SECURE EXPORTS SCHEME SECURITY PLAN

This fact sheet explains the requirements for the Secure Exports Scheme security plan. New Zealand Customs Service has developed the Secure Exports Scheme (SES) in response to the need for increased security surrounding goods for export.

WHY HAS THE SECURE EXPORTS SCHEME BEEN INTRODUCED?

The purpose of the Secure Exports Scheme is to help ensure that goods for export are packaged securely, with no other goods and conveyed to the place of shipment securely and without interference, before shipping.

WHAT IS A SECURITY PLAN?

A security plan documents the policies, processes and procedures that a company has in place to ensure that goods for export are securely packed, accurately accounted for and securely transported to the point of export from New Zealand.

WHAT INFORMATION IS REQUIRED IN THE SECURITY PLAN?

The security plan must detail the company's written and verifiable policies, processes and/or procedures in place to meet the following security criteria:

- procedural security
- document security
- physical security
- access controls
- personnel security
- education and training
- other government agency requirements (where applicable).

To assist with developing a security plan, these criteria are described in more detail below.

WHAT IF ONE OF THESE SECURITY CRITERIA DOES NOT APPLY TO MY COMPANY?

Some of the elements within the security criteria will not be applicable to all export companies eg, businesses operating solely from an office environment. Please include a comment in your security plan, under the security element heading about why it does not apply.

CAN I INCLUDE REFERENCES IN THE SECURITY PLAN?

Yes, you can include references to standard operating procedures, provided this is prefaced with a short summary which covers the criteria and is clearly referenced to your site operating procedures (SOPs).

WHAT ABOUT STORAGE SITES/ PACKING SITES AND TRANSPORT OPERATORS HANDLING YOUR EXPORT GOODS?

As part of your security plan, you will need to include security plans provided by third party operated sites and transport operators that are contracted to either pack, store or transport your export goods.

Customs needs to see that your arrangements with these companies/ operators include the minimum security standards and that there is a method of checking that these standards are met. If the contracted third party sites and transport operators have already been approved by Customs, you will need to ensure their existing security plans align with your company's specific secure handling requirements.

DO ALL SITES NEED TO BE COVERED IN THE SECURITY PLAN?

Yes, the security plan must cover all sites where export goods are packed into approved secure packages and held ready for transportation. A security plan is not required from port companies or international airports where goods are only delivered for export, unless they are undertaking the packing of export goods into approved secure packages within the Port/Airport environment.

DOES MY COMPANY HAVE TO PUT UP FENCES, AND BUY CAMERAS OR ALARM SYSTEMS?

Customs recognises that all businesses operate differently. While fences, alarms, and cameras are common methods of monitoring or deterring unauthorised access to a site, your company may have

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other acceptable means of doing this. Document these methods in your security plan.

CAN I GET ASSISTANCE FROM CUSTOMS?

Customs can provide assistance in clarifying the information that needs to be presented in your security plan. You can contact your local Customs office or the Customs Call Centre on 0800 428 786.

HOW SECURE IS MY SECURITY PLAN INFORMATION WITHIN CUSTOMS?

The security plan is for Customs' purposes only and will not be shared. When the security plan is finalised, Customs will retain an electronic PDF copy of the plan and the manual copy will be returned to you or destroyed as required. Access to the electronic PDF file is restricted and recorded.

FOR FURTHER INFORMATION

Contact your nearest office of the New Zealand Customs Service, visit the Customs website www.customs.govt.nz, or call Customs on 0800 428 786 (0800 4 CUSTOMS).

GUIDE TO PREPARING YOUR SECURITY PLAN

The following is a guide to assist with preparing a security plan, which should cover each of the security criteria headings detailed below. Where applicable, minimum requirements for a security plan are identified by a double asterisk**

ADMINISTRATION

Include the following:

- full company name (legal operating entity)
- company address and all site addresses including your transport operator/s
- key contact details for the applicant, including a contact person, telephone numbers, and email address
- short introductory comment on the company's history/activities including the number of employees that are normally at your site
- identification of the company on the first page, and each page containing the page number, date, and version number.

PROCEDURAL SECURITY

Procedural security covers knowledge of the participants in your international supply chain and the cargo that is packed for export, supported by quality assurance procedures that protect against the introduction of unmanifested or unknown items/goods.

