

ISO/PAS 17712:2005 (E) Assessment

Date of Audit: January 27 & February 1, 2006

Company Name: E.J. Brooks Co., Inc.

Company Address: 8 Microlab Road
Livingston, New Jersey 07039
973-597-2900 (tel)
973-597-2973 (fax)

Auditor: Bernadette M. Martinez
ABS Quality Evaluations, Inc.

References: ISO/PAS 17712:2005(E)
*Freight containers –
Mechanical Seals*

Scope and Purpose of Assessment:

The purpose of the assessment was to verify E.J. Brooks Company's implementation of ISO/PAS 17712:2005 (E). The assessment was conducted at the Angola, Indiana manufacturing facility and the Livingston, New Jersey Corporate Headquarters.

Result: It has been determined that as a result of the assessment conducted on January 27 (Angola) and February 1 (Livingston) that E.J. Brooks has effectively addressed the requirements of ISO/PAS 17712:2005 (E).

It is evident that established practices meet the technical and spirit of the requirements.

This audit is not considered a certification audit unless it is determined at later date that the report can be used for that purpose.

A.2 Stage 1 – Design processes

All the requirements of this section, A.2.1, A.2.2 and A.2.3 have been effectively addressed and implemented.

A.2 Stage II – Manufacturer's best practices

A.3.1 Seal Manufacturer's certification

A.3.1.1 Manufacturer maintains ISO 9001:2001 or equivalent certification on all company owned manufacturing facilities.

E.J. Brooks, Angola, Indiana is certified by ABS Quality Evaluations, Inc. Certificate No. 34224

A.3.1.2 Manufacturer purchases contract production services for market ready seal products from ISO 9001:2000 (or equivalent) certified plants.

The requirements of this section are deemed not applicable, however, E.J. Brooks has procedurally addressed this section in its documentation.

A.3.1.3 If a manufacturer's facility or outside production facility for market ready seal products loses its ISO 9001:2000 or equivalent certification, notification must be sent to the appropriate customs administrations if de-certification impacts the use of that company's specific product in international trade.

This section is determined to be not applicable.

A.3.1.4 The best practices referenced herein must be implemented in accordance with this document.

E.J. Brooks has established a corporate initiative to meet the requirements of ISO/PAS 17712:2005 (E).

A.3.1.5 Manufacturer agrees to random and unannounced inspections of facilities and documentation for conformance with this document; inspections are to be accomplished by appropriate certification bodies.

The intent of this requirement has been met. Where required, E.J. Brooks has contractually allows inspections by customers.

A.3.1.6 Manufacture agrees to conduct an initial risk assessment of its facilities, and periodic update reviews, and implement countermeasures and/or policies to overcome potential vulnerabilities or threats.

An initial risk assessment had been conducted on January 28-30, 2002 at the EJ Brooks, Angola facility. The results provided evidence of a thorough assessment. E.J. Brooks implemented the reported findings and has scheduled a follow-up assessment.

A.3.1.7 Manufacturer assigns responsibility for security and product integrity to knowledgeable individual(s), with a principle point of contact.

E.J. Brooks has satisfied this requirement.

A.3.1.8 Manufacturer agrees to cooperate with relevant law enforcement officials.

E.J. Brooks has effectively addressed this requirement at the corporate level.

A.3.1.9 Manufacture will cooperate with regulatory or certification bodies in responding to questions and issues regarding compliance, irregularities, copying etc.

Evidenced by maintenance of ISO 9001:2000 certification and corporate implementation strategies.

A.3.1.10 Manufacture will develop and maintain a crisis management strategy to prepare for and respond to tampering and other malicious, criminal, or terrorist actions; the strategy will provide guidelines to segregating and securing affected products.

E.J. Brooks has implemented these requirements within their non-conforming product procedures and is in the process of developing a policy level statement to provide a stronger focus on the intent of the requirement.

A.3.1.11 Manufacture will provide security awareness among staff. Security awareness includes identification of whom in management they should alert about potential security problems (24 contacts).

