

Commercial Customs Operations Advisory Committee (COAC) (Trusted Trader Sub-committee/CTPAT MSC Work Group)

September 2018



U.S. Customs and
Border Protection



Action Required:

- CBP continues to make great progress in its work with the COAC's Trusted Trader Subcommittee in updating CTPAT's minimum security criteria (MSC).
- As agreed upon with the COAC, CTPAT started the 90-day MSC socialization process in August. In late July, CTPAT emailed Members outlining the key elements of the outreach strategy – including an electronic form for members to provide their feedback, and workbooks for each of the CTPAT entities that contained the draft MSC.
- Weekly workshops are currently being held at each field office through October 2018 to discuss the draft MSC and gather feedback.
- The new MSC was a prominent topic of the recent CTPAT conference held on September 12 and 13, 2018. A workshop provided more details of what to expect from the update.
- Most concerns voiced at the workshops revolved around providing ample time for Members to learn and implement the new criteria before its use is mandated. Additional requests centered on needing help with training.
- CTPAT assured Members it will provide training and give them sufficient time to learn and adopt the new MSC before its final implementation.

Background:

- The program's security criteria has never been updated; it requires review and updating to ensure it reflects the current supply chain environment, CBP's mission, global threats, and experience gained from validations.
- In April 2016, the Global Supply Chain Subcommittee formed a COAC Working Group (WG) to address the program's criteria update. The WG now resides under the Trusted Trader Subcommittee.
- The WG was comprised of about 50 individuals representing the entire spectrum of the supply chain. There were 31 members from the trade with 10 from COAC.
- The WG was divided into six teams, with each team addressing a specific set of requirements or issues proposed by CBP. The issues discussed by the teams included the following:
 - Security Measures to Counter Agricultural Pests and Diseases/Personnel Issues;
 - Cybersecurity Issues;
 - 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.
- The WG had numerous discussions, webinars, and two face-to-face meetings.

Next Steps:

- Further refinements/changes will be made to the draft MSC based on the feedback as well as providing the basis for an FAQ.
- Once finalized, the updated MSC will be posted on the CTPAT webpage.
- CTPAT will continue to develop training materials on the new MSC, and begin providing training to its membership prior to implementing the updated MSC.
- Based on guidance from the trade and COAC, CTPAT plans to implement the new MSC incrementally throughout 2019.
- The program has recommended that Members first implement those requirements that deal with cybersecurity, conveyance security, and seal security. This decision was based on the importance of the criteria in these categories and the level of effort to implement them.
- Members will not be expected to adhere to the new security standards until early 2020.

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