

Pharmaceutical Cargo Theft in Europe

INSIGHTS INTO THE SEVERITY OF POTENTIAL UNDERREPORTING

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About the Author

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For over 20 years, he has conducted research on drug importation, drug counterfeiting, and drug diversion. His research has been featured on CNN News, NPR Radio, Newsweek, Wall Street Journal, Money Magazine, Time Magazine, US News and World Report, New York Times, USA TODAY, Washington Post, and many other outlets.

Dr. Shepherd has testified before U.S. Congress on drug importation, prescription drug diversion, and counterfeit drugs. In 2010, he was appointed to the Drug Packaging and Distribution Committee of the United States Pharmacopeia.

Project Background

The objective of the research underlying this report was to gain a better understanding of the extent that pharmaceutical cargo thefts go unreported in Europe. With this knowledge, executives in the pharmaceutical and supply chain industries can better assess risks and make more intelligent business decisions.

Specifically the goals of the research were to:

- Investigate the extent to which underreporting of pharmaceutical cargo thefts occurs in Europe.
- Determine how severe a problem it is for companies in the industry.
- Examine the circumstances, factors, and influences of whether or not pharmaceutical cargo theft is reported.
- Highlight countries where the underreporting of pharmaceutical cargo thefts is most prevalent.

Methodology

A web-based, self-administered survey collected information and opinions of pharmaceutical industry executives. The research team used Qualtrics software to develop the questions, manage the distribution process, and analyze the data. The survey was posted on a secure University of Texas website and made available to industry executives through a variety of association and organizational web sites and electronic newsletters. The survey's website address, along with an invitational paragraph defining the study's purpose and objectives, was sent to members via their organization's website or email newsletter. In addition, emails were sent to logistical and security experts requesting their participation. Participation in the survey was voluntary and participants were assured confidentiality and anonymity. No personal data was collected.

The individuals who participated in this research included pharmaceutical manufacturer security personnel, risk managers, product security representatives, supply chain distribution specialists, and insurance experts.

Respondents were from membership-based associations or organizations that focus on the European pharmaceutical distribution process and are dedicated to security for the pharmaceutical supply chain in Europe. These included:

- Transported Asset Protection Association (TAPA)
- Pharmaceutical Security Institute (PSI)
- Pharmaceutical Cargo Security Coalition (PCSC)
- Pharmaceutical Security Institute (PSI)
- American Institute of Marine Underwriters (AIMU)
- National Vehicle Crime Intelligence Service (NaVCIS)

Members of these organizations are considered to be experts in the distribution of pharmaceutical products, risk management, logistics, freight insurance carriers, and the investigation of pharmaceutical thefts and diversion activities.

Due to the nature of the survey, and diversity of respondent expertise, it was expected that not all participants would have the experience and knowledge to provide answers to all of the questions. Thus, the number of responses per question varied. A total of 49 respondents completed all or some portions of the questionnaire. The majority of responses were from pharmaceutical manufacturers and supply chain logistics executives (74.4%). Access to the questionnaire was available between May 2016 and July 2016. For a complete profile of responses, see the Appendix.

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Executive Summary

The total annual loss of all transit cargo stolen on European Union (EU) roads is relatively unknown because the theft of freight is often categorized as other types of crime or simply not reported.

Consequently, the true magnitude and economic impact of cargo theft can only be estimated.

The FreightWatch International Supply Chain Intelligence Center (SCIC) recently examined available data and cargo crime intelligence for Europe from 2013 to determine the potential value of stolen cargo. After arduously evaluating this information, SCIC ascertained that the estimated loss of all cargo theft in 2013 was valued at €11.6 billion.¹ (*For more detail on this, see “Putting a Price Tag on Underreported Cargo Theft in Europe”*).

While that estimation is for the underreporting of all cargo theft in Europe, the research behind this report focuses specifically on the pharmaceutical industry in an effort to determine how much underreporting occurs in this market.

To gain a better understanding of this, European pharmaceutical industry executives were asked for their insights on how extensive underreporting is in this industry—and their answer was that it is a serious and prevalent problem. Across the board, pharmaceutical manufacturer security personnel, risk managers, product security representatives, supply chain distribution specialists, insurance experts, and law enforcement, all agree that underreporting is a significant occurrence.

