|  |  |
| --- | --- |
| **R & R Trucking Inc**  **AATCO NEI Transport** | |
| Document No: SC-1004 Rev: NC  Department: Safety and Compliance  Title: C-TPAT Equipment/Cargo Security Procedure  Page : 1 of 5 | Author: Karlene Shull  Approval:  Date: 10/26/2015  Effective Date: 10/26/2015 |

**I. PURPOSE / SCOPE**

C-TPAT compliance requires highway carriers to perform systematic thorough inspections of all equipment and cargo entering or exiting the US to protect against the introduction of unauthorized material and/or persons. The purpose of this procedure is to ensure the integrity of the tractor, trailer/container and cargo by defining inspection and security practices. Drivers to refer to “DRIVER’S SECURITY CHECKLIST” in orientation manual for general awareness protocol.

**II. ASSOCIATED DOCUMENTS/FORMS/LOGS, ETC**

DOC #SC-1005 FORM - C-TPAT TRACTOR, CONTAINER/TRAILER CHECKLIST

DOC #SC-1006 - C-TPAT HIGH SECURITY SEAL MANAGEMENT

DOC #SC-1007A FORM – C-TPAT HIGH SECURITY SEAL CHAIN OF CUSTODY (CABLE & BOLT)

DOC #SC-1007B FORM - SEAL REPLACEMENT FORM

DRIVER’S SECURITY CHECKLIST

VEHICLE INSPECTION, REPAIR AND MAINTENANCE PROGRAM

Training Video – see Website: randrtruck.com, Driver Tools

**III. RESPONSIBILITIES**

Drivers participating in trans-border commerce

Driver Managers

Extended Coverage Dispatch

C-TPAT Coordinator

Safety Department

**IV. DEFINITIONS**

Transportation Security Administration (TSA) – Division of US Dept of Homeland Security whose purpose is to protect the Nation’s transportation systems to ensure freedom of movement of people and commerce.

Customs-Trade Partnership Against Terrorism (C-TPAT) - A voluntary government-business initiative to build cooperative relationships that strengthen and improve overall international supply chain and US border security.

Defense Transportation Tracking System (DTTS) - Satellite monitoring and tracking service for sensitive shipments

DCS – Trailer tracking service that can be utilized in tandem with a DTTS tractor mounted satellite system.

TMW - Transportation management software system utilized by R&R Transportation Group

U.S. Customs and Border Protection (CBP) - Division of U.S. Department of Homeland Security tasked with guarding our Nation’s borders while fostering economic security through lawful international trade and travel

**V. DOCUMENT DETAIL**

1. Cargo Verification and Trailer/Container, Tractor Inspection

1.1 If trailer/container is loaded by company personnel prior to transport across the border, check cargo for proper marking, piece count and weight and verify it is manifested correctly.

1.2 An inspection of the tractor, trailer/container, and cargo must be completed per DOC #SC-1005 – C-TPAT Tractor, Container/Trailer Checklist. Inspections to be performed prior to leaving the truck yard, at the point of loading, and at final stop before border crossing if vehicle has been left unattended en-route. Additional en- route inspections may be done if a situation occurs that warrants increased security measures. A “Trailer Integrity Verified” (TIV) entry should be made to the driver logs each time an inspection has been done. Any anomalies or structural modifications found must be documented and reported. (see 4.0)

NOTE: If trailer is pre-loaded, mark any areas that are not able to be inspected as N/A.

Inspection reports, DOC #SC-1005, to be kept with trip paperwork and turned into the billing department.

1.3 Based on risk, supervisory personnel or a security manager held accountable to senior management, to perform a random secondary search to ensure proper procedures are being followed. Follow-up search and results will be documented at the bottom of the inspection report being verified.

1. C-TPAT High Security Seal Requirement

2.1 When transporting a trailer/container for trans-border commerce, a high security seal that meets or exceeds PAS ISO 17712 standard for high security seals must be utilized. Drivers will be issued both cable seals and bolt seals. Cable seals will be routinely used. Bolt seals will be used as a replacement if evidence of tampering is found on cable seal or if a higher security seal is needed. Increased security requirement will be determined by C-TPAT coordinator or management and relayed via Omnitracs message. Accountability for all seals will be maintained per DOC #SC1006, C-TPAT High Security Seal Management.

