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9.5	Private passenger vehicles should be prohibited from parking in or adjacent to cargo handling and storage areas, and conveyances.	Locate parking areas outside of fenced and/or operational areas - or at least at substantial distances from cargo handling and storage areas.	Should
9.6	Adequate lighting must be provided inside and outside the facility including, as appropriate, the following areas: entrances and exits, cargo handling and storage areas, fence lines, and parking areas.	Automatic timers or light sensors that automatically turn on appropriate security lights are useful additions to lighting apparatus.	Must
9.7	Security technology should be utilized to monitor premises and prevent unauthorized access to sensitive areas.	<p>Electronic security technology used to secure/monitor sensitive areas and access points includes: burglary alarm systems (perimeter and interior) –these are also known as Intrusion Detection Systems (IDS); access control devices; and video surveillance systems (VSS) -including Closed Circuit Television Cameras (CCTVs). A CCTV/VSS system could include components such as Analog Cameras (coax-based), Internet Protocol-based (IP) cameras (network-based), recording devices, and video management software.</p> <p>Secure/sensitive areas, which would benefit from video surveillance, may include: cargo handling and storage areas, shipping/receiving areas where import documents are kept, IT servers, yard and storage areas for Instruments of International Traffic (IIT), areas where IIT are inspected, and seal storage areas.</p>	Should
9.8	<p>Members who rely on security technology for physical security must have written policies and procedures governing the use, maintenance, and protection of this technology.</p> <p>At a minimum, these policies and procedures must stipulate:</p> <ul style="list-style-type: none"> <li>• That access to the locations where the technology is controlled or managed is limited to authorized personnel;</li> <li>• The procedures that have been implemented to test/inspect the technology on a regular basis;</li> </ul>	<p>Security technology needs to be tested on a regular basis to ensure it is working properly. There are general guidelines to follow:</p> <ul style="list-style-type: none"> <li>• Test security systems after any service work and during and after major repairs, modifications, or additions to a building or facility. A system’s component may have been compromised, either intentionally or unintentionally.</li> <li>• Test security systems after any major changes to phone or internet services. Anything that might affect the system’s ability to communicate with the monitoring center should be double-checked.</li> </ul>	Must

ID	Criteria	Implementation Guidance	Must / Should
	<ul style="list-style-type: none"> <li>• That the inspections include verifications that all of the equipment is working properly, and if applicable, that the equipment is positioned correctly;</li> <li>• That the results of the inspections and performance testing is documented;</li> <li>• That if corrective actions are necessary, they are to be implemented as soon as possible and the corrective actions are documented;</li> <li>• That the documented results of these inspections be maintained for a sufficient time for audit purposes.</li> </ul> <p>If a third party central monitoring station (off-site) is used, the CTPAT Member must have written procedures stipulating critical systems functionality and authentication protocols such as (but not limited to) security code changes, adding or subtracting authorized personnel, password revisions, and systems access or denials.</p> <p>Security technology policies and procedures must be reviewed and updated annually, or more frequently, as risk or circumstances dictate.</p>	<ul style="list-style-type: none"> <li>• Make sure video settings such as motion activated recording; motion detection alerts; images per second (IPS), and quality level, have been set up properly.</li> <li>• Make sure camera lenses (or domes that protect the cameras) are clean and lenses are focused. Visibility should not be limited by obstacles or bright lights.</li> <li>• Test to make sure security cameras are positioned correctly and remain in the proper position (cameras may have been deliberately or accidentally moved).</li> </ul>	
9.9	CTPAT Members should use licensed/certified resources when considering the design and installation of security technology.	<p>Today's security technology is complex and evolves rapidly. Oftentimes companies purchase the wrong security technology that proves to be ineffective when needed and/or pay more than was necessary. Seeking qualified guidance will help a buyer select the right technology options for their needs and budget.</p> <p>According to the National Electrical Contractors Association (NECA), in the U.S. 33 states currently have licensing requirements for professionals engaged in the installation of security and alarm systems.</p>	Should

