



ISO Technical Committee 104, Freight Containers

February 23, 2012

Mr. Jouko Lempiainen
Director, Compliance and Facilitation
World Customs Organization
Rue du Marche 30
B-1210 Bruxelles
Belgium

Subject: Interim Recommendations for Application of ISO 17712:2010, Mechanical Seals

Dear Mr. Lempiainen:

I am writing to inform you and the WCO's member agencies about an important development in the implementation of ISO 17712. Many customs agencies and related stakeholders will be affected by these developments, particularly those that require shippers and carriers to use ISO 17712-compliant High Security "H" barrier seals.

This letter describes the situation, what TC 104 is doing about it and, most importantly, our recommendation about how users should respond to the current situation.

Implementation of tamper-evident testing in accordance with ISO 17712

The ISO published 17712:2010 in September 2010. A transition period postponed implementation of two features until 1 March 2012. One feature, a change in the minimum diameter of bolt seals, is ready to go into effect. However, the second feature (passing 17712's tests for evidence of tampering) encountered difficulty.

Clause 6 of ISO 17712:2010 requires compliant seals to pass three tests of tamper evidence administered by an accredited third party testing laboratory. The text assigns to the testing labs an unusual degree of latitude in designing specific tamper-evident test procedures. The drafters of the standard took this approach to balance the needs of security and transparency. Subsequent to publication, accredited labs declined to offer such tests. Some were concerned that the tests were not repeatable and reliable; others were concerned that adequate tests would be impractically expensive.

As a result the seals that will be available for purchase will not be and cannot be in compliance with the current tamper evident requirement in the standard.

Corrective actions

TC 104 has been working diligently to address this issue. We took action to encourage the market for testing laboratory services to meet the need. We also investigated alternative approaches and test procedure guidelines to help testing laboratories accommodate their concerns.

Since neither of these initiatives succeeded a TC 104 working group has developed draft amendments to the standard which accommodate both the testing market realities and stakeholder concerns about the tamper-evident capabilities of cargo seals. We expect to initiate formal ISO amendment procedures in the near future based on this work with a view towards having an official Amendment to the ISO mechanical seal standard approved later this year.

A recommendation to users for interim application of ISO 17712

During the interim period until the official Amendment to the ISO standard is published, all other aspects of ISO 17712 remain completely viable and applicable to its users, regulators and other stakeholders, including the requirement for a larger bolt seal diameter. The difficulty with tamper-evident testing delays an expansion of the scope of ISO 17712. It does not undercut the usefulness or usability of the standard.

As the Technical Committee chair responsible for this standard and with the agreement of colleagues engaged in work on ISO 17712, I recommend the following interim approach. This approach is simply a summary restatement of ISO 17712's active requirements, including the requirement for physical testing for proper seal classification and the full implementation of security over the seals during manufacturing and distribution.

Consider a seal as compliant with ISO 17712:2010 if the manufacturer or distributor can produce upon request:

- A current Certificate of Conformance for Freight Container Mechanical Seal Testing or an equivalent letter from an ISO 17025 accredited independent testing laboratory with ISO 17025 in its scope of accreditation. For High Security "H" seals, the certificate or letter should indicate only classification ratings of "High Security" and the seal should be marked with an "H." For bolt seals, the certificate or letter must also show "Pass" for the minimum diameter test.
- A timely audit report or equivalent letter of conformance with ISO 17712:2010 Annex A, Seal manufacturers' security-related practices, completed by an independent process certification provider specifically accredited to audit conformance with ISO 17712.

Although not required by the standard, best practice among testing laboratories and auditors is to provide digitally authenticated documents.

Consider a seal as non-compliant with ISO 17712:2010 only if the manufacturer or distributor cannot provide documentation and marking as described above.

If it would be helpful to you or your colleagues, I would be pleased to answer questions or provide further clarification.

Sincerely,



M.T. Bohlman
Chairman

cc: Mr. Simon Royals, Technical Officer, WCO Facilitation Sub-Directorate (Procedures)