Customs-Trade Partnership Against Terrorism

Bulletin

Compliance With ISO’s 17712 Standards for High Security Seals

The Customs-Trade Partnership Against Terrorism (C-TPAT) program is one layer in U.S. Customs and Border Protection’s (CBP) multi-layered cargo enforcement strategy. Through this program, CBP works with the trade community to strengthen international supply chains and improve United States border security.

To enhance communication with its Partners, C-TPAT routinely highlights matters of interest to the membership; this C-TPAT bulletin addresses the new ISO 17712:2013 standards for security seals that will go into effect May 15, 2014.

ISO (International Organization for Standardization) is the world’s largest developer of voluntary International Standards. A standard is a document that provides requirements, specifications, guidelines or characteristics that can be used consistently to ensure that materials, products, processes and services are fit for their purpose. ISO International Standards ensure that products and services are safe, reliable, and of good quality.

The ISO 17712 establishes “uniform procedures for the classification, acceptance, and withdrawal of mechanical freight container seals. It provides a single source of information on mechanical seals which are acceptable for securing freight containers in international commerce.”

The current ISO 17712 standard requires independent confirmation in three areas:

1. Testing to determine a seal’s physical strength (as barriers to entry).

   ISO 17712 defines three types of classes of seal strength or barrier capacity: “I” for Indicative; “S” for Security; and “H” for High Security. **C-TPAT requires the use of “H” class seals.** Suppliers must use independent third party test laboratories to validate a seal’s classification. Labs must be accredited according to ISO/IEC 17025 (General requirements for the competence of testing and calibration laboratories) to perform testing specific to ISO 17712.

2. Auditing of manufacturer’s security-related business processes.

   Poor security-related practices can undercut the effectiveness of a high-quality security seal. ISO 17712’s Annex A defines over two dozen required practices, such as facility risk assessments and access controls to production and storage areas. Suppliers’ conformance with Annex A should also be demonstrated through an independent certification provider that is accredited to audit compliance with the ISO standards.
3. Seals be designed and constructed with tamper indicative features that generate tell-tale evidence of tampering.

Seal manufacturers must be able to demonstrate to, and obtain certification from, an accredited auditor from an independent third party organization that their high security seals have built-in tamper evidence features. If an independent third party organization accredited to ISO 17020 verifies conformity, it will provide the manufacturer with a certificate of compliance that documents that the seals submitted for review do reflect tell-tale evidence of tampering generated by attempts to defeat a correctly closed and affixed seal.

Considering that most seals are tampered with in order to introduce illegal contraband or to pilferage a container, this is a welcomed improvement for high security seals – particularly those that are U.S. bound and those affixed to C-TPAT containers and trailers.

C-TPAT’s security criteria states that “…a high security seal must be affixed to all loaded containers bound for the U.S. All seals must meet or exceed the current ISO 17712 standards for high security seals.” C-TPAT Partners, however, may continue to use the remaining ISO 17712:2010 high security seals they have in stock and then look to purchase ISO 17712:2013 high security seals in the future.

Seals are much more vulnerable to successful tampering when they can be manipulated prior to application and closing. Seals should never be handled by unauthorized/untrained individuals. Partners can minimize the possibility of seals being tampered with by establishing a seal integrity process. The VVTT seal verification and inspection process should be used before seals are put in place and closed:

V – View seal and container locking mechanisms.
V – Verify seal number for accuracy.
T – Tug on seal to make sure it is affixed properly.
T – Twist and turn seal to make sure it does not unscrew.

Partners are reminded to be vigilant in their purchase of ISO 17712 compliant seals.

- They should be obtaining independent written certification from a supplier that its product and processes meet or exceed the ISO 17712 standard. Partners should ask their suppliers for copies of conformance certificates for product testing and security related business practices (Normative Annex A).

- The certificates for product testing should come from a lab that is properly accredited according to ISO procedures, such as ISO 17025. The test house must be accredited by an independent third party test laboratory.

Beware of fraudulent documents. Some independent laboratories have adopted digitally signed and certified test reports to ensure content integrity and author authenticity.

**C-TPAT Program**

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