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9.10	All security technology infrastructure must be physically secured from unauthorized access.	Security technology infrastructure includes computers, security software, electronic control panels, video surveillance or closed circuit television cameras, power and hard drive components for cameras, as well as recordings.	Must
9.11	Security technology systems should be configured with an alternative power source that will allow the systems to continue to operate in the event of an unexpected loss of direct power.	A criminal trying to breach your security may attempt to disable the power to your security technology in order to circumnavigate it. Thus, it is important to have an alternative source of power for your security technology. An alternative power source may be an auxiliary power generation source or backup batteries. Backup power generators may also be used for other critical systems such as lighting.	Should
9.12	If camera systems are deployed, cameras should monitor a facility's premises and sensitive areas to deter unauthorized access. Alarms should be used to alert a company to unauthorized access into sensitive areas.	Sensitive areas, as appropriate, may include cargo handling and storage areas, shipping/receiving areas where import documents are kept, IT servers, yards and storage areas for Instruments of International Traffic (IIT), areas where IIT are inspected, and seal storage areas.	Should
9.13	<p>If camera systems are deployed, cameras must be positioned to cover key areas of facilities that pertain to the import/export process.</p> <p>Cameras should be programmed to record at the highest picture quality setting reasonably available, and be set to record on a 24/7 basis.</p>	<p>Positioning cameras correctly is important to enable the cameras to record as much as possible of the physical "chain of custody" within the facility's control.</p> <p>Based on risk, key areas or processes may include cargo handling and storage; shipping/receiving; the cargo loading process; the sealing process; conveyance arrival/exit; IT servers; container inspections (security and agricultural); seal storage; and any other areas that pertain to securing international shipments.</p>	Must
9.14	If camera systems are deployed, cameras should have an alarm/notification feature, which would signal a "failure to operate/record" condition.	A failure of video surveillance systems could be the result of someone disabling the system in order to breach a supply chain without leaving video evidence of the crime. The failure to operate feature can result in an electronic notification sent to predesignated person(s) notifying them that the device requires immediate attention.	Should

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9.15	<p>If camera systems are deployed, periodic, random reviews of the camera footage must be conducted (by management, security, or other designated personnel) to verify that cargo security procedures are being properly followed in accordance with the law. Results of the reviews must be summarized in writing to include any corrective actions taken. The results must be maintained for a sufficient time for audit purposes.</p>	<p>If camera footage is only reviewed for cause (as part of an investigation following a security breach etc.), the full benefit of having cameras is not being realized. Cameras are not only investigative tools. If used proactively, they may help prevent a security breach from occurring in the first place.</p> <p>Focus the random review of the footage on the physical chain of custody to ensure the shipment remained secure and all security protocols were followed. Some examples of processes that may be reviewed are the following:</p> <ul style="list-style-type: none"> <li>• Cargo handling activities;</li> <li>• Container inspections;</li> <li>• The loading process;</li> <li>• Sealing process;</li> <li>• Conveyance arrival/exit; and</li> <li>• Cargo departure, etc.</li> </ul> <p><b>Purpose of the review:</b> The review is intended to evaluate overall adherence and effectiveness of established security processes, identify gaps or perceived weaknesses, and prescribe corrective actions in support of improvement to security processes. Based on risk (previous incidents or an anonymous report on an employee failing to follow security protocols at the loading dock, etc.), the Member may target a review periodically.</p> <p><b>Items to include in the written summary:</b></p> <ul style="list-style-type: none"> <li>• The date of the review;</li> <li>• Date of the footage that was reviewed;</li> <li>• Which camera/area was the recording from;</li> <li>• Brief description of any findings; and</li> <li>• If warranted, corrective actions.</li> </ul>	Must

