Container Security Initiative

2006–2011 Strategic Plan
The Container Security Initiative is a revolutionary program to extend our zone of security by pre-screening containers posing a potential security risk before they leave foreign ports for U.S. seaports. Our goal is to process 85 percent of all containers headed for the United States through CSI ports by 2007.

- Commissioner W. Ralph Basham

The Container Security Initiative (CSI) Strategic Plan specifies the goals and objectives for this vital program, which is one element of the U.S. Customs and Border Protection (CBP) multi-layered approach to cargo security. Begun in January 2002, CSI is a multinational program protecting the primary system of global trade—containerized shipping—from being exploited or disrupted by international terrorists. CSI adds security to the movement of maritime cargo containers to the United States, while at the same time moving those containers faster, more efficiently and more predictably through the supply chain.

The four core elements of CSI are:

- Identify high-risk containers. CBP uses automated targeting tools to identify containers that pose a potential risk for terrorism, based on advance information and strategic intelligence.

- Pre-screen and evaluate containers before they are shipped. Containers are screened as early in the supply chain as possible, generally at the port of departure.

- Use technology to pre-screen high-risk containers to ensure that screening can be done rapidly without slowing down the movement of trade. This technology includes large-scale X-ray and gamma ray machines and radiation detection devices.

- Use smarter, more secure containers, which will allow CBP officers at United States ports of arrival to identify containers that have been tampered with during transit.

As of August 2006, CSI is operational in 44 ports in Europe, Asia, Africa, the Middle East and North, Central and South America. CBP is continuing to work toward strategically locating CSI teams in additional ports in order to detect and deter attempts to conceal terrorist weapons destined for the United States. By the end of FY2007, CBP intends to expand CSI ports to cover 85
percent of the containers destined to the United States and to maintain a 100 percent manifest review rate for those ports. CSI will continue fostering partnerships with other countries and our trading partners with the goal of inspecting all high-risk containers before they are loaded on board vessels to the United States. In addition, the World Customs Organization, the European Union and the G8 support CSI expansion and have adopted resolutions to introduce and implement security measures and non-intrusive inspection standards similar to CSI at ports throughout the world.

The CSI program helps accomplish the CBP twin goals of securing and facilitating the movement of legitimate trade. Securing the primary distribution system of international trade—the container—makes our Nation safer and our economy more secure.

W. Ralph Basham
Commissioner

Photo: Commissioner Basham at the American Association of Exporters and Importers conference held in N.Y.
CSI Operational Ports as of August 2006

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<td>Buenos Aires</td>
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<td>Santos</td>
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</tbody>
</table>
Contents

2 Mission Statement/How CSI Supports the CBP Priority Mission
3 Links to Other Strategic Plans
4 Executive Summary
6 Introduction
7 CSI Benefits and Costs
11 Threat and Vulnerability
12 External Factors
15 Secure U.S. Borders (Strategic Goal 1)
20 Build a Robust CSI Cargo Security System (Strategic Goal 2)
25 Protect and Facilitate Trade (Strategic Goal 3)
31 Economic Cost of Securing the Maritime Supply Chain
33 Performance Measures
35 Program Evaluations
36 Looking to the Future
U.S. Customs and Border Protection Mission Statement

We are the guardians of our Nation’s borders.
We are America’s frontline.
We safeguard the American homeland at and beyond our borders.
We protect the American public against terrorists and the instruments of terror.
We steadfastly enforce the laws of the United States while fostering our Nation’s economic security through lawful international trade and travel.
We serve the American public with vigilance, integrity and professionalism.

How CSI Supports the CBP Priority Mission

The priority mission of CBP is to prevent terrorists and terrorist weapons from entering the United States.
CSI directly supports the priority mission of CBP by preventing and deterring terrorist use of maritime containers through the facilitation and maintenance of legitimate trade.
CSI enhances the capability of CBP to target and examine sea cargo, and if necessary, respond to the presence of weapons grade materials without disrupting the vital flow of cargo through United States seaports.
Links To Other Strategic Plans

This CSI Strategic Plan aligns with the President’s Strategy for Homeland Security, the Department of Homeland Security (DHS) Strategic Plan, the efforts by the Department to develop a national strategy for cargo security and supports the CBP 2005–2010 Strategic Plan.

### DHS Supports

<table>
<thead>
<tr>
<th>DHS Strategic Goals:</th>
<th>Goal 1 – Protect the American people, society and economy</th>
<th>Objective 1.1: Secure our borders</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<td>Objective 1.3: Protect lawful trade, travel and immigration</td>
</tr>
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<td></td>
<td>Goal 2 – Promote national resilience</td>
<td>Objective 2.1: Strengthen nationwide preparedness and response</td>
</tr>
</tbody>
</table>

### CBP Supports

<table>
<thead>
<tr>
<th>CBP Strategic Goals:</th>
<th>Goal 1 – Preventing terrorism at ports of entry</th>
<th>Objective 1.4: Push the Nation’s zone of security outward beyond our physical borders through partnerships on extended border initiatives to deter and combat the threat of terrorism</th>
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<td></td>
<td>Goal 4 – Balancing legitimate trade and travel</td>
<td>Objective 4.3: Promote industry and foreign government partnerships by engaging foreign governments, the trade community and others in the supply chain in cooperative relationships</td>
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Executive Summary

The CBP CSI Strategic Plan relies on a multi-layered approach consisting of three goals and associated objectives and strategies. This section summarizes the essential features of the CSI plan designed to address elements of the terrorist threat involving the global maritime trade community.

**CSI Strategic Goal 1 – Secure U.S. Borders**

Secure U.S. borders against terrorists and terrorist weapons by evaluating all containers bound for the United States for terrorist risk before lading at CSI ports.

**Objective 1.1:** Enhance the process for identifying high-risk cargo by receiving and making full use of advance trade data.

**Objective 1.2:** Improve the process of screening and examining containers by developing and fully utilizing state-of-the-art technology.

**Objective 1.3:** Promote parity through increased examinations of high-risk containers prior to entering the United States.

**CSI Strategic Goal 2 – Build a Robust CSI Cargo Security System**

Build a robust CSI cargo security system that will withstand a terrorist incident and ensure a continuous flow of trade, or promptly resume trade through CSI ports, should a terrorist event occur.

