



IT Security



Supply Chain



OT Security



Insider Threat



Physical Security



Interoperable Communications



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# ChemLock: Chemical Product Stewardship

## Overview

At every juncture in the chemical supply chain—manufacture, distribution, storage, transportation, and consumption—dangerous chemicals are at risk of theft, contamination, or misuse. Whether a small business or an international company, everyone who interacts with these chemicals has a role to play in understanding the risk and taking collective action to prevent chemicals being weaponized by terrorists.

To mitigate the risk of dangerous chemicals being weaponized at any point in the supply chain, the Cybersecurity and Infrastructure Security Agency (CISA) recommends that chemical manufacturers, distributors, and retailers—as one part of a holistic security plan—consider implementing a product stewardship program. This may include a “know-your-customer” program, inventory management, in-transit tracking of chemicals, shipment confirmation, and receipt confirmation, among others.

## Product Stewardship

Product stewardship is a product-centered approach to the protection of dangerous materials so that manufacturers, distributors, retailers, and consumers share responsibility for reducing the potential for theft, contamination, or misuse of such chemicals for nefarious purposes.

Good product stewardship allows an organization to always know where its product is located. Elements of a good product stewardship program may include:

- Strict vehicle identification, entry authorization, shipping, and control procedures that are tested regularly
- Procedures for handling the arrival of an unknown carrier at the facility, including the staging of a vehicle and its driver until both the driver and the load are vetted and approved
- Confirmation from the facility employee who is responsible for a given shipment that the shipment is expected and approved
- Advance planning and approval of inbound and outbound shipments of dangerous materials
- An active, documented “know-your-customer” program
- Proper identification checks and verification of transactions for customer pickup of dangerous materials
- An audit procedure with appropriate redundancies in place for all shipping, receiving, and delivery of dangerous materials

## Know-Your-Customer Program

Stealing or diverting chemicals is not the only way that nefarious actors can procure dangerous chemicals—they can also use legitimate means, such as purchasing those chemicals. Developing a “know-your-customer” program ensures that a chemical is purchased by, delivered to, or received from a known, approved individual or entity and helps prevent the misuse of dangerous materials.



Know your chemicals.

Lock in your security posture.

Ensure all sales and shipments of chemicals are documented, including the method of shipment, carrier information, the times and dates of shipments, and the destination.

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A “know-your-customer” program may include a policy of refusing to sell dangerous materials to those who do not meet the pre-established customer qualification criteria set up by your organization, such as:

- Verification and/or evaluation of the customer’s onsite security
- Verification that shipping addresses are valid business locations
- Confirmation of financial status
- Establishment of normal business-to-business payment terms and methods (e.g., not allowing cash sales)
- Verification of product end-use

## Report Suspicious Activity or Security Incidents

Suspicious activity is any observed behavior that could indicate terrorism or terrorism-related crime (e.g., chemical purchase inquiries from unknown buyers, cash purchase, requests for unusual chemicals or quantity, etc.). To report suspicious activity, please contact your local law enforcement. After an incident is concluded, contact CISA Central at [Central@cisa.gov](mailto:Central@cisa.gov) to report the suspicious activity.

When reporting suspicious activity, remember to include **who** or **what** you saw, **when** you saw it, **where** it occurred, and **why** the behavior is suspicious.

To learn more about the Nationwide Suspicious Activity Reporting (SAR) Initiative (NSI), visit [dhs.gov/nsi](https://dhs.gov/nsi).

The “If you See Something, Say Something™” Campaign has additional resources at [dhs.gov/see-something-say-something](https://dhs.gov/see-something-say-something) or the “If You See Something, Say Something™” Chemical Security Brochure at [cisa.gov/publication/see-say-chemical-security-brochure](https://cisa.gov/publication/see-say-chemical-security-brochure).

## CISA ChemLock Program

The CISA ChemLock program provides facilities that possess dangerous chemicals no-cost services and tools to help them better understand the risks they face and improve their chemical security posture in a way that works for their business model. Learn more at [cisa.gov/chemlock](https://cisa.gov/chemlock).

## Industry Resources

Several chemical distribution industry associations and/or organizations have developed a template or other resources to assist business owners and operators implement a know-your-customer, product stewardship, or other chemical security program.

## Additional Resources

- ChemLock Exercises and Drills: [cisa.gov/chemlock-exercises](https://cisa.gov/chemlock-exercises)
- Chemical Sector Resources: [cisa.gov/chemical-sector-resources](https://cisa.gov/chemical-sector-resources)
- Chemical Sector Training: [cisa.gov/chemical-sector-training](https://cisa.gov/chemical-sector-training)
- Insider Threat Mitigation: [cisa.gov/insider-threat-mitigation](https://cisa.gov/insider-threat-mitigation)
- Bomb-Making Materials Awareness Program (BMAP): [cisa.gov/bmap](https://cisa.gov/bmap)
- FBI Weapons of Mass Destruction (WMD): [fbi.gov/investigate/wmd](https://fbi.gov/investigate/wmd)
- FBI Suspicious Sales Security Awareness: [fbi.gov/video-repository/suspicious-sales-retail-security-awareness.mp4/view](https://fbi.gov/video-repository/suspicious-sales-retail-security-awareness.mp4/view)

Note: Participation in any portion of CISA’s ChemLock program does not replace any reporting or compliance requirements under CISA’s Chemical Facility Anti-Terrorism Standards (CFATS) regulation (6 CFR part 27). Some ChemLock activities may fulfill CFATS requirements, depending on your specific security plan. Contact local CISA Chemical Security personnel or visit [cisa.gov/cfats](https://cisa.gov/cfats) to learn more about CFATS regulatory requirements.