Procedural security includes:

- the secure packages used and the type of Customs-approved seal/marking/substance or device to be applied to the package
- pre-pack accuracy
- loading security around containers or other approved secure packages
- management of Customs-approved seal/marking/substance or device to be applied to the approved secure packages

- reporting anomalies and suspicious activity
- documented working/business practices
- contingency planning for events.

Secure packages and the Customs-approved seal/marking/substances or device to be applied to the package

Describe the type of secure package that is to be used to export your goods and the Customs-approved seal/marking/substance or device to be applied to the approved secure package.

Include the following:

1. **Description of the various types of approved secure package that are used to export your goods eg, container, pallet, tank.
2. **Detail the Customs-approved seal/marking/substance or device that is to be applied to the approved secure package as soon as loading is completed.

    Note:

    As soon as the approved secure package is secured with the Customs-approved seal/marking/substance or device, the goods are subject to the control of Customs. It is an offence to apply a Customs-approved seal/ marking/substance or device to a non-approved package and (unless authorised or other lawful access is required) to tamper/interfere with a secure package to which a Customs-approved seal/marking/substance or device has been applied.

Pre-pack accuracy

Describe the controls or procedures used to ensure that goods are properly marked, weighed, counted and subsequently documented in packing lists, invoices, shipping and Customs documentation prior to loading.

Include the following:

1. **A process map (see Fact Sheet 34B) to illustrate the physical and documentary activities for the export supply chain ie, the flow of goods and documentation used from production to the point of export.
2. **List the documentation used to identify products to be loaded eg, packing/pick list and/or tally sheet.
3. **The checks that are in place to verify the goods have been properly marked, weighed, counted and reconciled.
4. **The relevant documentation records the name and signature of person undertaking the final check for pre-load accuracy.
5. **The procedures for the reporting of errors in documentation or with product lines.
6. The inventory system for managing export goods/stock control and frequency of checks.
7. Other controls including data matching/reconciliation between packing and invoicing.

Loading security around containers and/or other packages

Describe the controls that prevent unauthorised access to containers or other packages during packing and loading for export.

Include the following:

1. **How the mandatory 7/8 point interior and exterior inspection of the empty container is undertaken prior to loading. The elements of the 7/8 point container inspection are; front wall, left side, right side, inside/outside doors, floor, ceiling/roof and outside/undercarriage, motor area (refrigerated containers only).

2. **Identify all of the parties involved in completing the 7/8 point inspection.

   Note:
   All or part of this inspection can be completed by your transport operator or third party operator prior to loading provided it is documented, signed off by each party and retained by the load site.

3. **Identify the documentation used for sign off by the person/s responsible to verify that all pre-load inspection checks have been undertaken.

4. **Detail the procedures for checking goods <u>during loading</u> into the approved secure package against the pick/packing list or load sheet and identify the document used to record the checks and the position responsible for signing off the load as correct.

5. **Detail the procedures to ensure that only goods belonging to the SES exporter are loaded into the approved secure package.

6. **Detail the continuous monitoring procedures that will be maintained during loading/packing of export product into the approved secure package.

   Note:
   There must be a staff member present at all times during loading.

7. **Identify the position responsible for supervision for approved package loading and any other specific load out area controls in place eg, restricted personnel access during load out, CCTV coverage of the load out area.)

   Note:
   Supervision relates to the control of personnel and does not require continuous presence during loading.

8. The position responsible for applying the Customs-approved seal/marking/substance or device immediately on the completion of loading. If the approved package cannot be sealed immediately detail the procedures to ensure security of the product until the package is sealed.

9. **The position responsible to undertake the physical check of the seal/marking/substance or device. Identify the documentation used to record this check which confirms the seal number and that the seal has been correctly applied.

   Note:
   The physical check may include twisting the bolt to ensure the barrel and lock mechanisms is correctly engaged and pulling on the cable to ensure it is captured by the locking device.

10. **The procedures that protect partially packed approved secure packages from unauthorised access during load breaks and at the close of business. The use and security of any temporary locking mechanisms to protect the approved package are to fully detailed.

    Note:
    Doors on containers must be secured at all times when staff are not present.

11. **Describe, where applicable, the additional procedures used when undertaking collection of export goods loaded into a container at more than one secure site ie, multiple site load pickups.

(commonly called "milk runs").

   Note:
   Security of the load must be maintained and documented at each stage during transport and pick up. The Customs approved seal must be applied on at the final collection point.