**Objective 2.1:** Advance security of all world nations by promoting an international framework of standards covering data elements, host country examinations, risk management and detection technology.
Objective 2.2: Enhance cargo security and trade facilitation by strategically identifying the optimal trade lanes and ports for inclusion into CSI.

Objective 2.3: Expedite the movement of low-risk shipments through the global supply chain.

Objective 2.4: Continue to work with other agencies on maritime contingency and recovery plans and efforts.

CSI Strategic Goal 3 – Protect and Facilitate Trade

Protect and facilitate the movement of legitimate trade by maintaining effectively operating CSI ports, working with host nations to inspect all containers identified as posing a potential terrorist risk and providing benefits and incentives to international governments and organizations, as well as to our trading partners.

Objective 3.1: Increase the effectiveness of CSI by negotiating with host countries to review and request examination of all high-risk shipments identified by CBP through the Automated Targeting System (ATS).

Objective 3.2: Ensure effective coordination with host countries by conducting periodic risk evaluations of ports to assess the level of staffing and other resource needs.

Objective 3.3: Encourage interagency cooperation by developing a capacity to collect and share information and trade data gathered from CSI ports.

Objective 3.4: Present CSI standards and promote greater participation by international governments, international organizations, trade communities and other organizations engaged in maritime security.

Objective 3.5: Improve CSI operations by evaluating the feasibility of regionalizing management of CSI teams.
Introduction

The priority mission of CBP is to prevent terrorists and terrorist weapons from entering the United States. This extraordinarily important mission means improving security not only at physical borders and ports of entry but also globally, in collaboration with other countries and the international trade community.

CBP must do this important work while continuing to perform our traditional missions. These include apprehending individuals attempting to enter the United States illegally, stemming the flow of illegal drugs and other contraband, protecting our agricultural and economic interests from harmful pests and diseases, protecting American businesses from theft of their intellectual property rights, regulating and facilitating international trade, collecting import duties and enforcing U.S. trade laws.

In Fiscal Year 2005, CBP processed 20 million sea, truck and rail containers entering the United States and 29 million trade entries, collected $31.4 billion in import duties, seized 2 million pounds of illegal drugs, and processed 431 million passengers and pedestrians. CBP must perform this security and border-related work while facilitating the flow of legitimate trade and travel that is so important to our Nation’s economy. In other words, we have “twin goals”— building more secure and more efficient borders.

The border authority of CBP is unsurpassed in defense of national interests because examinations of cargo or persons do not require search warrants, probable cause or particularized suspicion. In order to allow for the movement of legitimate travel and trade, CBP uses all resources at its disposal to target travelers and cargo that pose a risk for terrorism and to facilitate the flow of legitimate trade. CSI is one important resource to accomplish this mission.

CSI helps to secure an indispensable link in the chain of global trade: maritime containerized shipping. Since CSI was unveiled in January 2002, it has become a part of our government’s strategy to secure the Nation from the potential terrorist threat using maritime cargo containers.

To implement the CSI program, CBP deploys multi-disciplined teams to selected foreign seaports of countries that have bilaterally agreed to implement the CSI program. CSI officials partner with foreign governments to identify cargo containers that pose a potential risk for terrorism and inspect those containers at the foreign ports before they are shipped to the United States. Through use of advanced technology, sharing of trade data and expanded collaboration, CSI officials work to enhance maritime security.

CSI initially became operational in the top twenty largest volume ports that export to the United States. CBP now intends to expand CSI to other ports based on strategic importance related to terrorist threats. This Strategic Plan outlines this intention and other goals and objectives that CSI plans to accomplish to both protect and facilitate global maritime trade.
CSI Benefits and Costs

The following highlights key benefits of the CSI program to international governments and organizations, as well as to industry and the trade community.

**Benefits to International Governments and Organizations**

There are a number of reasons why many countries are signing up to participate in CSI.

- CSI offers added protection, on a day-to-day basis, for the primary system of international trade – a system on which all national economies of the world depend.

- The collaboration between Customs administrations improves their capabilities and increases the overall effectiveness of the targeting process. The mutual goal is to target containerized cargo that poses a potential risk for terrorism and secure maritime trade from acts of terrorism.

- For CSI to remain an active deterrent for terrorism and maintain vigilance, CBP will continue to require additional advance sea cargo information from the trade community. The benefits of this information to international governments include:
  - Improving the opportunity to obtain advance information on potential threats and containers not previously available.
  - Collaborating with foreign countries’ customs services to jointly identify high-risk containers that pose a risk for terrorism.
• Enhancing public perception and creating a psychological deterrence by continuing to strive for a strong, safe and secure environment for the free and expeditious movement of international trade.

• CSI offers opportunities to expand security to detect radiological and nuclear material through enhanced overseas security.

• CSI offers opportunities to expand technological resources to develop and use better equipment in the area of enhanced container technology to track movement and location and detect any kind of tampering.

• CSI ports will have an effective security system in place. In the event of a terrorist attack, CSI ports may be afforded special continuity considerations and their cargo may receive facilitated handling at ports of entry.

• Overseas examinations, using the normal downtime for a container awaiting loading in a foreign port, enhance trade facilitation at U.S. ports of entry.

• By engaging international organizations, hosting global conferences and interfacing with foreign countries to address significant threats of terrorism, CSI is participating in developing a world standard. International organizations, such as the World Customs Organization, World Bank, the International Maritime Organization, along with other domestic outreach forums, allow CSI to be an integral part of securing the supply chain.

• CSI has increased the level of awareness for the need to secure global trade.
Benefits to the Industry and Trade Community

- While providing security for the maritime cargo transportation system, CSI ensures that security mechanisms do not impede the flow of legitimate trade. The CSI program, as well as securing the movement of legitimate trade, facilitates the movement of trade by using the time prior to the lading of the container for inspections, rather than after arrival. Thus, the normal downtime while a container waits for loading is used to enhance both security and trade facilitation. CBP will work with industry and trade to promote increased examinations abroad and continue to take advantage of the downtime. Effective use of downtime is a benefit also promoted to foreign governments.

- As the trade community continues to accept and adhere to the CBP changes imposed by CSI, the 24-hour rule and Customs-Trade Partnership Against Terrorism (C-TPAT), the benefits will become more evident through rapid movement of cargo and fewer invasive inspections. They will lessen the impact to industry and the United States economy and allow importers to move goods to market faster.

