

United States House Committee on Homeland Security

“Utilizing Canine Teams to Detect Explosives and Mitigate
Threats”

Testimony of Chris Connell

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on behalf of the

Airforwarders Association

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Chairman Hudson, Ranking Member Richmond and members of the committee, thank you for holding this important hearing and for inviting me to testify.

My name is Chris Connell and I am the President of Commodity Forwarders, a freight forwarding company specializing in perishable products. We are headquartered in Los Angeles and we operate both domestically and internationally. Today I am testifying on behalf of the Airforwarders Association (AfA), on whose board I sit.

The Airforwarders Association represents 360 member companies that together employ tens of thousands of employees and contractors. AfA members range from small businesses to large companies with thousands of employees, and with business models varying from domestic to worldwide operations. Some of our members operate their own aircraft,

but most use scheduled airlines and operators of cargo planes to move the freight they are handling.

Accordingly, we move our clients' cargo throughout the supply chain in the most timely and cost efficient manner, whether it is carried on aircraft, truck, rail or ship. As many of our members operate internationally, we are a key cog in global trade and logistics.

Cargo Screening

Safety and security are at the core of our members' livelihoods. Since our nation and our aviation industry came under attack on September 11, 2001, air freight forwarders have worked tirelessly with our government, our customers and our airline partners to better secure the global supply chain. AfA members have worked diligently to comply with the 100% cargo screening mandate and we are currently working with U.S. Customs and Border Protection (CBP) and the Transportation

Security Administration (TSA) on the Air Cargo Advanced Screening (ACAS) pilots. We are highly aware that the threat to the aviation industry remains high, and we are determined to do our part to ensure safety.

Given the topic for today's hearing, I will say, in the spirit of full disclosure, that in addition to freight forwarders, the Airforwarders Association also consists of air cargo screening technology companies and canine screening companies. But I am not going to tell you that privatized canines are a magic bullet when it comes to screening, because that would not square with our belief as an industry association that the best route to the highest level of safety and security is through a multi-layer, risk-based approach.

Accordingly, what I am here to state is our belief that privatized canines can be a potentially valuable part of this

multilayer approach – another important tool in the toolbox, if you will – that also includes a range of other technology solutions and government-trained canines for our members to utilize to meet screening requirements.

The issue here, as we see it, is whether authorizing private companies to provide dogs to conduct security screening at government-certified freight forwarding facilities – assuming those dogs are trained and certified to government standards – is a good thing to do. And we believe that it is something that TSA should move forward with.

As you are aware, canines have long proven to be an effective security tool. In the wake of the 9/11 Commission Recommendations Act that was passed by Congress in 2007, TSA created the Certified Cargo Screening Program (CCSP), which permitted certified freight companies to screen cargo

away from the airport. The legislation also allowed screening to be performed through a variety of methods including physical inspection, x-ray and explosive trace detection technology. Use of specially trained dogs was deemed as an acceptable way to screen air cargo.

Unfortunately, TSA has permitted only the use of its own dogs, and only at the airport. TSA-owned canines are limited in number, busy at airport passenger terminals and are shared with airline freight facilities only as time and availability permit. So, for the hundreds of forwarders who operate off-airport Certified Cargo Screening Facilities (CCSF), there really is no option to use dogs on their premises.

Just this month we surveyed our members and found that fully three-quarters of the respondents – about half of whom operate CCSFs – say they would strongly consider using dogs

provided by private companies if they were given the option to do that. Additionally, I know that Atlas, DHL, Fedex, UPS and TNT are highly supportive of having the option to use privatized canines to screen cargo.

Let me tell you about my own company's experience in operating a CCSF.

In 2013, CFI's Los Angeles facility screened just over 6.7 million packages through a combination of ETD, X-ray and metal detection. Due to the density of the produce, seafood and proteins we move, most of the screening is done at the box level. Cold chain is another area that requires a more efficient method of screening. CFI spent about \$1.6 million on screeners, loaders and forklift drivers to screen most of those 6.7 million cases. Companies such as Costco, Walmart, Tyson, Kuehne and Nagel and Sysco, are asking CFI for the least

adverse screening method as possible, not just to control cost but to best maintain the quality of the food we ship and people eat.

Accordingly, we are highly interested in any solution that can help us expedite the screening process, move our perishables more quickly through the supply chain, and still provide the utmost in safety and security of what we ship. We think dogs can really help us do that – again, not as a magic bullet, but as an important option to help get the most out of the other solutions we are already using.

Time is money in our business. And right now we believe that we could save over a million dollars a year at our LAX facility if we had access to a third party solution deploying canines. And of course our customers would highly appreciate the time savings that this solution would help us achieve.

Past Testing of Privatized Dogs

I understand that in 2011, TSA ran a pilot program to test the feasibility of implementing a third-party private explosive detection canine program that would make explosive detection dogs available to screen all cargo before it goes on passenger and all-cargo aircraft. I also understand that while the results were mixed, they offered encouragement that private sector canines could meet TSA standards. I would hope that the lessons learned by the canine companies will be useful should you conduct further testing.

I would add that, given the track record of canines in cargo screening, proceeding with a private sector option – with solutions fully regulated, certified and monitored by government agencies – would square with other screening approaches such as in-house x-ray and ETD, where the

government does not develop the technologies and solutions in-house. Rather, it relies on the private sector to do this work and then puts it through rigid testing before authorizing it for use. We think this approach would work well for using dogs.

Conclusion

In conclusion, we urge TSA to finalize its efforts to develop a certification program for private companies to enable them to use their own canines, certified to TSA standards, to meet federal air cargo screening mandates. Leveraging private sector resources will introduce much-needed additional canines into the cargo screening system. The Aviation Security Advisory Committee (ASAC) comprised of stakeholders, including the Airforwarders Association and as diverse as the Association of Flight Attendants to the Pan Am 103 survivors have endorsed the concept of privatized screening. It is our

hope that this hearing will spur what appears to be near universal support for privatized canines.

Thank you for this opportunity and I will be happy to answer any questions that you may have.