12. **Identify the documentation, signed by the transport operator and retained by the site, that records the checks undertaken by the road transport operator at the time of collection of the approved secure package (ie, the physical check of the Customs-approved seal and container number).

   Note:
   The physical check may include twisting the bolt to ensure the barrel and lock mechanisms are securely engaged and pulling on the cable to ensure it is captured by the locking device.

13 **Describe the procedures for storage of approved packages sealed but not immediately transported to the port of loading that maintain the integrity/security of the approved package.

   Note:
   Must be held within an approved secure site and checks undertaken that the seal remains intact.

14. **Describe, where applicable, the documented checks undertaken on receipt of made up packages eg, masterpacks etc being transferred between approved secure sites. Checks of made up packages may include confirming that the outside wrapping/packaging is intact.

   Note:
   Made up packages are defined as product that has been assembled or combined into a larger package that has not been secured with a Customs-approved seal/marking/substance or device.

Customs-approved seal/marking/substance or device applied to export packages

The written procedures that stipulate how the Customs-approved seal/marking/substance or device is to be received, securely stored, accessed, used and accounted for.

Include the following:

1. **Describe the register (in manual or electronic format), that will be maintained and secured to record the seal number, date of receipt, date of usage and use (eg, transferred to another party, container number the seal has been applied to, or if damaged and destroyed).

    Note:
    The SES partner must take physical possession of the Customs-approved seal/marking/substance or device and reconcile the seal numbers at the time of receipt before distribution to their approved secure sites.

2. **Describe the security for the Customs-approved seal/marking/substance or device including (a) where stored, (b) how this area is secured at all times and (c) who has access.

3. **The position of the person responsible for control and distribution of the Customs-approved seal/marking/substance or device.

4. **Detail the distribution practices for the delivery of seal/marking/substance or device to approved secure sites by the SES partner.

5. Describe any contractual arrangements with approved providers for maintaining security in the supply of any seal/marking/substance or device manufactured exclusively for your company's use.

Reporting anomalies and suspicious activity

Describe the procedures for reporting anomalies, suspicious activity and/or illegal activity when it is detected or suspected.

Include the following:

1. **Describe how staff and contractors report any breaches of security to a supervisor or manager.

2. **Procedures for promptly reporting to a contact point provided by Customs all incidents where:

    *   seals are found to be lost/missing
    *   interference with export goods
    *   seal tampering is suspected or detected on site and when advised by your transport operator after departure from site
    *   breaches of security occurring within the site area (after appropriate investigation is completed)
    *   seal broken during inspection undertaken by another government agency.

3. **Detail procedures for reporting to Customs when staff have suspicions or concerns about any unusual cargo documentation or when receiving out of the ordinary requests for information on shipments.

4. **Identify the locations where Customs contact numbers will be prominently displayed.

5. The company position responsible for completing internal investigation procedures in relation to security breaches/seal tampering and reporting the result to Customs.

6. The use of internal incident reporting forms.

Documented working/business practices

Describe the methods to ensure that your company policies in relation to goods for export are being met.

Include the following:

1. **The documented quality control measures in place that regularly verify that the company procedures are complied with. The following

SES procedures must be subject to quality control measures and the results recorded.

*   Seal register maintenance including regular stock reconciliations to identify missing/lost seals
*   Security practices for Customs-approved seals is being maintained
*   Compliance with container loading procedures
*   Keys/access cards register maintained
*   Transport operator sign off practices at the time of collection of approved packages
*   7/8 secure package inspection sign off practices.

2. **Identify the position, within the company, responsible for completing quality control measures including the response to non compliance.

3. **The SES partner maintains a regular programme to ensure their nominated secure sites comply with SES standards.

4. **The SES partner or secure site operator must list all nominated transport operators contracted to transport approved secure packages.

5. **The SES partner/secure site operator demonstrates that they have a security component in their selection process, for all external contractors, that have access to their site and manage any subcontracting.

    Note:
    The SES partner/secure site must be satisfied that the selected contractors/subcontractors have procedures for positive identification of employees and that they will maintain controls on any access devices provided.

6. **The quality assurance procedures for post clearance checks on export entries (including entries lodged by

your Customs brokers) to confirm accuracy of the declaration made to Customs. eg, shipping details, tariff classification, description of goods, FOB value, SES details.

7. **The controls relating to lodging amendments for export clearances when errors are detected, export clearance cancellation and responding to Customs rejected export clearances.

