



December 9, 2016

U.S. Seafood Traceability Program Summary

[Note: The purpose of this document is to report on the implications of the Seafood Import Monitoring Program. This document should not be construed as legal advice.]

The Presidential Task Force for Combatting Illegal, Unreported, and Unregulated (IUU) Fishing and Seafood Fraud was created in 2014 by Executive Order. Their Action Plan was released in March 2015, and contains recommendations ranging from expanding collaboration with other nations on the issue of IUU, developing better technology for tracking imports, and ratifying the UN's Port State Measures Agreement. In response to Recommendations 13 & 14 a national seafood traceability program has been developed that will apply to select seafood products entering US commerce beginning January 1, 2018.

Seafood Import Monitoring Program

The seafood traceability program will initially apply to products containing a short list of species that the National Ocean Council Committee identified as 'at-risk' of IUU fishing and fraud, but could be expanded to include all species in the coming years. Additional information on the origin of 'at risk' products will be required of seafood *importers* – domestic fisheries already collect the information required by the traceability program.

Affected Species:

Abalone*	King Crab (red)	Shrimp*
Atlantic Cod,	Pacific Cod	Swordfish
Blue Crab (Atlantic)	Red Snapper	Tunas (Albacore, Bigeye,
Dolphinfish (Mahi Mahi)	Sea Cucumber	Skipjack, Yellowfin, and
Grouper	Sharks	Bluefin)

*Data collection for abalone and shrimp is on indefinite hold pending additional U.S. regulation

What it does:

- Requires product importers to enter product data electronically into (the International Trade Data System (ITDS) a web-based government database) beginning January 1, 2018.
- Applies to imported products in most formats (e.g. fresh/frozen, cans, pouch)
- Requires importers to hold International Fisheries Trade Permit (TFTP) (~\$30/year)
- Requires submission of data about the harvest, landing, and CoC of select wild capture and farmed seafood products prior to clearing customs
- Requires chain of custody (CoC) records be sufficient to trace product from entry into U.S. commerce back to point of harvest
- Requires that CoC records be retained for 2 years and provided upon request to NMFS for verification purposes
- Regulators will randomly select products for verification audits based on risk criteria

**What it does not do:**

- Does not require vessel, farm or aquaculture facility specific information about product harvested by small-scale vessels (i.e., twelve meters in length or less or 20 gross tons or less) or farms (deliver 1,000 kg or less in a day).
- Does not track product chain of custody after entry into U.S. commerce (not full-chain traceability)
- Does not share company data outside of U.S. government agencies – no consumer facing labeling or certifications
- No new information requirements for domestic landings of wild-caught seafood
- Does not apply to some highly processed products (e.g. fish oil, slurry, sauces, sticks, balls, cakes, puddings)

What's ahead...

January 8, 2017: The final rule becomes effective

January – February 2017: Task Force will [host public](#) webinars on the final rule

March 2017: Task Force presents panels at the North American Seafood Expo in Boston

January 1, 2018: Mandatory compliance deadline

Resources:

[Fact Sheet: U.S. Seafood Import Monitoring Program \[PDF\]](#)

[Press Release: NOAA Fisheries' Announces Seafood Import Monitoring Program](#)

FishWise will continue to track the development of this program and post briefs for the industry, like this one, on our [website](#).