

## **APPENDIX A**

### **Cargo Security Standards and Specifications (TD 72-56)**

#### **Part 1- Physical Security Standards**

All cargo handling and storage facilities should provide a physical barrier against unauthorized access to cargo. Usually, this will require a covered structure with walls and apertures, which can be securely closed and locked. In addition, fencing may be needed:

To prevent unauthorized persons and vehicles from entering cargo storage and handling areas.

As sole protection for open storage of bulk cargo or large article, which cannot be easily pilfered or removed without mechanical handling equipment or which have their own inherent security (containers).

#### **Buildings**

##### **General Standard**

All buildings used to house cargo and associated support buildings should be constructed of materials which resist unlawful entry. The integrity of the structure must be maintained by periodic inspection and repair. Security protection should be provided for all doors and windows.

##### **Recommended Specifications**

Equip all exterior doors and windows with locks.

Protect all windows through which entry can be made from ground level by safety glass, wire mesh or bars.

Similarly safeguard all glassed-in areas where shipping documents are processed.

Construct all delivery and receiving doors of steel or other material that will prevent or deter unlawful entry and keep them closed and locked when not in use.

Where fencing is impractical or guards insufficient, equip the building with an intrusion detection or alarm system.

Inspections must insure particularly that there are no avenues for surreptitious entry through floors, roofs, or adjacent buildings.

#### **Fencing**

##### **General Standard**

Where cargo security is dependent upon fencing, it should enclose an area around cargo and support buildings sufficient to provide maneuvering space for pick-up and delivery vehicles and should be set off a sufficient distance on all sides from the building or exterior stored cargo. The fence line must be inspected regularly for integrity and any damage promptly repaired.

### **Recommended Specifications**

Install chain link fencing with at least nine gauge, two-inch mesh, and at least 8 feet high (not including a barbed wire extension). If the level on which the fence is constructed is lower than the area outside the fence line, increase the height of the fence to provide an effective 8-foot fence at all points.

Top the fence with a 2-foot barbed wire extension, consisting of 3 strands of barbed wire properly spaced and angled outward.

Place fence posts on the inside of the fence, and secure them in a cement foundation at least 2 feet deep.

Ensure that objects or persons cannot pass beneath the fencing by providing;

Cement aprons not less than 6 inches thick.

Frame piping.

U-shaped stakes driven approximately 2 feet into the ground.

Avoid any conditions that compromise the fence line. Prohibit the placing of containers, dunnage, cargo or vehicle or any other item that may facilitate unlawful entry adjacent to the fence line.

Where necessary, install bumpers or fence guards to prevent damage by vehicles.

## **Gates**

### **General Standard**

The number of gates in fences should be the minimum necessary for access. All fence gates should be at least as substantial as the fence. Gates through which vehicles or personnel enter or exit should be manned or under observation by management or security personnel.

### **Recommended Specifications**

Equip gates with a deadlocking bolt or a substantially equivalent lock that does not require use of a chain. All hardware connecting the lock to the gate should be strong enough to withstand constant use and attempts to defeat the locking device.

Construct swing-type gates so that they may be secured to the ground when closed.

Separate gates for personnel and vehicle traffic are desirable.

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## **Gatehouses**

### **General Standard**

Operators of facilities handling a substantial volume of cargo should maintain a manned gatehouse at all vehicle entrances and exits during business hours.

### **Recommended Specifications**



Unattended outdoor parking areas

1.0 foot candles

Illuminate all vehicle and pedestrian gates, perimeter fence lines, and other outer areas with mercury vapor, sodium vapor, power quartz lamps or substantially similar high intensity lighting, employing a minimum of 400 watts per fixture. Locate lights 30 feet above ground level and properly spaced to provide the appropriate light intensity for the area to be illuminated.

Establish a system of planned maintenance.

Protect lighting subject to vandalism by wire screening or other substantially equivalent means.

## **Locks, Locking Devices, and Key Control**

### **General Standard**

Locks or locking devices used on buildings, gates and equipment should be so constructed as to provide positive protection against unauthorized entry. Management or security personnel should control the issuance of all locks and keys.

### **Recommended Specifications**

Use only locks having (a) multiple pin tumblers, (b) deadlocking bolts, (c) interchangeable cores, and (d) serial numbers.

To facilitate detection of unauthorized locks, use only locks of standard manufacture displaying the owner's company name.

