



Jamaica Customs Agency

Guideline for Shared Warehouse Space

AEO Programme

Prepared by	AEO Unit
--------------------	-----------------



Document Control Sheet

Document type	Policy
Document ID	JCA/AEO/Shared Warehouse /20241217/V.1
Document Title	Guidelines for Shared Warehouse space – AEO Programme
Original Author	Karen Wilson
Owner/Accountable Officer	AEO Unit Manager
Date	December 17, 2024

Revision History

Revision Date	Reviewed by	Previous Version	Description of Revision



Approval Sheet

I/We certify that this plan has been drafted and approved in keeping with the Jamaica Customs Agency Quality Management System and other guidelines:

DOCUMENT OWNER:

Karen Wilson
Name of Authorized Officer

Wilson
Signature

17/12/2024
Date

**REVIEW OF CONTROL (Quality Management Section):
FEATURES:**

Kirk Benjamin
Name of Authorized Officer

KB
Signature

18/12/2024
Date

APPROVAL (/CEO /Commissioner or Designate):

Keena Prickett Waller
Name of Authorized Officer

Keena Prickett Waller
Signature

Dec 18, 2024
Date

Name of Authorized Officer

Signature

Date

Table of Contents

INTRODUCTION..... 5

AUTHORITY 5

OVERVIEW 5

PURPOSE..... 5

APPLICATION PROCESS 6

STORAGE CAPACITY 6

HANDLING CAPABILITIES 6

SECURITY MEASURES..... 7

APPENDIX A: SITE APPROVAL CHECKLIST 9

APPENDIX B: AEO PROGRAMME SECURITY REQUIREMENTS..... 15

INTRODUCTION

Jamaica is currently witnessing a boom in its industrial real estate market, amid the COVID-19 pandemic, where commercial properties such as warehouses, manufacturing, distribution, and logistics centres have proven resilient. The demand for warehousing and logistics facilities are driven by the need to stock up inventory. The global supply chain is seeing cases where shipments are delayed leading to companies seeking additional warehouse capacity to store goods. This, along with the Government of Jamaica's mandate to make Jamaica a place to do business, has given rise for the need to have more industrial real estate, in particular, warehouses. *'Section 2.22 of the Authorized Economic Operator Memorandum of Understanding states 'Comply with such directions or requirements as the Commissioner may in any particular case issue or impose, in any case in which the Operator shares a warehouse with other Operators or non-AEO companies. These directions or requirements may relate, among other things, to the manner in which goods are separated, secured, or stored'.* It is on this premise that these guidelines have been developed to facilitate shared warehouse spaces. This will facilitate a more efficient and effective logistics industry.

AUTHORITY

AEO Memorandum of Understanding

OVERVIEW

Shared warehousing is defined as co-warehousing or shared warehousing. It is a **logistics solution where multiple businesses share a warehouse facility to store their goods**. The warehouse is usually operated by a third party who manages the storage and delivery of cargo for the cargo owner. Rather than each business having its own dedicated warehouse space, they share the available storage, labour, and resources.

Shared space warehousing provides a solution to companies by offering businesses access to strategically located warehouses that are equipped with advanced inventory management, security systems and efficient order processing capabilities.

Shared warehousing space can only be accommodated where factors such as **storage capacity, handling capabilities, security measures, and any industry-specific certifications** or standards are satisfied.

PURPOSE

To establish guidelines for the request to share warehouse space between AEO companies or other approved warehouses.

SCOPE

AEO warehouses approved and monitored by the Jamaica Customs Agency and the Other Government Agencies under the Customs Act and Regulations where cargo is processed in relation to companies participating in the Jamaica AEO Programme.

APPLICATION PROCESS

Application for the use of a shared warehouse should be sought from the Commissioner of Customs on an official letterhead. The letter should detail the name of the applicant, the location of the warehouse, the reason for the application and the type of goods to be stored in the space.

The requested facility must meet all the requirements as listed in Site Approval Checklist and AEO Programme Security Requirement (Appendix A and B). Recommendations for approval/denial will be decided by the AEO Committee.

All applications will be vetted against Appendix A and B. The AEO Unit on behalf of the JCA is to ensure that said space is appropriate for approval to be granted.

APPROVAL

If approved the applicant will be officially notified in writing by the Commissioner of Customs.

DENIAL

If denied, the applicant will be officially notified in writing.

APPEAL

The applicant must submit their request in writing to the Commissioner within 30 days of receipt of the correspondence.

