
❖ SPC&B Update ❖

A Newsletter for Clients of Sharretts, Paley, Carter & Blauvelt, P.C.

December 21, 2010

Is Your Supply Chain Security Profile Up-to-Date? CBP to Implement New Annual Review Procedure in 2011



Without a lot of fanfare, U.S. Customs & Border Protection (CBP) has started rolling out a new and improved version of the former supply chain “Self Assessment,” which will now be referred to as the “Supply Chain Annual Security Profile Review.” Starting on January 1, 2011, CBP will start sending annual notifications to C-TPAT members, reminding them of the requirement to update their Security Profiles on the C-TPAT Portal, with the due date being 90 days from the date of the notification.

C-TPAT members are expected to review their Security Profile every year, and provide updates as appropriate, but there has been little guidance on how or when to conduct the reviews. The new Annual Review procedure states that the original text of the Profile should not be changed during the review; rather, the updates are to be listed with the date of the change separately from the original text. As part of the review, C-TPAT members should include their Risk Assessment procedures, if they have not done so already. (See our *Update* of July 21, 2010, for further details.) The Annual Review is still required, even if no changes have been made in a company’s supply chain during the year. Failure to complete an annual review may adversely affect a company’s status in the C-TPAT program.

C-TPAT members do not have to wait for the notification from CBP to learn the date by which that their review must be completed, since CBP already has posted the due dates in members’ Portal accounts.

Anyone with questions or concerns about the status of their security profile, or who need assistance in conducting the annual review, should contact Donna Shira at dshira@spcblaw.com or Gail Cumins at gcumins@spcblaw.com or call us at 212-425-0055.

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