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9.16	If cameras are being used, recordings of footage covering key import/export processes should be maintained on monitored shipments for a sufficient time to allow an investigation to be completed.	<p>If a breach were to happen, an investigation would need to be conducted, and maintaining any camera footage that covered the packing (for export) and loading/sealing processes would be of paramount importance in discovering where the supply chain may have been compromised.</p> <p>For monitoring, the CTPAT program recommends allotting at least 14 days after a shipment has arrived at its first point of distribution. This is where the container is first opened after clearing Customs.</p>	Should
9.18	As required by the Maritime Security Act (MTSA – 33 CFR 104.285), Sea Carriers must have the capability to continuously monitor the ships, the restricted areas on board the ships, and the areas surrounding the ships through a combination of lighting, watch keepers, security guards, deck watches, waterborne patrols, automatic intrusion detection devices, or surveillance equipment as specified in the ship or vessel security plan.	Please see Part 9.42 of the ISPS Code for guidance.	Must

- 10. Physical Access Controls** – Access controls prevent unauthorized access into facilities/areas, help maintain control of employees and visitors, and protect company assets. Access controls include the positive identification of all employees, visitors, service providers, and vendors at all points of entry.

ID	Criteria	Implementation Guidance	Must / Should
10.1	<p>CTPAT Members must have written procedures governing how identification badges and access devices are granted, changed, and removed.</p> <p>Where applicable, a personnel identification system must be in place for positive identification and access control purposes. Access to sensitive areas must be restricted based on job description or assigned duties. Removal of access devices must take place when the employees separate from the company.</p>	<p>Access devices include employee identification badges, visitor and vendor temporary badges, biometric identification systems, proximity key cards, codes, and keys. When employees are separated from a company, the use of exit checklists help ensure that all access devices have been returned and/or deactivated. For smaller companies, where personnel know each other, no identification system is required. Generally, for a company with more than 50 employees, an identification system is required.</p>	Must

ID	Criteria	Implementation Guidance	Must / Should
10.2	<p>Visitors, vendors, and service providers must present photo identification upon arrival, and a log must be maintained that records the details of the visit. All visitors should be escorted. In addition, all visitors and service providers should be issued temporary identification. If temporary identification is used, it must be visibly displayed at all times during the visit.</p> <p>The registration log must include the following:</p> <ul style="list-style-type: none"> <li>• Date of the visit;</li> <li>• Visitor's name;</li> <li>• Verification of photo identification (type verified such as license or national ID card).</li> </ul> <p>Frequent, well known visitors such as regular vendors may forego the photo identification, but must still be logged in and out of the facility;</p> <ul style="list-style-type: none"> <li>• Time of arrival;</li> <li>• Company point of contact; and</li> <li>• Time of departure.</li> </ul>		Must
10.8	<p>Arriving packages and mail should be periodically screened for contraband before being admitted.</p>	<p>Examples of such contraband include, but are not limited to, explosives, illegal drugs, and currency.</p>	Should

ID	Criteria	Implementation Guidance	Must / Should
10.10	<p>If security guards are used, work instructions for security guards must be contained in written policies and procedures. Management must periodically verify compliance and appropriateness with these procedures through audits and policy reviews.</p>	<p>Though guards may be employed at any facility, they are often employed at manufacturing sites, seaports, distribution centers, storage yards for Instruments of International Traffic, consolidator, and forwarders operating sites.</p>	Must
10.12	<p>Sea Carriers should have a security guard(s) on vessels operating in high-risk areas. High-risk areas are defined by the CTPAT Members' risk assessment.</p> <p>The security guard(s) should be in addition to the vessel's manning requirements. Guard(s) needs to be trained on vessel security operations and CTPAT, the ISPS Code, and MTSA requirements, as applicable. Guard(s) must report directly to the vessel master. When security risks at sea or security risks ashore that pose a significant risk to the vessel are identified, the senior guard must immediately notify the vessel master, who in turn must immediately notify senior management ashore of the situation.</p>	<p>The above criterion does not require the security guard(s) to be "armed".</p>	Should

**11. Personnel Security** – A company’s human resource force is one of its most critical assets, but it may also be one of its weakest security links. The criteria in this category focus on issues such as employee screening and pre-employment verifications. Many security breaches are caused by internal conspiracies, which is where one or more employees collude to circumvent security procedures aimed at allowing an infiltration of the supply chain. Therefore, Members must exercise due diligence to verify that employees filling sensitive positions are reliable and trustworthy. Sensitive positions include staff working directly with cargo or its documentation, as well as personnel involved in controlling access to sensitive areas or equipment. Such positions include, but are not limited to, shipping, receiving, mailroom personnel, drivers, dispatch, security guards, any individuals involved in load assignments, tracking of conveyances, and/or seal controls.

