

附件 12 Anatomy of a Post Incident Fact Finding Mission



2011

A Decade of Supply Chain Security
and Innovation

Anatomy of a
Post-Incident Analysis
(PIA)

A Decade of Supply Chain Security and Innovation



Objectives

Introduction to PIAs

Why do we conduct PIAs

Main reasons for security breaches/incidents

Case Studies

FY 2010 C-TPAT PIA Statistics

Security Breach Photos

A Decade of Supply Chain Security and Innovation



Anatomy of a PIA

Introduction to PIA(s)

- What type of incident does C-TPAT consider to be a security breach?
 - An introduction of restricted, prohibited, or harmful cargo or people into the supply chain, which are in violation of U.S. Customs and Border Protection laws and regulations, or the laws and regulations of other government agencies.
 - Terrorism, Narcotics, Human Smuggling, Weapons, Currency, and IPR, Health & Safety, etc...
- Notify your SCSS immediately – via email and telephone
- Conduct an internal investigation – gather CCTV recordings, inspection sheets, identify employees which handled the particular cargo, verify seal numbers, GPS tracking/monitoring logs, etc.
- Coordinate and cooperate with the investigation – contact and forward documents and information to your assigned SCSS
- Time frame for conducting the PIA – 30 days (however, the process could be shortened to 15 days if all the above is handled expeditiously)

A Decade of Supply Chain Security and Innovation



Anatomy of a PIA

Why are PIAs conducted?

- To assist C-TPAT with identifying where the security breach/incident occurred
 - Before/after the loading of the trailer/container
 - En-route to the trailer yard or to the U.S.
- Assist companies on how to improve security procedures
 - Trailer/container tracking, monitoring and documentation
 - 7/17 Point Tractor/Trailer/Container Inspection Training
- To provide C-TPAT companies with a corrective action plan for reinstatement after being suspended
 - Appeals process

A Decade of Supply Chain Security and Innovation



Anatomy of a PIA

What are some specific reasons for security breaches/incidents?

- Failure to follow through established company policy and procedures
- Improper tracking/monitoring procedures throughout the supply chain (Air, Land, Sea and Rail)
- Trailer/Container/Cargo inspections improperly conducted
- Use of non-certified subcontractors and business screening procedures
- Not conducting periodic background investigations on employees

A Decade of Supply Chain Security and Innovation



Case Study

Narcotics hidden in sleeper compartment of tractor prior to pick-up



- Security measures in place
 - Convoys
 - Police escorts
 - GPS tracking
 - Reporting issues with trucks
- Factors contributing to breach
 - Tracking and monitoring
 - Internal conspiracy
 - Conveyance inspections
 - Lack of management oversight

A Decade of Supply Chain Security and Innovation



Case Study

Multi-layered tracking and monitoring system defeated



- Security measures in place
 - Dual layered tracking and monitoring
 - Geofencing
 - Established routes and timeframes
 - High security cable seal
- Factors contributing to breach
 - Tracking and monitoring
 - GPS settings
 - Lack of audits
 - Access controls
 - Internal conspiracy

A Decade of Supply Chain Security and Innovation



FY 2010 PIA Statistics

- Twenty-three (23) PIA(s) involving thirty-four (34) companies were conducted by C-TPAT
- Multiple factors contributed to each of the security breaches – however, the primary factors were:
 - Lack of tracking/monitoring procedures: 61%
 - Business screening procedures: 22%
 - Improper inspection procedures: 13%
 - Lack of management oversight and accountability: 4%