In fact, **over 80% of these industry experts believe there is a major-to-moderate problem** in the reporting of pharmaceutical thefts. To put this in perspective, consider that in 2015, there were 24 reported thefts of pharmaceutical cargo in Europe. Almost all (92.8%) of the executives in this survey believe that the actual number of unreported thefts was **at least twice** the number of crimes reported in 2015. Drilling down deeper, over a third of the respondents stated that the number of unreported thefts was most likely **three to five times greater** than what was reported. Even of more concern, there were over 20% of respondents that believed the actual number of thefts could be **five to ten times greater** than the 24 reported crimes.

Based on these findings, **a conservative estimate for the actual number of pharmaceutical cargo thefts in 2015 could be anywhere from 72 to 120 incidents**.

This is a clear indication that the 24 reported crimes for that year is a gross misrepresentation of the actual number of crimes that occurred. And it also indicates that the risk of pharmaceutical theft is far greater than the industry perceives or is led to believe.

This research report delves deeper into why cargo theft goes unreported, with more details on the extent of underreporting and where underreporting is most prevalent.

¹ Putting a Price Tag on Underreported Cargo Theft in Europe, FreightWatch Supply Chain Intelligence Center, 2016, <http://www.sensitech.com/assets/whitepapers/underreportedcargotheftweb.pdf>

The Risk of Cargo Theft in the Pharmaceutical Industry

In a 2015, FreightWatch International published a study² on pharmaceutical theft in Europe and found that 91% of the executives surveyed considered pharmaceutical cargo theft to be the top threat to their business. These executives also believed that cargo theft was an ongoing concern; over 80% of them felt that the risk of theft had increased over the previous three years. Thirty-six percent thought there was even a *significant* increase in cargo theft during that time period.

Given the perception of these executives, many of whom were from some of the largest global pharmaceutical companies (in Europe), the relatively small number of yearly reported thefts clearly

doesn't represent the true state of the industry. For instance, there were only 24 pharmaceutical thefts reported in 2015 according to SCIC reports and analysis, and as this report will show, that seems to be a grossly underreported number.

Without a clear understanding of how prevalent cargo theft is, pharmaceutical executives may underestimate the need to secure their shipments and therefore take fewer precautions to effectively protect their cargo.

These insights attempt to clarify this enigma and provide greater data on the actual risk of shipping pharmaceuticals throughout Europe. First let's look at the circumstances that drive underreporting.

² Pharmaceutical Cargo Theft in Europe, A Realistic View of the Current Trends, Challenges, and Financial Impacts; Helmut Brüls and Daniel Wyer, FreightWatch International, 2015.

Two Key Factors Driving Cargo Theft Underreporting

The magnitude and economic impact of cargo theft is relatively unknown because of the propensity of underreporting throughout Europe.

What is clear is that there are two main factors that industry experts say contribute to the significant underreporting of cargo: *misreporting or misclassification*, and *the choice to not report the crimes*.

Factor #1: Failure to Report Cargo Theft

The majority of underreporting occurs because the thefts are simply not reported due to oversight or, more often, by choice due to internal company policies. While this occurs across all market segments, it's particularly common in the pharmaceutical industry.

Underreporting in this market typically falls into the following four categories:

1. **Theft not reported to law enforcement.** In the pharmaceutical industry, companies may not report a theft to law enforcement officials for a variety of reasons. One reason may be to avoid insurance premium increases. Or, these organizations may want to protect their brand or reputation and conceal the theft of valuable and critically needed pharmaceuticals.
2. **Theft not reported to the media, government, or private agency.** In addition to not reporting theft to law enforcement, companies often do not report incidents to entities that collect and disseminate cargo theft information to public or member organizations and associations. Even if incidents were reported to law enforcement, when they aren't reported to the press, governments, or private agencies, it is difficult to track and effectively share that information.

3. **Theft not reported to internal monitoring or analysis personnel.** Another barrier to full insight into cargo theft is the lack of communication and reporting within the pharmaceutical companies themselves. This occurs when employees don't release theft information to those in the company who are responsible for collecting the data and passing it on the appropriate external organizations.
4. **Theft valued below deductible.** Finally, cargo thefts don't appear to be reported if the value of the stolen product is less than the deductible on insurance policies. However, this may not apply to self-insured large pharmaceutical firms where the deductible may not be a factor.

