Jamaica Customs Agency
AEO Validation Preparation

**** Please have the following **documents** and/ or information available for review during the validation in order to facilitate the process. All requested items *should* apply, but may not be applicable to your company. For items deemed 'not applicable' by your company, please be prepared to discuss why ****

****The Validation process and adherence to AEO programme standards is largely based on, and requires **written** company policies and procedures regarding supply chain security****

Company Financials

_____ Copies of the company's last two financial statements and supporting documents

_____ Be prepared to give a walk-through of the company's accounting system (whether manual, electronic or both)

Risk Assessment

_____ Copy of security risk assessment of supply chain(s)

_____ Copy of plan to correct security weaknesses found in the supply chain(s)

Business Partner Requirements

_____ Written process / procedure / policy (SOP) and copies of documents describing how business partners are screened, including customers, service providers, and contractors- (e.g. questionnaires, surveys, financial screening, business reference verifications, professional association affiliation, etc.) To include written procedures or policies your company uses to indicate "risk factors" for business partners regarding security weaknesses. (Financial stress, poor service, security gaps, etc.)

_____ Evidence in business partner files showing commitment to the AEO programme (or any other) security criteria and policies/ procedures (e.g., security surveys/ questionnaires, written agreements, documentation of audits/ visits, etc.)

_____ Documentation demonstrating business partners' AEO status (e.g., letter of acceptance into the Programme; C-TPAT certificate, etc.). and/ or business partners' participation in foreign supply chain security programs (as applicable).

_____ For partners with no form of security certification, documented evidence that business partner is meeting minimum AEO security programme criteria. (e.g. contracts, completed security surveys, etc.)

_____ Evidence that Non-AEO business partners are subject to verification of compliance with AEO programme security criteria based on documented risk assessment. (e.g. copy of risk assessment to identify high risk vendors, documented visits to vendors' premises, etc.)

_____ Evidence of periodic reviews of business partner security practices in order to detect and/or correct weaknesses (e.g. documented visits, audits, performance measurements).

Container/ Conveyance Security

_____ Written container security policies and procedures used throughout the supply chain (Including storage, container inspections, sealing procedures, etc.)

_____ Container/ Conveyance inspection checklists and/or evidence of outreach to business partners / service providers regarding container security inspections.

_____ Documentation of training given to shipping / receiving personnel on how to conduct inspections on incoming / outgoing containers and handling anomalies, if encountered.

Seal Security

_____ Evidence that high security seals are requested from suppliers and affixed to all loaded inbound containers, to include evidence (certificate) that those seals meet or exceed the current PAS ISO 17712 standards.

_____ Evidence that high security seals are affixed to all loaded outbound containers, to include evidence (certificate) that those seals meet or exceed the current PAS ISO 17712 standards.

_____ Written policies and procedures governing seal security (storage, inventory, issuance, affixing, and verification; how to handle seals broken before crossing border, notification to importer/ shipper/ other parties, recording new seal numbers, etc.), to include procedures for recognizing and reporting compromised seals/ containers to the Jamaica Customs Agency (JCA) and other appropriate authority.

Haulage Contractors

_____ Copy of contract with owner-operators

_____ Copy of security requirements/ expectations for owner-operators

Conveyance Tracking / Monitoring

_____ Demonstrate and /or documentation on how drivers are tracked/ monitored (e.g. GPS, radios, cell phones) *and* how monitoring is recorded (logs) for inbound cargo and outbound cargo while in transit to port or consolidation point.

____ Written policies, procedures, and checklists with instructions to drivers, transportation service providers, or consolidators regarding container tracking, check-in times, routes they are required to follow, confirmation of delivery, etc.

Personnel Security

____ Written personnel procedures/ policies (SOP) for employee selection/ screening process. Please have available reference check forms and other pre-employment data collection tools

____ Manual of conduct and code of ethics that stipulates the administrative sanctions for breaches of the security measures and other behaviours that affect safety

____ Sample of employee files – 1 active and 1 terminated employee personnel file and documentation contained and maintained in such files.
(e.g. identification, training, pre-employment screening checklist)

____ Documented company personnel termination procedures (e.g. checklist showing company property issued / returned, physical / IT accesses rescinded)

Procedural Security

____ Copy of policies/ procedures (written SOP) explaining when and how to notify JCA / law enforcement and other parties in the supply chain if anomalies or suspicious activities occur.

____ Policies/ procedures addressing how cargo is manifested, timeliness of information, etc.

____ Packing and Shipping/ Receiving policies/ procedures

____ Post orders (Standard Operating Procedures) for guards (if applicable)

____ Sample of export documentation package for cargo (e.g. manifest, invoices, packing list, purchase order, etc.)

Physical Security / Access Controls

____ Copy of map showing the location of sensitive areas of the facility

____ Written contingency and emergency procedures which will ensure continuity and security in the international supply chain in the event of any unforeseen circumstances (natural disasters; etc.)

____ Copy of company ID

____ Copy of logs or records recording issuance/ retrieval of access devices
and company property (e.g. key cards, keys, badges, passwords, uniforms, etc.)

____ Written visitor policies, procedures, logs, recorded visits, etc.

____ Written procedures and/ or training for employees on challenging unauthorized/ unidentified persons

____ Copy of policies/ procedures for physical security maintenance (e.g. cameras, alarm systems, fencing inspections, security guards, etc.)

Security Training Awareness

____ Agendas of security training given to employees

____ Policy and/ or documentation on employee training

____ Policy and/or documentation of specialized security training given to shipping/ receiving/ warehouse employees and those who handle mail.

Information Technology

____ Written policies and procedures for securing the IT system (passwords, system access level restrictions, monitoring the system, etc.)

____ Documentation of training given to personnel on Information Technology security.

____ Company Code of Conduct as it relates to use of IT System.

Audits / Testing

____ Documentation of security audits performed (packing, shipping, seal verification, trailer/ container inspections, facility physical security inspections, personnel security, etc.)

____ Documentation of protocols for periodic audits / tests of security systems

Raw & Packaging Materials

____ Written policies/procedures governing the use/control/storage of raw and packaging materials

____ Documentation used in the whole manufacturing process (e.g. requisitions, input/output forms, etc.)

Three important points for all companies to remember !

1. The importance of continued upper management support for the Programme.

2. Periodic company self-audits of policies and procedures.

3. Continued communications between JCA (AEO Account Manager) and company.

**** If you have any questions about your Validation, please contact the AEO Unit