

CARGO SEALING POLICY AND PROCEDURES FOR FAST CONVEYANCES

1. Scope

This document establishes the recommended procedures for affixing mechanical seals to cargo loaded trailers for participants of the southern border FAST program. To receive full consideration and benefits of FAST, shippers and importers participating in FAST are requested to ensure the security and integrity of their cargo by adhering to more stringent guidelines as outlined in this document for the use and control of seals used to secure cargo containers. Periodic reviews will be conducted to determine the applicability of existing procedures and to make recommendations for enhancements, including the addition of electronic devices designed to replace mechanical seals and speed cargo processing.

2. Background

Customs organizations and trade entities worldwide use seals to ensure the integrity of containerized cargo while moving from point to point within the Supply Chain. U.S. Customs and Border Protection (CBP) verifies the integrity of these seals upon arrival in the United States. With the concerns and need for increased security, the quality and integrity of the seal is critical to the process of preventing the use of cargo trailers as vehicles to import illicit materials and contraband including Weapons of Mass Destruction and other terrorist devices into the United States.

3. Terms and Definitions

For the purpose of this document, high security seals are considered those seals that are constructed and manufactured of material such as metal or metal cable with the intent to delay intrusion; they generally must be removed with quality bolt cutters or cable cutters. They require inspection to indicate whether tampering has occurred or entry has been attempted. Inspection of the seal would readily indicate if there have been any attempts to tamper with or alter the seal structure and integrity. Example of high security seals, as defined by ISO standards and authorized for FAST participants are:

HIGH SECURITY BOLT SEALS

A bolt seal consisting of a metal rod, threaded or unthreaded, flexible or rigid, with a formed head, secured with a separate locking mechanism.

HIGH SECURITY CABLE SEALS

A cable seal consisting of a cable and a locking mechanism. On a one-piece seal, the locking or seizing mechanism is permanently attached to one end of the cable. A two-piece cable seal has a separate locking mechanism, which slips onto the cable or prefabricated cable end.

HIGH SECURITY PADLOCK/HANDCUFF SEALS

A padlock/handcuff seal consisting of a locking body with a bail attached. Examples of this type of seal are wire shackle padlock and keyless padlock seals.

OTHER

CBP continues to encourage the development of secure locking devices including enhanced mechanical seals. As new devices are introduced and certified, it is expected that these devices/seals will be authorized for use by FAST participants.

4. FAST Authorized High Security Seals

Seals will not be accepted for use on cargo loaded trailers arriving in the United States through FAST certified lanes, unless they meet the standards, specifications and identification requirements of 19CFR24.13a(a), (b), and (c). These specifications are elaborated on in ISO/PAS 17712. Seals shall be identified by unique marks and numbers that are readily legible; markings intended for unique identification of the seal shall be considered permanent. Any modification of markings shall require irreversible physical, chemical, heat or other destruction of the security seal.

5. Bolt Seal Placement

Given the known vulnerabilities of existing trailer door hardware and in an effort to increase the security of cargo loaded trailers, all FAST participants who elect to use bolt seals will be required to modify their trailers. This modification would require a ½" hole be drilled that would allow a mechanical or electronic seal to be affixed THROUGH the inboard vertical bar on the right-hand door and THROUGH the lower plate fastening that bar to the door of the container. The seal, when affixed through this hole, should cover rivet heads on the plate to prevent tampering. See photo below. Further information is available through the Office of Field Operations, Interdiction and Security Division.



6. High Security Cable Seal Placement

Given the known vulnerabilities of existing trailer door hardware and in an effort to increase the security of cargo loaded trailers, all FAST participants who elect to use high security cable seals, will be required to affix those seals in the following manner.

The cable seal will be secured between the left and right door inboard locking rods, at the point where the door handle is attached. This will be accomplished by starting the cable in-between the left and right inboard locking rods and passing the cable behind the left locking rod then looping it over the door handle attaching bracket and passing the cable back behind the left locking rod. The same procedure will then be performed on the right locking rod. The cable should then be locked to remove all possible slack (see photo A). If needed the cable should be looped as many times as required to remove all possible slack (see photo B). The cable when affixed properly in this manner can not be moved up or down on the locking rod nor can the locking rod be rotated more than a few degrees with out damaging the cable.

