



August 29, 2022

Olena Moskalenko
G.N. Transport Ltd.
163 Bowes Road
Concord, Ontario
L4K 1H3 Canada

Re: PIP ID 11862 Account ID 12054
Partners in Protection – Approved Revalidation of Membership

Thank you for your continued participation in the Canada Border Services Agency's (CBSA) Partners in Protection (PIP) program. We are pleased to inform you that the revalidation of your PIP membership has been approved.

Please be reminded that you must log on to the Trusted Trader Portal at <http://www.cbsa-asfc.gc.ca/prog/tt-nf/portal-portail-eng.html> on an annual basis to review your Company Profile and Security Profile, and verify the accuracy of your information. In accordance with the Terms and Conditions of PIP membership, you are also responsible for providing updates through the portal regarding any changes to your information, as they occur.

No later than every four years, your company must submit an updated Security Profile and undergo a site visit for revalidation of your PIP membership, as was just completed. Please note that, as per PIP policy, all members are subject to periodic reviews and/or site visits at any time in order to ensure compliance with minimum security requirements.

In closing, we commend your organization for the responsible role it has undertaken to secure the international supply chain. We look forward to a continued successful partnership!

Please contact the PIP program at pip-pep@cbsa-asfc.gc.ca should you require further information.

Sincerely,

Partners in Protection
Commercial Program & Policy Management Division
Canada Border Services Agency



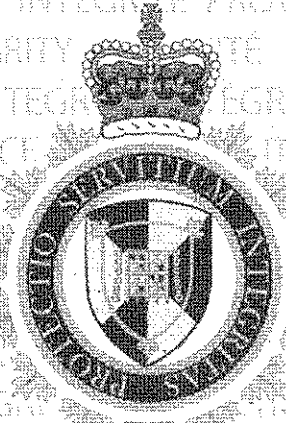
Partners in Protection (PIP)

Site Validation Report

PIP11862

G.N. Transport Ltd.
dba - G.N. Transport Ltd.
August 04, 2022

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PROTECTION • SERVICE • INTEGRITY



G.N. Transport Ltd.

Executive Summary

G.N. Transport Ltd. has been a member of the PIP program since June 11, 2012. G.N. Transport Ltd. is not a member of the CSA program. Its Business Number is 882729320 and Carrier Code is 20SA. Its internet website is www.gntransport.com.

G.N. Transport Ltd. is a transportation company that has been in business since 1984, specializing in the transportation of Steele Tubes, Aluminum Extrusion, Asphalt Shingles, etc. G.N. Transport Ltd. operates from an office/yard facility in Concord, ON. It has a total of 10 employees, seven office/administrative staff and three employees in the warehouse. Its fleet consists of 53 tractors, 80 trailers and two straight trucks. The company employs 32 drivers and contracts 12 owner/operators. Four company drivers are FAST approved; two owner/operators are FAST approved. About 20% of their shipments are domestic and 80% are cross border shipments (USA) with 0% being exported outside of North America and 0% being imported from outside of North America.

G.N. Transport Ltd.'s primary customer is Welded Tube.

The site validation meeting took place on August 04, 2022 at the office and yard facility located at 163 Bowes Rd., Concord, ON.

In Attendance

G.N. Transport Ltd.;

- Greg Nisan, Owner
- Serge Parkhomenko, General Manager
- Olena Moskalenko, Safety and Compliance

CBSA;

- Graeme Stager, Senior Trusted Trader Officer

Procedural Security

Mechanisms are in place to ensure documentation relating to shipments is secure and controlled. Each driver is given a trip envelope which is kept locked and secured inside the truck. When not in use, all documentation is kept inside the locked office.

Procedures are in place to ensure information to clear cargo is accurate, complete, timely and protected against loss/exchange. Dispatch ensures that all information to clear cargo is in order and provided to each driver. Dispatch is in constant contact with the drivers and were any issues to arise, they would be addressed immediately. Each trip envelope is kept secured by the drivers and locked inside the truck.

Procedures are described for notifying the CBSA or appropriate authority when illegal/suspicious activity is discovered. The information for CBSA's Border Watch Line and CBP's Be-Alert line have been made available to employees to report suspicious activities. In the event of an immediate threat to national security 9-1-1 should be contacted. Drivers are provided with the phone numbers for CBSA as well as CBP in every trip folder.