8. The steps that you take to identify your offshore customers and know they are legitimate.

Contingency planning for events

Identify contingency plans for emergency/security situations.

Include the following:

1. **Documented procedures on how the security of the following sensitive areas are maintained during building/site evacuations and how staff, visitors and contractors on site are accounted for.

   – Storage areas.

   – Office.

   – Container loading areas.

   Note:
   Partially loaded containers that are left unattended and cannot be monitored during an emergency evacuation must be repacked on resumption.

2. Contingency plan procedures for maintaining security on loaded secure packages subject to transport breakdown or port security closure.

3. A plan that details the business continuity response in the event of border closure in New Zealand.

DOCUMENT SECURITY

Document security covers procedures that ensure information stated on export entries, other Customs declarations, and other documentation is accurate and cannot be tampered with.

Document security includes:

• hard copy documents.

• information technology.

Hard copy documents

Include the following:

1. **How export documents, including invoices and export clearances, are stored securely.

2. **Confirm that export documentation archives are retained in hard copy or electronic format for seven years.

3. The controls on personnel removing documents or files from the office.

4. The security measures in place for documents that bear your company logo (brand) or company names (eg, letterheads, invoices, carters' notes, company stationery, packaging, branded tape).

Information technology

Include the following:

1. **Controls to ensure the security and prevention of misuse of Customs declarant/unique user identifier codes allocated to your employees by Customs.

2. **Controls to ensure the security and prevention of misuse of your Customs client code/s.

3. **Information security related controls in place to protect the computer systems from unauthorised access (ie, firewalls, log in passwords and screen saver lockouts, after a period of inactivity, including policies that prohibit the sharing of passwords.

4. Procedures and back up capabilities in place to protect against the loss of information.

5. System in place to identify the abuse of IT, including improper access, tampering or the altering of business data.

6. Automated systems using

individually assigned accounts that require a periodic change of password.

PHYSICAL SECURITY

Physical security covers the buildings and sites where export goods are packed and stored and are resistant to unauthorised entry.

Physical security includes:

• site plan

• perimeter controls

• lighting

• locking devices, including electronic access controls

• cargo segregation

• additional security.

Site plan

The site plan is used to identify any perimeter controls, buildings, parking areas, security lighting, export storage areas, container loading areas and all access points including for buildings.

See Fact Sheet 34C for more information.

Perimeter controls

Describe the measures that are in place to resist unauthorised entry to premises where goods for export are packed and stored.

Include the following:

1. **Describe the physical security measures in place that control access to the site eg, perimeter fencing, gates, access points.

2. **Describe security features that restrict access to key buildings and sensitive areas including hours of operation.

   Note:
   Key buildings and sensitive areas are: Offices containing export documentation and Customs approved seals/markings/substances or devices, buildings used for storage of export products and container loadout areas.

3. **Maintenance programme for

checking and maintaining buildings, lighting and site perimeter controls.

4. The operating procedures used by security personnel or security contractors including incident reporting and patrols of site.

5. Environmental elements in the surrounding area that may have a positive effect on security of the site.

Lighting

Detail any internal and/or external lighting facilities on site that contribute to security.

Include the following:

1. **Identify the types of security lighting in operation for office, storage and loading areas and how it is activated.

2. Describe any lighting used to illuminate fence lines, parking areas and entrances/exits.

Locking devices, including electronic access controls

Describe the type of mechanical/electronic locking devices/systems used to protect your site and buildings including how access is controlled after business hours.

Include the following:

1. **Detail specific security locking systems (key/code/card etc) in place to control access to export documentation and export goods areas inside/outside business hours.

2. **Describe the issue of access keys/codes/cards is specifically controlled by management or security personnel and a register of security keys/cards/alarm codes is maintained in a secure manner.

3. Procedures for issuing, removing and changing access devices (eg, keys, key cards) and alarm codes including procedures when codes/keys/key cards are compromised, lost or stolen.

4. Detail any other types of locking mechanisms or alternative access

control measures used for doors, external and internal windows, gates and fences.

Cargo segregation

Detail the segregation/separation of international, domestic and dangerous goods within the site.

Include the following:

1. Describe if different treatment used or specific branding/marking etc, is applied to goods destined for international or domestic market.

Additional security

Describe other security measures in place on site (eg, alarms, security patrols etc).

Include the following:

1. Any CCTV operating procedures, identify the type recording system, how it is monitored and the time period for storage of images.

