



Frustrated by C-TPAT? You're Not Alone

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Customs-Trade Partnership Against Terrorism (C-TPAT) has undergone numerous changes since its inception in 2001, the last major change being the release of Portal 2.0. Unfortunately, 2.0 resulted in a portal that was not intuitive, in addition to being plagued with glitches.

To add to the frustration, the security profiles in the portal contain criteria that do not belong to the business entity, which are the types of business permitted to participate in the program—for example, highway carrier, Customs broker, consolidator, importer, etc. One example of criteria that does not belong is the Record Replacement Seal, which is currently in the importer section but belongs in the highway carrier section. The security profiles also include criteria that are not part of the C-TPAT minimum security standards, such as the Record Replacement Seal. In addition, some of the notes provided as guidance in the security profile sections do not correspond with what is required in the section. It's no wonder Portal 2.0 has created so much frustration with C-TPAT members.

To confuse members further, some Supply Chain Security Specialists have told their accounts to hold off on submitting their profiles until further notification. Meanwhile, other Specialists are sending out emails for partners to submit them.

Director of C-TPAT, Liz Schmelzinger, is well aware of the trade's frustration and has multiple teams working behind the scenes to fix glitches, revise the security profiles, and make the portal more user-friendly. Director Schmelzinger and her teams regularly reach out to members of the trade community for input and very much appreciate the feedback and the insight provided.

What Are C-TPAT Members to Do in the Meantime?

Here are some suggestions to get you through this frustrating process in the mean time.

- **Continue to perform your annual review to ensure integrity within your supply chain.** It is important not to neglect this review as it is required of all C-TPAT certified partners.
- **Know your partners and your supply chain vulnerabilities.** The best way to do this is to forward comprehensive questionnaires—that touch on all of the security criteria—to your business partners. The questionnaires should be reviewed every year and a written vulnerability assessment should be created and forwarded to your partners for feedback. Ensuring your partners meet the C-TPAT criteria is a critical component of the program.

- **Map out your high-risk supply chains to ensure you know who is involved with your shipment from manufacturer to final distribution center.** If you're an exporter, create cargo mapping from manufacturing to foreign port.
- **Re-evaluate the risks for each country with which you do business.** Countries we never thought of as high risk, such as Belgium, France, United Kingdom and Germany are now categorized as higher risk due to terrorist incidences in the last few years. MI5, the United Kingdom's domestic counter-intelligence and security agency, has set the UK's threat level as severe. France has announced their terrorism threat as imminent. A country's threat level should be taken into consideration as it is a major factor when determining risk in a supply chain.
- **If you're a consolidator, reach out to your agents and the container freight stations they use for co-loading.** Agents, container freight stations, and co-loaders are part of a consolidator's supply chain. Since this is a supply chain security program, you will need to reach out to all of the business partners in your supply chain.
- **Take a stab at rewriting your security profile, even with all of the redundancies.** For example, highway carriers will see the same criteria reworded in multiple sections, such as Access Controls, Container Seal, and Container Security. For importers and exporters, you will see sections that do not apply to your business entity. Go through the process of rewriting your profile; and if you know a section does not belong, enter "not applicable" and state why.

If you are a C-TPAT certified importer and exporter, you are in luck. Your security profiles have been revised and should be forthcoming from Customs in the C-TPAT portal public library. In the meantime, if you don't want to wait for the release, below are the upcoming changes to the importer and exporter security profiles [1]. For sections that are scheduled to be removed, be sure to enter "to be removed" in the section.

Importer Security Profile: Importer Questions

Section	Question ID	Changes
Container Security	Record Replacement Seal (2205)	Removed
Container Security	Reporting Structural Changes (2501)	Removed
Procedural Security	Shipment Risk (4201)	Removed
Container Security	Conveyance Inspections (7620)	Removed
Container Security	Trailer Inspection (7651)	Removed

Section	Question ID	Changes
Security Training and Threat Awareness	Training Documentation (7991)	Removed
Access Controls	2800	Added: "An employee identification system must be in place for positive identification and access control purposes."

Exporter Security Profile: Exporter Questions

Section	Question ID	Changes
Container Security	Conveyance Inspections (7620)	Removed
Container Security	Tractor Inspection (7651)	Removed
Container Security	Reporting Structural Changes (2501)	Removed
Container Security	Record Replacement Seal (2205)	Removed
Container Security	Conveyance & Trailer Integrity (7840)	Moved Responses to 7842
Container Security	Predetermined Routes (7860)	Moved Response to 7842
Container Security	Route Delays (7820)	Moved Response to 7842
Container Security	Storage Area Security (2500)	Moved Response to 8610
Procedural Security	Export Security Program (8860)	Removed
Procedural Security	Corporate Support (8870)	Removed
Physical Security	Physical Barriers at Cargo Facility (8840)	Moved Responses to 5700
Security Training and Threat Awareness	Training Documentation (7991)	Removed
Business Partners	740	Added: "Written procedures must exist for screening business partners, which identify specific factors or practices, the presence of which would trigger additional scrutiny by the C-TPAT partner."
Access Controls	2800	Added: "An employee identification system must be in place for positive identification and access control purposes."

Section	Question ID	Changes
Physical Security	5700	Added: "Cargo handling/ storage facilities and storage yards for instruments of international traffic throughout the supply chain must have physical barriers and deterrents that guard against unauthorized access."

Customs will be reviewing all other security profiles for the various business entities and will attempt to make the necessary revisions in 2017.

Footnote

[1] Customs and Border Protection. (Producer). *C-TPAT Importer and Exporter Update Internet Webinar* [Video webinar]. Webinar presented in December 2016.

BEVERLEY SEIF—Vice President & General Manager

If this process seems overwhelming, **call Mohawk Global Trade Advisors for help with your annual review.** We have consultants who have been helping companies with their annual reviews since the inception of C-TPAT and we can help you too.

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