E.J. Brooks indicates that they have provided security awareness. It is their intent to implement security awareness requirements within their current management system including the internal audit process.

A.3.1.12 Manufacture requires background checks on all employees to the extent allowed under local and regulation.

E.J. Brooks procedurally addresses this requirement for their employees. When temporary employees are used, the temp agency is required to conduct background checks on the temporary employees. It is E.J. Brooks' intent to address this requirement contractually with their temp agencies.

A.3.2 Seal product certification

A.3.2.1 Manufacturer agrees to submit all relevant products to a testing laboratory to insure the product complies with ISO/PAS 17712 or its successor international standard on an annual basis. The testing lab must be certified according to the standards outlined in ISO/IEC 17025, General Requirements For Competence of Testing And Calibration Laboratories.

E.J. Brooks utilizes ACT Testing Laboratory. ACT is ISO 17025 certified by A2LA. E.J. Brooks has effectively implemented the requirements of this section.

A.3.2.2 Manufacturer will mark seals with its company identity.

E.J. Brooks has effectively implemented the requirements of this section.

A.3.2.3 Manufacturer will produce seals with unique numbers and identifiers. Manufacturers will not re-use or duplicate these unique seal numbers or identifiers unless authorized by the *bona fide* user for the specific seal application.

E.J. Brooks has effectively implemented the requirements of this section.

A.3.2.4 Manufacturer shall track seal numbers and identifiers of all seals it produces or has produced for it, and so as to identify any potential duplication of identifiers. Manufacturers shall track, by seal type, number and identifier, date if finished production, date of order, date seals were shipped, and names of consignee(s). Manufacturer shall retain this information for a period of at least (7) years in a manner that makes it readily available by a regulatory or certification body.

E.J. Brooks has effectively implemented the requirements of this section.

A.3.2.5 Manufacturer restricts the distribution of custom-designed tools to facilities authorized by the *bona fide* user.

E.J. Brooks has effectively implemented the requirements of this section.

A.3.2.6 Manufacturer segregates and renders non-functional any incidental production of scrap seal product before disposal.

E.J. Brooks has effectively implemented the requirements of this section.

A.3.2.7 Manufacturer controls access to production and storage areas and loading docks and stores seals in secure areas.

E.J. Brooks has effectively implemented the requirements of this section.

A.3.2.8 Manufacturer will lock all loaded trailers or containers on the premises. This section is determined to be non-applicable (no on-site loaded trailers or containers).

A.3.2.9 Manufacturer will “inspect what it expects”, by verifying driver identification, if applicable, and verifying the load and count of inbound seal components.

E.J. Brooks has addressed the requirements of this section in a new draft procedure (7.4.4).

A.3.2.10 Manufacturer will implement a policy for off-hour deliveries to ensure prior notice of these deliveries. The policy will require the presence of an authorized individual to receive these shipments. Advance notification, by phone, fax or email, should be required for all vendors/suppliers for incoming deliveries.

E.J. Brooks has addressed the requirements of this section in a new draft procedure (7.4.4).

A.4 Stage III – Distributor and reseller best practices

A.4.1 Sales organizations such as distributors or resellers can enhance or undermine even the best manufacturer’s security program. The manufacturer must help educate their distributors and resellers about the importance, mutual advantage, and specifics of effective seal security programs.

E.J. Brooks has effectively implemented the requirements of this section.

A.4.2 The manufacturer must also set standards and undertake to ensure that their distributors and resellers comply with the following security guidelines.

E.J. Brooks has effectively implemented the requirements of this section.

A.4.2.1 Distributor/reseller will permit manufacturer to review its security procedure.

E.J. Brooks has effectively implemented the requirements of this section.

A.4.2.2 Manufacturer, if it becomes aware of a gap in distributor/reseller security practices, will identify the gap and recommend needed changes that will provide seals with the necessary oversight and accountability.

E.J. Brooks has effectively implemented the requirements of this section.

A.4.2.3 Distributor/reseller will not sell seals without the manufacturer's identity marked on the seal.

E.J. Brooks has effectively implemented the requirements of this section.