2. Security arrangements, including contractual agreements with external security contractors, concerning procedures for monitoring alarms, responding to activation, and alarm system maintenance.

3. How alarm codes to deactivate the building's alarm system are individually assigned and restricted to only those with a need to have access to the premises.

4. Procedures for the periodic review of alarm deactivation to identify patterns of unusual access.

ACCESS CONTROLS

Access controls cover operationally appropriate measures to maintain control of company personnel and visitors to the site/premises, in order to protect company assets and prevent unauthorised access.

Access controls include:

- employees
- site visitors/contractors
- vehicle access, including transport operators.

Employees

Describe how access by company personnel to the premises/site is controlled at all times.

Include the following:

1. **Describe the nature of the system used to identify individuals on site as company personnel (eg, small number of staff all known by management, biometric identification, branded overalls, ID tags, high visibility safety wear with company brand depicted).

2 **Describe how access by staff into and around the site is controlled.

3. **During load out activity and unless specifically authorised, only personnel directly involved in the loading of the container/secure package are present in the load out area.

4. Any other controls relating to employee access including hours of operation.

Visitors/contractors

Describe positive identification procedures and access controls to the premises/site at all times for visitors/contractors.

Include the following:

1. **Describe the access controls for visitors arriving at and moving around site, including sign in, positive identification and sign out procedures.

2. **How contractors are identified and monitored on site including reporting procedures used for recognition and work allocation (eg, induction requirements, branded clothing, ID tags, high-visibility safety wear).

3. **Identify the designated company position/s that are responsible for monitoring visitors/contractors whilst on site.

4. Company policy for accompanying visitors while on site.

VEHICLE ACCESS INCLUDING TRANSPORT OPERATORS

Describe the measures used to keep unauthorised vehicles separate from export cargo handling, packing and loading areas, and to control transport operators during collection/delivery.

Include the following:

1. **The vehicle parking facilities provided for visitors, company personnel and contractors are within clearly designated areas.

2. **The vehicle parking facilities during load out are restricted unless specifically authorized by company, in which case, describe the measures in place to protect the export product.

3. **Vehicle access controls for transport operators during and after business hours. eg, contractual arrangements including standards for identification, access provisions, reporting requirements on access and departure from site.

4. The areas of access that transport personnel are limited to on site and describe the measures for monitoring their presence.

PERSONNEL SECURITY

Describe the company procedures that maintain assurance over the integrity of personnel in positions directly involved with order processing, packing, storing or shipping export cargo, or completing company documentation.

Include the following:

1. **Identify the key company roles/positions that have management responsibility, for export documentation, packing goods and the loading of goods for export.

2. **The pre-employment checks conducted for all positions and ongoing procedures to maintain personnel integrity for key positions (ie, positive ID checks, reference checks and ongoing reviews for key positions).

3. **Procedures for cessation of employment for personnel involved in international supply chain positions (eg, return of ID cards, company branded property, company uniforms, keys/codes/cards and removal of computer access).

4. Company code of conduct provisions that relate to integrity.

5. Checklist used for new employee induction.

EDUCATION AND TRAINING

Describe the ongoing communication of security policies and the awareness training provided to promote the identification of potential security risks.

Include the following:

1. **The security induction and basic SES awareness training, including the challenging of persons found in areas where access is not authorized, is delivered to company personnel and as appropriate provided to relevant contractors/transport operators.

2. **The additional SES awareness training that is provided to company personnel in key positions including supervisors, staff in loading area and export documentation officers.

3. How security awareness is provided to visitors to site.

4. How any new Customs information would be communicated to company personnel, contractors and transport operators.

OTHER GOVERNMENT AGENCY REQUIREMENTS

Describe the other government agency processes and procedures, undertaken by your company, that contribute to securing your international supply chain.

Include the following:

1. Reference any Ministry of Agriculture and Forestry accreditation that applies to goods for export including any allocated site number reference.

2. Record your approval as a known shipper under the Civil Aviation Authority Regulation 109 or registration as a Regulated Air Cargo Agent (RACA).

3. Reference your procedures for types of export goods that are controlled by the Ministry of Foreign Affairs and Trade (MFAT). (eg, dual use strategic goods).

FOR FURTHER INFORMATION

Contact your nearest office of the New Zealand Customs Service, visit the Customs website www.customs.govt.nz or call Customs on 0800 428 786 (0800 4 CUSTOMS).