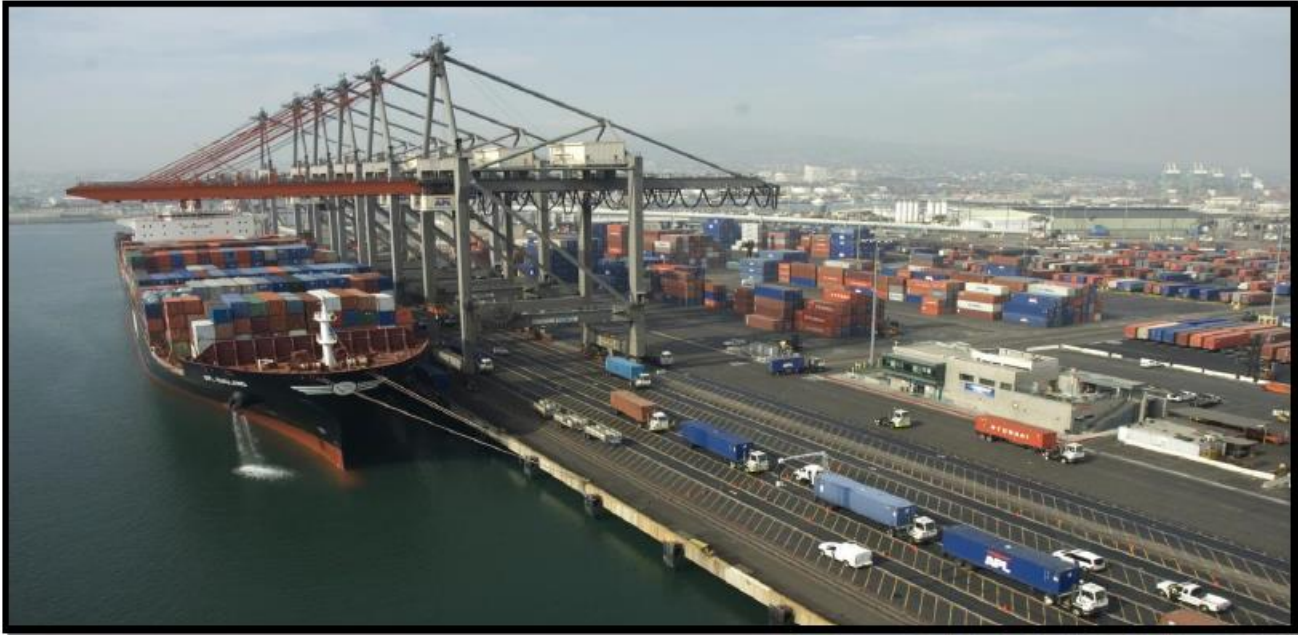


# Seal Integrity



## **Gore CTPAT Container Sealing and Unsealing Procedure**

CTPAT participants are required to ensure the security of cargo from origin through to distribution. Since many different business partners may have access to freight, or be involved in security of a full container at different points in the supply chain, it is important to know what Customs and Border Protection (CBP) requires of each group.

Below is a listing of seal procedures for various parties involved in different links and activities within the supply chain.

Included are seal requirements for companies that are not eligible to be direct Partners of the CTPAT Program, such as domestic highway carriers in the US and other countries. This information is included as part of the minimum-security criteria to ensure all business partners and links in the supply adhere to the minimum-security criteria.

Seals must be compliant with ISO 17712 standards for high security seals and qualifying cable and bolt seals are both acceptable.

## Section: I

### US Importers – Providing Direction to Export Location - Point of Sealing

- Documentation regarding the compliance standard must be maintained on file for verification.
- Upon receipt of seals, an inventory audit must be conducted and the seals must be recorded in a seal log along with each seal number.
- Seal inventories must be conducted at least once per year during the internal audit. Records to prove an audit was conducted must be maintained.
- Seals must be assigned to a designated employee/department and stored in a secured area.
- Upon issuance of seals, the seal log should be updated with the seal usage information that at a bare minimum should contain the following:
  - Seal Number
  - Container Number
  - Bill of Lading Number
  - Shipment reference number such as sales or purchase order numbers
  - Name of person affixing seal to the container, dated and initialed by that person
  - Name of person witnessing the sealing process, dated and initialed by that person
- Cable seal application:
  - Ensure the seals envelope the rectangular hardware base of the vertical bars in order to eliminate any upward or downward movement.
  - Remove the slack from both sides of the cable
  - Use the VVTT method to ensure the cables are taut.
    - **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



- Tug and pull the cable in order to determine if there is any cable slippage within the locking body mechanism.
- Bolt seal application
  - Use CBP's VVTT method (view, verify, twist and tug) when affixing a bolt seal to a container.
- A designated person who has received seal security training must affix the seal to the loaded container/trailer, witnessed by another person who has had seal security training, to ensure it has been properly affixed using US Customs VVTT method.