ID	Criteria	Implementation Guidance	Must / Should
11.1	Written processes must be in place to screen prospective employees and to periodically check current employees. Application information, such as employment history and references, must be verified prior to employment, to the extent possible and allowed under the law.	CTPAT is aware that labor and privacy laws in certain countries may not allow all of the application information to be verified. However, due diligence is expected to verify application information when permitted.	Must
11.2	<p>In accordance with applicable legal limitations, and the availability of criminal record databases, employee background screenings should be conducted. Based on the sensitivity of the position, employee vetting requirements should extend to temporary workforce and contractors. Once employed, periodic reinvestigations should be performed based on cause, and/or the sensitivity of the employee’s position.</p> <p>Employee background screening should include verification of the employee’s identity and criminal history, encompassing city, state, provincial, and country databases. CTPAT Members and their business partners should factor in the results of background checks, as permitted by local statutes, in making hiring decisions. Background checks are not limited to verification of identity and criminal records. In areas of greater risk, it may warrant more in-depth investigations.</p>		Should

ID	Criteria	Implementation Guidance	Must / Should
11.3	Vessel masters must account for all crewman prior to the vessel's departure from a U.S. port. If the vessel master discovers that a crewman has deserted or absconded, the vessel master must report this finding to U.S. Customs and Border Protection immediately and prior to the vessel's departure.	<p>Per CFR - Title 8 - § 251.2 Notification of Illegal Landings, and U.S. Customs and Border Protection's Vessel Inspection Guide, July 2012 (<a href="https://www.cbp.gov/sites/default/files/documents/vessel_guide_4.pdf">https://www.cbp.gov/sites/default/files/documents/vessel_guide_4.pdf</a>), the owner, agent or master is required to report immediately, by telephone, the desertion or absconding of a nonimmigrant crew member to the U.S. Customs and Border Protection office at the location of the incident. In addition, the following forms and documents are required:</p> <ol style="list-style-type: none"> <li>1. Completed U.S. Customs and Border Protection Form I-409 (Report for Deserting Crewman);</li> <li>2. A letter from the owner, agent, or master providing details of the incident;</li> <li>3. The passport or travel document of the deserting/absconded crew member; and</li> <li>4. Absconder/deserter will be listed on U.S. Customs and Border Protection Form I-418 traveling manifest to indicate that they are no longer on the vessel.</li> </ol>	Must

ID	Criteria	Implementation Guidance	Must / Should
11.4	Members should direct Vessel Masters and/or Agents to notify CBP of any suspicions of a crew member planning to abscond or desert a ship. Procedures to address the potential risk of desertion/absconding should be enacted to include potentially adding additional security measures (appropriate to the risk present) upon arrival at a U.S. port/territory.	<p>A deserter is a seafarer with a valid non-immigrant visa who CBP has granted a conditional landing permit to enter into the U.S. but does not depart the U.S. or return to the vessel when required. An absconder is a crew member that has been refused a conditional landing permit to leave the vessel while it is in port and is ordered detained on board, but departs the vessel without permission.</p> <p>Information received from a crew member about another member's plan to desert upon arrival at a U.S. port is an example of a risk factor for desertion. Additional security procedures that may be implemented once the potential risk of desertion/absconding is identified may include refusing that crew member a conditional landing permit, and/or adding additional security personnel to the ship.</p>	Should
11.5	CTPAT Members must have an Employee Code of Conduct that includes expectations and defines acceptable behaviors. Penalties and disciplinary procedures must be included in the Code of Conduct. Employees/contractors must acknowledge that they have read and understood the Code of Conduct by signing it, and this acknowledgement must be kept in the employee's file for documentation.	A Code of Conduct helps protect your business and informs employees of expectations. Its purpose is to develop and maintain a standard of conduct that is acceptable to the company. It helps companies develop a professional image and establish a strong ethical culture. Even a small company needs to have a Code of Conduct; however, it does not need to be elaborate in design or contain complex information.	Must