STORAGE CAPACITY

There must be separation of each company's goods, which may include but not limited to dry wall or chain-linked fencing. The area must have a door, gate, locks or other mechanisms to secure the space.

HANDLING CAPABILITIES

There should be separate teams assigned to offload and load goods to prevent comingling or delays. Proper documentation or an inventory management system must always be maintained to show the movement of goods, as Customs reserves the right to request documentation at any time. There should also be proper documentation of persons accessing

the warehouse space. Non-compliance may result in the issuance of a warning letter, a suspension or revocation of the AEO status.

SECURITY MEASURES

AEO Requirements

See Appendix B: AEO Programme Security requirements.

Site Requirements

All requirements for the Site approval for the facilitation of the proper officer to examine goods at the site should be in place (see appendix A: Site Check list)

Industry-specific Certifications

All goods must be stored based on industry requirements and approval of the JCA and the relevant regulatory agency.

RISK MANAGEMENT

The warehouse should have a system/plan to assess and manage risks relating to security, safety, theft, or damage to goods. The plan should include:

- Ensuring that the most direct route is taken when goods are being transported.
- A warehouse management system to record the receipt and disbursement of goods in real time.
- Contingency plans for disruptions such as natural disasters, geopolitical events, unexpected economic downturns.
- The management of sensitive data
- Regulatory requirements
- Security protocols as per industry standards
- Contractual agreements which clearly outline the company name with authorized signatories, address of the warehouse location, security expectations, liability and penalty for breaches of the contract.
- Security audits to identify any potential gaps or weaknesses

Compliance with Laws

Operators must demonstrate that they are in compliance with all applicable Customs and Regulatory laws.

Communication Protocols

There should be established communication channels with the JCA. Incidents should be reported within 24hrs of the occurrence by the AEO company to the JCA via the assigned AEO

Account Officer or the AEO Unit Manager. If the occurrence involves illegal activities, the matter should also be reported to the police.

Audits

The warehouse shall be subject to periodic audits by the JCA or relevant regulatory agency to ensure compliance with government of Jamaica laws and standards.

Standard Operating Procedures (SOPs)

Documented procedures must be prepared and be in place to manage various Customs and security operations, in the format of a policy or procedure manual.

Contract between Warehouse owner/keeper and lessor.

Both the warehouse owner/keeper should have a written contract detailing the rights and obligations of both parties as well as a clear statement as to who is liable for any damage or theft of the goods while in the custody of the warehouse owner/keeper. The AEO company is responsible for ensuring that the warehouse keeper has met all the AEO, Site and applicable government agency requirements for the storage of goods at the location prior to the submission of request or application.

Where goods under the incentives scheme are approved to be stored in shared warehouse space, the company owning the goods will still be held liable to pay all applicable duties and taxes if the goods are damaged or destroyed.

Revocation of the AEO privilege may occur where incentive goods are loaned, disposed of or sold without the expressed written permission of the Commissioner.

Revocation

The Commissioner of Customs retains the right to revoke any approval where the warehouse operators or approved AEOs fail to comply with the above established terms and conditions.

APPENDIX A: SITE APPROVAL CHECKLIST

DETAIL	IN PLACE		REMARKS
	YES	NO	
STRUCTURAL SECURITY			
1. Is there perimeter fencing? (Type: concrete, chain link etc.)			
2. Is the site located in a volatile area If yes explain in remarks			
3. Is the perimeter fencing in good condition? What is the height? Is it topped with barbed wire? Is the chain link fence base cemented?			
4. Is the structure of the building in good condition? (Zinc shed, yard, warehouse etc.)			
LIGHTING	YES	NO	REMARKS
5. Does the facility have adequate lighting? i. Perimeter fencing ii. Entrance and exit points. iii. Cargo handling areas iv. Examination areas			
VENTILATION	YES	NO	REMARKS
6. Is the Office and Warehouse space adequately ventilated			
CHECK POINTS AND ACCESS CONTROL	YES	NO	REMARKS
7. Are security personnel at check points PSRA Certified.			

DETAIL	IN PLACE		REMARKS
	YES	NO	
STRUCTURAL SECURITY			
8. Are incoming and outgoing persons, goods, and vehicles checked/subject to search?			
9. Who conducts the checks of the incoming/outgoing persons, goods, and vehicles?			
10. Is there an access control procedure (gate log, visitor's pass, Staff ID)			
11. Are physical controls (motor vehicles and pedestrians) recorded / documented?			
12. What information is recorded at entry and exit?			
13. Are the number of check points adequate?			
14. Is there CCTV surveillance of entry, exit perimeter, parking lot, loading and examination area?			
15. How long is CCTV footage stored?			
16. Do you have remote access to surveillance data?			
17. Do all visitors enter the premises through a controlled access point?			
18. Are vehicles including the license plates and individuals recognizable on all video surveillance cameras?			