Factor #2: Misreporting and Misclassification

Other circumstances driving underreporting are misreporting and misclassification of cargo thefts. These typically occur because of a lack of uniform reporting standards or definitions across countries or jurisdictions by law enforcement agencies, especially in Europe, where there are widespread diversities by country and jurisdiction. Misreporting often occurs because there is no official organization in Europe where cargo theft information is collected, aggregated, and disseminated.

Although there have been some improvements regarding misreported and misclassification of thefts, these issues present problems in not only collecting the cargo theft information country by country, but also in consolidating the information more holistically.

When cargo thefts are misreported or misclassified, they typically fall into these two categories of theft:

1. **Theft classified as stolen vehicle.** Individual countries in Europe often use different systems and codes in categorizing cargo thefts. For example, when the theft involves the high-jacking or the stealing of a loaded tractor and trailer (lorry), some law enforcement agencies may classify the theft under the broad category of "stolen vehicle." When the crime is reported as such, there is little specific information about the theft and there most likely is no record of stolen cargo.
2. **Theft classified as theft or theft from a vehicle.** Oftentimes, high-value cargo losses are categorized as simply a theft or a theft from a vehicle. Once again, what actually was stolen may be overlooked in reports and thus, there is no indication cargo was stolen.

As a result of underreporting, the police and governments in most European countries cannot fully assess the true scale of freight crime in their own territories. This leaves law enforcement at a disadvantage, and they cannot properly inform the companies that ship into their areas of responsibility of the actual potential risk. This report, however, gives a broader perspective of what might really occur.

How Extensive Is Underreporting in Europe?

While losses cause short-term angst in the pharmaceutical industry, the actual longer-term consequences are nearly impossible to fully assess due to underreporting.

To gain a better understanding of the extensiveness of this in Europe, the pharmaceutical executives that were surveyed in this research were asked to share their insights on the following six key topics:

1. Is underreporting of pharmaceutical theft a problem in Europe?
2. How many estimated cargo thefts actually occurred in 2015?
3. For pharmaceutical manufacturers, how many thefts occurred in their company over the last three years?
4. How many cargo thefts go unreported?
5. Why cargo thefts go unreported?
6. Did the monetary value influence the reporting of thefts?

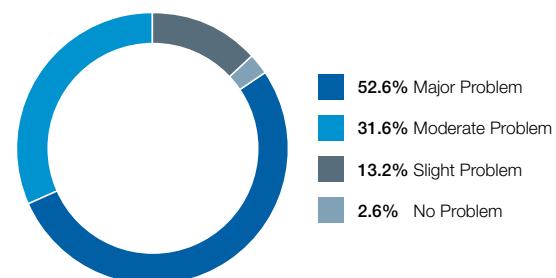
Here is a quick glance into their opinions and views.

1. Is underreporting of pharmaceutical thefts truly a problem in Europe?

The vast majority (84.2%) of respondents in this survey believes that the underreporting of pharmaceutical cargo theft is either a **serious or moderate problem** in Europe (see chart below). Only 2.6% of these executives believe that there is no problem with underreporting.

Clearly, underreporting exists and is of concern in this industry.

How Problematic is Underreporting?



For those respondents who indicated they worked for a pharmaceutical manufacturer, 73.3% viewed underreporting as either a *serious or moderate problem*. Those from the supply chain distribution industry are even more concerned with this issue, with close to 92% believing underreporting is a *serious or moderate problem*.

2. How many estimated cargo thefts actually occurred?

As mentioned earlier, there were 24 reported pharmaceutical cargo thefts in Europe in 2015. When asked about an actual number of thefts in 2015 comparison to this number, here is what the respondents reported:

- **92.8%** of those surveyed felt that the actual number of thefts was **at least twice—and perhaps as many as 20 times greater**—than what was actually reported in 2015.
- **54.7%** stated that the number of unreported thefts was most likely between **three and ten times greater** than what was reported.

- 14.3% thought the actual number of thefts could be approaching a staggering 500 incidents per year.

From a very conservative perspective, this means that the **actual number of pharmaceutical cargo thefts** in Europe per year could be anywhere from **72 cargo thefts (3x24)** to **240 cargo thefts (10x24)**.

For those who work for a pharmaceutical manufacturer, 60.0% believe that the actual number of thefts could be three to five times greater than reported. For supply chain distributors, 57.1% of them believe the actual number of thefts could be five times or greater.