Number all keys and obtain a signature from the recipient when issued. Maintain a control file for all keys. Restrict the distribution of master keys to persons whose responsibilities require them to have one.

Safeguard all unissued keys or duplicate keys.

Remove and secure keys from cargo handling equipment and vehicle when not in actual use.

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## **High Risk Cargo**

### **General Standard**

Adequate space capable of being locked, sealed or otherwise secured for storage of high-value cargo and packages, which have been broken prior to or during the course of unloading must be provided at each cargo handling building. When such cargo must be transported a substantial distance from the point of unloading to the special security area, vehicles capable of being locked or otherwise secured must be used. (19 C.F.R. § 4.30(l))

### **Recommended Specifications**

Construct special security rooms, cribs or vaults so as to resist forcible entry on all sides and from underneath and overhead.

Locate such special security areas where possible so that management and/or security personnel may keep them under continuous observations. Otherwise, install an alarm system or provide for inspection at frequent intervals.

Release merchandise from such an area only in the presence of authorized supervisors and/or security personnel.

Log all movements of merchandise in or out of a special security area, showing date, time, condition of cargo upon receipt, name of truckman, name of company making pick-up and registration number of equipment used.

## **Part 2- Procedural Security Standards**

## **Personnel Screening**

### **General Standard**

Operators of cargo handling facilities should conduct employment screening of prospective employees. (19 C.F.R. §§ 4.30(m), 19.3(d), 111.28(b))

### **Recommended Specifications**

Require all personnel, including maintenance and clerical personnel, who will have access to cargo areas to submit a detailed employment application that contains a photograph of the applicant and lists his/her residences and prior employment for the preceding 10 years.

Screen all such employment applications for:

- A. Verification of address and prior employment
- B. Credit record
- C. If possible, criminal record

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## **Security Personnel**

### **General Standard**

Operators of cargo handling facilities should employ a security officer or assign a particular officer of the firm to be responsible for security. All operators handling a substantial volume of international cargo should provide guards to protect the cargo.

### **Recommended Specifications**

Employ the number of guards required to provide adequate security for the size of each facility and the volume of cargo handled. Alarm systems, closed circuit television and other security devices may reduce the number of guards needed.

Train all company employee guard forces or insure that contract guard forces are trained in:

Methods of patrolling terminals and warehouses

Use of firearms and other equipment that may be furnished

Report writing, log and record keeping

Identification of security problems and specific trouble areas

Equip guard forces with uniforms that are complete, distinctive, and authoritative in appearance.

Provide firearms, vehicles, communications systems, and other equipment deemed necessary for the successful performance of the guard function.

Insist on physical fitness as a prime consideration in selecting a guard force. Require guards to undergo self-defense training similar to that of police agencies. Require a physical examination at least once a year.

Furnish each guard a manual covering operating procedures and standards of conduct, and a clear statement of what management expects of him.

## **Communications**

### **General Standard**

Adequate and reliable communications between elements of the terminal security force and from the security force to local police should be provided.

### **Recommended Specifications**

Provide security personnel with a telephone at fixed posts or two-way radio, intercom, or other type of equipment providing voice communication capability within the company.

Arrange assured means (telephone, radio or special alarm line) for summoning assistance from local police forces.

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## **Identification System**

### **General Standard**

All operators of facilities handling a substantial volume of cargo should employ an identification card system to identify personnel authorized to enter cargo and document processing areas.

### **Recommended Specifications**

Include on the I.D. card: (a) physical description or, preferably, a color photograph of the holder, (b) name and address, (c) social security number, (d) date of birth, (e) employer's Customs license number, if any, (f) signature of holder, (g) reasonable expiration date.

Laminate all cards to prevent alterations and assign each card a control number.

3. Recover I.D. cards from terminated employees.

4. Require each employee to display his I.D. card to gain access to the facility, to cargo areas within the facility and to areas where shipping documents are processed. Preferably, the I.D. card should be displayed so that it is visible at all times that the employee is within the facility.

## **Independent Contractors**

### **General Standard**

The background and corporate structure of independent contractors providing janitorial service, refuse disposal, or other services should be verified. Access by independent contractors to the facility should be under security controls.

### **Recommended Specifications**

Periodically examine independent contractor vehicles that are parked in or near cargo areas.

Permit independent contractor employees to enter only those areas necessary for their particular work; permit them access to cargo and areas where shipping documents are located only under the supervision of security and/or management personnel.