A Decade of Supply Chain Security and Innovation



Ocean Cargo Concealment



A Decade of Supply Chain Security and Innovation



False Gas Tank



A Decade of Supply Chain Security and Innovation



False Trailer Floor



A Decade of Supply Chain Security and Innovation



LD3 Container



A Decade of Supply Chain Security and Innovation



False Wall and Ceiling



A Decade of Supply Chain Security and Innovation



394 Pounds of Cocaine



A Decade of Supply Chain Security and Innovation



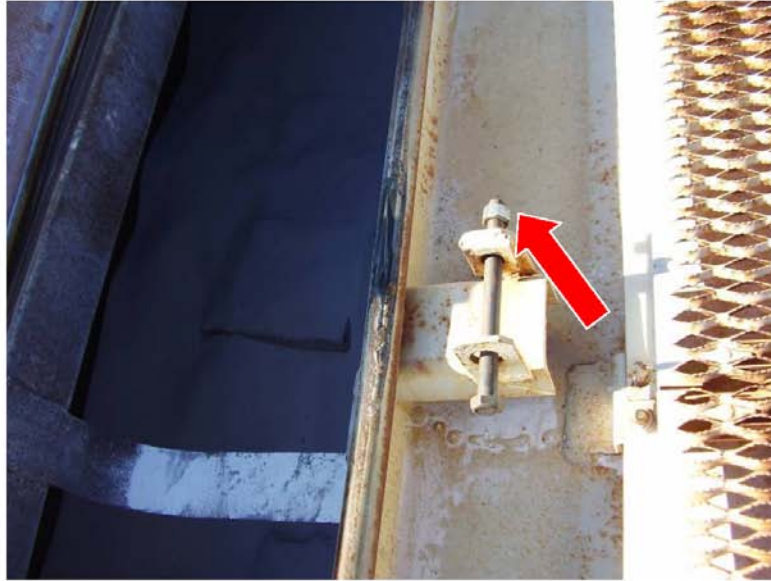
Rail Breach



A Decade of Supply Chain Security and Innovation



Tampered bolts



A Decade of Supply Chain Security and Innovation



Marijuana bundles



A Decade of Supply Chain Security and Innovation



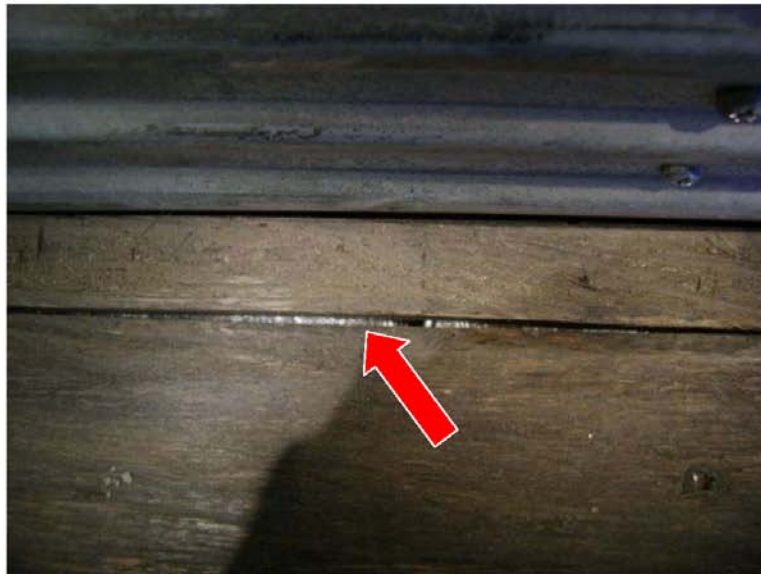
Improper Trailer Inspection



A Decade of Supply Chain Security and Innovation



The Obvious!



A Decade of Supply Chain Security and Innovation



7-point Inspection Workshop- El Paso



A Decade of Supply Chain Security and Innovation



2011

A Decade of Supply Chain Security
and Innovation



Supply Chain Security A Global Perspective

A Decade of Supply Chain Security
and Innovation

C-TPAT's International Strategy



- Partnering with the international trade community to help secure global supply chains.
- Partnering with individual Customs administrations.
- Support the work of international organizations such as the World Customs Organization (WCO) and the Asia Pacific Economic Council (APEC).
- Support the work of private sector organizations to improve the security and integrity requirements of their membership.

A Decade of Supply Chain Security and Innovation



Validation Visits By Region – March 1, 2011

- **Canada: 5,031**
- Mexico: 4,076
- Germany: 362
- United Kingdom: 180
- **Japan: 387**
- **Korea: 146**
- Hong Kong: 189
- Philippines: 202

- Dominican Republic: 60
- Panama: 15
- Colombia: 113
- Peru: 48
- **New Zealand: 47**
- **Jordan: 20**
- Turkey: 109
- South Africa: 28
- Egypt: 24

A Decade of Supply Chain Security and Innovation



Partnering with Individual Customs Administrations

- Providing Training and Technical Assistance
- Negotiating and Reaching Mutual Recognition Arrangements
- Working With Key Partners to Develop Additional Mechanisms to Accomplish the Mission



A Decade of Supply Chain Security and Innovation



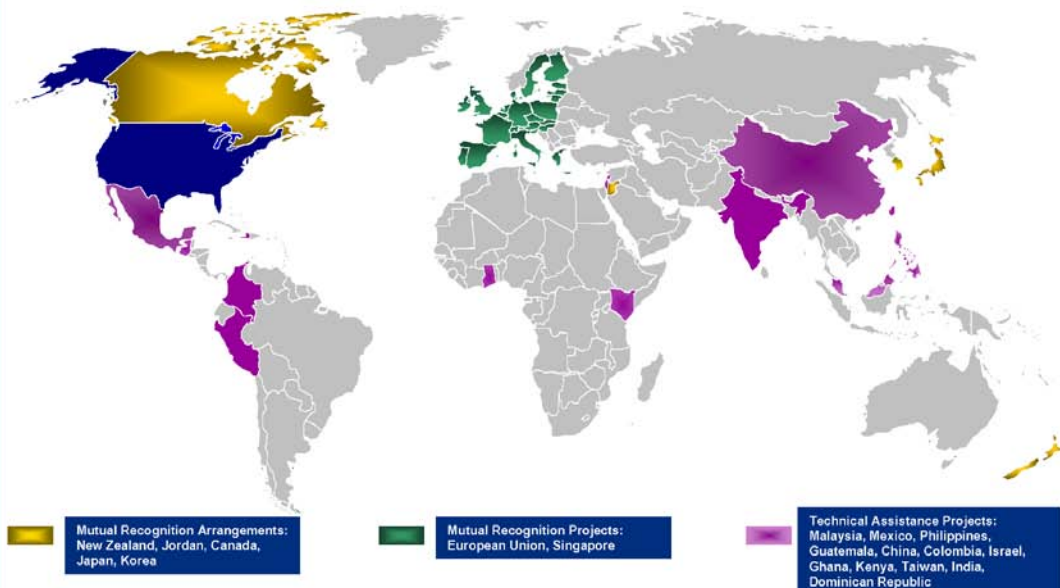
Providing Training and Technical Assistance