- Adoption of a standardized, harmonized security approach ensures that companies can compete and allows nations to have confidence in the security of goods flowing through their ports. Secure supply chains assure a predictable and uniform approach for each participant within the supply chain and avoid the burden of multiple standards for trade compliance to secure shipping against the threat of terrorism. There should be one set of rules.

- With the effective supply chain security provided by CSI ports, resumption of trade in the event of a terrorist attack can be achieved rapidly. After a domestic or international incident, CSI ports may be afforded special continuity considerations and their cargo may receive facilitated handling at ports of entry during the recovery process.

In summary, should a terrorist attack occur in the United States, or within any other country in the supply chain, the economic impact would be potentially devastating to the U.S. and the economic ripples would be felt worldwide. All nations have a stake in protecting global trade and the global economy.

CSI offers added protection, on a day-to-day basis, for the primary system of international trade – a system upon which all national economies of the world depend. CSI also enhances the public perception and creates a psychological deterrence by continuing to strive for a strong, safe and secure environment for the free and expeditious movement of international trade.

CSI Costs

Although there are many key benefits of the CSI program, there is also a financial cost for performing both the non-intrusive inspections (NII) and physical inspections initiated by CSI, whether conducted overseas at foreign ports or in the United States. While the existence of CSI has shifted examination costs from the U.S. importer to the foreign shipper (exporter), the costs incurred for these exams (foreign or domestic) are fairly consistent regardless of where they are done or who conducts them. And, as mentioned previously, using the downtime prior to the lading of the container for examination will facilitate the efficient movement of trade and lessen the impact to industry and the U.S. economy.
Insurance costs may decline because of CSI. If the increased scrutiny of containers leads to fewer inspections because of more careful shippers, there is also potential for a reduction in the number of and costs associated with liability claims against Customs administrations. While this would result in a reduction in insurance costs to seaports around the world, to date the cost of such insurance has proven to be difficult to obtain and quantify.
Threat And Vulnerability

Experts have estimated that the cost to the U.S. economy resulting from port closures due to the discovery or detonation of a weapon of mass destruction or effect (WMD/E) would be enormous. In October 2002, Booz, Allen and Hamilton reported that a 12-day closure required to locate an undetonated terrorist weapon at one U.S. seaport would cost approximately $58 billion. In May 2002, the Brookings Institution estimated that costs associated with U.S. port closures resulting from a detonated WMD/E could amount to $1 trillion, assuming a prolonged economic slump due to an enduring change in our ability to trade.

In addition to the threat of a terrorist weapon in a maritime container, the possibility that terrorists could exploit the maritime container transport system for their ends was confirmed on October 18, 2001. On that day, port authorities in the southern Italian port of Gioia Tauro discovered a stowaway within a well-appointed shipping container complete with bed, heater, toilet facilities and water. The man’s belongings included a cell phone, a satellite phone, a laptop computer and ominously, given previous events, airport security passes and an airline mechanic’s certificate valid for several international airports.

To understand the extent of the U.S. security vulnerability growing out of international trade, it is important to understand the size and complexity of that trade. Since an estimated 95 percent of U.S. imports move by sea, the security environment must place a premium on detecting, identifying and tracking terrorist networks with interests in disrupting maritime commerce.

Maritime and coastal or inland navigable waterway-related interests in the United States encompass a wide range of critical and transportation infrastructure assets that terrorists could target. Attacks on these targets would significantly disrupt the U.S. economy, trade and cause general panic.

Of over 100 million containers which moved through the maritime transport system in 2005, about 11 million arrived and were offloaded at domestic seaports in the United States, according to the Port Import Export Reporting Service (PIERS). The volume alone acts as a significant enticement for a cargo container to be used as a conveyance for terrorism. Historically, containers have been used as a vehicle for the smuggling of contraband and human beings into the United States. The extension of these illegal activities into the realm of terrorism is a plausible but unacceptable outcome.

The CSI program has generated an international awareness for the need to improve and enhance global maritime security. The implementation of CSI and the increase in international export container targeting and analysis has increased security and thwarted attempts to use a maritime container to move contraband material. In addition to illegal persons with possible or suspected links to terrorists, actual attempts to make illegal shipments of weapons, ammunition and equipment that could be used against the United States have been detected, interdicted and deterred based on CSI action or information.
External Factors

CBP continuously monitors the internal and external factors affecting the achievement of goals and ultimately the success of the CSI program. Monitoring these factors and developing strategies for mitigating them is accomplished through an analysis of stakeholder issues, as well as internal and external strengths, weaknesses, opportunities, challenges and threats in the CSI program and its operating environment. This analysis served as the starting point for the CSI strategic planning process and is addressed in this Strategic Plan. By implementing this CSI Plan, CBP intends to maximize its strengths and opportunities and address the challenges, weaknesses and threats.

CBP will continue to face the challenge of enhancing its strategy for keeping terrorists and their weapons out of the United States while maintaining trade facilitation. On a global scale, many external issues or events may have a great effect on maritime security such as: regional conflicts, natural disasters, organized crime, terrorist activity, changes in political administration of a CSI host country, funding shifts and unforeseen technological developments.

Rapid changes are predicted that will impact the maritime environment and may increase the risk of terrorist activity affecting the United States. Legal maritime trade, driven by global economic growth and flourishing international trade, will triple by 2020. The most significant growth will be in the container shipping industry with the trend toward larger ships carrying more containers. Global trade needs for tailored, speedy delivery, along with the volume of cargo and size of ships, will require U.S. ports and foreign ports to expand their infrastructure, deepen the channels in their harbors and provide more virtual ports with online processing to remain competitive.
Specific internal and external issues affecting the CSI program directly involve security and trade facilitation, partnerships and human capital and are discussed in the following sections.

**Security and Trade Facilitation**

The CSI program benefits from the greater exchange of customs-to-customs information resulting from bilateral cooperation and international awareness established to secure global trade. Further, a generally positive perception exists that CSI is a dynamic, flexible program that promises to neutralize large-scale threats and intercept high-risk containers while facilitating the flow of legitimate trade.

The opportunities for CSI include continued growth to 50 ports by the end of 2006, promoting global security standards and serving as a model to secure air cargo. Through CSI, CBP can position itself as a proactive leader in counter-terrorism and trade facilitation and inform the public of its role through communication and global outreach. CSI also offers opportunities to expand technology resources and develop better detection technology and equipment, such as smart boxes. However, while technology is vital, the human element of officer experience is also a critical component of an effective program.

