

Global Supply Chain subcommittee, C-TPAT Minimum Security Working Group Government Issue Paper

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U.S. Customs and
Border Protection

Customs-Trade Partnership Against Terrorism

Minimum Security Criteria Update

Executive Summary

The Customs-Trade Partnership Against Terrorism (C-TPAT) requires that members meet the Minimum Security Criteria (MSC). Co-created by U.S. Customs and Border Protection (CBP) and the trade community, the MSC are layered, cross-departmental security procedures and standards. The MSC must reflect CBP's overall mission, the current supply chain environment and the threats that the global supply chain faces today. To ensure this, the C-TPAT program, in cooperation with the Trade, must review and update the MSC.

Background

On January 13, 2016, CBP formally requested that the Advisory Committee on Commercial Operations' (COAC) Global Supply Chain Subcommittee establish a working group (WG) to review and recommend updates to the MSC. On April 12, 2016 CBP management approved a work plan outlining the strategy and the WG was subsequently formed.

The individuals comprising the WG represent the equities and interests of the entire supply chain spectrum. Representatives from major trade organizations and associations, supply chain security specialists and current C-TPAT companies in good standing – including importers, exporters, sea carriers, and Customs brokers – participate in the WG.

The WG is comprised of six teams. Each team addresses a specific set of requirements or issues proposed by CBP; most of these are based on requirements or recommendations from private sector organizations and associations to their own memberships. The issues discussed included: security measures to counter agricultural pests and diseases; personnel security; cybersecurity; non-IT security technology; prevention of money laundering and terrorism financing issues; risk; high security seals and highway carrier issues; and security management and administration.

Discussions for Teams A, B, and C were conducted under Phase I from May 15 - July 15, 2016. Under Phase II, Teams D, E, and F conducted discussions from August 30 - October 5, 2016. Additionally, all members of the WG were invited to participate in two in-person meetings held in Washington, DC in July and October, respectively.

Present Status

At present, C-TPAT and the Trade are developing an implementation plan. This plan will integrate the six documents produced by the WG with the current requirements from the criteria that are deemed relevant to today's threat environment. This plan will apply to all business entities and the program envisions the development of a phased in, gradual approach for the Trade to comply with the different requirements. C-TPAT expects the plan to be finalized by the beginning of 2017.

Future

Throughout this process, C-TPAT will continue to work in the spirit of partnership by seeking the input of the Trade. For example, the program is aware that many of its members are small and medium sized companies. Thus, C-TPAT will continue to provide flexibility in the implementation of its requirements by considering risk, the security protocols of the company already in place, and the amount of leverage the partner has over its business partners in the supply chain. C-TPAT Partners will not need to be re-certified or re-validated outside of their regular validation cycle once the criteria is formally adopted. The program will also provide training and guidance material to its Partners prior to implementation, to include a “Frequently Asked Questions” document.

C-TPAT expects phased implement of the new MSC in 2018.