- China – General Administration of China Customs
- Colombia – Dirección De Impuestos y Aduanas Nacionales (DIAN)
- Dominican Republic – Dirección General de Aduanas (DGA)
- Ghana – Customs, Excise and Preventive Service
- India – The Central Board of Excise and Customs (CBEC)
- Israel – Israel Tax Authority, Customs Directorate
- Kenya – Kenya Revenue Authority
- México – Servicio de Administración Tributaria (SAT)
- Perú – Superintendencia Nacional de Administración Tributaria - (SUNAT)

A Decade of Supply Chain Security and Innovation



International Outreach



A Decade of Supply Chain Security and Innovation



Providing Training and Technical Assistance

Pre-Requisites for Training

- Program Has a Legal Foundation
- Program Has a Budget in Place
- Personnel Assigned to Develop / Implement the AEO Program

Duration: 3-5 Days – Both Theory and Practice

Topics:

- Eligibility Requirements
- Application, certification, and validation processes
- Minimum Security Criteria
- Benefits
- Suspension, Removals, Post Incident Analysis

A Decade of Supply Chain Security and Innovation



Mutual Recognition



“...it is well understood by all that mutual recognition is evolutionary rather than revolutionary in character. It will develop over time, probably first through bilateral agreements which can mature into multilateral and even groups of interconnecting multilateral pacts”.

Michael Schmitz

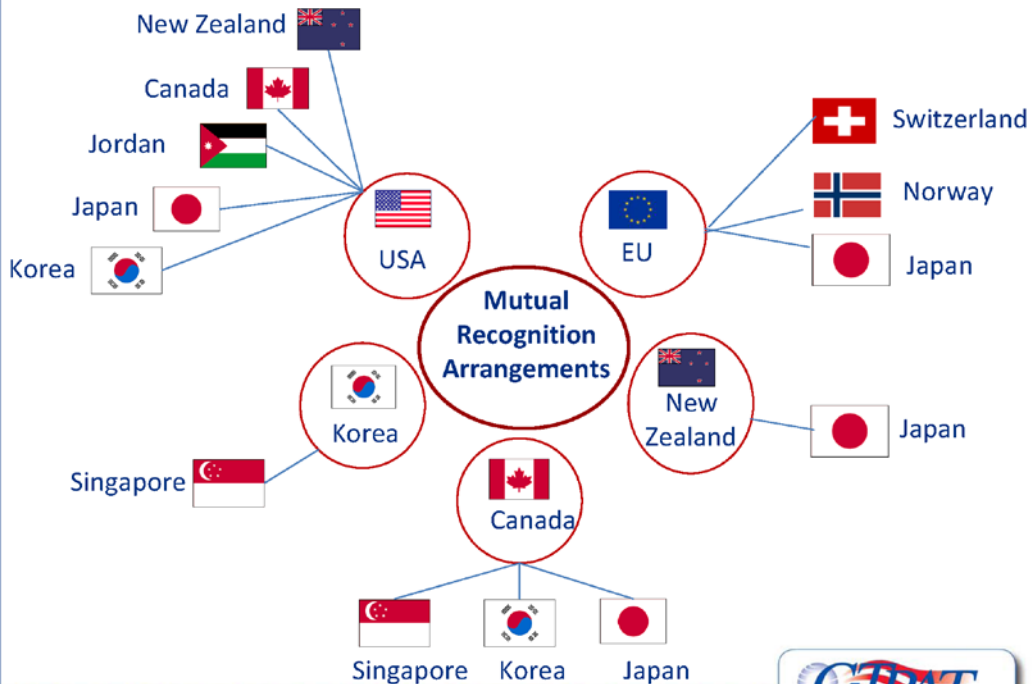
WCO Director – Compliance and Facilitation

WCO News – February 2008

A Decade of Supply Chain Security and Innovation




MRAs Around the World




A Decade of Supply Chain Security and Innovation





MRAs Signed by CBP

 New Zealand – Secure Export Scheme – June 2007

 Canada – Partners in Protection – June 2008

 Jordan – Golden List – June 2008

 Japan – Authorized Economic Operator – June 2009

 Korea – Authorized Economic Operator – June 2010

A Decade of Supply Chain Security and Innovation



Mutual Recognition – What It Is...