In addition, perhaps in the future, CSI may broaden its focus from terrorism alone to encompass other activities known to support terrorism: for example, smuggling narcotics, violations of intellectual property rights and currency violations. Meanwhile, CBP will continue working with host nations to access terrorism-related data, increase inspections at overseas ports and periodically assess its resource deployment to effectively manage workload demands at foreign ports.
**Partnerships**

The strong support CSI has earned from many host governments has helped to enhance information sharing between the CSI teams and foreign officials regarding U.S. bound shipments. CSI will continue to pursue opportunities for sharing trade information among countries while ensuring adherence to enforcement methods, standards and technologies.

CSI will also focus on enhancing communication and coordination between importers, exporters, and trade representatives, increasing participation and reciprocity with foreign governments and maintaining the credibility of host nations. Other issues that CSI needs to remain alert to include subversive elements exploiting the flow of information between countries and the financial impact on foreign governments to support CSI.

**Human Capital**

CSI enhances abilities and opportunities for DHS personnel and provides focused training on NII technology, ATS and international diplomacy. Courses in cultural differences are part of CSI training. In addition, CSI promotes greater knowledge of customs practices relating to: illegal drugs, agricultural/biological threats, harmful pests and diseases, strategic commodities and international trade regulations and import duties on a global scale, resulting in better informed officers.

To resolve the continuing requirements for more experienced officers, CBP will evaluate the selection process and consider varying alternatives for staffing CSI positions. Other human capital issues CSI will consider include: integrity and potential fraud, long distance management and oversight of CSI officers and operations.
Secure U.S. Borders

Strategic Goal 1

Secure U.S. borders against terrorists and terrorist weapons by evaluating all containers bound for the United States for terrorist risk before lading at CSI ports.

Objective 1.1

Enhance the process for identifying high-risk cargo by receiving and making full use of advance trade data.

CSI currently targets vulnerabilities to containerized cargo destined for the United States in the maritime environment through advance and enhanced information and trade data. This is done using the 24-Hour Rule, implemented in January 2003, which requires manifest and bill of lading information to be submitted to CBP 24 hours in advance of the cargo being loaded on a ship at a foreign port. The 24-Hour Rule allows CBP officers to pre-screen and target high-risk shipments and containers before they arrive in a United States port. Failure to fully comply with the new regulations may lead to a civil penalty, and permission to load or unload cargo to or from the vessel may be denied.

In support of the 24-Hour Rule, bill of lading information is entered into CBP’s sophisticated automated systems. The Automated Targeting System

Photo by James Tourtellotte

National Targeting Center staff works 24/7 in support of the CBP antiterrorism mission
(ATS) then applies hundreds of targeting rules to pre-screen every arriving shipment and assigns a level of risk for terrorism to each oceangoing container headed to the United States before it leaves the port of lading.

To achieve the objective of receiving and making full use of advance trade data, CSI will work to obtain information even earlier in the supply chain than the 24-Hour Rule requires. This includes the possible receipt of the more detailed exporter entry data prior to lading. In addition, CBP will work towards utilizing trade data to identify the real parties of interest and the point of origin of a shipment.

CBP will also acquire more information through foreign collaboration and enriched trade data. To provide a more robust cargo targeting and analysis environment for pre-screening high-risk maritime cargo, CBP will collect and incorporate that information into its Automated Targeting System. In addition, CBP will continue to enhance the ATS rules-based targeting system and assure that its application addresses the mission.

CBP will continue to increase accuracy and reduce false anomalies in ATS to help concentrate efforts on identifying and examining shipping containers that pose the greatest threat. Ultimately, these actions will allow CBP to better assess and identify high-risk shipments and conduct fewer cargo inspections on low-risk shipments.
Objective 1.2

Improve the process of screening and examining containers by developing and fully utilizing state-of-the-art technology.

Currently, when examining containers that pose a potential terrorist threat, CBP officers generally conduct either non-intrusive or physical inspections. The non-intrusive inspection (NII) involves use of X-ray or gamma ray scanners to generate an image of the contents, which CBP officers review for anomalies. CBP officers also scan cargo using radiation detection devices. If an irregularity is identified, officers may physically examine all or a portion of the container’s contents.

To improve the process of screening and examining containers, CBP continues to develop and utilize state-of-the-art technology. The use of high-tech detection equipment enables early and efficient screening of cargo overseas during the container’s down time while awaiting lading. The following will help achieve this objective:

- Future planned development of the CBP Automated Commercial Environment (ACE) will dramatically impact the current information base and risk management approach to container targeting and analysis. In addition, analytical tools and capabilities that consolidate disparate information systems and enhance ways to screen advance information will enable links between people, places and events, which traditionally could not be identified.
- Emerging technology is a key factor in the evolution of CSI. For example, electronic surveillance technology, such as Global Positioning System (GPS) equipment that monitors the movement of containers and remote imaging, can maximize screening and examination resources.
The use of electronic seals and the development of container technology that can track and report on the integrity of a shipment will provide supply chain stakeholders with a real-time picture of the location and status of shipments and give carriers better control of equipment. These technologies significantly impact domestic and foreign cargo handling and trade facilitation.

CSI continues to monitor these developments and to collaborate with other supply chain security specialists to ensure the optimum use of the most cost-effective technology. CSI also incorporates research conducted by the CBP Enforcement Technology Center.

In addition, CSI will continue to collaborate on interagency programs such as the:

- Department of Energy Megaports Initiative which agreed to install radiological and nuclear detection monitoring devices at CSI seaports.
- Maritime Transportation Security Act (MTSA) initiatives such as the proposed regulation that will require verification of seals prior to lading in the foreign port.
- U.S. Coast Guard International Ship and Port Facility Security (ISPS) Code designed to improve security practices and determine if additional security precautions will be required for vessels arriving in the United States.

Through the security benefits derived from these and other ongoing technology-related security efforts, CBP aims to establish a seamless barrier against terrorism in the maritime environment in the near future.
Objective 1.3

Promote parity at CSI ports through examination of all high-risk containers prior to entering the United States.

