or other material that will prevent or deter unlawful entry and keep them closed and locked when not in use.
5. Where fencing is impractical or guards insufficient, equip the building with an intrusion detection or alarm system.
6. Inspections must insure particularly that there are no avenues for surreptitious entry through floors, roofs, or adjacent buildings.

FENCING

General Standard:

Where cargo security is dependent upon fencing, it should enclose an area around cargo and support buildings sufficient to provide maneuvering space for pick-up and delivery vehicles and should be set off a sufficient distance on all sides from the building or exterior stored cargo. The fence line must be inspected regularly for integrity and any damage promptly repaired.

Recommended Specifications:

1. Install chain link type fencing with at least nine gauge, two-inch mesh and at least 8 feet high (not including a barbed wire extension). If the level on which the fence is constructed is lower than the area outside the fence line, increase the height of the fence to provide an effective 8-foot fence at all points.
2. Top the fence with a 2-foot barbed wire extension, consisting of 3 strands of barbed wire, properly spaced and angled outward.
3. Place fence posts on the inside of the fence and secure them in a cement foundation at least 2 feet deep.
4. Ensure that objects or persons cannot pass beneath the fencing by providing:
 - a. Cement aprons not less than 6 inches thick, or
 - b. Frame piping, or
 - c. U-shaped stakes driven approximately 2 feet into the ground.
5. Avoid any condition which compromises the fence line. Prohibit the placing of containers, dunnage, cargo, vehicles, or any other item that may facilitate unlawful entry adjacent to the fence line.
6. Where necessary, install bumpers or fence guards to prevent damage by vehicles.

GATES

General Standard:

The number of gates in fences should be the minimum necessary for access. All fence gates should be at least as substantial as the fence. Gates through which vehicles or personnel enter or exit should be manned or under observation by management or security personnel.

Recommended Specifications:

1. Equip gates with a deadlocking bolt or a substantially equivalent lock which does not require use of a chain. All hardware connecting the lock to the gate should be strong enough to withstand constant use and attempts to defeat the locking device.
2. Construct swing-type gates so that they may be secured to the ground when closed.
3. Separate gates for personnel and vehicle traffic are desirable.

GATE HOUSES

General Standard:

Operators of facilities handling a substantial volume of cargo should maintain a manned gate house at all vehicle entrances and exits during business hours.

Recommended Specifications:

1. Set the gate house back from the gate so that vehicles can be stopped and examined on terminal property.
2. Equip the gate house with a telephone or other communication system.
3. Clear the area around the gate house of any encumbrances that restrict the guard's line of vision.
4. Post prominently on the exterior of all gate houses signs advising drivers and visitors of the conditions of entry. Include in conditions of entry a notice that all vehicles and personnel entering the area are subject to search.

PARKING

General Standard:

Private passenger vehicles should be prohibited from parking in cargo areas or immediately adjacent to cargo storage buildings. Access to employee parking areas should be subject to security controls.

Recommended Specifications:

1. Locate parking areas outside of fenced operational areas, or at least a substantial distance from cargo handling and storage areas or buildings and support buildings.
2. Require employees exiting to the parking area from the cargo area to pass through an area under the supervision of management or security personnel. Require employees desiring to re-

turn to their private vehicles during hours of employment to notify management and/ or security personnel.

3. Allow parking in employee parking areas by permit only. Maintain a record of each issued permit, listing the vehicle registration number, model, color and year. The permit should consist of a numbered decal, tag, sticker, or sign placed in a uniform location on the vehicle.

4. Issue to vendors and other visitors temporary parking permits which allow parking in a designated area under security controls.

LIGHTING

General Standard:

Adequate lighting should be provided for the following areas:

1. Entrances, exits and around gate houses.
2. Cargo areas, including container, trailer, aircraft and rail-car holding areas.
3. Along fence lines and stringpieces.
4. Parking areas.

Recommended Specifications:

1. The Society of Illuminating Engineers recommends the following light intensities measured at ground level:

- a. Vehicle and pedestrian areas.....2.0 foot candles
- b. Vital structures and other sensitive areas..... 2.0 foot candles
- c. Unattended outdoor parking areas.....1.0 foot candle

2. Illuminate all vehicle and pedestrian gates, perimeter fence lines, and other outer areas with mercury vapor, sodium vapor, power quartz lamps or substantially similar high intensity lighting, employing a minimum of 400 watts per fixture. Locate lights 30 feet above ground level and properly spaced to provide the appropriate light intensity for the area to be illuminated.

3. Establish a system of planned maintenance.

4. Protect lighting subject to vandalism by wire screening or other substantially equivalent means.

LOCKS, LOCKING DEVICES, AND KEY CONTROL

General Standard:

Locks or locking devices used on buildings, gates and equipment should be so constructed as to provide positive protection against unauthorized entry. The issuance of all locks and keys should be controlled by management or security personnel.