DETAIL	IN PLACE		REMARKS
	YES	NO	
STRUCTURAL SECURITY			
19. Is access to the examination area segregated or are the shipments processed sequentially?			
20. Is the examination and loading area sterile?			
SIGNAGE	YES	NO	REMARKS
21. Does the facility have clearly marked signage to indicate: a. access restrictions, b. safety and evacuation, c. first aid,			
22. Does the facility have valid regulatory certificates as deemed necessary? (JFB, Public Health, VSD etc.)			
23. Is there signage specifying the required speed limit for forklift operators to drive within the warehouse?			
24. Are entrance and exit signs visible?			
EXIT POINTS	YES	NO	REMARKS
25. Are emergency exits functioning?			
26. Are exits free from encumbrances?			
SUITABILITY OF THE EXAMINATION AREA			
27. Is the location suitable for the examination of the nature of goods imported?			

DETAIL	IN PLACE		REMARKS
	YES	NO	
STRUCTURAL SECURITY			
21. Is the location suitable for the examination of the nature of goods imported?			
22. Does the location have a properly paved landing or ramp?			
23. Does the location have a physical structure to be used for the examination of cargo as well as to protect the Customs Officers from the elements (dust and contaminants)?			
24. Will the Customs Officers be exposed to any hazardous substances on site?			
25. Is the hazardous/dangerous goods storage area adequate and has mechanisms to control spills			
26. Is the location free of hazards which may lead to slips, trips and falls?			
27. Has the warehouse keeper provided adequate staff for the unloading and assistance in the examination of the cargo in compliance to the established standards?			
28. Has the warehouse keeper provided adequate equipment (e.g., steel cutter, forklift etc.) for the timely unloading and examination of the cargo in compliance to the established standards?			

DETAIL		IN PLACE		REMARKS
STRUCTURAL SECURITY		YES	NO	
29.	Does the facility have a secured area allocated for the detention of goods should the need arise?			
30.	Is the detention area under dual custody? Who has access to the detained/seized cargo storage area?			
31.	Are the equipment and forklift operators certified?			
SECURITY		YES	NO	REMARKS
32.	Are there non-standard entry points to the secure areas? (Site plan/facility layout to be provided)			
33.	Are security personnel properly identified?			
34.	Are non-standard entry points secured and/or monitored?			
AMENITIES		YES	NO	REMARKS
35.	Are the Office spaces being maintained according to the requirements?			
36.	Are the bathroom, sick bay and lunchroom facilities in excellent condition?			
<u>HEALTH AND SAFETY</u>		<u>YES</u>	<u>NO</u>	<u>REMARKS</u>
37.	Is there a pest control programme in place?			
38.	Are pest control records available?			

DETAIL	IN PLACE		REMARKS
STRUCTURAL SECURITY	YES	NO	
in place? Date of last emergency drill activity.			

Officer Comments:

Officer Name: _____ Officer Signature: _____

Supervisor Comments:

Supervisor Name: _____ Supervisor Signature: _____

Manager Comments:

Manager Name: _____ Manager Signature: _____

APPENDIX B: AEO PROGRAMME SECURITY REQUIREMENTS

3.CONTAINER AND CONVEYANCE SECURITY

Container and conveyance integrity must be maintained to protect against the introduction of unauthorized material and/or persons. At the point of stuffing, procedures must be in place to properly seal and maintain the integrity of the shipping containers. A high security seal must be affixed to all loaded containers bound for Jamaica and outbound from Jamaica.3.1 and 3.2 are applicable to exporters who also import.

THE AEO MUST:

3.1. Request a Container Inspection Report, duly signed by the inspecting officer from their overseas supplier/consolidator for each container prior to loading. (This report must incorporate the seven- point inspection process outlined in 3.2. including the names of the personnel off-loading the container.

3.2. Have documented and implemented procedures to verify the physical integrity of the container. This should include their liability of the locking mechanisms of the doors after unloading and prior to returning the empty container to the port.