CBP will continue to promote parity, which is the security inspection of all high-risk containers by imaging and radiation screening, using non-intrusive inspection (NII) technology, and/or physical examination, unless containers are removed from high-risk via information provided by the host nation. Better equipment and more detection technology has increased the number of inspections significantly since 9/11, without hampering trade. However, more work still needs to be done.

To promote examinations, CBP will continue working with local officials through physical and technological presence at foreign ports and increase information and trade data sharing. Multi-disciplined teams of CBP personnel, working side-by-side with our overseas customs partners, will identify and interdict containers posing a high-risk for terrorism before they arrive at a U.S. port. As parity is achieved, this strategy will both secure global supply chains and also reduce the number of security inspections required upon arrival at U.S. ports.

In addition, while CSI focuses on screening and examination of U.S. bound containers, the awareness and value of CSI is passed on to foreign customs for cargo bound for other destinations. Finally, CBP will develop additional beneficial initiatives for industry and trade to take advantage of the container downtime before loading on a vessel. Use of downtime was the benefit initially promoted to foreign governments. CBP will consider developing outreach programs for importers and exporters, and other impacted entities within the shipping environment, to explain CSI benefits and raise understanding of the program.
Build A Robust CSI Cargo Security System

**Strategic Goal 2**

Build a robust CSI cargo security system that will withstand a terrorist incident and ensure a continuous flow of trade, or promptly resume trade through CSI ports, should a terrorist event occur.

**Objective 2.1**

Advance security of all world nations by promoting an international framework of standards covering data elements, host country examinations, risk management and detection technology.

To better protect global trade against the threat of global terrorism, CBP will use the core elements of our U.S. cargo security strategy – the 24-Hour Rule, CSI, C-TPAT, advance information requirements and automated, risk-based targeting – to promote an international framework of standards to govern customs-to-customs relationships and customs-to-business relationships. By including harmonized advance manifest data elements, all nations that join such a framework will require and receive the same data on shipments that would, preferably, be submitted electronically.

CSI also envisions a harmonized, multilateral examination and security process. Each coun-
try would employ a common risk-management approach regarding the way high-risk containers are identified. Information relevant to terrorist risks would be shared between the Customs administrations of participating nations. Each nation participating in the framework would offer an efficient, expedited process to private sector companies that meet minimal supply chain security standards and best practices.

In addition, CSI supports standardizing technology products, which ultimately would result in cost efficiencies. Further, CBP will ensure competition for all CSI technology and infrastructure products and services.

Setting international guidelines, and adopting standards that meet or exceed existing maritime requirements, will help further the security of all world nations and ensure the expeditious movement of cargo worldwide. The logical forum for achieving this objective is through the World Customs Organization (WCO), which represents 169 Customs administrations. In June 2004, the WCO adopted a resolution establishing a high-level group of heads of customs to draft this global framework. In June 2005, the WCO adopted a global Framework of Standards which aims to:

- Establish standards that provide supply chain security and facilitation at a global level to promote certainty and predictability.
- Enable integrated supply chain management for all modes of transport.
- Enhance the role, functions and capabilities of customs to meet the challenges and opportunities of the 21st Century.
- Strengthen cooperation between Customs administrations to improve their capability to detect high-risk consignments.
Strengthen customs/business cooperation.

- Promote the seamless movement of goods through secure international trade supply chains.

Objective 2.2

Enhance cargo security and trade facilitation by strategically identifying the optimal trade lanes and ports for inclusion into CSI.

The initial twenty CSI ports were selected primarily based upon volume. However, as the program moves forward, the identification and selection of potential ports will focus more on strategic significance related to terrorist threats in the commercial maritime domain. In the future, selection of ports for participation in CSI will be based upon several criteria including:

- Trade Volume—the volume of import trade overseas ports have with the United States.
- Terrorism Connections—the presence of terrorist groups with the ability to plan or execute a course of action against the United States from this location. This may include support bases for funding, political sympathy or historical action.
- Geographical interest—the geographic significance of the ports as transshipment or intermediary hubs serving regions of high-risk origins for a WMD/E or other terrorist activity.

Once a port has been selected, additional steps are implemented to reach operational status. The steps include negotiating and executing a Declaration of Principles document with the host country; conducting an operational assessment of the proposed port; determining CSI facility possibilities
and conducting surveys and estimates of requirements to establish a CSI office; staffing the CSI office; and building-out all facilities, support and IT infrastructure necessary for the CSI team to become operational.

Objective 2.3

Expedite the movement of low-risk shipments through the global supply chain.

By meeting the challenge of increased container scrutiny abroad, developing enhanced container technology and receiving advance transmission of timely, complete bill of lading information, CBP can move forward in its goal to facilitate global trade. This concept involves facilitating secure, low-risk shipments across U.S. borders and through the ports of entry and represents enhanced security along the entire supply chain, from a foreign manufacturer all the way to the U.S. port of entry. It also represents expedited processing at the port of entry and will play a vital role in contingency planning for periods of increased threat following a terrorist attack.

To fully accomplish this objective, participating CSI nations, ocean carriers and the importing and exporting communities must commit to effectively using the downtime while cargo is waiting to be loaded in a foreign country. Further, these entities must recognize the monetary costs incurred are necessary and can be balanced against the cost savings of expedited processing and increased security.
Objective 2.4

Continue to work with other agencies on maritime contingency and recovery plans and efforts.

CBP, working through DHS and its component agencies, as well as federal, state and local law enforcement and the public and private sector, is working to further develop and enhance contingency and recovery plans and efforts in the event of an incident of national significance affecting the movement of maritime cargo.

CBP participated in the development of the “Maritime Infrastructure Recovery Plan” (MIRP) as part of the President’s National Strategy for Maritime Security as directed by the joint National Security Presidential Directive – 41 and Homeland Security Presidential Directive – 13 (NSPD–41/ HSPD–13). The MIRP, which was released in April of 2006, is designed to establish an overarching approach within the maritime domain to recover from an incident of national significance resulting from a national transportation security incident. CSI will be a significant factor in post-incident risk assessments to determine priorities for cargo as normal operations are resumed.
Protect and Facilitate Trade

Strategic Goal 3

Protect and facilitate the movement of legitimate trade by maintaining effectively operating CSI ports, working with host nations to inspect all containers identified as posing a potential terrorist risk and providing benefits and incentives to international governments and organizations, as well as to our trading partners.