- Bilateral understanding between two Customs Administrations
- Security requirements or standards of the foreign industry partnership program, as well as its verification procedures, are the same or similar with those of the C-TPAT program.
- Based on security only / Compliance Issues Fall Outside the Scope of the MRA.
- Goal - link the various international industry partnership programs, so that together they create a unified and sustainable security posture that can assist in securing and facilitating global cargo trade

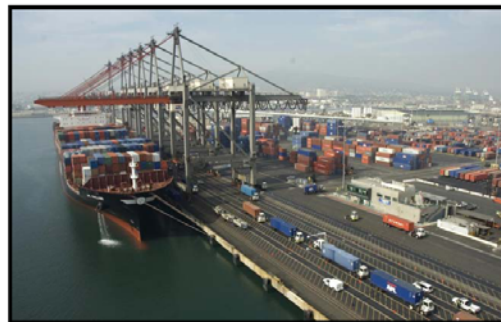
A Decade of Supply Chain Security and Innovation



Mutual Recognition - Basics

Four Step Process:

- Side by side comparison of program requirements
- Joint validations
- Actual signing of the document
- Implementation



Pre-Requisites:

- Foreign Customs Administration must have an operational program in place
- Methodology in place to review and validate their members
- Program must have a security component to it

A Decade of Supply Chain Security and Innovation



Benefits

For Customs Administrations:

- Unified Vision
- Similar / Compatible Security Standards
- Efficiency: Reduced Validations
- Risk Management Tool



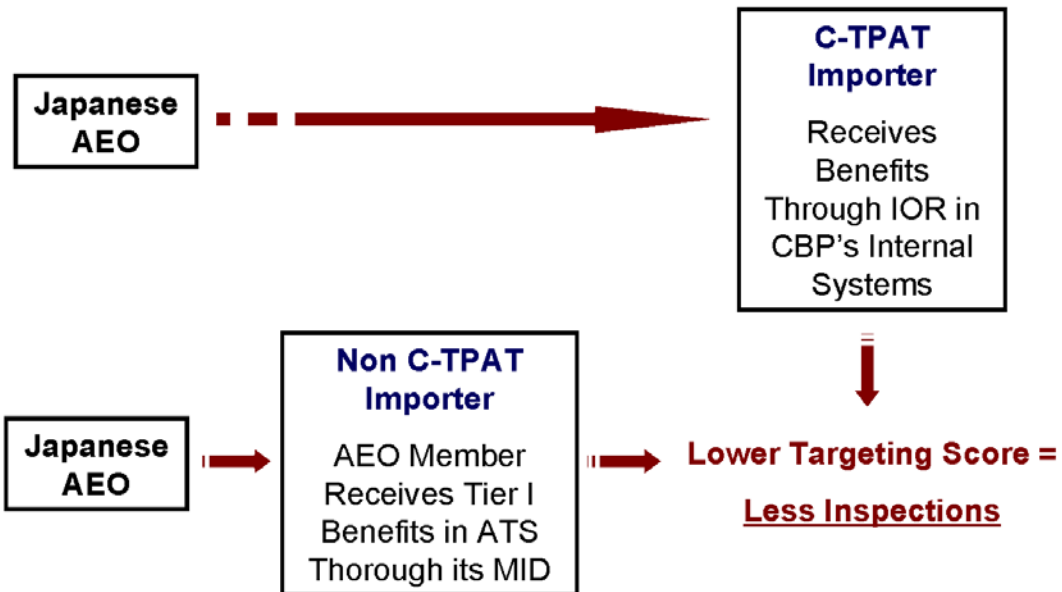
For Trade Partners:

- Single Set of Security Standards
- Eliminate Redundant Validation Visits
- Faster Validation Process
- Easier to Document Business Partners Meet Program's Minimum Criteria
- Foreign AEO Partners: A lower Targeting Score in CBP's ATS

