

## **Cole International Security Seal Policies**

The PIP, Partners In Protection, security profile application, Section 5.3 Container, Trailer and Rail Car Seals, states;

'Foreign business partners must have documented procedures that set forth their internal policy regarding the processing of cargo with high-security seals that meet or exceed the ISO/PAS 17712 standard and/or other devices designed to prevent tampering with cargo. Please note, that effective March 1, 2012, the new seal standard will be ISO 17712:2010.

Written procedures must stipulate how seals are to be controlled and affixed to loaded containers and must include procedures for recognizing and reporting, as necessary, compromised seals and/or containers to the CBSA and other appropriate foreign authorities. Only designated employees should distribute container seals for integrity purposes'.

### **What is ISO 17712?**

The original ISO PAS 17712 was initially developed in 2003 by a working group of users and manufacturers assembled by ISO for freight containers. It focused on the physical parameters of three levels of seal strength; indicative, security and high security. The strength of a seal is based on tests that measure impact, shear, bend and tensile strength. The values, the measures of strength, reflected numbers in use by major customs authorities.

As a series of program such as C-TPAT and PIP and the World Customs Organization's framework of standards, endorsed the use of ISO compliant seals, the quality of seals used in international trade is improving. Seals that confirm or exceed the ISO/PAS 17712 standard are manufactured with strong metal materials that delay intrusion. These seals require removal with bolt or cable cutters. Please note, March 1, 2012, the new seal standard will be ISO 17712:2010.

Container/trailer integrity must be maintained to protect against the introduction of unauthorized material and/or persons. Properly sealing trailers and containers is a crucial element in a secure supply chain and is a critical commitment as a PIP member.

### **Purchasing Seals**

ISO 17712:2010 high security seals should be purchased from approved vendors. This updated standard is in effect March 1, 2012.

Assign a seal custodian(s) for the acceptance, inventory and issuance of seals. The custodian must review each carton of seals received to ensure that the carton(s) haven't been opened. The seal numbers must be documented (notating the starting and ending numbers) using a manual or electronic seal log for inventory control. This should be securely filed or password controlled. A certificate of conformance/attestation for the specific seal should be obtained and a hard copy maintained on file. This could be kept where the actual supply of seals is securely stored.

### **Control of Seals**

All seals must be securely stored and controlled. They should be locked away, preferably in a cabinet or desk drawer until such time as their use is warranted. Access to such secure location must be restricted to the seal custodian(s). If anyone can help themselves to seals, chances are they can help themselves to cargo. Staff must be made aware who the seal custodians are.

If seals are sold, then the seal numbers and sold to party must be indicated in the log. Discarded seals must be made non functional (cut with bolt cutters) and be recorded in the log.

Seals that are sold, discarded, or affixed to containers/trailers must be properly notated in the seal log. The seal log must be periodically reconciled. The on hand seal inventory must be compared with the log, to verify that all seals are accounted for and ensure that none have been stolen.

The seal log and any related documentation must be securely filed and maintained for at least seven years.

### **Container/Trailer Inspection Procedures**

Procedures must be in place to verify the physical integrity of the container/trailer structure, prior to loading.

A seven point inspection process is recommended for all containers/trailers.

- Front wall
- Left side
- Right side
- Outside/undercarriage
- Floor
- Ceiling/roof
- Inside/outside doors

Also check the reliability of the door locking mechanisms.

Confirm that the inner measurements conform to industry standards. A shorter length, width or height could indicate a false ceiling or false wall, which could be used to smuggle contraband. If this, or other similar situation is discovered, a supervisor must be immediately advised who in turn must document the situation and notify the appropriate enforcement authority such as the CBSA or police for investigation.

Verify that the container/trailer is empty and clean, without any material or residue present.

If a container/trailer is found to be not suitable (e.g. unsafe, holes in roof/sides, locking mechanism, unmanifested material is found) an incident report must be completed and reported by a supervisor. The container/trailer provider must be contacted and arrangements made to have any deficiencies or problems corrected or have a suitable replacement unit exchanged for the unsuitable one.

### **Container/Trailer Stuffing**

Materials prepared for stuffing must be packed and staged for shipment by authorized personnel. Access to the staging and shipping areas should be controlled. Once the product is staged. A supervisor should verify the model/piece count to the shipment manifest and observe the loading to ensure that no un-manifested product is introduced and that the model and quantities loaded are correct. The supervisor and carrier should sign the shipping manifest verifying that the physical cargo reconciles to the manifest, prior to sealing.

### **Container/Trailer Sealing**

Loaded containers/trailers destined for the USA or other foreign country, must be sealed with a high security seal that meets or exceeds the ISO standard. March 1, 2012, the standard is ISO 17712:2010. In some cases the steamship line or transport company may provide their own seal. Whether it's their own or a Cole/Cancon seal, all manifests, bills of lading or other documentation (including electronic data transmissions) submitted for the cargo to be shipped are complete and include the pertinent seal information.

The seal number must also be notated in the internal seal log for control purposes. This can either be in a manual or preferably electronic format. The seal log should reflect; the seal number, person issuing the seal, person sealing the unit, trailer/container number, carrier, bill of lading, date/time and any notes.

### **Attaching the Security Seal**

Assuming that bolt seals are utilized, request a seal from the seal custodian.  
(He /she will record the seal number and any pertinent shipment details in the seal log)

Examine the seal to ensure that it's not defective.  
Insert the seal stem portion through the top of the hasp of the trailer or container.  
Engage the seal lock housing portion, keeping the serial number facing outward.

Push the two portions together until an audible click(s) is heard indicating the seal is fully engaged. A supervisor should verify that it is properly locked.

If the affixed seal must be broken, a company supervisor must be present. A new seal must be affixed before the container/trailer leaves the loading dock area. The new seal number must be advised to the carrier with written or electronic confirmation of the event. The new seal number must be recorded on the relevant shipping documents. It must also be reflected in the seal log with a notation of the circumstances.

Photograph the seal applied to the container/trailer and send along with shipping documents if requested, or maintain on file.

### **Arriving Loaded Containers/Trailers**

The physical integrity of the container/trailer structure must be examined prior to de-stuffing. It is also imperative that seal verification is performed.

Check for the following:

Is a proper seal affixed to the container/trailer?

Is the seal intact and does it exhibit any evidence of tampering?

What is the seal number, and

Is the seal number the same as what the shipper stated was originally affixed to the container/trailer.

### **Addressing Seal Anomalies**

There are four different seal anomalies that could be encountered.

The seal does not meet the ISO standard.

The seal number does not match the seal number in the shipping documents.

The seal has been tampered with and is not intact, or

The seal is missing.

Any of the above anomalies must be reported to the supervisor for investigation. There may be a logical explanation. Perhaps the seal was broken by an authorized government department such as the CBSA or CFIA and another seal was affixed. This should have been notated on the documentation. Ultimately any discrepancies should initiate an investigation and the supervisor in turn will notify all the appropriate parties. This may include the CBSA or other foreign authority. This must all be documented and maintained on file.