**12. Education, Training and Awareness** – CTPAT’s security criteria are designed to form the basis of a layered security system. If one layer of security is overcome, another layer should prevent a security breach, or alert a company to a breach. Implementing and maintaining a layered security program needs the active participation and support of several departments and various personnel. One of the key aspects to maintaining a security program is training. Educating employees on what the threats are and how their role is important in protecting the company’s supply chain is a significant aspect to the success and endurance of a supply chain security program. Moreover, when employees understand why security procedures are in place, they are much more likely to adhere to them.

ID	Criteria	Implementation Guidance	Must / Should
12.1	<p>Members must establish and maintain a security training and awareness program to recognize and foster awareness of the security vulnerabilities to facilities, conveyances, and cargo at each point in the supply chain, which could be exploited by terrorists or contraband smugglers. The training program must be comprehensive and cover all of CTPAT’s security requirements. Personnel in sensitive positions must receive additional specialized training geared toward the responsibilities that the position holds.</p> <p>One of the key aspects of a security program is training. Employees who understand why security measures are in place are more likely to adhere to them. Security training must be provided to employees, as required, based on their functions and position on a regular basis, and newly hired employees must receive this training as part of their orientation/job skills training.</p> <p>Members must retain evidence of training such as training logs, sign in sheets (roster), or electronic training records. Training records should include the date of the training, names of attendees, and the topics of the training.</p>	<p>Training topics may include protecting access controls, recognizing internal conspiracies, and reporting procedures for suspicious activities and security incidents. When possible, specialized training should include a hands-on demonstration. If a hands-on demonstration is conducted, the instructor should allow time for the students to demonstrate the process.</p> <p>For CTPAT purposes, sensitive positions include staff working directly with import/export cargo or its documentation, as well as personnel involved in controlling access to sensitive areas or equipment. Such positions include, but are not limited to, shipping, receiving, mailroom personnel, drivers, dispatch, security guards, any individuals involved in load assignments, tracking of conveyances, and/or seal controls.</p>	Must

ID	Criteria	Implementation Guidance	Must / Should
12.4	CTPAT Members should have measures in place to verify that the training provided met all training objectives.	Understanding the training and being able to use that training in one's position (for sensitive employees) is of paramount importance. Exams or quizzes, a simulation exercise/drill, or regular audits of procedures etc. are some of the measures that the Member may implement to determine the effectiveness of the training.	Should
12.7	Training must, in accordance with the Member's business model, be provided to applicable personnel on preventing visible pest contamination. Training must encompass pest prevention measures, regulatory requirements applicable to wood packaging materials (WPM), and identification of infested wood.	U.S. Customs and Border Protection has collaborated with the U.S. Department of Agriculture to develop training on visible pest contamination. Different training modules have been developed for the different trade environments: air, sea, and land border (rail and highway carrier). These training modules will be made available to all Members via the CTPAT Portal.	Must
12.8	As applicable, based on their functions and/or positions, personnel must be trained on the company's cybersecurity policies and procedures. This must include the need for employees to protect passwords/passphrases and computer access.	Quality training is important to lessen vulnerability to cyberattacks. A robust cybersecurity training program is usually one that is delivered to applicable personnel in a formal setting rather than simply through emails or memos.	Must
12.9	Personnel operating and managing security technology systems must receive operations and maintenance training in their specific areas. Prior experience with similar systems is acceptable. Self-training via operational manuals and other methods is acceptable.		Must
12.10	Personnel must be trained on how to report security incidents and suspicious activities.	Procedures to report security incidents or suspicious activity are extremely important aspects of a security program. Training on how to report an incident can be included in the overall security training. Specialized training modules (based on job duties) may have more detailed training on reporting procedures, including specifics on the process, such as, what to report, to whom, how to report the incident, and what to do after the report is completed.	Must