

Commercial Customs Operations Advisory Committee (COAC) Trusted Trader Subcommittee

August 2018



U.S. Customs and
Border Protection

Cargo and Conveyance Security / Office of Field Operations
Trusted Trader Subcommittee / CTPTA Minimum Security Criteria Update
August 2018

Action Required:

- CBP continues to make great progress in its work with the COAC's Trusted Trader Subcommittee in updating C-TPAT's minimum security criteria.
- The program's security criteria requires review and updating to ensure that it is reflective of CBP's overall mission, the current supply chain environment and the threats that the global supply chain faces today.
- A working group comprised of about 50 individuals representing the equities and interests of the entire supply chain spectrum was created. Many of our COAC representatives have been part of the discussions, webinars and face to face meetings that have taken place since this working group was created in April of 2016.
- Director Schmelzinger briefed the senior leadership on the progress of this project and my understanding is that we have reached a good level of consensus with the requirements that have been discussed and that most of the recommendations from the trade were incorporated into the latest version.
- As agreed with the COAC, we started the 90-day MSC socialization process earlier this month. In late July, CTPAT Members received an email from the program outlining the key elements of the socialization strategy – including the development of Workbooks for each of the entities eligible for CTPAT membership which have been uploaded to the CTPAT Portal; the delivery of live webinars; and an agenda outlining a series of workshops that are being delivered throughout the United States by CTPAT field personnel.
- CTPAT Members were also notified that they may provide feedback to CBP via an electronic Excel form at any time during this socialization period.
- Once the socialization concludes, CTPAT will evaluate the feedback received and make any necessary changes to the proposed criteria. The criteria will then be finalized and subsequently posted on the CTPAT webpage.
- CBP plans to provide an update to the membership at large during the C-TPAT conference in September.

Background:

- A COAC Working Group under the COAC's Global Supply Chain Subcommittee was created in April 2016 to address the program's criteria update.
- The working group is comprised of six teams, with each team addressing a specific set of requirements or issues proposed by CBP. The first step of this project was the discussions by the 6 teams of the original drafts submitted by CBP. This was followed by two meetings in Washington DC, and six webinars following those meetings. The issues discussed by the teams included:
 - ✓ Security Measures to Counter Agricultural Pests and Diseases / Personnel Issues
 - ✓ Cybersecurity Issues
 - ✓ Non-IT Security Technology
 - ✓ Prevention of Money Laundering and Terrorism Financing Issues / Risk
 - ✓ High Security Seals and Highway Carrier Issues
 - ✓ Security Management and Administration

Next Steps:

- Based on guidance from the trade and COAC, CTPAT plans to implement the new MSC under a phased approach throughout 2019. The program has recommended that Members first implement those requirements that deal with cybersecurity, conveyance security and seal security. We based this determination on the importance of the criteria in these categories and the level of effort required to implement them.
- The program has developed training material on the new MSC and will continue to provide training to the membership over the implementation process. Members will not be expected to adhere to the new security standards until early 2020.

