



WORLD SHIPPING COUNCIL  
PARTNERS IN AMERICA'S TRADE

## World Shipping Council Responds to Customs' Request for Information on Secure Container Technology

---

### ***Council Proposes Framework For E-seals and Other RFID Technology***

February 18, 2004 – In an effort to help the government structure its consideration of the possible application of technology to container security, the World Shipping Council has submitted comments to the Bureau of Customs and Border Protection (CBP) in response to the agency's Request for Information regarding security technology for containers.

The Council and the liner shipping industry have supported Customs' "24 hour rule" requiring advance cargo manifest information to be filed with CBP for screening before vessel loading, the agency's Container Security Initiative agreements with other nations, and the enhanced targeting, screening and inspection programs CBP is undertaking. The industry continues to work closely with the government in the effort to enhance the security of America's trade, and every Council member has volunteered to participate in Customs' Trade Partnership Against Terrorism (C-TPAT).

The Council applauds the agency's effort to reach out to industry for input into the effort to establish clarity regarding what objectives technology proposals for secure containers should meet; and, importantly, how those requirements and proposals can fit into the operating environment of international trade without impeding trade flows or operations.

In the paper, the Council proposes several principles of general applicability that it believes the government should consider in any such effort, and responds to Customs' inquiry about the need to consider costs and operational impacts in such efforts.

The Council paper goes further, however, and provides a recommended framework for how Radio Frequency Identification (RFID) technology used in electronic seals and in cargo shipment tags should be analyzed and applied in the consideration of "smart" container initiatives. Specifically, the paper proposes what the security characteristics for RFID e-seals should be, and it advocates that container security objectives and devices and supply chain cargo management objectives and devices need to be analytically and physically separated. "A failure to clearly distinguish between security

objectives and commercial applications will create confusion and ambiguity, will impede progress on these issues and, in fact, may create security vulnerabilities,” the Council stated.

The World Shipping Council represents 44 liner shipping companies which carry more than 90 percent of U.S. containerized imports and exports.

The full text of the Council’s comments is attached.

For further information, contact Don O’Hare at 202-589-1233.