Objective 3.1

Increase the effectiveness of CSI by negotiating with host countries to review and request examination of all high-risk shipments identified by CBP through ATS.

To extend the zone of security internationally, and implement joint worldwide cargo targeting, analysis and examination capabilities, it is necessary to negotiate arrangements, called Declarations of Principles, with host nation Customs administrations. These arrangements permit the deployment of CBP personnel into the foreign nation’s seaports.

Several valuable lessons learned in the CSI program have resulted in the following guidelines:

- All shipments will be screened through ATS.
- CBP officers will use ATS to review and hold all high-risk shipments for examination.
• Cooperation and intelligence sharing will be established.
• Foreign countries need to conduct thorough risk assessments of each nation’s exports.

Objective 3.2

Ensure effective coordination with host countries by conducting periodic risk evaluations of ports to assess the level of staffing and other resource needs.

CBP has developed an evaluation tool, which will continue to be refined and used to periodically review existing CSI ports to assess and improve CSI operations and determine the number of CBP officers and other resources needed. CSI will evaluate the terrorist threat posed, the level of support provided and the cost and benefit of having officers within the particular country. To determine the effectiveness of the program, CSI will continue to complete evaluations for each country or region on a predetermined schedule, realigning CBP resources as necessary.

If it is determined the port should be modified to meet CSI requirements, there will be steps in place to expand responsibilities and ensure effective coordination. These steps include working with foreign host countries on standard risk assessment procedures, standard examination procedures and identification of compromised containers. The steps will help maintain the quality of targeting, efficient flow of trade and support any expedited handling processes for that particular port.
Objective 3.3

Encourage interagency cooperation by developing a capacity to collect and share information and trade data gathered from CSI ports.

The information and data gathered after the examination of a container will be made available to other CSI and domestic ports. CBP will also explore the feasibility of collecting that data and allowing it to be developed and used later in the targeting process.

To more effectively share information related to maintaining watch lists, CBP intends to strengthen cooperation and work closely within DHS and with other federal agencies and foreign governments to effectively share information and trade data to facilitate enhanced decision making at our Nation’s borders. There will be internal exchange of information with the Coast Guard and Immigration and Customs Enforcement, as well as an exchange of information and partnership with the Department of Energy, National Nuclear Security Administration, among others.
Objective 3.4

Present CSI standards and promote greater participation by international governments, international organizations, trade communities and other organizations engaged in maritime security.

All entities along the supply chain have a stake in protecting global trade and the global economy. CSI promotes participation by providing specific benefits to international governments and organizations including:

- Added day-to-day protection for the global system of international trade to the United States.
- Collaboration between CSI and foreign Customs administrations to improve the capabilities and increase efficiencies of the targeting process.
- The incentive for industry to provide advance trade data, which provides more open and accessible information, enhances collaboration, allows collecting and sharing of intelligence, enhances public perception and creates a psychological deterrence.
- Possibilities of expanding security to detect radiological and nuclear material through enhanced overseas security and to develop and implement enhanced container technology or other intrusive technologies.
- Pre-screening of containerized cargo, which will facilitate entry into the United States.
- Increased awareness of the need to secure global trade.
CSI also offers benefits to industry and the trade community including:

- Securing and facilitating the movement of legitimate trade by using the natural downtime in the foreign ports as containers are staged to be laden onboard a vessel.

- Expeditious movement of cargo and fewer invasive inspections.

To meet the challenge of increased scrutiny, CBP will continue to identify and develop additional benefits for international governments and organizations, as well as industry and the trade community. These benefits will promote examinations abroad to take advantage of the downtime that occurs before containers are loaded on a vessel. In addition, a plan for communicating the benefits of CSI participation will be developed and implemented.

CBP is also promoting the adoption of a standardized, harmonized security approach that allows nations to have confidence in the security of goods flowing through their ports. By engaging international organizations, hosting global conferences and offering foreign countries reciprocity, CBP is contributing to the development of global security standards. CBP is partnering with international trade and security groups to develop supply chain and container security standards that can be implemented by the world community.
Objective 3.5

Improve CSI operations by evaluating the feasibility of regionalizing management of CSI teams.

To ensure that CSI teams are effectively working with the host nation to target and inspect high-risk containers, CBP will consider the feasibility of realigning the country team managers as regional team managers. These managers would then be deployed to locations within geographic areas that support regional management of two or more CSI countries. Corresponding to this realignment, CSI team leaders, currently staffed one per port, would be centralized within a country or smaller region and be designated as country team leaders for one or more CSI ports.

Regionalization of deployed CSI teams could be mirrored by the expansion of CSI resources, organized to provide dedicated support to specifically assigned regions. Geographic and cultural knowledge gained would promote highly skilled specialists and a consistent relationship.

Regional Automated Targeting System weight sets - assigning targeting rules different weights based on the region where a shipment originates - could further enhance the ability of CBP to classify and characterize the threat. A byproduct would be positioning ports within a similar region in terms of targeting methods, approaches to examining CSI referrals and sensitivities to the private sector.

This regionalized management concept will be evaluated, and if feasible, an implementation plan will be prepared and executed. In addition, the CSI human capital plan will reflect any changes in structure.
Economic Cost of Securing the Maritime Supply Chain

The economic cost of massive destruction caused by the detonation of a WMD/E is difficult to quantify. One example that can be used is the disaster at the World Trade Center in New York City. CSI was started as a direct result of 9/11. The cost of 9/11 to New York City alone has been estimated in the range of $83 billion, according to a September 2002 report by the City's Comptroller.

A port closing due to suspected WMD/E in a container also has an economic cost which is difficult to quantify. The GAO report on Container Security in July 2003 cited a study estimating the total cost to the U.S. economy of a 12-day port closure to locate an undetonated WMD/E at $58 billion. This yields a cost per day of about $4.8 billion. However, based a 2001 study by the University of California Berkeley's Dr. Stephen Cohen of a potential West Coast dock shutdown, the cost per day would be about $1 billion. Finally, in June 2006, the Public Policy Institute of California listed more than one study reporting that the ripple effect of the closure of all the ports that occurred on the West Coast in 2002 cost the U.S. economy about $2 billion per day.