Require independent contractors to display identification similar to that required by the facility for its own employees.

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## **Cargo Quantity Controls**

### **General Standard**

Cargo should be tallied at time of delivery to the consignee or his agent. In the event of any discrepancies, the discrepancy must be annotated in the proprietor's records and a report pursuant to the appropriate CBP regulations must be filed.

### **Recommended Specifications**

To facilitate accurate delivery of cargo, terminal operators should maintain and continuously update a location chart or list of all cargo received.

Segregate imported cargo, cargo for export, and domestic cargo.

Carriers should arrange procedures with each terminal operator to insure that all overages and shortages are reported to CBP.

## **Delivery Procedures**

### **General Standard**

Gate passes should be issued to truckmen and other onward carriers to control and identify those authorized to enter the facility. Verification of the identity and authority of the carrier requesting delivery of cargo should be made prior to the cargo's release.

### **Recommended Specifications**

Require truckmen to submit proper personal identification (such as a driver's license) and a vehicle registration certificate before being issued a gate pass and being permitted to enter the facility; require truckmen to surrender the gate pass before leaving the facility.

Seal containers and trailers and note the seal number on the gate pass before delivery is effected. Verify the seal number when gate pass is surrendered.

Require the company name of all onward carriers to be clearly shown on all equipment. Do not accept temporary placards or cardboard signs as proper identification of equipment. Require carriers using leased equipment to submit the lease agreement for inspection and note the leasing company's name on the delivery order.

Release cargo only to the carrier specified in the delivery order unless a release authorizing delivery to another carrier, signed by the original carrier, is presented and verified. Accept only original copies of the delivery or pickup orders.

Personnel processing pre-lodged delivery or pickup orders should verify the identity of the truckman and the trucking company before releasing the pickup order. Limit access to areas where such documentation is processed or held to authorized personnel and rigorously safeguard all shipping documents from theft or unauthorized observation.

Conduct delivery and receiving operations at separate docks or doors, if feasible.

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Tally salvage and accumulated unclaimed cargo at the time of delivery and have management representatives and/or security personnel verify that only properly released items are included. If a terminal has truck scales, weigh the vehicle used to remove bulk salvage cargo (bales and drums) when empty and loaded.

## **Containerized Shipments and Seals**

### **General Standard**

All containers, trailers, rail cars and air cargo lockers entering or leaving a facility should be sealed. Mounted and high value containerized shipments should receive special security attention.

### **Recommended Specifications**

Inspect seals whenever a sealed containerized shipment enters or leaves a facility. If the seals are not intact or there is evidence of tampering or the seal numbers are incorrect, notify security and/or management personnel and tally the cargo.

Seal unsealed containerized shipments at the point of entry to the facility and note the seal number on the shipping documents. Seal all containerized shipments leaving the facility and note the seal number on the shipping documents.

Release seals to as few persons as possible. Require all persons handling seals to maintain strict control of the seals and to store them in secure place.

Maintain a seal distribution log that indicates to whom seals have been released.

Where possible, secure containers by butting or “marrying” their door ends against each other.

However, do not butt them against a perimeter fence or building wall if that will compromise the protection provided by the fence or wall. In stacking containers, place those containing high value merchandise on top.

Locate high value merchandise in mounted containers or trailers in a special security holding area visible to management and/or security personnel.

When containers are mounted on frames, secure the fifth wheel by a pin-lock that meets the minimum standards for locks and is constructed to withstand normal abuse from equipment. Hold designated management and/or security personnel responsible for storage and control of pin-locks.

Restrict access to special security holding areas and permit the release of containers or trailers from such areas only in the presence of management representatives and/or security personnel.

Log movements of containers in or out of a special security holding area, showing: date, time, seal number, name of truckman, name of company making pickup, and registration number of equipment used.

**Security Education**

**General Standard**

Management should institute a security awareness program for all personnel.

**Recommended Specifications**

Conduct a program of periodic security seminars for all employees involved in cargo handling and documentation processing, stressing the importance of:

- A. Maintaining legible and accurate cargo tallies
- B. Processing only legible documents
- C. Writing only in ink or ballpoint pen
- D. Completing all information required by shipping documents
- E. Obtaining clearly written signatures
- F. Safeguarding the confidentiality of shipping and entry documents
- G. Maintaining good cargo security