Procedures are in place to ensure information is reported accurately and timely. Drivers will advise dispatch upon their arrival to the shipper, at which point dispatch will confirm the paperwork prior to the driver's departure.

Security measures exist to prevent breach of trailers or containers within G.N. Transport Ltd.'s supply chain. Drivers are required to complete the 17 point check and complete the checklist. Security Awareness Training is provided and required for all employees.

Measures are in place to detect and report shortages and overages as reconciled against the cargo manifest. Drivers will compare the documentation from the trip envelope to that from the shipper to ensure accuracy. Should there be any discrepancies, dispatch will be notified and will contact CBSA if required.

Actions(s) Required/Resolved

There are no actions required.

Recommendations

It is recommended that company contacts remain in a communication partnership with their CBSA Senior Trusted Trader Officer, especially if there is a critical incident that needs to be reported and further security needs are required to be evaluated and implemented.

It is recommended that the account owner of the company profile log-in to the Trusted Trader Portal (TTP) every 12 months to prevent the suspension of log-in credentials. Credentials are automatically suspended after two years of inactivity. Please use this as an opportunity to ensure there has been no changes in the company or security profile.

Personnel Security

G.N. Transport Ltd. maintains a list of all employees. They have what can be considered as a low turnover rate for drivers. Screening procedures are in place for prospective employees and procedures are in place to remove identification, facility and system access for terminated employees.

All potential employees are required to provide background checks, including references, work history and a criminal check. Prospective employees are required to participate in two (2) interviews and a probationary period is observed. A personnel file is maintained for all employees and all training, including security training, is recorded in the personnel file.

A checklist is used during the hiring process to ensure all checks have been conducted prior to hiring. A separate checklist is used upon termination/departure to ensure all company equipment has been returned/accounted for.

Actions(s) Required/Resolved

There are no actions required.

Recommendations

It is recommended that drivers crossing the border be encouraged to obtain or maintain a Free and Secure Trade (FAST) card. It is also recommended that management occasionally request a visual verification of a driver's FAST card as under the Privacy Act companies are not informed by CBSA that a driver's FAST card has been revoked.

Security Training and Threat Awareness

A security awareness program and a Code of Conduct is in place and provided to employees, which includes recognizing internal conspiracies and fostering awareness of the threats in the supply chain.

Driver meetings are held on a quarterly basis, training related to security is also conducted. Attendance is required and documented.

Actions(s) Required/Resolved/Resolved

There are no actions required.

Recommendations

There are no recommendations.

Business Partner Security

There are written procedures in place for the screening of business partners and processes exist to ensure business partners meet PIP minimum security criteria. Each business partner is required to complete a Business Partner questionnaire which is kept on file. Business partners are re-checked annually and site visits are conducted.

Actions(s) Required/Resolved

There are no actions required.

Recommendations

There are no recommendations.

General Seal Security

G.N. Transport Ltd. uses a type of seal (bolt) that meets international ISO PAS 17712 seal standards. Procedures and training are in place for affixing, replacing, recording, tracking and verifying seals on containers, trailers and rail cars. A process is in place to record and control the distribution of seals.

Seals are issued to drivers randomly, one at a time. Seal numbers are recorded on shipping documents and reconciled against the seal log.

G.N. Transport Ltd. has inspection procedures in place. Drivers perform 17-point inspections of conveyance, containers and trailers prior to stuffing, prior to departing and after any stop. Inspections are performed systematically and an inspection checklist is completed.

Shipping personnel verify the reliability of any locking mechanisms used with the container or trailer. Seals are affixed to departing cargo and procedures exist to confirm the shipment arrived at the destination with seals intact. Written policy and training exist for recognizing and reporting compromised seals to CBSA or the appropriate foreign authority.

Procedures are in place to identify shipments of higher risk. Security measures are used to ensure that merchandise being transported is legitimate and that there is no loading of contraband at the loading dock or manufacturer's facility.

Conveyances are not stored on site but are stored in a secure area to prevent unauthorized access and/or manipulation. Conveyances are stored in the yard but are never stored when full. Only in very rare occasions would a container be stored overnight in the yard and in those instances it would be sealed and inspected prior to departure.