For the CSI benefit estimation, the figure of about $1 billion per day for a port shutdown is used and a 1 percent probability is applied for a cost avoidance benefit of $9.4 million per year. In addition, a loss of $115 million in federal, state and local taxes for a 5-day shutdown was documented in that study. Again, the CSI benefit estimation and a 1 percent probability are applied for a cost avoidance benefit of $230,000 per year.
The chart which follows summarizes the research on the quantifiable cost of major disasters due to WMD/Es from the CSI Cost Benefit Analysis. Reducing the chance of annual occurrence, and subsequently, the actual cost of future disasters (by preventing them) is the primary goal for CSI and the basis for estimating the benefit of the CSI program.

### Estimated Annual Loss from Major Disasters and Port Shutdowns

<table>
<thead>
<tr>
<th>Event</th>
<th>Estimated Loss (000)</th>
<th>Annual Chance of Occurrence</th>
<th>Estimated Annual Loss (000)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Port Shutdown (Economic Loss)</td>
<td>$940,000</td>
<td>1%</td>
<td>$9,400</td>
</tr>
<tr>
<td>Port Shutdown (Lost Fed/State/Local Taxes)</td>
<td>$23,000</td>
<td>1%</td>
<td>$230</td>
</tr>
<tr>
<td>Major Disaster (Economic Cost)</td>
<td>$83,000,000</td>
<td>1%</td>
<td>$839,000</td>
</tr>
</tbody>
</table>

Contrast these figures with the program costs. As of August 2006, CSI was operational at 44 ports located in 26 countries or regions. For Fiscal Year 2004, 2005 and 2006 the CSI budget was about $61, $126 and $139 million respectively. For Fiscal Year 2007, $141 million is requested.

Lack of funding for CSI would effectively handicap the ability of CBP to secure maritime cargo entering U.S. sea ports. Without CSI, CBP would be forced to essentially await the arrival of targeted high-risk cargo and then, inside the U.S. port, examine, inspect and respond to anything found in the cargo, risking port disruption or more grave damage. The threat to the public, CBP personnel and maritime economic corridors makes this program vital to CBP’s ability to execute its mission, in accordance with the DHS and CBP Strategic Plans.
Performance Measures

Performance measures are used to gauge the effectiveness of the CSI program in meeting its strategic objectives. One of the primary outcomes of the program is that of deterrence—to prevent containers with WMD/Es from arriving at U.S. ports. The target for this deterrence goal is that no containers with WMD/Es enter the country.

Measurements of the outcomes for deterrence and prevention are extremely difficult to quantify. First, there is inherent difficulty in measuring whether a terrorist weapon has entered the country until they are used. Second, CSI is only one layer of the CBP layered strategy, and there are many other programs that contribute to this deterrence outcome. Finally, measuring the benefits of a program’s unique collocation with foreign customs partners in foreign ports is wholly unprecedented.

Many of the measures for this program are new, and as such they will be pilot-tested at numerous CSI ports to assess their feasibility, utility, relevancy and if they produce actionable information. Based on this pilot evaluation, the measures may be revised to improve their effectiveness in assessing program performance and outcomes. Once the measures have been solidified, targets will be established for out-year performance using Fiscal Year 2005 as the baseline.

Finally, CSI receives an extremely high level of support from the Federal Government including a strong financial commitment. It is also a highly visible program. Therefore, CBP must continuously assess CSI, measure its effectiveness, report on the results and make the necessary changes to continuously improve the program. At the same time, CBP must ensure that the program is not driven solely by generating statistics because this could jeopardize the program focus on the many qualitative benefits: increased collaboration and partnership, information sharing and standard security practices.

The CSI outcome, output and efficiency performance measures tracked in Fiscal Year 2005 are shown in the following table. Details regarding these measures are tracked by DHS and in the CSI Program Plan. Additional measures, such as the number of containers at CSI ports with WMD/Es, the number of containers at U.S. ports with WMD/Es that originated from an existing CSI port, or the comparison of these two measures, are under review and may be used in future years.
## CSI Performance Measures

<table>
<thead>
<tr>
<th>Measure No.</th>
<th>CSI Goal(s) Supported</th>
<th>Description</th>
<th>Scope</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>OUTCOME MEASURES</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>1 &amp; 2</td>
<td>Number of foreign mitigated examinations by category</td>
<td>This proxy measure gauges the outcome of increased information sharing and collaboration by collocating CSI CBP personnel at foreign ports. The measure is the number of examinations waived that are mitigated by foreign customs sources using their own knowledge of shippers, information from their sources/databases and intel sources to make a decision that an examination is not necessary. The baseline from FY2004 data is 2,416. For FY2005, the number of mitigated examination referrals was 18,160. The goal for FY2006 is 24,000.</td>
</tr>
<tr>
<td>2</td>
<td>1 &amp; 3</td>
<td>Number of investigative cases initiated due to CSI intelligence</td>
<td>This measure tracks the number of investigative cases opened either in the United States or at a foreign location due to intelligence gathered by CSI staff at foreign port locations. The FY2004 baseline is 20 cases. For FY2005, 44 investigative cases were opened. The goal for FY2006 is to increase the FY2005 figure by 10 percent.</td>
</tr>
<tr>
<td><strong>OUTPUT MEASURES</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>1, 2 &amp; 3</td>
<td>Number of intelligence reports based on CSI foreign sources</td>
<td>This is a proxy measure gauging the impact of foreign collocation and collaboration. It collects the number of intelligence reports that are based on CSI foreign sources. The FY2004 baseline is 17 cases and in FY2005 CSI researched and disseminated 99 intelligence alerts to CSI and CBP offices.</td>
</tr>
<tr>
<td>4</td>
<td>2 &amp; 3</td>
<td>Number of operational CSI ports</td>
<td>The measure identifies the total number of ports where CSI has been implemented. For FY2005, the goal was to increase the number of ports by 15 for a total of 41. The actual number of ports for FY2005 was 40. The target for the end of FY2006 is 50 ports.</td>
</tr>
<tr>
<td>5</td>
<td>1 &amp; 3</td>
<td>Number of positive findings by category</td>
<td>This information measure shows the number of foreign and domestic positive findings with CSI participation.</td>
</tr>
<tr>
<td>6</td>
<td>1</td>
<td>Percent of worldwide United States destined containers processed through CSI ports</td>
<td>This measure is the percent of worldwide U.S. destined containers (tracked via their respective bills of lading) processed through CSI ports as a deterrence action to detect and prevent WMD/Es and other potentially harmful materials from leaving foreign ports headed to U.S. ports. For 2005, CSI ports processed 73.41% of all containers destined for the United States prior to lading. The goal by 2010 is for CSI ports to process 86 percent of all containers destined for the United States prior to lading. Note: Processed may include any of the following: 1) U.S. destined cargo manifest/bills of lading data reviewed using the ATS; 2) further research conducted; 3) collaboration with host country and Intel reps; 4) exam of container.</td>
</tr>
<tr>
<td><strong>EFFICIENCY MEASURE</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>2 &amp; 3</td>
<td>Average cost per CSI port to achieve operational status</td>
<td>This measure includes the average cost per CSI port of achieving operational status for the planned number of CSI ports for each fiscal year. The average cost per CSI port includes: site assessments and certifications, telecom circuit installation, Local Area Network (LAN) and office equipment, commercial-off-the-shelf (COTS) software, office furniture, Radiation Isotope Identification Device (RIID) equipment, purchase of automobiles, initial lease and utilities costs and initial shipping costs. The annual total of all costs divided by the number of ports that achieve operational status during the year results in the average cost per CSI port to achieve operational status each year. As of October 2004, the estimated average cost per CSI port to achieve operational status is about $395,000. For FY2005, the estimated cost per CSI port to achieve operational status during the year was $227,324.</td>
</tr>
</tbody>
</table>
Program Evaluations