Recommended Specifications:

1. Use only locks having (a) multiple pin tumblers, (b) dead-locking bolts, (c) interchangeable cores, and (d) serial numbers.
2. To facilitate detection of unauthorized locks, use only locks of standard manufacture displaying the owner's company name.
3. Number all keys and obtain a signature from the recipient when issued. Maintain a control file for all keys. Restrict the distribution of master keys to persons whose responsibilities require them to have one.
4. Safeguard all unissued or duplicate keys.
5. Remove and secure keys from cargo handling equipment and vehicles when not in actual use.

HIGH-RISK CARGO

General Standard:

Adequate space capable of being locked, sealed, or otherwise secured for storage of high-value cargo and packages which have been broken prior to or during the course of unloading must be provided at each cargo handling building. When such cargo must be transported a substantial distance from the point of unloading to the special security area, vehicles capable of being locked or otherwise secured must be used. *

* The standard are required by Customs Regulation (19 C.F.R. 4.30).

Recommended Specifications:

1. Construct special security rooms, cribs or vaults so as to resist forcible entry on all sides and from underneath and overhead.
2. Locate such special security areas, where possible, so that management and/or security personnel may keep them under continuous observation. Otherwise, install an alarm system or provide for inspection at frequent intervals.
3. Release merchandise from such an area only in the presence of authorized supervisors and/or security personnel.
4. Log all movements of merchandise in or out of a special security area, showing date, time, condition of cargo upon receipt, name of truckman and company making pick-up and registration number of equipment used.

PROCEDURAL SECURITY STANDARDS

PERSONNEL SCREENING

General Standard:

Operators of cargo handling facilities should conduct employment screening of prospective employees. *

* Customs regulations already require international carriers, proprietors of bonded warehouses, and customhouse brokers to submit employee lists upon request from the District Director of Customs. Such lists must contain the name, address, social security number, and date and place of birth of each employee and be kept up to date (Customs Regulations, 19, C.F.R. 4.30(m), 19.3 and 111.28).

Recommended Specifications:

1. Require all personnel, including maintenance and clerical personnel, who will have access to cargo areas to submit a detailed employment application which contains a photograph of the applicant and lists his residences and prior employment for the preceding 10 years.
2. Screen all such employment applicants for:
 - (a) verification of address and prior employment
 - (b) credit record and,
 - (c) if possible, criminal record.

SECURITY PERSONNEL

General Standard:

Operators of cargo handling facilities should employ a Security Officer or assign a particular officer of the firm to be responsible for security. All operators handling a substantial volume of international cargo should provide guards to protect the cargo.

Recommended Specifications:

1. Employ the number of guards required to provide adequate security for the size of each facility and the volume of cargo handled. Alarm systems, closed circuit television and other security devices may reduce the number of guards needed.
2. Train all company employee guard forces or insure that contract guard forces are trained in:
 - (a) Methods of patrolling terminals and warehouses.
 - (b) Use of firearms and other equipment that may be furnished.
 - (c) Report writing, log and record keeping.
 - (d) Identification of security problems and specific trouble areas.
3. Equip guard forces with uniforms which are complete, distinctive and authoritative in appearance.
4. Provide firearms, vehicles, communications systems, and other equipment deemed necessary for the successful performance of the guard function.
5. Insist on physical fitness as a prime consideration in selecting a guard force. Require guards to undergo self-defense training similar to that of police agencies. Require a physical examination at least once a year.

6. Furnish each guard a manual covering operating procedures and standards of conduct, and a clear statement of what management expects of him.

COMMUNICATIONS

General Standard:

Adequate and reliable communications between elements of the terminal security force and from the security force to local police should be provided.

Recommended Specifications:

1. Provide security personnel with a telephone at fixed posts or two-way radio, intercom or other type of equipment providing voice communication capability within the company.
2. Arrange assured means (telephone, radio, or special alarm line) for summoning assistance from local police forces.

IDENTIFICATION SYSTEM

General Standard:

All operators of facilities handling a substantial volume of cargo should employ an identification card system to identify personnel authorized to enter cargo and document processing areas.

Recommended Specifications:

1. Include on the I.D. card: (a) physical description or, preferably, a color photograph of the holder, (b) name and address, (c) social security number, (d) date of birth, (e) employer's Customs license number, if any, (f) signature of holder, and (g) reasonable expiration date.
2. Laminate all cards to prevent alterations and assign each card a control number.
3. Recover I.D. cards from terminated employees.
4. Require each employee to display his I.D. card to gain access to the facility, to cargo areas within the facility, and to areas where shipping documents are processed. Preferably, the I.D. card should be displayed so that it is visible at all times that the employee is within the facility.

INDEPENDENT CONTRACTORS

General Standard:

The background and corporate structure of independent contractors providing janitorial service, refuse disposal, or other services should be verified. Access by independent contractors to the facility should be under security controls.

Recommended Specifications:

1. Periodically examine independent contractor vehicles which are parked in or near cargo areas.

2. Permit independent contractor employees to enter only those areas necessary for their particular work; permit them access to cargo and areas where shipping documents are located only under the supervision of security and/or management personnel.