A.4.2.4 Distributor/reseller records all aspects of a seal shipment, including source, seal numbers and identifiers, description and the name and address of the individual placing order and the consignee for the order. Distributor/reseller agrees to retain records for a period of seven (7) years. Upon request from a government agency, the distributor/reseller will make necessary records available to assist the agency in the investigation of a cargo shipment incident.

E.J. Brooks has effectively implemented the requirements of this section.

A.4.2.5 Distributor/reseller will restrict the distribution of custom-designed seal application and/or removal tools to facilities authorized by the *bona fide* user.

E.J. Brooks has effectively implemented the requirements of this section.

A.4.2.6 Distributor/reseller will conduct an initial security risk assessment of its facilities and implement countermeasures and/or policies to overcome potential vulnerabilities or threats.

E.J. Brooks has effectively implemented the requirements of this section.

A.4.2.7 Distributor/reseller controls access to storage areas and loading docks, and store seals insecure areas.

E.J. Brooks has effectively implemented the requirements of this section.

A.4.2.8 Distributor/reseller will lock all loaded trailers or containers on the premises.

E.J. Brooks has effectively implemented the requirements of this section.

A.4.2.9 Distributor/reseller will "inspect what it expects" by verifying driver identification, if applicable, and verifying the load and count of inbound seal components.

E.J. Brooks has effectively implemented the requirements of this section.

A.4.2.10 Distributor/reseller will implement a policy for off-hour deliveries to ensure prior notice of these deliveries. The policy will require the presence of an authorized individual to receive these shipments. Advance notification, by phone, fax, or email, should be required from all vendors/suppliers for incoming deliveries.

E.J. Brooks has effectively implemented the requirements of this section.

A.5 Stage IV – User knowledge and discipline

This stage focuses upon the best practices of bona fide users, including government agencies, such as Custom administrations that might apply seals to container shipment. The influence and responsibility of seal manufacturers limited to education. Best practice, in this instance, can be enhanced by the seal manufacturers through the inclusion of educational information about seals on product cartons, product literature, and on-site training where appropriate.

E.J. Brooks has effectively implemented the requirements of this section.

A.5.1 Manufacturers will help educate users in the importance of proper control of and record-keeping about seals *prior* to their application and use.

E.J. Brooks has effectively implemented the requirements of this section.

A.5.2 Manufacturers will help educate users in the correct and most effective use of seals, including conformance with applicable standards and regulations.

E.J. Brooks has effectively implemented the requirements of this section.

A.6 Stage V – In transit management

A.6.1 Chain-of-custody of an in-transit shipment falls well beyond the responsibility of the seal manufacturer. However, manufacturers may help users and regulators educate supply chain personnel.

A.6.2 This help involves the application of chain-of-custody principles. Such principles may include assuring that the seal is the right type, that its number has been documented and verified, that its application is correct, and that an audit trail is established. In addition, principles may include a seal anomaly policy, such as procedures to follow if tampering is noted during a shipment.

E.J. Brooks has effectively implemented the requirements of this section as applicable.

A.7 Stage VI – Post shipment chain of custody (seal after-life)

A.7.1 Most of the post –shipment stage in the life cycle of a seal relates to maintaining chain-of-custody information on completed cargo.

A.7.2 Manufacturers' responsibilities and best practices relate to data about the seal themselves. These responsibilities and practices are covered in Stages I, II and, to a lesser extent, IV. Manufacturers' retain:

A.7.2.1 Total responsibility for maintaining the manufacturer's data on seal production, sales, and unique numbers and identifiers.

E.J. Brooks has effectively implemented the requirements of this section.

A.7.2.2 Responsibility to educate distributors and re-sellers about maintaining historical data on their seal inventories and sales, and to educate users about maintaining historical data on their inventories.

E.J. Brooks has effectively implemented the requirements of this section.

General Comment Concerning Sections III, IV, V, and VI

E.J. Brooks provides a strong focus and support in the education of their distributors/re-sellers and bona fide users. This was verified in the considerable level of documentation and education materials that are made available.