

# C-TPAT Highway Carrier Frequently Asked Questions

**Q: As a carrier, I already participate in the Customs Carrier Initiative - is it duplication of effort to join C-TPAT?**

A: No. C-TPAT is the primary CBP supply chain security program. CBP is looking for carriers to join C-TPAT to enhance existing security practices and better address the terrorism threat to international air, sea, and land cross-border shipping. C-TPAT participation requires that a Carrier Initiative Program (CIP) participant implement and document specific C-TPAT supply chain security guidelines or criteria. CIP participants should already ascribe to the importance of security from a narcotics-smuggling perspective and are well positioned to expand their security focus to encompass anti-terrorism.

**Q: In the less-than-truckload motor carrier environment, is each C-TPAT importer required to place a new ISO 17712 compliant seal on the trailer when the pickup and delivery (P&D) driver picks up freight?**

A: LTL carriers must use a high security padlock or similarly appropriate locking device when picking up local freight in an international LTL environment. LTL carriers must ensure strict controls in order to limit the access of unauthorized individuals to the keys or combinations that can open these padlocks. After the freight from the pickup and delivery run is sorted, consolidated and loaded onto a line haul carrier destined to cross the border into the U.S., the trailer must be sealed with a high security seal which meets or exceeds the current ISO/PAS 17712 standard for high security seals. Written procedures must be established to record the change in seals, as well as stipulate how the seals are controlled and distributed, and how discrepancies are noted and reported. Procedures should also exist for reporting compromised seals and/or trailers to U.S. Customs and Border Protection or the appropriate foreign authority. These written procedures should be maintained at the terminal/local level.

**Q: For trucking operations where a truck makes several pickups and then heads straight for the U.S. border, what kinds of sealing or locking devices will be required?**

A: In LTL or Pickup and Delivery (P&D) operations that do not use consolidation hubs to sort or consolidate freight prior to crossing the U.S. border, the importer and/or highway carrier must use either an ISO PAS 17712 high security seal or a high security padlock or similarly appropriate locking device for the trailer or container at each stop. High security padlocks or similarly appropriate locking devices may be used between stops only if the pick-up and loading locations are within close proximity of each other to allow the company dispatcher to properly monitor the routing times and to identify any potential time or routing discrepancies. For extended, multiple LTL pick-ups where shipments will not be returned to a hub for consolidation or will be passed intact to another driver for cross border transportation, high security seals may be required between pick up stops depending on the time, number of stops and mileage involved. Written procedures must be established to record the change in seals, as well as stipulate how the seals are controlled and distributed, and how discrepancies are noted and reported. Procedures

should also exist for reporting compromised seals and/or trailers to U.S. Customs and Border Protection or the appropriate foreign authority. These written procedures should be maintained at the terminal/local level.

**Q: What about tank trucks and flatbeds and other equipment that cannot be sealed?**

A: Tank trucks and flatbeds hauling goods for C-TPAT importers that are incapable of being sealed do not need to be sealed or padlocked.

**Q: What other kinds of locking or sealing devices are acceptable for use by P&D drivers in an LTL environment?**

A: The intent of this security element is to maintain the integrity of the trailer and prevent unauthorized access. CBP does not stipulate exactly what kind of device is required, but instead provides general criteria which afford the importer the flexibility in how to meet this standard.

**Q: How must the seals be applied to the trailer?**

A: Seals must be applied to the trailer to prevent and detect any unauthorized access.

**Q: Will CBP suspend or remove me from the C-TPAT program if I do not implement a sealing program for trailers destined for the United States?**

A: Retaining membership in the C-TPAT program is contingent upon a continued, demonstrated commitment to enhancing supply chain security, and on meeting the outlined minimum security criteria. Container security measures, including sealing requirements, are crucial aspects to supply chain security and C-TPAT members who do not adopt acceptable practices may be suspended. CBP will continue to work in partnership with members to address individual business models and company concerns. Any decisions to suspend or remove a C-TPAT member from the program are taken seriously, are only made by senior C-TPAT program managers, and are initiated only after discussions with the C-TPAT member have failed to resolve the security deficiency.

**For More Information:**

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