Program evaluations complement the use of performance measures in assessing program effectiveness. Using objective measurement and systematic analysis, program evaluations assist in determining if programs achieve the intended objectives. The following summarizes the program evaluations used to develop the Strategic Plan and the program evaluations proposed to implement the Plan.

GAO has conducted or will conduct the following reviews:

- Container Security: Current Efforts to Detect Nuclear Materials, New Initiatives, and Challenges, November 2002, (GAO-03-297T);
- Container Security: Expansion of Key Customs Programs Will Require Greater Attention to Critical Success Factors, July 2003, (GAO-03-770); and

The Evaluation and Assessment Branch of the Container Security Division is responsible for the assessments and evaluations of foreign ports participating in CSI. Members of this branch perform the following activities:

- Conduct on-site capacity assessments for potential CSI ports including reviewing the potential ports’ cargo security procedures, physical security of the port, automation capabilities, internal security procedures and its capacity and willingness to become a full partner in the CSI program;
- Analyze the assessment and intelligence information and prepare a report for the Commissioner for a decision on whether or not a port should be included in CSI;
- Formulate formal comprehensive evaluation and port assessment reports;
- Perform analysis regarding the program’s strengths and weaknesses and propose program policy changes;
- Recommend an implementation strategy based upon the readiness of a foreign government to implement CSI;
- Conduct periodic evaluations of current operating CSI ports. During the evaluations, the branch members conduct a physical inspection of the office, ensure that the CSI team is adhering to standard operating procedures and evaluate the relationship between the United States and host nation CSI team. Branch members also meet with the host government to exchange best practices, resolve any outstanding issues and exchange ideas to enhance the CSI program; and
- Maintain statistics generated from the CSI ports.

The CBP Office of Policy and Planning has plans to evaluate the CSI program in FY2006 in three areas:

- Operational assessment;
- Organizational structure and staffing; and
- External stakeholder relationships.
Looking To The Future

CSI is a dynamic, evolving program rapidly moving forward to extend the zone of security and pre-screen the greatest volume of cargo destined to the United States. The chart on page 37 illustrates the projected volume as the program moves to operational status at 58 seaports by 2007 and works to maintain, fully implement and convert these seaports to permanent status by 2010.

In the future, the supply chain will begin with a certified C-TPAT importer and their associated supply chain exporters using enhanced container technology to secure the containers. Next, containers will be shipped to the port of lading and the targeting and analysis will begin with full access to integrated information including manifest data, seal integrity data, enhanced overseas security information and other intelligence available 24 hours in advance of lading. Upon arrival at the CSI port, U.S. destined containers will be screened for radiological and nuclear material through radiation portal monitors procured through the Department of Energy, National Nuclear Security Administration Megaports Initiative, and the electronic seal will be monitored for evidence of possible tampering.

Then, using advance information screened by ATS, the CSI team, in collaboration with the foreign host Customs administration, will jointly identify those containers that may pose a risk for terrorism, as well as those that will be screened because of random compliance examinations. Next, the containers will be screened through NII examinations, and when necessary, unloaded and physically inspected. For CSI ports establishing a level of inspections on par with U.S. domestic ports, containers will receive expedited clearance upon arrival at the U.S. port of entry. The container security technology will be automatically monitored within the unlading process, and with the integrity of the container validated, it will be cleared for distribution.
Emerging technologies will be a key factor in the evolution of the CSI program. ACE will dramatically impact the current information base and risk management approach to container targeting and analysis. The increased use of remote targeting, and the further development of enhanced container technology, able to track movement and location and detect any kind of tampering, will significantly impact domestic and foreign cargo handling and facilitation in the support of maritime cargo.

In the area of human capital, CBP will develop a specialized cadre of officers that are well rounded and knowledgeable regarding CSI operations and seaport security issues on a global scale. In the future, these officers will strengthen and enhance the entire CBP workforce.

The seamless, standardized integration of information and trade intelligence, security procedures and processes; international collaboration; increased participation in reciprocity; and the partnerships among governments and trade will combine to secure maritime trade from terrorism. Further, the internationalization of maritime security is also progressing through CSI.

Working through international organizations, such as the World Customs Organization, CSI is advancing the recognition of the need for Customs administrations to expand their targeting and analysis to include transit and export cargos, as well as imports. In addition, CSI is promoting an international security standards framework covering data reporting, examinations and risk assessments.

Finally, at some point in the future, consideration should be given to potential expansion from focusing on terrorism alone to encompassing other activities known to support terrorism, such as smuggling narcotics, violations of intellectual property rights and currency violations.
All of these activities, taken together, will function to secure maritime trade while facilitating its movement. Working together with the trade community, we will improve security standards around the world, secure global trade against terrorism and make the global trading system faster, more efficient and more predictable than ever before.

In light of the strengths CSI provides to global maritime security, and in anticipation of the opportunities the future will bring, this Strategic Plan serves as the framework to ensure CBP is prepared to meet the challenges we will face.