- All security inspections should be performed in an area of controlled access and, if available, monitored via cameras.
- In the event the container is not able to be loaded or unloaded the same day, the container should be left at the dock and remain secured with the seal still in place. If able, place container in the view of video surveillance.
- Compromised seals and/or containers, destined for W. L Gore & Associates, must be reported to the W.L Gore CTPAT Team members via email at CTPAT@WLGORE.COM, or via phone, Gay Ann Yoder (410) 506-3830 or Glenn Hallman (410) 506-2079. The plant should hold the compromised seal until released by the CTPAT team upon which the seal would be sent to Left Bank for processing. US Customs and Border Patrol and or the appropriate foreign authority shall be notified immediately if a security risk is identified.

## **Section: II**

### **Manufacturers - Exporting to the US – Point of Sealing**

- Documentation regarding the compliance standard must be maintained on file for verification.
- Upon receipt of seals, an inventory audit must be conducted and the seals must be recorded in a seal log along with each seal number.
- Seal inventories must be conducted at least once per year during the internal audit. Records to prove an audit was conducted must be maintained.
- Seals must be assigned to a designated employee/department and stored in a secured area.
- Upon issuance of seals, the seal log should be updated with the seal usage information that at a bare minimum should contain the following:
  - Seal Number
  - Container Number
  - Bill of Lading Number
  - Shipment reference number such as sales or purchase order numbers
  - Name of person affixing seal to the container, dated and initialed by that person
  - Name of person witnessing the sealing process, dated and initialed by that person
- Cable seal application:
  - Ensure the seals envelope the rectangular hardware base of the vertical bars in order to eliminate any upward or downward movement.
  - Remove the slack from both sides of the cable
  - Use the VVTT method to ensure the cables are taut.
    - **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



- Tug and pull the cable in order to determine if there is any cable slippage within the locking body mechanism.
- Bolt seal application
  - Use CBP's VVTT method (view, verify, twist and tug) when affixing a bolt seal to a container.
- A designated person who has received seal security training must affix the seal to the loaded container/trailer, witnessed by another person who has had seal security training, to ensure it has been properly affixed using US Customs VVTT method.
- All security inspections should be performed in an area of controlled access and, if available, monitored via cameras.
- In the event the container is not able to be loaded or unloaded the same day, the container should be left at the dock and remain secured with the seal still in place. If able, place container in the view of video surveillance.
- Compromised seals and/or containers, destined for W. L Gore & Associates, must be reported to the W.L Gore CTPAT Team members via email at CTPAT@WLGORE.COM, or via phone, Gay Ann Yoder (410) 506-3830 or Glenn Hallman (410) 506-2079. US Customs and Border Patrol and or the appropriate foreign authority shall be notified immediately if a security risk is identified.

## Section: III

### **US Exporters – Manufacture/Distributor/Warehouse - Point of Sealing**

- Documentation regarding the compliance standard must be maintained on file for verification.
- Upon receipt of seals, an inventory audit must be conducted and the seals must be recorded in a seal log along with each seal number.
- Seal inventories must be conducted at least once per year during the internal audit. Records to prove an audit was conducted must be maintained
- Seals must be assigned to a designated associate/department and stored in a secured area.
- Upon issuance of seals, the seal log should be updated with the seal usage information that at a bare minimum should contain the following:
  - Seal Number
  - Container Number
  - Bill of Lading Number
  - Shipment reference number such as sales or purchase order numbers

- Name of person affixing seal to the container, dated and initialed by that person
- Name of person witnessing the sealing process, dated and initialed by that person
- Cable seal application:
  - Ensure the seals envelope the rectangular hardware base of the vertical bars in order to eliminate any upward or downward movement.
  - Remove the slack from both sides of the cable
  - Use the VVTT method to ensure the cables are taut.
    - **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