Estimated Number of Actual Cargo Thefts in 2015		
This % of respondents believes...	...that the actual number of thefts for 2015 is...	...bringing the potential number of actual thefts in 2015 to:
7.1%	1x or less than what was reported	24 or less thefts
11.9%	2x greater than what was reported	48 or more thefts
33.3%	3-5x greater than what was reported	72 to 120 thefts
21.4%	5-10x greater than what was reported	120 to 240 thefts
11.9%	10-20x greater than what was reported	240 to 480 thefts
14.3%	More than 20x greater than what was reported	Greater than 480 thefts

Where is Underreporting Most Prevalent?

Respondents were asked to name the top European countries in which they considered the underreporting of cargo thefts to be the most prevalent. Of the twelve countries mentioned by those surveyed, Italy was by far the most frequently reported country (62% of the mentions). Second to Italy was France, followed by Germany at a distance.

3. Per company, how many thefts occurred over the last three years?

(Pharmaceutical manufacturers only)

To get a better perspective of how many cargo thefts actually occur, executives from pharmaceutical manufacturers were asked to indicate how many cargo thefts their company experienced for the years 2013, 2014, and 2015.

- **Between 78.6% (in 2015) and 100% (in 2013) reported between 1 and more than 15 cargo thefts each year.**
- Of these companies **half or nearly half of the respondents** said that their companies had **between one and five** cargo thefts per year from 2013 to 2015.
- The remaining respondents (50% in 2013, 40% in 2014, and 28.6% in 2015) experienced **between six and more than 15 cargo thefts** during this time period.

Estimated number of thefts (per respondent company)	Number of Estimated Thefts (2013 to 2015) (% = number of respondents reporting)				Differential 2013-2015
	2013	2014	2015		
No cargo thefts	8.3%	13.3%	21.4%	+13.1%	
1 to 5 cargo thefts	50.0%	46.7%	50.0%	0%	
6 to 10 cargo thefts	8.3%	13.3%	14.3%	+6.0%	
11 to 15 cargo thefts	25.0%	6.7%	0.0%	-25%	
More than 15	16.7%	20.0%	14.3%	-2.5%	

4. How many of these cargo thefts go unreported?

To gain an understanding how many of cargo thefts go underreported, all of the respondents were asked to estimate the **number of times** they encountered an underreporting incident in their company in 2015. The responses were specific to the type of underreporting—either misreporting or misclassification, or not reported.

- Of those that responded, **69.3% (43)** of the incidents of underreporting were cases of **not reported** incidents (see *Section A below*), while 30.7% (19) of the incidents of underreporting were misclassified or misreported (see *Section B below*).

- As to frequency of underreporting, **54.8% (34)** of the incidents (*not reporting and misreported combined*) of underreporting occurred an **estimated 10 or fewer times**.

- That means that **45.2%** of the underreporting is for **greater than 10 incidents** per company, with as many as **40 or more incidents** of not reporting or misreporting in several of the respondents' companies.

Based on this, one could conclude that the estimated number of possible underreporting incidents of cargo thefts is substantial.

Frequency of Underreporting (<i>Not Reporting versus Misclassification</i>) of Cargo Theft Incidents*						
Number of Incidents	< 10 Unreported Thefts	10 to 20 Unreported Thefts	21 to 30 Unreported Thefts	31 to 40 Unreported Thefts	> 40 Unreported Thefts	Total*
Section A: Frequency of Not Reporting						
To law enforcement	5	3	0	1	0	9
To a private or public data monitoring agency	6	2	0	0	1	9
To an internal monitoring or analysis department	6	2	0	0	1	9
To the media or press	2	2	2	0	2	8
Because of the value being less than the deductible	3	3	0	2	0	8
Total	22	12	2	3	4	43
Section B: Frequency of Misclassification or Misreporting						
Classified as a "stolen vehicle"	6	1	3	0	0	10
Classified as a "theft from a vehicle"	6	1	1	0	1	9
Total	12	2	4	0	1	19
Grand Total	34	14	6	3	5	62

*Due to the nature of the question, there could be multiple answers per respondent, so the total number of responses is larger than the number of respondents.

5. Why are these thefts not reported?

Various influences or factors seem to play a role in whether or not the cargo theft is reported.

To explore this further, the surveyed executives were asked to rate the circumstances that may have influenced them to not report a theft to various entities (law enforcement, external organizations, or internal departments).

The most influential reasons were:

- **Company policy.** This may be because of insurance or reputation-related concerns as earlier discussed.