As even- point inspection process is required for all containers:

1. Front wall
2. Left side
3. Right side
4. Floor
5. Ceiling/Roof
6. Inside/outside doors
7. Outside/Undercarriage Reefer:
 - a) Inspection of the evaporator area.
 - b) Area of the condenser.
 - c) Control box
 - d) Area Compressor

When exporting– Inspect the tractor head and chassis and complete the inspection Check List. The inspecting officer must duly sign the inspection check list. It must contain the following:

1. The fifth wheel area – inspect the natural compartment/ skid plate
2. Exterior-front/ side
 - I. Rear-bumpers/doors
 - II. Front wall
 - III. Left side
 - IV. Right side
 - V. Floor
 - VI. Ceiling Indoor/ Outdoor
 - VII. Inside (including the Sleeper)/outside
 - VIII. Exterior/ Bottom section

3.3 CONTAINER SEALS

3.3.1 Submit a written request to their suppliers/consolidator for high security seals to be affixed to all the imported containers (companies who import and export). All seals must meet or exceed the current PAS SO17712 standards for high security seals.

3.3.2. Document, implement and maintain procedures to recognize and report to the shipping line or agent and the Jamaica Customs Agency (JCA), whenever the seals, containers and/or other cargo units have been violated.

3.3.3 Report to the JCA prior to the landing or opening of the container if the supplier(s)/consolidator neglect to use seals meeting the required standard (companies who importers only).

3.3.4 Document, implement and maintain procedures governing the use, distribution, and storage of seals. Only designated employees should manage and distribute seals.

3.4 CONTAINER STORAGE

3.4.1 Store containers and other cargo units (loaded and empty) in a secure area to prevent access and/or tampering.

3.4.2 Have procedures for reporting and neutralizing unauthorized entry into containers, trailers, and areas for the storage of containers and trailers.

3.4.3 Perform and document periodic inspections of storage areas for containers and other cargo units (full and empty) to detect suspicious or irregular activities (refer to 8.1)

4. PHYSICAL SECURITY

THE AEO MUST:

4.1. FENCING

4.1.2 Have perimeter fencing that encloses the cargo handling areas and storage facilities. The fencing must be appropriate for protecting the cargo.

4.1.3 Inspect perimeter fencing at least once per week to verify their integrity and address any damages. There must be documentary record of the inspections, duly signed by the person who conducted the inspection.

4.1.4 Finished goods imported for export under bonded facility. Have designated areas within the cargo handling area to separate and store goods intended, or local consumption and goods intended for export.

4.2 ENTRANCES AND EXITS

4.2.1. Monitor entrances and exits for vehicles and personnel. A log must be used to capture information such as the driver's/visitor's name, license plate number, and the number from valid photo identification. This log must be kept for three (3) years.

4.3. BUILDING STRUCTURE

4.3.1 Secure their building structures with the necessary physical features that will serve to reduce the possibility of illegal entry.

4.3.2 Perform annual inspections and conduct repairs as circumstances dictate to maintain the integrity of their building structures.

4.4 CONTROL OF LOCKS AND KEYS

4.4.1 Secure all windows, doors, interior and exterior gates with locks. Management or security personnel must control the issuance of all locks and keys using appropriate logs. This log must be kept for a minimum of three.

4.5 SECURITY SYSTEM

4.5.1 Either have their own security service staffed by persons registered with the Private Security Regulation Authority (PSRA) or contract a security company registered with the PSRA. The security prepared to offer timely 24-hour response service in the event of any unforeseen threat to the company's operations.

4.5.2 Have a map showing the location of sensitive areas (relating to the importation, manufacturing, and exportation of cargo, as applicable) of the facility.

4.5.3 Use alarm systems and video surveillance cameras to monitor premises (especially the sensitive areas as defined in 4.9) and aid in deterring unauthorized access to the areas of cargo handling and storage. The recordings must be stored for a minimum of 30 days (1 month). Storage can be in the form of, DVD's etc.

4.5.4 Document, implement and maintain contingency and emergency procedures to be used in the event of natural disasters, civil unrest, container contamination (in any form), corruption and terrorist acts in order to ensure continuity and security in the international supply chain

4.5.5 Conduct drills testing contingency and emergency procedures outlined in 4.11.

4.6 LIGHTING

THE AEO MUST:

4.6.1 Always have adequate lighting inside and outside the facility. Special attention must be paid to the following areas entrances and exits, areas of cargo handling and storage, perimeter fencing and parking areas.

4.6.2 Have an emergency electrical power supply system (such as generators or inverters) to restore power to sensitive areas (refer to 4.9) in the event of a loss of

electricity. Alarm systems and surveillance video cameras must be connected to the emergency power supply system.

4.7 PARKING AND LOCKERS

4.7.1 Prohibit the parking of vehicles of employees and visitors within the cargo handling areas and adjacent areas while such operations are taking place.