A Decade of Supply Chain Security and Innovation



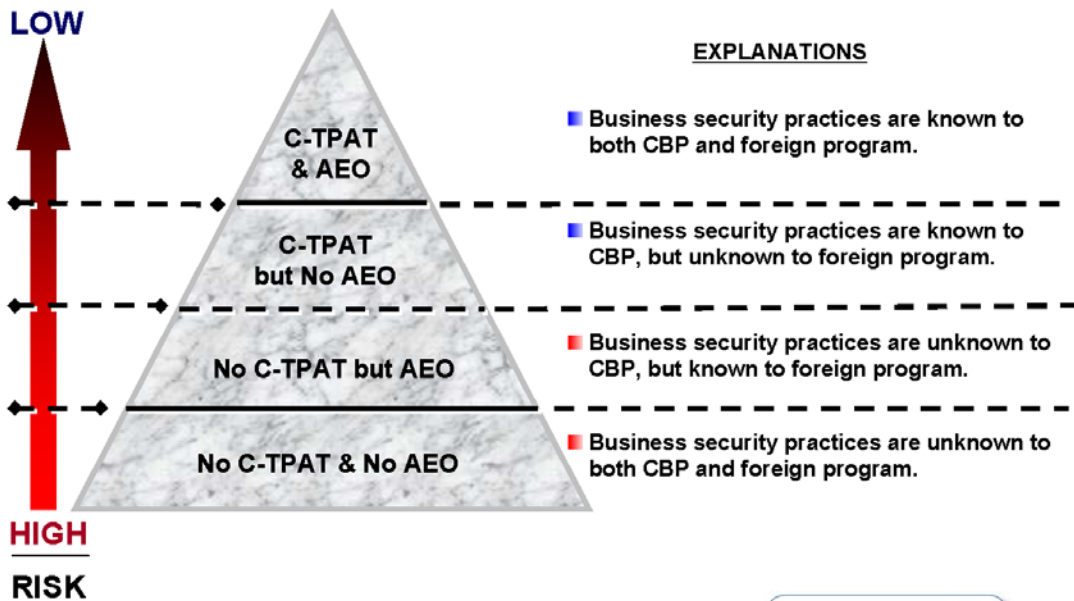
MR – Benefit – Lower Targeting Score



A Decade of Supply Chain Security and Innovation



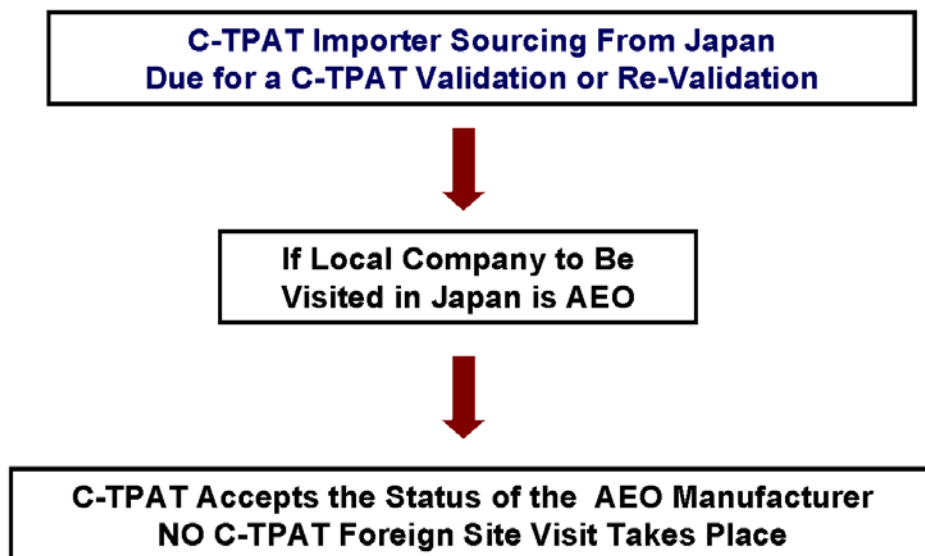
Mutual Recognition Security Model



A Decade of Supply Chain Security and Innovation



MR – Benefit – Less Redundant Validations



A Decade of Supply Chain Security and Innovation



MR – Benefit – Less Redundant Validations

Benefits

U.S. Importer – Does Not Have to Worry About The Foreign
Validation Visit / Faster Validation Process

Foreign AEO Manufacturer – Receives a Lower Targeting Score

Foreign Customs Administration – Can Claim to Provide an
Additional Benefit

U.S. Customs and Border Protection – Efficiency

Japan – CY 2010 – U.S. Dollars and Man Hours Saved

A Decade of Supply Chain Security and Innovation



Challenges with MR...

Operational

IT Connectivity – Non-Existent

Partner Identification Numbers – Different

Lack of Common Terms for Key Processes

Manage Expectations – Benefits

Mutual Recognition Is NOT a Green Lane

A Decade of Supply Chain Security and Innovation



Pending MRAs – European Union

Timeline

- EU Program Becomes Operational – January 2008
- Side by Side Theoretical Comparison – Completed
- Workshops in the EU – October-November 2009
- Joint Validations – Nov. 2010 - Present – 13 So Far in the EU

Next Steps

- Joint Validations in the US : April to June
- Continue With the Joint Validations in the EU – June to October
- Make Recommendation to Upper Management as to Next Steps

A Decade of Supply Chain Security and Innovation



MR Flyers



The screenshot shows the CBP.gov website in a Windows Internet Explorer browser. The page is titled "Mutual Recognition" and is part of the "Trade" section. It features a search bar, a navigation menu, and a list of links for "Mutual Recognition Information" and "Mutual Recognition Frequently Asked Questions".

U.S. Customs and Border Protection - Trade - Windows Internet Explorer provided by US Customs & Border Protection

https://www.cbp.gov/trade/cargo_security/ctpat/mra/

SEARCH

CBP.gov
Securing America's Borders

Home / Trade / Cargo Security / C-TPAT: Customs-Trade Partnership Against Terrorism /

Trade

- Automated Systems and Operational Support
- Basic Importing and Exporting
- Cargo Security
- Legal Decisions/Publications
- Priority Trade Issues
- Quicklinks
- Trade Outreach
- Trade Programs

Mutual Recognition

- Mutual Recognition Information**
- 03/10/2010
For Accessibility Information: OT508CONTACT@dhs.gov
pdf - 68 KB.
- Mutual Recognition Frequently Asked Questions**
- 03/30/2010
For Accessibility Information: OT508CONTACT@dhs.gov
pdf - 72 KB.