Photo A

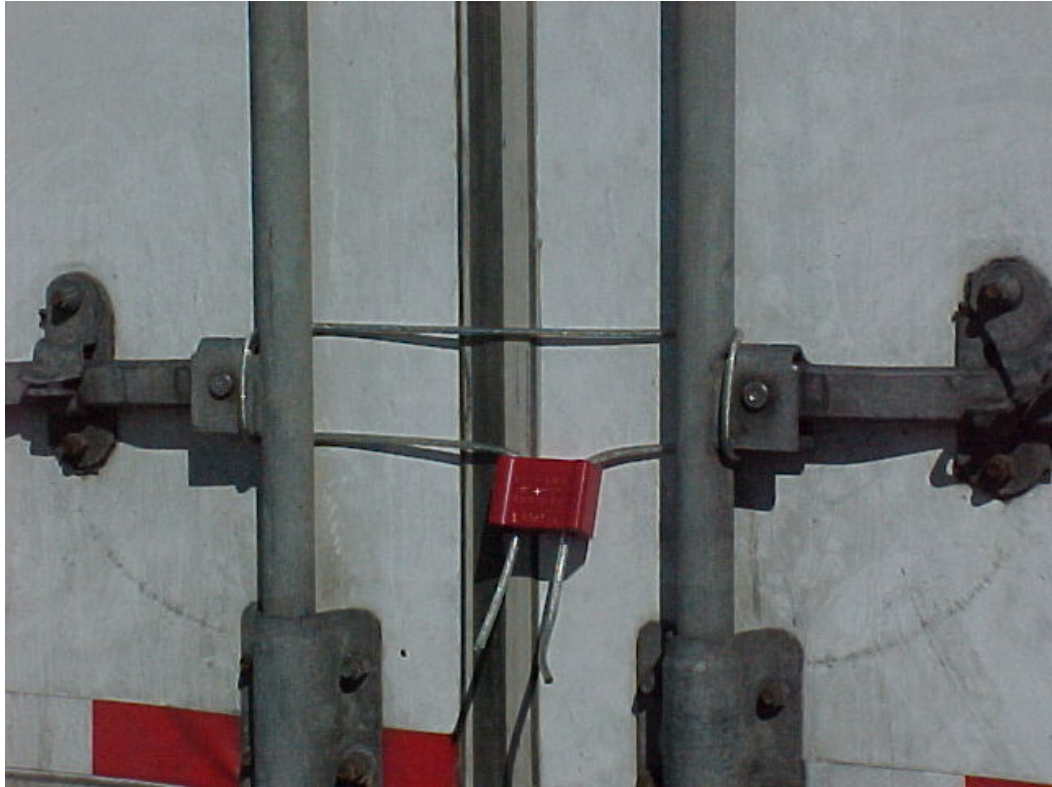
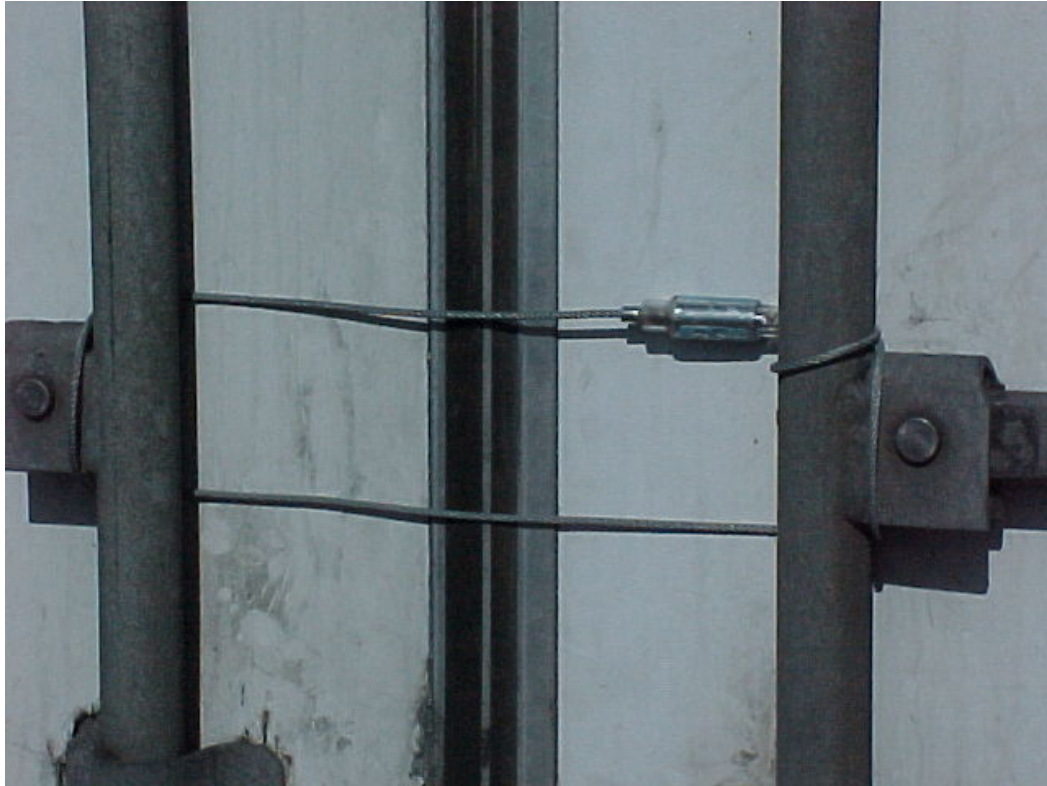


Photo B



7. Seal Acquisition and Control Responsibility

FAST participants are responsible for acquiring seals from legitimate manufacturers. CBP does not endorse any particular seal manufacturer or product. There are organizations, however, such as the International Seal Manufacturers Association that can provide guidance for FAST participants looking for seal manufacturers offering ISO/PAS 17712 high security seals.

All FAST participants affixing seals to cargo loaded trailers will be responsible for initiating control, inventory, and accountability procedures to minimize the risk of compromising seal integrity and use of their seals by unauthorized entities. This must include the tracking of individual seal use. Information concerning the use of every seal must be recorded and readily retrievable for possible audit. The FAST member placing the initial seal on a cargo loaded trailer at the time the trailer is loaded should ensure the seal number is indicated on the Manifest. This will provide CBP personnel with a method of verifying legitimate seals.