3. Require independent contractors to display identification similar to that required by the facility for its own employees.

CARGO QUANTITY CONTROLS

General Standard:

Cargo should be tallied at time of delivery to the consignee or his agent. In the event of any discrepancies at time of delivery, a U.S. Customs Form 5931 or a duplicate copy of the amended cargo manifest must be completed and submitted to Customs by the carrier or his agent. *

* All international carriers are required by Customs Regulations to make discrepancy reports (19 C.F.R. 4.12(a), 6.7(h), 15.8, 18.2(b), 18.6(b), (c), 123.9).

Recommended Specifications:

1. To facilitate accurate delivery of cargo, terminal operators should maintain and continuously up-date a location chart or list of all cargo received.
2. Segregate imported cargo, cargo for export, and domestic cargo.
3. Carriers should arrange procedures with each terminal operator to insure that all overages and shortages are reported to Customs.

DELIVERY PROCEDURES

General Standard:

Gate passes should be issued to truckmen and other onward carriers to control and identify those authorized to enter the facility. Verification of the identity and authority of the carrier requesting delivery of cargo should be made prior to the cargo's release.

Recommended Specifications:

1. Require truckmen to submit proper personal identification (such as a driver's license or Customs I.D. card) and a vehicle registration certificate before being issued a gate pass and being permitted to enter the facility; require them to surrender the gate pass before leaving the facility.
2. Seal containers and trailers and note the seal number on the gate pass before delivery is effected. Verify the seal number when the gate pass is surrendered at the gate.
3. Require the company name of all onward carriers to be clearly shown on all equipment. Do not accept temporary placards or cardboard signs as proper identification of equipment. Require carriers using leased equipment to submit the lease agreement for inspection and note the leasing company's name on the delivery order.
4. Release cargo only to the carrier specified in the delivery order unless a release authorizing delivery to another carrier, signed by the original carrier, is presented and verified. Accept only original copies of the delivery or pick-up orders.

5. Personnel processing prelodged delivery or pick-up orders should verify the identity of the truckman and the trucking company before releasing the pick-up order. Limit access to areas where such documentation is processed or held to authorized personnel and rigorously safeguard all shipping documents from theft or unauthorized observation.

6. Conduct delivery and receiving operations at separate docks or doors, if feasible.

7. Tally salvage and accumulated unclaimed cargo at the time of delivery and have management representatives and/or security personnel verify that only properly released items are included. If a terminal has truck scales, weigh the vehicle used to remove bulk salvage cargo (bales and drums) when empty and loaded.

CONTAINERIZED SHIPMENTS AND SEALS

General Standard:

All containers, trailers, rail cars and air cargo lockers entering or leaving a facility should be sealed. Mounted and high value containerized shipments should receive special security attention.

Recommended Specifications:

1. Inspect seals whenever a sealed containerized shipment enters or leaves a facility. If the seals are not intact or there is evidence of tampering or the seal numbers are incorrect, notify security and/or management personnel and tally the cargo.

2. Seal unsealed containerized shipments at the point of entry to the facility and note the seal number on the shipping documents. Seal all containerized shipments leaving the facility and note the seal number on the shipping documents.

3. Release seals to as few persons as possible. Require all persons handling seals to maintain strict control of the seals assigned and to store them in a secure place.

4. Maintain a seal distribution log which indicates to whom seals have been released.

5. Where possible, secure containers by butting or "marrying" their door ends against each other. However, do not butt them against a perimeter fence or building wall if that will compromise the protection provided by the fence or wall. In stacking containers, place those containing high value merchandise on top.

6. Locate high value merchandise in mounted containers or trailers in a special security holding area where it can be observed by management and/or security personnel.

7. When containers are mounted on frames, secure the fifth-wheel by a pin-lock which meets the minimum standards for locks and is constructed to withstand normal abuse from equipment. Hold designated management and/or security personnel responsible for storage and control of pin-locks.

8. Restrict access to special security holding areas and permit the release of containers or trailers from such areas only in the presence of management representatives and/or security personnel.

9. Log movements of containers in or out of a special security holding area, showing: date, time, seal number, name of truckman and company making pick-up, and registration number of equipment used.

SECURITY EDUCATION

General standards:

Management should institute a security awareness program for all personnel.

Recommended Specifications:

1. Conduct a program of periodic security seminars for all employees involved in cargo handling and documentation processing, stressing the importance of:

- (a) Maintaining legible and accurate cargo tallies,
- (b) Processing only legible documents,
- (c) Writing only in ink or ball point pen,
- (d) Completing all information required by shipping documents,
- (e) Obtaining clearly written signatures,
- (f) Safeguarding the confidentiality of shipping and entry documents, and
- (g) Maintaining good cargo security generally.

2. Include in the security awareness program posters, stickers, payroll stuffers, monetary incentives, and properly worded reward signs. (Appropriate signs can be obtained from the Bureau of Customs field offices.)