Search Mutual Recognition for: [input] GO

section sitemap for Mutual Recognition

see also:

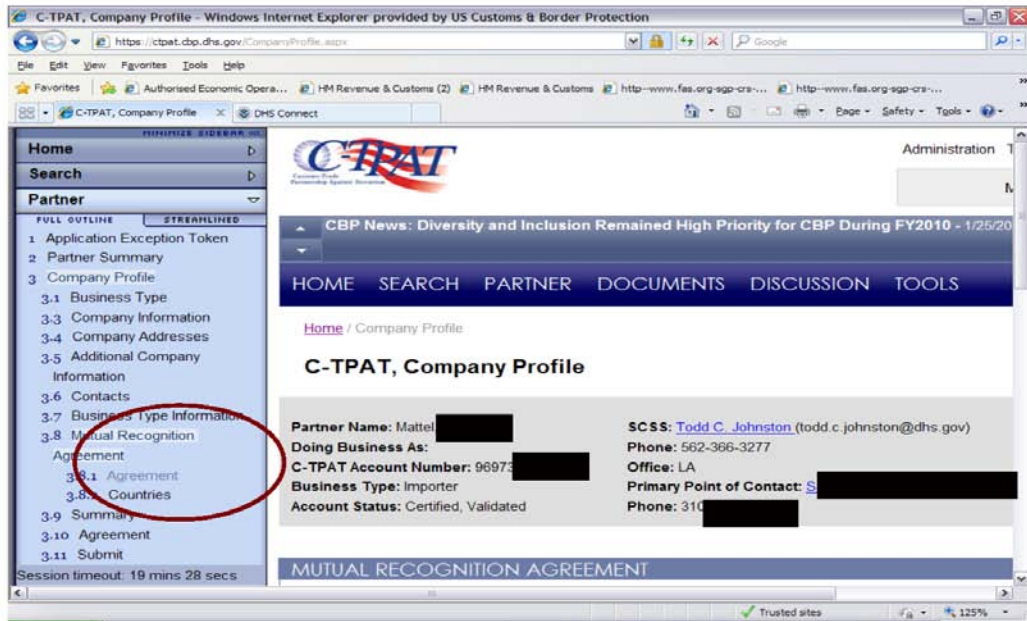
- in C-TPAT: Customs-Trade Partnership Against Terrorism:
 - Security Profile Review Information
 - 2011 C-TPAT Supply Chain Security Training Seminar Registration Notice
 - Annual Security Profile Review FAQ's
 - C-TPAT 2010 Partner Survey (pdf - 824 KB.)