- **Monetary value of the cargo.** If the value of theft was not significant, companies may want to avoid the costly process of reporting the loss.
- **Loss value was below the deductible.** This factor is explored more in the next section, but companies once again may want to avoid the cost of submitting an insurance claim for low-valued losses.

The location of the theft, type of product, carrier, law enforcement, or insurer request, harm to drivers were not major factors as to why these companies did not report cargo.

Ranking of Top Influencing Factors Per Reporting Organizations (Highest to Lowest Influence per Category)				
Why companies do not report thefts to these organizations:	Law enforcement	Press or media	Data monitoring agency	Internal monitoring or analysis
Company Policy	# 1 Factor	#1 Factor	# 1 Factor	2
Monetary Value	2	2	2	3
Poor Internal Monitoring	NA	NA	3	# 1 Factor
Value Less Than Deductible	3	NA	3	4
Product Type	4	3	5	5
Law Enforcement Request	NA	4	4	NA
Location	5	9	NA	NA
Carrier Request	6	8	NA	7
Injury or Harm to Driver	NA	NA	6	6
Insurance request	NA	5	NA	NA

To review the full results of this question, including the factors that had a moderate, minor, or no influence, see the table in the appendix.

6. Did the monetary value influence reporting?

Based on the respondents' answers, it appears the monetary value of stolen goods can play a role in whether or not the theft is reported to an insurance company, law enforcement, or even higher management. This may be one of the reasons that company policy seems to dictate whether cargo crime is reported or not.

According to the pharmaceutical manufacturers surveyed, **most of the companies (56.4%) set a minimal threshold value** that must be met before officially reporting a pharmaceutical theft loss. Oftentimes, this minimal value will be the insurance deductible. Consequently, if the deductible is higher than the loss value of the product, the theft may not be reported—and this may be a major contributing factor to the overall underreporting issue. However, with many companies being self-insured this may not have a role. The **most frequent threshold** in these companies was **€250,000**.

It is important to note that over 40% of the pharmaceutical manufacturer respondents (43.6%) indicated that no threshold of cargo theft value is set where they are employed.

Confidence in Cargo Theft Information Flow

Pharmaceutical manufacturer respondents were asked to give their opinions about the confidence they have in how well their company processes and disseminates the flow of information concerning cargo thefts.

The results show that the majority of the respondents (66.6%) are **mildly or moderately confident** with their company's processes of handling cargo theft data. Only 13.3% reported they were "extremely confident" and no respondent indicated "little or no confidence."

Confidence Level	Percentage of Respondents
Extremely Confident	13.3%
Moderately Confident	33.3%
Mildly Confident	33.3%
Weak Confidence	20.0%
Little to No Confidence	0.0%

Conclusion

The results of this study show that people who work in the pharmaceutical industry in Europe believe that cargo theft underreporting is a problem and it is very prevalent.

The actual number of crimes seems to be exponentially higher than those reported on a yearly basis.

By not reporting thefts, especially to law enforcement and data monitoring companies, pharmaceutical companies contribute to misinformation and a sense of false security within the industry and to other interested parties (such as insurance companies).

Based on this data, one could conclude that the risks of shipping pharmaceutical cargo in Europe are higher than perceived by manufacturers and others in the industry. As noted many different parties can be affected by this misinformation.

Given these insights, pharmaceutical companies should consider expanding their security measures. This recommendation is not only because of the potential risk that currently exists, as noted here, but also because criminals are getting more sophisticated and the number of thefts most likely will continue to increase.

Appendix

Demographic Description of Respondents

Respondents were asked in a closed-ended question: “Which of the following best describes your general work area of responsibility?” Respondents had the opportunity to check more than one area of responsibility since responsibilities overlap for many positions. Thus, table 1 presents both percentage based on number of respondents and percentages based on number of responses. A total of 39 respondents (of the 49 total respondents) answered the question. Table 1 depicts the choices and the results.

Table 1: Distribution of General Work Area Responsibilities

General Work Area of Responsibility	Number of Responses	Percentage of Respondents ^a	Percentage of Responses ^b
Supply Chain Security	14	35.9%	23.3%
Product Security	12	30.8%	20.0%
Warehouse Management and Distribution	8	20.5%	13.3%
Supply Logistics Management (Non-security)	8	20.5%	13.3%
Risk Management	7	18.0%	11.7%
Insurance Provider	6	15.8%	10.0%
3rd Party/Loss Investigator	2	5.1%	3.3%
Quality Assurance	1	2.6%	1.7%
Data Analyst for Cargo Thefts in Data collection	1	2.6%	1.7%
Public Relations	1	2.6%	1.7%
Law Enforcement	0	0.0%	0.0%
Total	60	—	100.0%

a. A total of 39 respondents (of the 49 total respondents) completed the question. Sum of percentages for respondents will not equal 100.0 because respondents could check multiple items.

b. The percentage calculations are based on the number of responses (N= 60) not number of respondents.