- Tug and pull the cable in order to determine if there is any cable slippage within the locking body mechanism.
- Bolt seal application
  - Use CBP's VVTT method (view, verify, twist and tug) when affixing a bolt seal to a container.
- A designated person who has received seal security training must affix the seal to the loaded container/trailer, witnessed by another person who has had seal security training, to ensure it has been properly affixed using US Customs VVTT method.
- All security inspections should be performed in an area of controlled access and, if available, monitored via cameras.
- In the event the container is not able to be loaded or unloaded the same day, the container should be left at the dock and remain secured with the seal still in place. If able, place container in the view of video surveillance.
- Compromised seals and/or containers, destined for W. L Gore & Associates, must be reported to the W.L Gore CTPAT Team members via email at CTPAT@WLGORE.COM, or via phone, Gay Ann Yoder (410) 506-3830 or Glenn Hallman (410) 506-2079. The location should hold the compromised seal until released by the CTPAT team. US Customs and Border Patrol and or the appropriate foreign authority shall be notified immediately if a security risk is identified.



## Section IV

### US Importers – Point of Receipt

- Prior to cutting the seal on inbound shipments, CBP's View, Verify, Twist, and Tug (VVT) method must be used, with a witness, to ensure the seal is the correct seal number, uncompromised, and properly affixed to the loaded container/trailer.
  1. **V** – view seal and container locking mechanisms, look for loose bolts/haps or other signs of damage or tampering
  2. **V** – verify seal number for accuracy, compare with shipping documents and look for alterations to the seal
  3. **T** – tug on seal to make sure it is affixed properly. If seals are damaged or removed do not open container
  4. **T** – twist and turn seal to make sure it does not unscrew. If seals come off do not open container



- Compromised seals and/or containers, destined for W. L Gore & Associates, must be reported to the W.L Gore CTPAT Team members via email at [CTPAT@WLGORE.COM](mailto:CTPAT@WLGORE.COM), or via phone, Gay Ann Yoder (410) 506-3830 or Glenn Hallman (410) 506-2079. The plant should hold the compromised seal until released by the CTPAT team upon which the seal would be sent to Left Bank for processing. US Customs and Border Patrol and or the appropriate foreign authority shall be notified immediately if a security risk is identified.
- Cut seals must be manipulated (hammered/crushed) such that the seal cannot be reused and then disposed of in a secure separate container.
- Gore receiving locations must send seals to Left Bank for destruction. Left Bank Associates will destroy seals in accordance with current recycling practices.
- All security inspections should be performed in an area of controlled access and, if available, monitored via cameras.
- In the event the container is not able to be loaded or unloaded the same day, the container should be left at the dock and remain secured with the seal still in place. If able, place container in the view of video surveillance.

## Section V

### **Consolidators handling inbound for US importers – Point of Receipt**

- Prior to cutting the seal on inbound shipments, CBP's View, Verify, Twist, and Tug (VVTt) method must be used, with a witness, to ensure the seal is the correct seal number, uncompromised, and properly affixed to the loaded container/trailer.
  1. **V** – view seal and container locking mechanisms, look for loose bolts/haps or other signs of damage or tampering
  2. **V** – verify seal number for accuracy, compare with shipping documents and look for alterations to the seal
  3. **T** – tug on seal to make sure it is affixed properly. If seals are damaged or removed do not open container
  4. **T** – twist and turn seal to make sure it does not unscrew. If seals come off do not open container



- Compromised seals and/or containers, destined for W. L Gore & Associates, must be reported to the W.L Gore CTPAT Team members via email at [CTPAT@WLGORE.COM](mailto:CTPAT@WLGORE.COM), or via phone, Gay Ann Yoder (410) 506-3830 or Glenn Hallman (410) 506-2079. The location should hold the compromised seal until released by the CTPAT team. US Customs and Border Patrol and or the appropriate foreign authority shall be notified immediately if a security risk is identified.
- Cut seals must be disposed of in a separate container, the contents of which, are inaccessible, and must be delivered to or picked up by a recycling company on a regular basis to ensure proper destruction.
- Cut seals must be manipulated (hammered/crushed) such that the seal cannot be reused and then disposed of in a secure separate container.
- All security inspections should be performed in an area of controlled access and, if available, monitored via cameras.
- In the event the container is not able to be loaded or unloaded the same day, the container should be left at the dock and remain secured with the seal still in place. If able, place container in the view of video surveillance.