Report Suspicious Activity to 1-800-BE-ALERT

A Decade of Supply Chain Security and Innovation



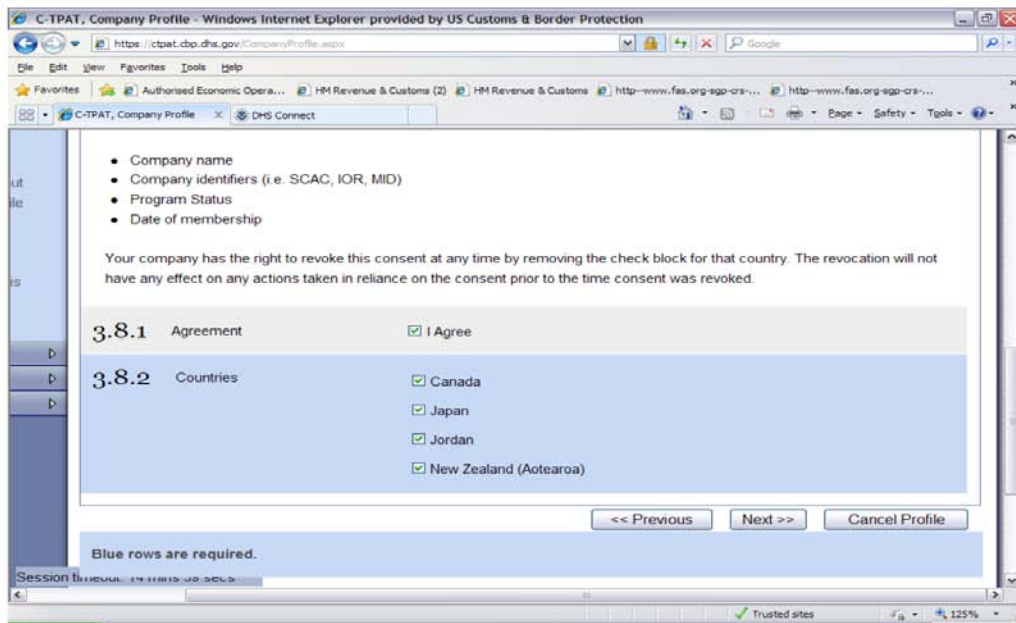
Portal and MR



A Decade of Supply Chain Security and Innovation



Portal and MR



A Decade of Supply Chain Security and Innovation



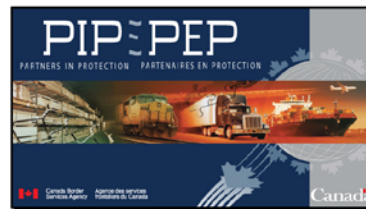
Other Key Partners – Canada

5,094 Validations in Canada

2,774 C-TPAT Members in Canada

Six Business Sectors in Canada Eligible for C-TPAT Membership

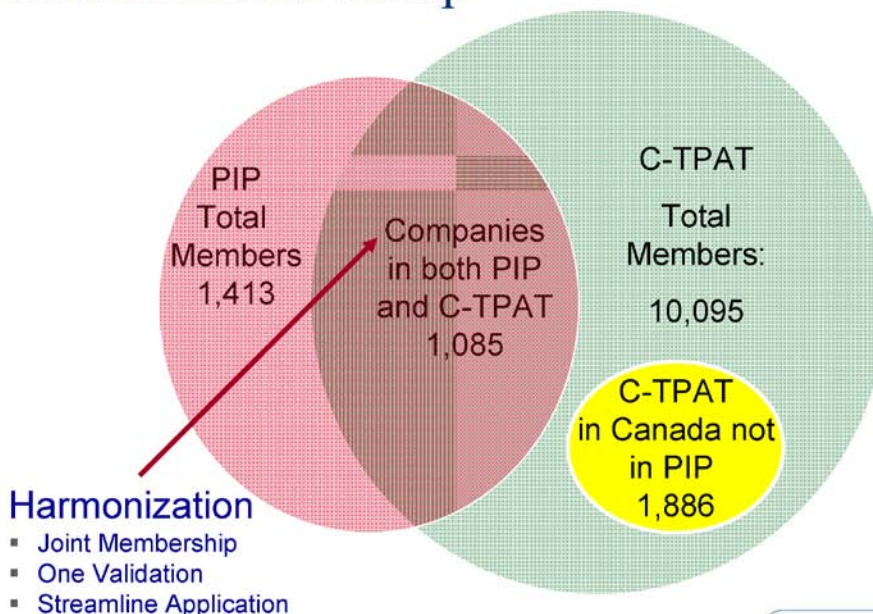
- Air Carrier – 2
- Importer – 1,116
- Highway Carriers - 1,503
- Manufacturers - 147
- Rail Carrier – 2
- Sea Carrier - 4



A Decade of Supply Chain Security and Innovation



Canada – Unique Relationship – Shared Membership



A Decade of Supply Chain Security and Innovation



Other Key Partners – Canada

As of March 2011

- PIP has completed 600 Total Validations
- PIP has conducted 205 Validations on Companies that are C-TPAT and PIP
- PIP has accepted 869 of C-TPAT validations.
- PIP and C-TPAT have completed 43 joint Validations

A Decade of Supply Chain Security and Innovation



Other Key Partners - Mexico



Programa Alianza Para un Comercio Seguro – PACS

- Program Director and Full Time Staff Identified
- Pilot To Be Announced Soon / Start with Exports

C-TPAT's Support to MX Customs

- Provided Two Training Seminars in Mexico City
- Supported Two Technical Assistance Missions in Washington DC
- MX Has Participated as Observers in 12 C-TPAT Validations
- Participated with MX on Outreach Events with the Trade Community
- MX Adopted C-TPAT's Security Criteria / Validation Process

A Decade of Supply Chain Security and Innovation



Other Key Partners – China

Third Party Validation Pilot Program

- SAFE Port Act Requirement
- Completed 2008

Three Rounds of Joint Validations with China Customs in China

- 40 C-TPAT Importer Members Validated

MOU on Supply Chain Security Collaboration - May 2010

- Action Plan – 100 C-TPAT Validations in China in 2011 and 2012

A Decade of Supply Chain Security and Innovation



Partnering with International Organizations

International Organizations

- World Customs Organization (WCO)
- Asia Pacific Economic Council (APEC)



Associations

- World BASC Organization
- COMCE (Mexican Foreign Trade Council)
- Others



Trade Conferences and Seminars

- Participate as presenters on dozens of trade events in the US and abroad

A Decade of Supply Chain Security and Innovation



Next Steps

- Strengthen Existing, Developing Relationships
- Engage with Other Customs Administrations Towards a MRA
- Continue to Support DHS as it Develops a *National Strategy on Global Supply Chain Security*
- Work Closer with the WCO

A Decade of Supply Chain Security and Innovation



Feedback - Input

Helps Us Be A Better Program



A Decade of Supply Chain Security and Innovation





Supply Chain Security

A Global Perspective

A Decade of Supply Chain Security
and Innovation





2011

A Decade of Supply Chain Security
and Innovation

Practical Suggestions to Mitigate
Cargo Security Risks

A Decade of Supply Chain Security and Innovation



Objectives

Examine seven risk indicators

- Sea Environment
- Air Environment
- Land Environment

Look at mitigating risk with C-TPAT criterion

Study examples of breached supply chains

A Decade of Supply Chain Security and Innovation



“BSI has determined that since 2004, at least 600 attacks targeting the supply chain have occurred – a rate that equals to one attack every four days.”