Procedures are in place for reporting unauthorized entry into conveyances, containers and trailers. CBSA is notified of any structural changes to equipment that crosses the border.

Driver logs are used for the timely tracking and monitoring of loads and the logs are reviewed by the dispatch after each trip. Pre-determined routes are identified and any changes or delays are reported to dispatch.

G.N. Transport Ltd. uses appropriate locking padlocks or ISO PAS 17712 seals for local shipments in an international Less-Than-Truckload (LTL) environment.

Actions(s) Required/Resolved

There are no actions required.

Recommendations

There are no recommendations.

Physical Security and Access Control

Access controls and procedures are in place to prevent unauthorized access of vehicles and persons.

There is 1 building on site, the facility is 30,000 square feet and is constructed of materials that resist unlawful entry (Brick and Metal); it is located on 11.0 acres of land. Facility inspections are performed as needed to detect possible breaches or security gaps. The inspections are performed by the Owner, they are conducted randomly and are documented. External doors and windows are secured with locking devices and the facility has physical barriers and deterrents to guard against unauthorized access.

All visitors enter through the main entrance where they are restricted to the reception area by controlled access doors. The visitor policy requires that identification is requested of all visitors, they are required to sign in and out, they are issued a temporary identification badge and are escorted throughout the facility. The visitor log is maintained by reception. Vendors are also required to present proper ID and or photo identification upon arrival. Access to areas of the office is restricted to need, and the entire office is locked and alarmed after hours. Procedures exist to identify and challenge unauthorized persons and vehicles and the company has not been the subject of any security breaches.

G.N. Transport Ltd. has an identification system in place for all employees. A photo ID card is issued to each employee and controlled by General Manager, the photo is updated periodically. Drivers are issued access fobs and have access to only specific areas of the office facility such as the driver's lounge. If an employee is terminated or leaves the company their access card is de-activated.

Controlled access of the yard is maintained with a gate. The gate is manned or monitored and locked when not in use. Fencing surrounds the yard and is sufficient to deter illegal entry. It is wire, seven (7) feet high with barbed wire at a 45 degree angle. It is regularly inspected for integrity and damage which is documented.

Signage is adequate to deter accidental unauthorized access of vehicles. Visitor and employee parking locations in relation to cargo handling is adequate. The lighting, both exterior and interior is sufficient.

The facility and yard are also monitored by 27 surveillance cameras, 10 inside and 17 outside. The area covered by the cameras is sufficient and monitored both in house and remotely. Camera footage is digital and accessible for two weeks.

Actions(s) Required/Resolved

There are no actions required.

Recommendations

There are no recommendations.

Data Security

There is no unauthorized access to computers, equipment or documents. Measures are taken to protect electronic assets, including training employees on the need to protect passwords and computer access. Passwords are required to be changed every three months. Firewalls and anti-virus software is used, employee's internet usage is monitored and certain sites are restricted.

G.N. Transport Ltd. controls their IT through a third party service provider, data is backed up on a daily basis. Systems are in place to identify IT abuse such as improper access, tampering or altering of business data and there is an established policy for system violations.

Actions(s) Required/Resolved

There are no actions required.

Recommendations

There are no recommendations.

Summary

Based on the security profile, a virtual on-site review of the company's security practices and additional information provided during the validation, it has been determined that G.N. Transport Ltd. is meeting PIP minimum security criteria and is therefore, recommended for inclusion into the PIP program.

CBSA encourages G.N. Transport Ltd. to continue to periodically review security measures to ensure gaps do not develop within your trade chain. Through established security practices, stringent hiring practices and promotion of the need to remain alert and aware, companies not only contribute to the overall security of the trade chain, but more importantly, they contribute to the safety of our communities and the well-being of all Canadians.

The daily practice of an effective security program that is highly visible to employees, clients, and trade chain partners will encourage the reporting of security breaches and suspicious activity.

G.N. Transport Ltd.'s commitment to the Partners in Protection program is greatly appreciated. Should you wish to discuss our observations or have any questions or concerns regarding the PIP program, please do not hesitate to contact me.



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