Table 1 shows that 66.7% of the respondents worked in either supply chain or product security and when you had “warehouse distribution and distribution” 87.2% of the respondents have security or distribution responsibilities.

A follow-up question asked respondents about the size of the organization where they are employed. This was a forced choice question with the following choices: less than 100 employees, 100 to 1,000 employees, 1,000, to 5,000 employees, 5000 to 10,000 employees, and over 10,000 employees. Table 2 shows that nearly half, 44.5%, of the respondents worked for firms which have 5000 or more employees. A third of the respondents work for firms with 10,000 employees or more.

Table 2: Distribution of the size of the firm where respondents were employed

Number of Employees	Percentage of Respondents
Less than 100	18.4%
100 to 1,000	21.0%
1,000 to 5,000	15.8%
5000 to 10,000	10.3%
Over 10,000	34.2%

11 respondents failed to answer the question

Table 3: Distribution of respondents' perceptions of "influence" for each type of pharmaceutical cargo theft underreporting.

Category and factors	Major Influence	Moderate Influence	Minor Influence	No Influence	Don't know
Not reporting to law enforcement					
Monetary value of cargo	43.2%	21.6%	24.3%	8.1%	2.7%
Geographic location (%)	13.5%	27.0%	29.7%	27.0%	2.7%
Type of product	24.3%	27.0%	24.3%	18.2	5.4%
Company policy	48.6%	20.0%	5.7%	22.9%	2.9%
Carrier request	14.3%	28.6%	20.0%	34.3%	2.9%
Cargo loss value below deductible	38.9%	13.9%	30.6%	13.9%	2.8%
Not reporting to press or media					
Monetary value of cargo loss	47.2%	16.7%	19.4%	8.3%	8.3%
Geographic location	5.6%	30.6%	27.8%	25.0%	11.1%
Type of product	44.4%	19.4%	8.3%	19.4%	8.3%
Company policy	61.1%	5.61%	13.9%	11.1%	8.3%
Injury or harm to driver	14.3%	28.6%	25.7%	22.9%	8.6%
Carrier request	8.6%	20.0%	28.6%	34.3%	8.6%
Law enforcement request	36.1%	13.9%	16.7%	13.9%	19.4%
Insurance request	31.4%	22.9%	14.3%	17.1%	14.3%
Poor internal monitoring flow of information	19.4%	30.6%	25.0%	13.9%	11.1%
Not reporting theft to data monitoring agency					
Monetary value of cargo loss	44.1%	14.7%	8.8%	32.4%	0.0%
Geographic location	8.8%	17.7%	26.5%	44.1%	2.9%
Type of product	20.6%	35.3%	17.7%	26.4%	0.0%
Company policy	48.6%	17.1%	8.6%	22.9%	2.9%
Injury or harm to driver	11.8%	17.7%	29.4%	35.3%	5.9%
Carrier request	11.4%	22.9%	20.0%	40.0%	5.7%
Law enforcement request	34.3%	5.7%	20.0%	31.4%	8.6%
Poor internal monitoring information flow	37.1%	28.6%	14.3%	14.3%	5.7%
Cargo loss value below deductible	37.1%	14.3%	20.0%	20.0%	8.6%
Not reporting to an internal monitoring or analysis department					
Monetary value of theft	40.5%	24.3%	5.4%	24.3%	5.4%
Geographic location	10.8%	29.7%	10.8%	40.5%	8.1%
Type of product	29.7%	21.6%	10.8%	29.7%	8.1%
Company policy	46.0%	10.8%	10.8%	27.0%	5.4%
Injury or harm to driver	13.5%	10.8%	13.5%	51.4%	10.8%
Carrier request	10.8%	8.1%	18.9%	48.7%	13.5%
Poor internal monitoring	48.6%	17.1%	14.3%	14.3%	5.7%
Cargo loss value below deductible	36.1%	22.2%	22.2%	13.9%	5.6%

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