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Seal Usage in International Transportation

A seal is a tamper-resistant device attached to a container or trailer to secure the goods inside and alert the cargo receiver if the container or trailer door has been opened since it was sealed at the cargo origin. To maintain CTPAT compliance, only high-security seals certified to meet ISO 17712:2013 requirements must be used. These seals offer the highest level of protection against tampering and unauthorized access. When purchasing seals, ensure they have passed lab tests confirming they meet the ISO 17712:2013 standard by requesting a Seal Certificate. CTPAT Members with seal inventories must document that the high-security seals they use meet or exceed the latest ISO 17712 standard.

The most commonly used seal is the bolt seal, though other seal types may be used if they meet the required security standards. All seals used must meet the latest ISO 17712 standards.

Proper Seal Application and Verification

Only trained and authorized employees are permitted to apply seals to containers or trailers. Seals must be applied immediately after stuffing or loading. An authorized supervisor must confirm that the seal is correctly applied and undamaged before releasing the cargo for transport. CTPAT requires adherence to a seal verification process to ensure all high-security seals are properly affixed to containers or trailers and are functioning as intended. This procedure is known as the VVTT process:

- V View the seal and locking mechanisms to confirm they are securely attached. Look for signs of tampering, such as scratches, tool marks, or residue, which could indicate a breach attempt.
- V Verify the seal number against shipping documents to confirm accuracy. Double-check the
 documentation to ensure the seal number matches what is recorded and that there are no
 discrepancies.
- T Tug on the seal to confirm it is affixed properly. Apply firm pressure to make sure the seal does not come loose. A properly secured seal should not shift or detach under reasonable force.
- T Twist and turn the seal to confirm that its components do not unscrew or loosen. High-security seals are designed to withstand manipulation, so any movement or separation of parts may indicate tampering.

If any irregularities are detected, they must be reported immediately and a new seal must be applied before the cargo is moved further. This is essential for maintaining cargo security and ensuring compliance with CTPAT security protocols.

In order to prevent theft, tampering, or unauthorized use of seals, all unused seals must be securely stored in a locked area with limited access. Proper inventory control measures are essential to verify seals remain secure. Only trusted and authorized employees are to handle seal distribution, perform regular documented audits, and maintain a Seal Inventory Log that includes the results of these audits. Purchased or provided seals must also be logged into this inventory. When a seal is ready to be applied to a container or trailer, its details must be recorded in a Seal Log, which captures both the seal and shipment information for proper recordkeeping.

The Seal Log must be updated to include the following details when a seal is removed from inventory:

Seal number

- Date seal was applied
- Bill of Lading (BOL) number
- Container or trailer number
- Destination
- Type of conveyance
- Name of the employee applying the seal

The Seal Log may be maintained electronically, but it must include all required information for compliance and auditing purposes. Keeping an accurate, up-to-date log certify transparency and accountability in the seal management process and supports CTPAT compliance.

Handling Seal Discrepancies

Any broken, damaged, or altered seals found in the company's inventory must be documented and reported immediately. These discrepancies must be logged in the Seal Inventory Log, and the compromised seal must be removed from inventory. If a seal is broken in transit, even by government officials, a second seal must be applied. The seal change must then be documented on the bill of lading, in the Seal Log, and communicated to relevant parties

If a seal issue arises, the following steps must be taken:

- Notify a supervisor immediately
- Record the discrepancy in the Seal Log
- Apply a new seal and document the new seal number
- Notify the shipper, customs broker, and/or importer of the seal replacement
- Retain broken or removed seals for at least one year for audit purposes

Following these steps establishes that businesses maintain a high level of security and compliance with CTPAT Minimum Security Criteria. If a seal discrepancy cannot be resolved, it must be reported to U.S. Customs and Border Protection (CBP) at https://www.cbp.gov/contact or via the Tip Line at 877-227-5511.

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Recommended Seal Procedures by Party

https://www.cbp.gov/document/guides/recommended-seal-procedures-including-best-practices

Below is a listing of seal procedures for various types of companies involved in different links and activities within the supply chain. Note many of these items are above and beyond the minimum security criteria, and some have been previously identified as Best Practices. Included are seal requirements for companies that are not eligible to be direct Partners of the C-TPAT Program, such as domestic highway carriers in the U.S. and other countries. This information is included as part of the minimum security criteria for importers and others is to ensure all business partners and links in the supply adhere to the minimum security criteria.

