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# ❖ SPC&B Update ❖

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A Newsletter for Clients of Sharretts, Paley, Carter & Blauvelt, P.C.

July 21, 2010

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## *CBP Posts Supply Chain Security Risk Assessment Guide*



Customs & Border Protection (CBP) posted a “C-TPAT 5 Step Risk Assessment Process Guide” on its website, to assist members in conducting an international security risk assessment of their supply chains, a project that is part of the minimum security criteria for C-TPAT participation. During validations and revalidations, CBP has found that many C-TPAT members were not assessing potential threats and vulnerabilities in their international supply chains.

The 5 Step Risk Assessment Process consists of:

- Mapping Cargo and Business Partners — identifying business partners and how cargo moves throughout the supply chain to include modes of transportation (air, sea, rail, or truck) and nodes (country of origin, transit points)
- Conducting a Threat Assessment — identifying such threats as terrorism, contraband/human smuggling, organized crime, or other conditions that may increase the probability of a security breach
- Conducting a Security Vulnerability Assessment — Based on C-TPAT minimum security criteria, determining if business partners have gaps, vulnerabilities, or weaknesses that may lead to a security breach.
- Preparing an Action Plan to address Vulnerabilities — developing a written strategy to address potential gaps, vulnerabilities, and weaknesses
- Documenting How the Security Risk Assessment is Conducted — writing the policies/procedures for conducting the risk assessment

CBP specifically states that C-TPAT members are not required to utilize the 5 Step Risk Assessment Process, but it does expect all members to have a documented process for determining and addressing security risks. The 5 Step Guide can be accessed at [http://cbp.gov/xp/cgov/trade/cargo\\_security/ctpat/supply\\_chain/](http://cbp.gov/xp/cgov/trade/cargo_security/ctpat/supply_chain/).

If your company needs assistance in documenting its risk assessment process, or if you are not currently a C-TPAT member and would like to know more about the C-TPAT program, please contact Gail Cumins at [gcumins@spcblaw.com](mailto:gcumins@spcblaw.com), Donna Shira at [dshira@spcblaw.com](mailto:dshira@spcblaw.com), or Peter Baskin at [pjbaskin@spcblaw.com](mailto:pjbaskin@spcblaw.com), or call us at 212-425-0055.

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