## Section VI

### **Consolidators receiving from US Exporters – Point of Receipt**

- Verify that CBP's View, Verify, Twist, and Tug (VVTT) method was used, with a witness, to ensure the seal is the correct seal number, uncompromised, and properly affixed to the loaded container/trailer.
  1. **V** – view seal and container locking mechanisms, look for loose bolts/haps or other signs of damage or tampering
  2. **V** – verify seal number for accuracy, compare with shipping documents and look for alterations to the seal
  3. **T** – tug on seal to make sure it is affixed properly. If seals are damaged or removed do not open container
  4. **T** – twist and turn seal to make sure it does not unscrew. If seals come off do not open container



- All security inspections should be performed in an area of controlled access and, if available, monitored via cameras.
- In the event the container is not able to be loaded or unloaded the same day, the container should be left at the dock and remain secured with the seal still in place. If able, place container in the view of video surveillance.
- Compromised seals and/or containers, destined for W. L Gore & Associates, must be reported to the W.L Gore CTPAT Team members via email at CTPAT@WLGORE.COM, or via phone, Gay Ann Yoder (410) 506-3830 or Glenn Hallman (410) 506-2079. The location should hold the compromised seal until released by the CTPAT team. US Customs and Border Patrol and or the appropriate foreign authority shall be notified immediately if a security risk is identified.

## Section VII

### **Cross-border highway carriers**

- Carriers must verify the seal number and location of the seal is the same as stated by the shipper on the original shipping documents.
- Verify that CBP's View, Verify, Twist, and Tug (VVTT) method was used to ensure the seal is the correct seal number, uncompromised, and properly affixed to the loaded container/trailer.



1. **V** – **v**iew seal and container locking mechanisms, look for loose bolts/nuts or other signs of damage or tampering
2. **V** – **v**erify seal number for accuracy, compare with shipping documents and look for alterations to the seal
3. **T** – **t**ug on seal to make sure it is affixed properly. If seals are damaged or removed do not open container
4. **T** – **t**wist and turn seal to make sure it does not unscrew. If seals come off do not open container



- If a seal is removed in-transit to the border, a second seal must be placed on the trailer, the seal change must be documented, the driver must immediately:
  - notify the dispatcher that the seal was broken
  - by whom, if known
  - number of the replacement seal used
  - request the dispatcher immediately notify the following of the replacement seal number:
    - the shipper/exporter
    - the custom's broker
    - the importer
- If a seal is removed or tampered with in-transit, the driver must report it to CBP or the appropriate foreign authority, depending on where the compromise occurred.
- All security inspections should be performed in an area of controlled access and, if available, monitored via cameras.
- In the event the container is not able to be loaded or unloaded the same day, the container should be left at the dock and remain secured with the seal still in place. If able, place container in the view of video surveillance.
- Compromised seals and/or containers, destined for W. L Gore & Associates, must be reported to the W.L Gore CTPAT Team members via email at CTPAT@WLGORE.COM, or via phone, Gay Ann Yoder (410) 506-3830 or Glenn Hallman (410) 506-2079. The location/carrier should hold the compromised seal until released by the CTPAT team. US Customs and Border Patrol and or the appropriate foreign authority shall be notified immediately if a security risk is identified.

## Section VIII

### Domestic highway carriers

- Verify that the seal number and location of the seal is the same as stated by the shipper on the original shipping documents.

- Verify that CBP's View, Verify, Twist, and Tug (VVTt) method was used to ensure the seal is the correct seal number, uncompromised, and properly affixed to the loaded container/trailer.

1. **V** – **view** seal and container locking mechanisms, look for loose bolts/nuts or other signs of damage or tampering
2. **V** – **verify** seal number for accuracy, compare with shipping documents and look for alterations to the seal
3. **T** – **tug** on seal to make sure it is affixed properly. If seals are damaged or removed do not open container
4. **T** – **twist** and turn seal to make sure it does not unscrew. If seals come off do not open container



- If a seal is removed in-transit to the border a second seal must be placed on the trailer, the seal change must be documented, the driver must immediately:
  - notify the dispatcher that the seal was broken
  - by whom if known
  - number of the replacement seal
  - request the dispatcher immediately notify the following of the replacement seal number:
    - the shipper/exporter
    - the custom's broker
    - the importer
- All security inspections should be performed in an area of controlled access and, if available, monitored via cameras.
- In the event the container is not able to be loaded or unloaded the same day, the container should be left at the dock and remain secured with the seal still in place. If able, place container in the view of video surveillance.
- Compromised seals and/or containers, destined for W. L Gore & Associates, must be reported to the W.L Gore CTPAT Team members via email at CTPAT@WLGORE.COM, or via phone, Gay Ann Yoder (410) 506-3830 or Glenn Hallman (410) 506-2079. The location/carrier should hold the compromised seal until released by the CTPAT team. US Customs and Border Patrol and or the appropriate foreign authority shall be notified immediately if a security risk is identified.