1. U.S. Importers – Point of Sealing

- Seals must be compliant with ISO 17712 standards for high security seals.
- Documentation regarding the compliance standard must be maintained on file for verification.
- Upon receipt of seals, an inventory must be conducted and the seals must be logged in a seal log.
- Seal inventories must be conducted at least once per year during the internal audit.
- Seals must be assigned to a designated employee/department and stored in a secured storage container.
- Upon issuance of seals, the seal log should be updated with the seal usage information.
- A designated person who has received seal security training must affix the seal to the loaded container/trailer, 1) witnessed by another person to ensure it has been properly affixed and 2) using CBP's View, Verify, Twist, and Tug (VVTT) method to ensure the seal is the correct seal number, uncompromised, and properly affixed to the loaded container/trailer.
- Compromised seals and/or containers must be reported to CBP or the appropriate foreign authority.

2. Manufacturers – Point of Sealing

- Seals must be compliant with ISO 17712 standards for high security seals.
- Documentation regarding the compliance standard must be maintained on file for verification.
- Upon receipt of seals, an inventory must be conducted and the seals must be logged in a seal log book.
- Seal inventories must be conducted at least once per year during the internal audit.
 Seals must be assigned to a designated employee/department and stored in a secured storage container.
- Upon issuance of seals, the seal log should be updated with the seal usage information.
- A designated person who has received seal security training must affix the seal to the loaded container/trailer, 1) witnessed by another person to ensure it has been properly affixed and 2) using CBP's View, Verify, Twist, and Tug (VVTT) method to ensure the seal is the correct seal number, uncompromised, and properly affixed to the loaded container/trailer.
- Compromised seals and/or containers must be reported to CBP or the appropriate foreign authority.

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3. Exporters – Point of Sealing

- Seals must be compliant with ISO 17712 standards for high security seals.
- Documentation regarding the compliance standard must be maintained on file for verification.
- Upon receipt of seals, an inventory must be conducted and the seals must be logged in a seal log book.
- Seal inventories must be conducted at least once per year during the internal audit.
- Seals must be assigned to a designated employee/department and stored in a secured storage container.
- Upon issuance of seals, the seal log should be updated with the seal usage information.
- A designated person who has received seal security training must affix the seal to the loaded container/trailer, 1) witnessed by another person to ensure it has been properly affixed and 2) using CBP's View, Verify, Twist, and Tug (VVTT) method to ensure the seal is the correct seal number, uncompromised, and properly affixed to the loaded container/trailer.
- Compromised seals and/or containers must be reported to CBP or the appropriate foreign authority.

4. U.S. 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 1) the correct seal number, 2)
 uncompromised, and 3) properly affixed to the loaded container/trailer.
- 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 destroyed on-site, if possible.

5. Consolidators Handling Inbound for U.S. 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 that the seal is 1) the correct seal number, 2) uncompromised, and 3) properly affixed to the loaded container/trailer.
- 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 destroyed on-site, if possible.

6. Consolidators Receiving from U.S. exporters - 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 1) the correct seal number, 2)
 uncompromised, and 3) properly affixed to the loaded container/trailer.
- 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 destroyed on-site, if possible.

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7. Importers Who Do Not Physically Handle Seals

All partners who, at any point have any contact with a seal (attach, remove, in-transit etc.)
must have written seal policies describing requirements to ensure seal integrity, proper usage,
verification of numbers, reporting tampering/theft, and disposal or destruction.

8. 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 shipping documents.
- Carriers must verify the seal is intact, and if it exhibits evidence of tampering along the route, note and report in writing to interested parties within the supply chain as well as to proper authorities.
- Carriers must properly document the original and second seal numbers (if a second seal is needed).
- If a seal is removed in-transit to the border 1) a second seal must be placed on the trailer, 2) the seal change must be documented, 3) the driver must immediately notify the dispatcher that the seal was broken, by whom, and the number of the second seal, and 4) the driver must make immediate notification to the shipper, the customs broker, and/or the importer of the placement of the second seal.
- 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.

9. Domestic Highway Carriers (within either U.S. or another country) (manufacturer or exporter to point of export)

- Carriers must verify the seal number and location of the seal is the same as stated by the shipper on the shipping documents.
- Carriers must verify the seal is intact, and if it exhibits evidence of tampering along the route, note and report to interested parties within the supply chain as well as to proper authorities.
- Carriers must properly document the original and second seal numbers (if a second seal is needed).
- If a seal is removed in-transit to the border 1) a second seal must be placed on the trailer, 2) the seal change must be documented, 3) the driver must immediately notify the dispatcher that the seal was broken, by whom, and the number of the second seal, and 4) the driver must make immediate notification to the shipper, the customs broker, and/or the importer of the placement of the second seal.
- If a seal is removed or tampered with in-transit, the driver must report it to CBP or the foreign authority, depending on where the compromise occurred.

10. Domestic Highway Carriers (within either U.S. or another country) (location of import to point of receipt/seal cutting)

- Carriers must verify the seal number and location of the seal is the same as stated by the shipper on the shipping documents.
- Carriers must verify the seal is intact, and if it exhibits evidence of tampering along the route, note and report to interested parties within the supply chain as well as to proper authorities.

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