-BSi Grade-

A Decade of Supply Chain Security and Innovation



Risk Indicators

1. Surveillance
2. Elicitation/Collecting Information
3. Probing of Security
4. Acquiring Supplies
5. Suspicious People
6. Dry Run/Rehearsal
7. Positioning for the Compromise

A Decade of Supply Chain Security and Innovation



Surveillance

- Casing (photos/notes of movements)
- Following employees
- Studying Routes
- Corporate espionage/theft
- Posing as employees/vendors
- Studying Entrances

A Decade of Supply Chain Security and Innovation



Surveillance

Sea Environment

- Doc workers monitoring vessel docking location
- Entrances and exits of seaport (port authority)
- Container staging

Air Environment

- Warehouse security camera positioning
- Accessibility to airfield or consolidation station

Land Environment

- Frequency of border crossings by driver, company, or logistics provider by "Spotters"

A Decade of Supply Chain Security and Innovation



Elicitation/Seeking Information

Targeting employees to befriend

Social engineering

Posing as vendors

Use of fraudulent e-mails and faxes

Making unusual inquiries

Accessing unauthorized IT systems

A Decade of Supply Chain Security and Innovation



Elicitation/Seeking Information

Sea Environment

- Gathering Basic Information Utilizing A Ship's Automatic Identification System
- Enquiring about a vessel's ship security plan, schematics, and load plan
- Acquiring information on doc worker movements and schedules

Air Environment

- Gauging ramp crew movements and schedules both on and off duty
- Asking questions about security protocols for aircraft and cargo

Land Environment

- Monitoring driver movements for trends and patterns
- Asking seemingly benign questions about a load, routing or destination

A Decade of Supply Chain Security and Innovation



Probing Security

Driving past the intended target

Penetrating the intended target

Purposely activating alarms

Testing established procedures for gaps

A Decade of Supply Chain Security and Innovation



Probing Security

Sea Environment

- Doc employees on premises on days off
- Staging containers and heavy equipment

Air Environment

- Entering the airfield/warehouse with unauthorized personal belongings
- Entering a restricted zone without proper credentials

Land Environment

- Leaving predetermined routes
- Prolonging previously established transit times to the border

A Decade of Supply Chain Security and Innovation



Contraband Behind Aft Cargo Panel



A Decade of Supply Chain Security and Innovation



Total of 62 Packages



A Decade of Supply Chain Security and Innovation



Acquiring Supplies

- Lost/Stolen uniforms
- Lost/Stolen employee IDs
- Missing high security seals
- Collecting used seals
- Missing branded boxes/packaging material

A Decade of Supply Chain Security and Innovation



Acquiring Supplies

Sea Environment

- Port/vessel employees reporting missing boiler suites and hard hats
- Missing trade specific tools

Air Environment

- Employees losing multiple IDs
- Accountability for ULD's, "Cookie Sheets" and pallets

Land Environment

- Employee acquires tools necessary to modify the tractor and trailer
- Devices to block GPS signal, mechanical or technological

A Decade of Supply Chain Security and Innovation



Replica packaging material



A Decade of Supply Chain Security and Innovation



Heroin imbedded in wood



A Decade of Supply Chain Security and Innovation



Heroin package with special markings



A Decade of Supply Chain Security and Innovation



Suspicious People

Individuals that do not belong

Demeanor does not relate to location/area

Types of questions asked

Unusual behavior

A Decade of Supply Chain Security and Innovation



Suspicious People

Someone unfamiliar loitering in your parking lot, office building, or warehouse

Anyone asking a lot of questions < especially concerning routes or loads or drop-off times.

Employers should be alert for unusual employment applications. Don't assume it couldn't be an inside job.

A Decade of Supply Chain Security and Innovation



Dry Run/Rehearsal

Monitoring response times to an incident

Shipping unrelated un-manifested items

Fake shipping documents

Unanticipated problems on a routine bases

A Decade of Supply Chain Security and Innovation



Dry Run/Rehearsal

Sea Environment

- Attempting to pick up container without proper documentation
- Creating fake shipping documents/ghost company
- Shipping cargo to a fake address

Air Environment

- Staging bogus items in the aircraft/cargo
- Clone airway bill and similar shipment for pick-up

Land Environment

- Brake/replace seal and cross border
- commingle un manifested goods with legitimate cargo

A Decade of Supply Chain Security and Innovation



Unknown device at importer premises



A Decade of Supply Chain Security and Innovation



Box comingled with manifested goods



A Decade of Supply Chain Security and Innovation



Positioning for the Compromise

Getting into position

Crew/conspirators on high alert

Behavioral changes in demeanor and appearance

Unusual requests and breaking from routine

A Decade of Supply Chain Security and Innovation



Positioning for the Compromise

Sea Environment

- Unauthorized schedule changes
- Uncharacteristic change in employees behavior and appearance

Air Environment

- Last minute swap/request to work specifics flights, days or times
- Employee reports to work in unusually baggy clothing

Land Environment

- A driver adamant about driving a specific load across the border
- Reporting to truck yard extremely early/late on specific days/routes

A Decade of Supply Chain Security and Innovation



Other Risk Indicators

First time shipper

Paying in cash

Address not in line with common business districts

Weights, values, quantities don't support manifested cargo

A Decade of Supply Chain Security and Innovation




Mitigating Risk

- Business Partner Requirement
- Container Security
- Container Inspection
- Physical Access Controls
- Personnel Security
- Procedural Security
- Security Training and Threat Awareness
- Information Technology Security

A Decade of Supply Chain Security and Innovation



Anyone Can Be A Hero






Report Suspicious Activity

If you see someone:

- **Watching** company activities;
- Trying to **befriend** our employees;
- **Testing** the security system;
- **Stealing** company property; or
- Acting **suspicious in any way**

Contact your supervisor immediately or call the number listed

A Decade of Supply Chain Security and Innovation



2011

A Decade of Supply Chain Security and Innovation