

APPENDIX C

PHYSICAL SECURITY GUIDELINES FOR CBP BONDED FACILITIES

Insert from the "Bonded Warehouse Manual for Customs and Border Protection Officers and Bonded Warehouse Proprietors" dated January 18, 2012

OBJECTIVE

To provide bonded facility proprietors with guidelines to ensure security of cargo handling facilities and cargos from point of receipt to shipping. It is incumbent upon bonded facility proprietors to develop and implement a sound security plan to demonstrate compliance with security criteria as identified by CBP. Bonded facilities as defined in this guideline are facilities that are used to store and stage international cargo, both bonded and non-bonded cargo, and domestic cargo for export. These facilities include both warehouse and Foreign Trade Zone operations.

APPLICABILITY

A written security plan should apply to all facility employees, visitors, vendors, and outside carriers.

Security Planning and Management

Bonded facility proprietors will establish a security management team with a designated leader accountable to a senior executive. Bonded facility proprietors will develop a security plan and shall review not less than annually all procedures to verify required actions are implemented and effective. Security plans will be kept in a secure location and shared on a "need-to-know" basis with appropriate regulatory officials, employees and customers.

Bonded facility proprietors will annually update a list of local, state and federal emergency contacts, local CBP contacts, and local public health official contacts.

THE SECURITY PLAN

Cargo handling and storage facilities must have physical barriers and deterrents that guard against unauthorized access. Bonded facility proprietors should incorporate physical security criteria throughout their facility as applicable.

Alarm Systems and/or Video Surveillance Cameras

Alarm systems and video surveillance cameras should be utilized to monitor premises and prevent unauthorized access to cargo handling and storage areas. Retrieval of recorded activities should be maintained for a reasonable period.

Building Structure

Buildings must be constructed of materials that resist unlawful entry and protect from outside intrusion. The integrity of structures must be maintained by periodic inspection and repair.

Facility Protection Systems

Facility protection systems, such as fire suppression and alarm systems, hazardous gas detection systems, and air scrubbers should be secured and monitored for unauthorized tampering or shut down by an approved remote alarm company. The integrity of such monitored alarms should be periodically tested.

Yard Security

Perimeter fencing should enclose the area around cargo handling and storage facilities. In the event there is no perimeter fencing, procedural practices to secure the yard from unlawful entry and protection outside intrusion must be documented.

Gates and Gate Houses

Where there are gates through which vehicles and/or personnel enter or exit, they must be manned and/or monitored. The number of gates should be kept to the minimum necessary for proper access and safety.

Lighting:

Adequate lighting must be provided inside and outside the facility including the following areas: entrances and exits, cargo handling and storage area, fence lines and parking areas.

Locking Devices and Key Controls

All external and internal windows, gates and fences must be secured with locking devices. Management or security personnel must control the issuance of all locks and keys.

Parking

Private passenger vehicles should be prohibited from parking in or adjacent to cargo handling and storage areas. Visitor parking should be separated from employee and container parking.

Manifesting Procedures

To help ensure the integrity of cargo, procedures must be in place to ensure that information received from business partners is reported accurately and timely.

Physical Access Controls

Access controls prevent unauthorized entry to a facility, maintain control of employees and visitors, and protect company assets. Access controls must include the positive identification of all employees, visitors and vendors at all points of entry.

Bonded facility proprietors must establish secured waiting areas where drivers can be identified and allowed limited access for confirmed pickups and deliveries.

Shipping and Receiving

Arriving cargo must be reconciled against information on the cargo manifest. The cargo must be accurately described, and the weights, labels, marks and piece count indicated and verified. Departing cargo must be verified against purchase or delivery orders.

Drivers delivering or receiving cargo must be positively identified before cargo is received or released.

Conveyance Security

The following elements outline a sound conveyance security process:

Procedures for the inspection of conveyance (trailers and containers) prior to loading with the awareness that no hidden compartments could conceal contraband;

Procedures for the inspection of vehicles of conveyance prior to loading to ensure that un-manifested materials are not shipped;

A process is **in** place for the refusal of vehicles of conveyance if they do not meet internal guidelines;

A process is in place to prevent unauthorized persons from gaining access to empty conveyance vehicles on the site;

A process is in place to prevent unauthorized persons from gaining access to conveyance vehicles which have been loaded and are ready for removal from the site;

A process is in place for approving and certifying transporting materials;

A process is in place for ensuring that only certified carriers have access to material from the site.

Employees Personnel

Security Training and Threat Awareness

A threat awareness program should be established and maintained by security personnel to recognize and foster awareness of the threat posed by terrorists at each

point in the supply chain. Employees must be made aware of the procedures the company has in place to address a situation and how to report it. Additional training should be provided to employees in the shipping and receiving areas, as well as those receiving and opening mail. Additionally, specific training should be offered to assist employees in maintaining cargo integrity, recognizing internal conspiracies, and protecting access controls.

Personnel Security/ Background checks/investigations

Processes must be in place to screen prospective employees and to periodically check current employees. An employee identification system must be in place for positive identification and access control purposes. Employees should only be given access to those secure areas needed for the performance of their duties. Company management or security personnel must adequately control the issuance and removal of employees, visitors and vendor identification badges. Bonded facility proprietors must establish procedures for issuing, removing and changing of access devices (e.g., keys, key cards, etc.) and this must be documented.

Pre-Employment Verification

Application information such as employment history and references must be verified prior to employment. To the extent authorized by law, bonded facility proprietors will conduct employment screening, background checks and through interviewing prior to hiring. Employees must be screened via E-Verify to help to ensure that they are authorized to work in the United States.

Personnel Termination Procedures

Bonded facility proprietors must have procedures in place to remove identification, facility and system access of terminated employees.

Education and Awareness Training

The bonded facility proprietor should provide employees with a procedures manual that covers all processes supporting the operation of the warehouse facility.

The bonded facility proprietor should provide periodic internal training programs covering bonded facility activities including the importance of maintaining cargo integrity.

ACCESS CONTROLS

The Security Plan provides a process to positively identify and control the movement of all persons on-site. Everyone on-site is required to have and display a security badge certifying their approval to be on-site.

Visitors

A process implemented to register and account for all non-company employees onto the site (sign in/sign out procedures). Visitors must possess government issued photo identification for documentation purposes upon arrival. Visitors will visibly display temporary identification. Proper vendor ID and/or photo identification must be presented for documentation purposes upon arrival by all vendors. Arriving packages and mail must be periodically screened before being disseminated.

Challenging and Removing Unauthorized Persons

Procedures must be in place to identify, challenge and address unauthorized unidentified persons.

INFORMATION TECHNOLOGY SECURITY

Password Protection

Automated systems must use individually assigned accounts that require a periodic change of password. In addition, IT security policies, procedures and standards must be in place and provided to employees via training.

Accountability

A system must be in place to identify improper IT access, tampering, or the altering of business data. All system violators must be subject to appropriate disciplinary actions for abuse.

CUSTOMS EVALUATION

A process is in place to verify company legitimacy by confirming contact names, a U.S. Mailing address for the company, references, and verification of phone numbers. Reasonable care should be taken to understand the type of cargo that is arriving at the bonded facilities.