4.7.2 Manage areas designated for employees' lockers, ensuring that these areas are away from the cargo handling areas.

41. PHYSICAL ACCESS CONTROLS

THE AEO MUST:

5.1 Have an identification system for employees if they employ more than nineteen (19) persons. This system must include an identification card with a picture which must be presented upon arrival.

5.2 Document procedures for delivery, removal and changing of access devices to employees (e.g. keys, keycards, etc.).

5.3 Require visitors going to the sensitive areas (refer to 4.9) of the organization to submit valid photo identification upon arrival, and record essential information from the ID.

5.4 Issue visitors going to the sensitive areas (refer to 4.9) of the organization with the organization's temporary visitor pass, which must be visibly displayed for the duration of the visit (This requirement less than 20 persons).

5.5 Control the issuance and return of visitors' passes. This includes having procedures in place to address lost or unreturned passes.

5.6 Have a record of all visitors going to the sensitive areas (refer to 4.9) of the organization. These records must include their arrival and departure times, as well as the name of the employee, they are visiting.

THE AEO MUST:

5.7 Escort visitors going to the sensitive areas (refer to 4.9) of the organization during their visit.

5.8 Have documented and implemented procedures on how to identify, challenge and address unauthorized or unidentified people within the facility.

42. PERSONNEL SECURITY

THE AEO MUST:

6.1 Document, implement and maintain procedures for the selection of employees (a recruitment policy).

6.2 Verify the information on the employment application, such as criminal record, personal and employment references, etc., in keeping with appropriate national legislation for candidates with employment opportunity.

6.3 Have updated employment history for all personnel, including photograph, address, phone number(s), next of kin information, and other relevant personal data.

6.4 Identify and update the critical positions that could compromise the security of the supply chain. Critical positions encompass all employees working in the sensitive areas (refer to 4.9) of the organization, along with the management team.

6.5 Have a manual of conduct and code of ethics that stipulates the administrative sanctions for breaches of the security measures and other behaviour's that affect safety. This manual must be communicated and made available to all staff.

6.6 Have a policy in place to control the supply (delivery and return) of uniforms and company identification and make reasonable effort (documented) to ensure that these supplies are returned upon the employee's separation from the company.

6.7 Have a policy governing the separation of employees from the organization.

6.8 Have procedures in place to refer staff to appropriate institutions in cases of substance abuse.

43. INFORMATION TECHNOLOGY SECURITY

7.1 CONTROL AND DATA PROTECTION

THE AEO MUST:

7.2 Assign individual accounts to employees. These accounts must require a change of password every three (3) months (minimum).

7.3 Have Information Technology policies documented, and these must be communicated to employees through training.

7.4 Have a back-up of trade-sensitive information for at least the last three (3) years of operation. A copy must be stored securely offsite.

7.5 Have a system in place to identify abuse of computer systems and detect improper access, tampering or the altering of business data.

7.6 Apply disciplinary measures to all violators of the system.

7.7 Comply with the laws governing Intellectual Property Rights (IPR) and Copyrights.

44. SECURITY TRAINING AND AWARENESS OF THREATS

THE AEO MUST:

8.1 Train employees in the procedures established by the company to address and report suspicious activities to the management team and the Jamaica Customs Agency.

8.2 Provide specific training to assist employees in maintaining cargo integrity, access controls, and recognizing internal conspiracies.

THE AEO SHOULD:

Implement a threat awareness program to equip employees with the knowledge of how to prevent, recognize and react to any threat of smuggling, hostage taking, bomb threat, criminal activities, and terrorism.

45. CONTROL OF RAW MATERIALS AND PACKAGING

MATERIALS (Applicable to Manufacturers only)

THE AEO MUST:

9.1 Use the necessary documentation (such as requisitions, returns, inputs, outputs, and authorized signatures) for the control of raw materials and packaging materials. These documents must be maintained for at least three (3) years.

9.2 Control access to areas where raw materials and packaging materials are stored.

46. PROCEDURAL SECURITY

10.1 Implement procedures to verify the accuracy of Customs Declarations.

10.2 Documented training sessions.

10.3 Company established procedures for addressing & reporting suspicious activities to the management team and the JCA:

- I. Maintaining Cargo Integrity
- II. Access Controls
- iii. Recognizing internal conspiracies.

10.4 Threat awareness program in place to equip employees with the knowledge of how to prevent, recognize and react to any threat of smuggling, criminal activities, and terrorism

10.5 Procedures in place on how documented procedures are updated and who is responsible for updating these procedures.