2.2 If the shipper’s facility placed the appropriate high security seal on the trailer/container, note the number on the inspection document and that it was installed by the shipper. Also verify that the seal number and location of the seal is the same as stated by the shipper on the shipping documents. If a compliant seal is not provided, driver will install a seal and note the number on the inspection document and shipping document. Driver to send an Omnitracs message to their driver manager noting the work order and the seal number that was used. A message will also be sent if the shipper used a compliant seal but the number and/or location does not match the shipping documents. Operations personnel to notify the shipper of discrepancy and advise further instructions.

**NOTE: Authorized employee should affix seal immediately after completion of trailer/container filling. Seal must be affixed to the right door on the hasp. Pull down on seal and twist and turn it to ensure it is locked and secure.**

2.3 If the original seal is removed in transit to the border, even by government officials, a replacement seal must be placed on the trailer/container. The driver must notify their dispatch manager or extended coverage dispatch via an Omnitracs message as soon as possible, that the seal was broken, by whom; and the number of the replacement seal that was placed on the trailer/container.

**NOTE: The carrier must make immediate notification to the shipper, the customs broker, and/or the importer/exporter of the placement of the second seal.**

NOTE: **Driver must use SEAL REPLACEMENT FORM per the instructions noted on form to document the change. Removed seal and a copy of the form to be given to consignee upon delivery and a copy of the form turned into the billing department along with the trip paperwork.**

**IF FREIGHT DAMAGE OR CONTRABAND IS DISCOVERED WHEN A SEAL HAS BEEN BROKEN, THE SEAL SHOULD BE RETAINED BY THE DRIVER AS EVIDENCE AND TURNED INTO THE SAFETY DEPARTMENT ALONG WITH A COPY OF THE SEAL REPLACEMENT FORM.**

3.0 Conveyance Tracking

3.1 While the conveyance is en-route transporting cargo to the border, tracking and monitoring will be accomplished by means of electronic logs along with DTTS/DCS tracking, if security level warrants. Logs are randomly reviewed for accuracy and compliance to all company requirements and DOT regulations.

3.2 Conveyance location is also available through TMW to verify shipment is on track and on route. Driver’s driver manager and/or extended coverage dispatch monitors TMW and is in contact with the driver through Omnitracs throughout the trip duration. Driver to notify their driver manager or extended coverage dispatch of any route delays due to weather, traffic or rerouting.

4.0 Reporting of anomaly, compromised seals, or unusual structural modifications

4.1 During Department of Transportation (DOT) inspections, driver inspections or other physical inspections performed during the conveyance as required by state, local, or federal law, drivers must report and document any anomalies, compromised seals, or unusual structural modifications found.

Drivers to immediately report any findings to their dispatch manager or extended coverage dispatch to allow US Customs and Border Protection (CBP) to be alerted in advance of conveyance crossing the border.

Driver manager or extended coverage dispatch, to contact the Port Director at the port the driver will be crossing. Port telephone numbers are located on web site: <http://www.cbp.gov/contact/ports>. If not able to reach specific port, contact US Customs and Border Protection’s “BE ALERT HOTLINE” at 1-800-232-5378  
 (1-800 BE ALERT) and advise them of the findings and all additional pertinent information.

If a security breach is suspected, operations personnel must wait for instructions; **drivers must make no attempt to cross the border or deliver the cargo until released to do so by CBP or company operations.**

**NOTE: For Training Video – see Website: randrtruck.com, Driver Tools**

5.0 Secure Storage and Handling

5.1 All trans-border cargo must be secured at all times with a C-TPAT high security seal while on company property. Cargo area should be either guarded or monitored with security camera. Handling or transfer of trans-border cargo to be done by authorized personnel only.

See DOC #SC-1008, Physical Security/Access Controls Sect. 4 for cargo area unauthorized entry procedure.

6.0 Tractor and Trailer Maintenance

6.1 Tractor and trailer maintenance is conducted per “VEHICLE INSPECTION, REPAIR AND MAINTENANCE PROGRAM”. The program is under the control and direction of the safety department.

**VI. REFERENCES**

R&R Driver Training Document: Contingency Plan – Emergency Response and Security Instructions to the Driver

Federal Motor Carrier Safety Regulations (FMCSR)

DOC #SC-1001 - C-TPAT POLICY/STANDARD OPERATING PROCEDURE

DOC #SC-1008 - PHYSICAL SECURITY / ACCESS CONTROLS

<http://www.cbp.gov/border-security/ports-entry/cargo-security/c-tpat-customs-trade-partnership-against-terrorism>

**VII. RECORD OF REVISION**

|  |  |  |  |
| --- | --- | --- | --- |
| Revision: | Description of Change: | Author: | Date: |
| NC | New | K. Shull | 10/26/2015 |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |