



## Public Webinar: Seafood Import Monitoring Program

**Date:** May 23, 2017, 9:00 am CT

**Presenter:** Laurice Churchill, Region Chief  
Office of International Affairs and Seafood Inspection (NOAA Fisheries)

**Facilitator:** NWX-DOC CONFERENCING

**Coordinator:** Welcome and thank you for standing by. At this time, all participants are in a listen-only mode. During the question and answer session please press Star 1. Today's conference is being recorded, if you have any objections you may disconnect at this time. Now I'd like to turn the meeting over to Kerry Turner thank you, you may begin.

**Kerry Turner:** Hello and welcome everyone. My name is Kerry Turner. I'm a communications specialist here with NOAA Fisheries Office of International Affairs and Seafood Inspection.

Thank you so much for joining us for our webinar presentation on the U.S. Seafood Import Monitoring Program of final rule released by NOAA Fisheries and we have - we'll be discussing the rule on - just a few reminders before we begin, we have both an audio and the web portion online.

If at any time you're unable to see the web portion you can visit us at [iuufishing.noaa.gov](http://iuufishing.noaa.gov) and that's where you'll find a PDF not only of this presentation that's going to be seen but also that's where we'll post a transcript and recording of today's presentation.

For our speaker, today we have (Laurice Churchill). (Laurice) is the region chief with our Office of International Affairs and Seafood Inspection, and she's going to be taking us through a brief presentation about the program and then we'll open it up for questions and answers discussion.

We really wanted to give you all an opportunity to ask any existing questions that you have about the program and to have that open dialogue with you. So, I'm going to turn it over to (Laurice), (Laurice) can you go ahead please.

(Laurice Churchill): Thank you and thank you very much, Kerry and thank you to everybody who's joined us today for this presentation about the new NOAA U.S. Seafood Import Monitoring Program, and I believe everybody should be able to see Slide 1, is that correct, Kerry?



(Kerry Turner): Yes.

(Laurice Churchill): Thank you. Okay so what's important about this program, we're going to talk through some highlights of it and then we'll go into a few more details.

Let's go to Slide 2. The rule became effective January 9th, 2017 and it has a compliance date of January 1, 2018. The new program establishes a permitting data reporting, and record keeping requirements for the importation of certain priority fish and fish products that come in to U.S. market.

These have been identified as particularly vulnerable to IUU fishing and or seafood fraud.

The intent of the program is to prevent IUU or illegal, unreported, and unregulated (unintelligible) fish, fish products, or misrepresented seafood from entering US commerce. It also supports the global efforts towards combating IUU fishing.

NOAA and its U.S. Government partner agencies are engaged in numerous efforts internationally and have (unintelligible) enforcement strengthening partnerships in establishing seafood traceability.

The NOAA Seafood Import Monitoring Program is the first phase of a risk-based traceability program requiring the importer of record usually your (unintelligible) to provide and report key data from the point of harvest to the point of entry into U.S. commerce. It includes an initial list of imported fish and fish products identified as particularly [vulnerable] to IUU fishing and or seafood fraud, and these are referred to as priority species. Let's go to the next slide.

So, the key points we're going to go over briefly here and then we'll move on into more detail. The rule establishing the (unintelligible) Seafood Import Monitoring Program applies only to seafood entering the U.S. from a foreign country and the importer of record is the entity - the person that will be required to keep records regarding the chain of custody of the fish or fish products from that point of harvest to the point of entry into the U.S.

Next, the data collected will allow those priority species of seafood to be traced from that point of entry into U.S. commerce to the point of harvest or production to verify that it was lawfully harvested or produced.

The collection of harvest and landing information for these priority seafood species will be entered into the custom and border protection ITDS or International Trade Data System. That information is confidential and the rule



applies also to reimported product of priority species originally harvested in the U.S.

So, that's a lot of information here and we'll start going into more details now. Through the rulemaking process it was determined that for the priority species to which this rule applies equivalent information is already being collected for products of US domestic fisheries that are already under rulemaking or are regulated through various federal and or fishery management and reporting programs.

And because we do have traceability on the basis of the existing program for domestically produced seafood this rulemaking effort will focus on import - the imported seafood, especially since the US does import about 90% of the seafood consumed in this country on an annual basis. So, let's move on to the next slide, it's got a lot of information on it and it's got four boxes and I'm going to move around through these different boxes to go into more detail.

So, based on the input and rulemaking process in the comments a final list of priority species was adopted in conjunction with the minimum standards and necessary data for a seafood traceability program. These are the harvest elements and chain of custody data.

The US customs and border protection ITDS system is the existing system to support th[ese] efforts. It's an electronic window so it's a program for collecting both information on imports as well as exports. (Unintelligible) a pilot program that way you can practice entering the data is under development and will be available before the end of the year.

As a result of all the considerations under the rulemaking also a commerce trusted trader program is under development aimed at reducing the burden appropriately for those who might achieve trusted trader status. We'll come back to that later.

The data we will collect at the point of entry into commerce, the import or entry filing will include information on the harvest event and the harvest entity. Notice on the left-hand-side of the slide here you've got two boxes referring to that. This data allows us to trace back to the harvest and verify with the (unintelligible) authority in that jurisdiction, go to that country, that those products were lawfully harvested or produced.

Now on the right-hand-side of this slide on the top you see the 13-priority species identified. The harmonized (unintelligible) schedule or what we also sometimes call HTS codes or HS codes associated with these fish and the



identified fishery products will be flagged in that ITDS system as requiring additional information in order to make the entry into the system.

The information collected is confidential as I said before, it's not available to the public unless it's aggregated. The information itself is protected as confidential business information under both the trade - what's called the trade secrets act and also the Magnuson Stevens or Magnuson Stevens Fishery Conservation Management Act.

In addition to reporting at the time of entry through the ITD[S] system the importer of record on the US side will be required to keep records regarding chain of custody of the fish or fish products from the point of harvest into the US market.

Now the records about the chain of custody, we're not mandating what those records must be but they must be able to support an audit from that point of entry into US commerce traceable back to the harvest event as its being entered and reported by the importer of record.

Now the records can include things such as landing tickets, what we also call tickets, processor receipts, invoices, manifests or any documents that are currently used in trade to support or would support a chain of custody audit. In other words, we need to know where that fish has been or that product has been from the point of harvest until the point of entry into US commerce.

In addition, the particular supply chain is making use of a third-party system such as a certification scheme or an RFMO or (regional) fishery management organization catch (unintelligible) or another government program. That documentation can also be used to support the chain of custody audit. The records should be able to demonstrate the connection between the goods that are entered into the US and back to the harvest event reported.

Remember this also applies to reimported product. Seafood harvested in the US we know it's sometimes exported abroad for cold storage, processing, could be reprocessed and then it's reimported back into the United States. Products that are reimported will have to demonstrate that they were originally of US origin.

Now the US harvest records can be from the local area jurisdiction or whichever catch dock system they're under they can use those records. It's interesting to note also that the EU has a program to document harvested fish and certification that those fish were not (EU) harvested. Those EU docs can be used if the fishery is engaged in supplying the EU market as well.



Now there was a sample form or a model catch certificate that was available through the rulemaking process when it was announced before and this is available for reference in the IUU web portal, we'll come back and swipe that again later. These forms do not have to be used but if there's no other existing mechanism in the area of jurisdiction wherever that harvest event is occurring (unintelligible) form that's used that model catch certificate could be used to record the required information and transmitted through the supply chain.

There's also no requirements that the reporting be on paper forms, electronic schemes that are in place can be used. So, in the lower right-hand side of the slide here you see importer of record and this is the responsible entity and they will identify themselves with the permit they obtained from the NOAA fisheries. The permit number would be reported during the entry process and ultimately result in the release of the fish, fish products, the goods into US commerce at the port.

The harmonized [tariff] schedule HTS codes will be used in the (unintelligible) system to identify those import commodities that are subject to this program. The system will then look for additional information about the import of record and the harvest event when (unintelligible) entry filing. So, there's sort of a connect the dots that's going on here and they will be connected to make sure that the information is there depending on which codes you put in. If you need more information it'll be flagged for you to do that.

There will be a pilot program to practice the data entry into the ITDS later this year. So, the importer of record is also responsible for maintaining the chain of custody records for a minimum of two years. So, a chain of custody records have to be held on to for two years that's so that the records can support a trace back if a particular entry is selected for audit from the harvest even all the way to US import.

So now back to the other side of the slide. The harvest event of producing entity data includes the vessel, I'm going to point out that if the vessel has a unique identifier this would be used plus identification information about it. It'll also note the type of fishing gear used, and if it's an agriculture commodity or produced by agriculture the name of the firm or agriculture facility will be entered.

Note in the 13-priority species, so let's go back to the upper right-hand corner of the slide. There's an asterisk in front of abalone and also in front of shrimp. When the domestic reporting program for the wild catch was analyzed it was determined that we had existing - basically existing systems regulating these in place the full-scale traceability for entry into the US commerce.



So however, in the US some agriculture of shrimp and abalone products have less complete information, so we need to do more work to close those gaps in order to have a domestic traceability program for shrimp and abalone products produced in US agriculture operations.

Subsequently, rather than have a separate treatment with imported products of those species we're delaying the implementation for shrimp and abalone. So, we will publish a federal registry notice in the future and announce a date when the program would be expanded to include the shrimp and the abalone.

So, moving on to Slide 5 or the last slide more information here, for more detailed information in a lot greater depth go to [www.iuufishing.noaa.gov](http://www.iuufishing.noaa.gov) it's an important website there's a lot of information there.

It's important to point out also in response to comments on the proposed rulemaking that there was a lot of concern expressed with respect to small scale operators in some fisheries abroad and the need for them to assemble information from a large number of small scale operators so that could be cumbersome. And so the concern was about how they were to identify the harvest events for a consolidated (shipment).

So, in order to reduce the burden on that reporting of all - such a small vessel we allow for (unintelligible) reporting for small scale operators. Basically, small vessels or small agriculture facilities can be consolidated, and again there's more details more information about this on the website.

The receiver of those fish would be able to be a consolidator so to speak at the ports, at the beaches for small scale operators so they can consolidate the record and have one simplified harvest event report but then that would be (unintelligible) through the supply chain. It would be a single calendar day, and I believe it was under 20 metric tons - or under 12 meters' length and - there are some size limits there but we need to check on them.

Again, the rule itself was effective January 9th, 2017 and has a January 1st, 2018 mandatory compliance date. So, NOAA is moving forward with outreach globally to continue to inform the trade community to invest now in the mechanism they need to comply with the rule. It's important to note that those efforts must and can start immediately and continue through and beyond January 1, 2018 because any imports after that date will be checked and screened for harvest event information.

They'll also look for the importer information and the harvester entity identification, who did the harvesting. So, any seafood products produced now



that will be entering through cold storage or processing or the shipping supply chain entering U.S. commerce after January 1 will need to comply with these reporting requirements so advanced preparation is certainly required.

We're currently engaged in this outreach phase doing a number of these stakeholder webinars seeking to gain an audience both with the U.S. importers as well as exporters to the U.S. market to make sure the industry understands the requirements that's going to require their cooperation throughout the supply chain.

The U.S. importers of records will have to be permitted, report, and keep records and those importers obviously are dependent upon the exporters and suppliers from abroad in order to keep that information to obtain, keep it, enter it, and make sure the product can enter the U.S. commerce.

Remember to look for a Commerce Trusted Trader Program. There will be a proposed rule on this in the Federal Register later this year and it will certainly be advertised and public hearings held before we would go final on that program.

Remember all information presented today is posted on [www.iuufishing.noaa.gov](http://www.iuufishing.noaa.gov) and for questions concerning implementation of the program, the Seafood Import Monitoring Program please contact (Celeste L[eroux]) her e-mail address is listed. And if your questions are specific to the ITDS programming the pilot testing and the entry filing all that electronic type entry (Dale J[ones]) is the person to contact and his e-mail is listed here.

So, in summary, again this presentation has been about the NOAA Seafood Import Monitoring Program. Remember the compliance date is January 1, 2018, who's doing this, the importer of record. They will be the permit holder required to enter the harvest event data plus the change of custody records into the Customs and Border Protection ITDS system which will support traceability of those identified priority species and identified commodities from the point of harvest to entry into U.S. commerce. We thank you for your time and I'll turn it back to Kerry. Thank you.

(Kerry Turner): Thanks (Laurice). As (Laurice) mentioned this discussion today is part of an added outreach that NOAA fisheries is doing in terms of just continuing outreach engagement to U.S. importers, our foreign trading partners, and international seafood producers.

A lot of the information in terms of the resource compliance guide, fact sheets can be found on that web portal [www.iuufishing.noaa.gov](http://www.iuufishing.noaa.gov), and there's a lot of information that (Laurice) presented on so we wanted to give you the



opportunity to ask any questions you have about the program about the points mentioned in the presentation and we have NOAA fisheries personnel here.

(Chris Rogers) is also here with us. (Chris) is the assistant director for [the] International Fisheries division of the Office of International Affairs [and] Seafood Inspection. He's also available to answer any questions you may have now. (Diane) can you let everyone know how to submit their questions please.

Coordinator: Thank you. We will now begin the question and answer session. If you would like to ask a question please press Star 1, you'll be prompted to record your name. To withdraw your request please press Star 2. One moment to see if we have any questions or comments.

We do have a question, one moment. (Roger Clark) your line is open.

(Roger Clark): Yes, the question is will the data be permitted to be uploaded through the Customs and Border Protection (unintelligible) program or does each element have to be keyed individually into the ITDS system?

(Chris Rogers): Hi this is (Chris Rogers). Thanks for that question, (Roger). This is a message set required for some of the other import monitoring programs that you are others may be familiar with.

We do allow some forms to be entered through the document imaging system, but for this program we're using the message set only. So each of those key data elements that (Laurice) showed in that upper left corner slide, the harvest event information would have to be keyed in as a data element.

So those who are customs brokers would have to take a look at our implementation guide for ITDS and look at the formats in which those data must be transmitted to (ACE) and to be accepted and read by the system. So this program no document imaging just a message set with the data elements.

(Kerry): Does that answer your question, (Roger)? Okay I think he's hung up. Any other additional questions please go ahead and submit them with the operator.

Coordinator: And again, as a reminder if you do have any other questions or comments please press Star 1 and record your name. (Ean Morris) your line is open.

(Ean Morris): Hi folks I think I've got probably a real easy question for you, you folks have been kind enough to schedule many many webinars are they supposed to be substantively different or are we going to go through the same slide show that we've just seen and then invite questions? I'm just not sure how the different



webinars scheduled over the next few weeks work one against the other, could you help me?

(Kerry): Yes. The main (jist) of the webinar will be quite similar. We schedule them at different [times] because we do have both domestic and international audiences that needed them at different times so that's why you see some early in the morning some in the afternoon around this time for us on the East Coast and then later on at night. So, we'll definitely be scheduling those but the content will be quite similar.

(Ean Morris): Thank you very much.

Coordinator: (Roger Clark) your line is open.

(Roger Clark): Yes. Another question I have is in regard to canned tuna, how will that be handled in respect to comingling of product when it's been processed and how is the importer going to designate specific catches to specific areas or specific cans.

(Chris Rogers): Okay. Thanks for that question (Roger). This is (Chris Rogers) again. There's no requirement that the individual cans be identified as to the harvest event or even cartons of cans or parts of a shipment, but basically each of the harvest events that contributed to that shipment must be declared and reported as part of that electronic message set.

So, if there were let's say a dozen harvest events that contributed to the lots that were processed on a particular day or over a course of several days they were consolidated in the shipping department, and in terms of cans and cartons and they load it onto a container, each of those harvest events would have to be transmitted with the shipment to the U.S. border and then reported by the importer of records. So no need to segregate the individual cans or components of the shipment based on the harvest event but all of the harvest events that contributed to that shipment must be reported. This is very similar to an ongoing program we've had for a number of years, our tuna tracking and verification program that substantiates use of the dolphin safe labels.

So for the most part tuna canners, U.S. importers of canned tuna are quite used to those - that documentation requirement for each of the tuna trips and it would just be a matter of the importer of record cycling through in terms of the software that would be developed for the customs broker indicating each of the trips, so the vessel, the gear, the harvest area, dates, port of landing et cetera.

(Kerry): Do we have another question, Operator?



Coordinator: Yes. We do have a question from (Thomas Craft), your line is open.

(Thomas Craft): Thank you very much. A couple of questions, first one is, how will this impact the release time of fresh seafood this being imported?

(Chris Rogers): Okay. It's not intended to affect the release time whatsoever provided the information is reported. The way the system would work in ACE ITDS is that the tariff code itself as (Laurice) explained would trigger a message set requirement.

Presumably, the importer of record would be knowledgeable of that requirement, have obtained the permit. The reason we do the permits is so that with can educate those who are importing these commodities as to the requirements of the program and then transmit that message set with the normal entry filing that would be done electronically anyway. The information would be validated as complete and the entry would be processed as it normally would be under the new electronic environment in ACE single window, and the may proceed message would be given to the importer and the freight forwarder can pick it up at the port.

Now in the event that the importer of record does not provide that message set, the entry processing will stop and the message - electronic message would be transmitted to the customs broker entry filer and the importer of record as well as National [Marine] Fisher[ies] Service that the required data elements for that message sets are missing and until resubmitted the entry would not process.

So, in the event of a lack of knowledge of the program, yes there could be some (surprise) disruption as people scramble to get that information and get it input to the system but that's the way it will work. (Unintelligible) the message set the entry will not process, the message set is complete and will validate - the entry will process in the normal time for electronic processing.

(Thomas Craft): All right, thank you. Can I ask a second question?

(Chris Rogers): Sure.

(Thomas Craft): Are the ASFIS numbers listed at the website for the products affected? The reason I ask is you have items in there like Pacific cod which is very specific and then you have something in there like grouper or red snapper which is a very broad category.



(Chris Rogers): So, this is (Chris Rogers) again. Thanks for that question, (Thomas). We are focusing on the three alpha even though we say it's a number there in the slide. There is a 10-digit number under the ASFIS species coding system but there's also a 3-alpha code just like the 3-alpha code use for airport designations.

So, we'll make it easier on reporting, we'll standardize on the 3-alpha system, that is published on a website at FAO, and we provide the links to that on our website and in the material in the compliance guide.

So, for certain tariff codes there is a one-to-one match between the tariff code and the 3-alpha code for that species. For example, if there's a tariff code that says yellow fin tuna there would be the one 3-alpha code for yellow fin, if it's an Atlantic cod or Pacific cod mentioned in the tariff code that would also correspond to the 1-3 alpha code for that species.

But you're right, in certain other situations there is a generalized tariff for grouper at large or snapper at large, so the importer knowledgeable of where the fish are coming from and which species exist in that country or fishing area would have to designate which of those 3 alpha codes pertain to that particular shipment.

So, the tariff code itself would trigger the requirement for the message set, one of the elements that would be validated in the message set is the 3-alpha code to identify which species - at the species level is contained in that shipment.

(Kerry): Does that answer all your questions, (Thomas)?

(Thomas Craft): I don't know I'll have to go and look into that a little bit more by going to the (unintelligible) website and looking at this and seeing if I totally understand it.

(Chris Rogers): We are working on a - I guess you can say a compliance aid that would do a crosswalk between the tariff codes and the 3 alpha codes from ASFIS, but they do change from time to time both the tariff codes and the ASFIS coding system so we'll put that online and keep it up to date as best we can whenever changes to those underlying coding systems happen.

(Thomas Craft): All right thanks that'll be really helpful. All of our records are entirely digital from point of capture all the way through so we expect that we would be submitting our data electronically. I don't know that the brokers are capable of receiving that data electronically and then resubmitting it as well.

Is there a way to supplement or augment their ability to report this information but using - by tying our system indirectly to the data receiving system or do



we need to talk to every single one of our brokers and make sure that you know we've written you know we've mapped it all out with their systems if they have them electronically.

(Chris Rogers): Good question, (Thomas), (Chris Rogers) again. The brokers are now used to the electronic reporting window, the ITDS. It came online for all commodities several years back and has recently come online through the end of December 2016 for what we're calling these partner government agency message sets.

So it's not only National [Marine] Fisher[ies] Service but other agencies, Consumer Product Safety, Food and Drug Administration, U.S. Department of Agriculture, all of these partner government agencies that have information requirements to be reported upon import or export are also collecting that information through the single window, the single window system.

So customs brokers are used to that single window system already and the role of the software developer would be brought into the mix in your situation where the broker that you use or have used in the past would work with their software developer so they can basically convert the information you already have digitally to the format that would be required to report through the automated broker interface and get it into the message set format that would be read and validated for any products subject to the National [Marine] Fisher[ies] Service message set.

So that's the way it works customs doesn't provide any particular software. They have a list of software certified ACE software vendors who will (write) that programs for customs brokers to get the information read properly and received and validated in ace.

So, it would be necessary for the customs broker for that commodity to understand hey this is a commodity that requires an (unintelligible) message set, here's what the [NMFS] message set looks like, again that's posted at the Customs and Border Protection website for ACE implementation, work with a software developer knowing that they'll be entry products for somebody who has the information already in digital format and just make that conversion.

(Thomas Craft): Okay. I think I understood that. So, the single window you refer to is the ACE ITDS that there are numerous software packages that any number of brokers could be using that are harmonized to the ACE ITDS but they may not themselves be harmonized with systems that other brokers are using.

(Chris Rogers): That's correct. What Custom [and Border Protection] provides is the message set format for transmitting the information in order for it to be read properly into that single window. So that's what they provide and then software



developers, customs brokers will work to ensure that the data are transmitted in that format.

(Thomas Craft): What's the contact that we would get a hold of at the government level to get that? So, who would I have my programmers contact because I imagine that we can harmonize this some way on our side so that no matter which broker we're working with you know we can be dub tailing our system with theirs, you know mapping it in otherwise it could get a little bit difficult on our side as we try and submit all this data.

(Chris Rogers): All right on the last slide of the presentation you'll see in the bottom there, (Dale.Jones@NOAA.gov). He's our ITDS technical expert. He's working with Customs and Border Protection to set up the pilot testing program. As soon as we do get that up and running we'll use the Customs network, the trade support network to enlist assistance of anybody who's willing and able to start pilot testing.

And there will be groups of Customs brokers and software developers in that outreach network there, but you can contact Dales Jones directly and ask him any questions, if he needs to refer you to Customs Border Protection or the software ACE certified software vendors he can do that for you.

(Thomas Craft): Thank you very much.

Coordinator: (Ean Morris) your line is now open.

(Ean Morris): Hi folks. I've got a question that I think you've already answered but it's such an important question I just want to touch base on it one more time. This has to do with the documents that an importer retains for 10 years' subject to audit.

I've received recently European community catch certificates. They seem to be a plethora of information when they're completed that run from the date of harvest through to the first time that the product touches land. I understood a little bit earlier in this seminar that that is a acceptable document as long as it's fully completed that could be retained by importer to at least check that box for chain of custody from harvest event to the first landing, have I got that right?

(Chris Rogers): Yes. However, there is one element that is not captured not routinely captured on the EU program forms that will require and that is the gear type. So that could be written in the margin or retained in a separate record that would certainly suffice as the harvest event report.



(Ean Morris): Right but gear type is a part of the data set that gets inputted before entry, is that not correct?

(Chris Rogers): That is correct.

(Ean Morris): Okay. So, we would need to have that right up front any way and I'm prepared for that, I'm more - my question was for focused on the documents that I'm going to be filing away waiting for the day that you guys want to take a look at them. So that information even if it's not on the catch certificate has already been captured and is a part of the entry.

(Chris Rogers): That's correct. That would be the trace back, in other words what we would do is we have a record of the entry from the entry filing. We have a record of the harvest event that was reported at entry and the purpose of the audit would be to look at the all the supply chain records to make sure that we can link that reported harvest event with the goods that were actually entered into U.S. commerce.

So, the catch certificate obviously at the starting point any processor receipts, invoices, manifests, shipping manifests, et cetera could be used to document that chain of custody.

(Ean Morris): Okay. Truck bills of (lighting), ocean bills of (lighting) warehouse receipts, am I on the right ballpark here?

(Chris Rogers): Yes certainly, although I thought I heard you say 10 years when you were asked the question, and the record keeper reform is 2 years in duration.

(Ean Morris): That'll be fine because otherwise the documents would expire before I do, or I'll expire before the documents do. Thank you that's very helpful, I'm working that way and I am maintaining a dialogue with some of you folks running sample documents by you so I really appreciate the help that I've got from everybody.

(Chris Rogers): Yes, and we certainly appreciate you giving us a trial run for - in order by providing those documents to us, and we'll get back to you relatively quickly We're still working through some of those documents.

(Ean Morris): That's great and I did find that we are making entries for them although it'll be before January 1st. One if already supplied the entry just about half an hour ago and the other one hasn't entered for a couple of days.

(Chris Rogers): Okay sounds great.



(Ean Morris): Thank you, sir. Thank you all.

Coordinator: I show no further questions.

(Kerry): (Dianne) can you repeat how you can get into the queue one more time?

Coordinator: I sure can. Again, as a reminder, if you do have any further questions or comments please press Star 1 and record your name, again please press Star 1.

(Kerry): while we wait for any additional questions just reiterating that today's webinar is part of a series of webinars that we're doing throughout this month and next month and you can find the dates and times, information listed on our web portal [www.iuufishing.noaa.gov](http://www.iuufishing.noaa.gov).

And any information in terms of any in person events that will be hosted about the seafood and (unintelligible) program will also be posted there. You also have resource guides, model catch forms as Chris mentioned, you can also check those out and facts sheets as well about the program and also the contact information if you want to sign up for updates on the seafood and (unintelligible) program you can go to that website as well. It looks like we have additional question, let's get to that.

Coordinator: (Justin Churpil) your line is open.

(Justin Churpil): Thanks. I might have said not so much a question, if you could just confirm a couple of things really quickly. Could you confirm that the 2-year record retention requirement applies only to the U.S. importer of record and not the foreign harvesters and processors, and if you could also confirm that the provision of data through the supply chain to the U.S. importer of record. I think I heard you say that could be electronic or paper, that's it.

(Chris Rogers): Yes, so we can confirm. The U.S. importer of records responsibility to retain those chain of custody records, so obviously to make sure that chain of custody record set is complete at the point of entry should the entry be subject to an audit, but it would not extend to any foreign entities, producers, processors, harvesters. If the record was incomplete the enforcement action would be taken against the U.S. importer of record.

And then the second part of your question or request for confirmation is yes, as long as the information is there it can be in electronic format or paper format. So again, the previous commenter said that they have digital record keeping system it's just a matter then of converting those records for the harvest event entry reporting into that format for ACE ITDS to read, and if



selected for an audit just an extract from that digital record keeping system can be used to support the audit.

(Justin Churpil): That's great, thanks for that. I do have one other question not related to that, but I know you commented briefly on the continued development of the Trusted Trader program, is there any type of timeline you have for when that might be ready?

(Chris Rogers): well we have the proposed rule in development here as soon as we get the documents cleared we'll get through and into the Federal Register. We'll announce the comment period and any public hearings or public webinars to explain how that program would work. We're trying to get that out before the end of this year, the proposed rule.

(Justin Churpil): Okay and that public comment period it would probably be around 45 days type of thing.

(Chris Rogers): Yes. Typically, we would do 30 to 45 days if necessary we can go longer, it depends on the number of comments received and if there's any request to extend the comment period.

(Justin Churpil): Understood. Thanks.

Coordinator: (Ean Morris) your line is open.

(Ean Morris): Yes, I won't give up. On your taskforce web portal identified on the screen right now, is there a link on that to model catch certificate that you said might be also a nice format for capturing some of this information? Is that a link on that?

(Kerry): Yes, there's a link on that. When you get to the web portal [www.iuufishing.noaa.gov](http://www.iuufishing.noaa.gov) you can click on the home page on the link that says Seafood Import Monitoring Program, and when you click on that link to the right side of the page you'll see resource materials or forms but at the top of that is the model catch certificate form.

(Ean Morris): Excellent.

(Kerry): Okay so we just click on the link, Seafood [Import] Monitoring Program and on the right side of the page you'll see the link for the catch forms.

(Ean Morris): Outstanding. Thank you very much.

Coordinator: (Roger Clark) your line is open.



(Roger Clark): Yes, I have a question. Even though shrimp is not on the initial implementation date it will be something in the future. Quite a bit of the data that you're requiring for NOAA duplicates the data that's required by the office (unintelligible) conservation department of state, is there a goal to harmonize that too so the data only needs to be put in once for multiple agencies, or is there going to have to be a separate set data set for each one of your agencies?

(Chris Rogers): Yes. We will be working - (Chris Rogers) again. Thank you for that question. There are commodities which would be subject to the National [Marine] Fisheries Service programs as well as other agency programs. You mentioned shrimp, yes, the state department does run the - as they Section 609 program for evaluation of shrimp and (turtle) bycatch and shrimp fisheries, so they do have a reporting mechanism there.

State is using ACE ITDS as well to collect that information. They have part of it as a message set part of it as a document imaging system I believe. We will work with State at the point where we're ready to expand our program to include shrimp to ensure that we are working appropriately together to collect the information in ACE ITDS is not duplication of effort so we'll take a look at that.

Another example of other agency information collection pertinent to this program is what would be Food and Drug Administration because everything that we are scrutinizing for the - under the criteria of lawful acquisition that the fish were taken in accordance with the farm law or regulation. They're all food commodities anyway, Food and Drug Administration has its own requirements for reporting and a message set requirement in ACE ITDS. So, as partner government agencies we strive to minimize duplication for the electronic reporting.

It may end up that the message set itself does have to be parsed out for the individual agency programs to pick and validate the data and do what they need to do with it, but a good software developer recognizing that multiple agencies are interested in that particular tariff code, commodities entered onto that tariff code should be able to set it up so that the data are only entered once and then parsed out as necessary to the various message set components for the entry filing.

(Man): This is a follow-up. It does take time for a software vendor to develop the software, implement it into the trade, so again if you're not going to be publishing the working or the pilot program until later in the year and then implementing this on January 1st in 2018. It's cutting trade fairly short on



getting this up and running especially if there's integration between the importers and the filers.

(Chris Rogers): Understood. We're working as fast as we can with Customs to complete the programming and it's necessary to open up the pilot test.

Coordinator: I show no further questions.

(Kerry Turner): Dianne can you give us one last time before we wrap up to see if there's any last-minute questions.

Coordinator: I sure can. And again, if you do have any questions, comments please press Star 1 and record your name, again please press Star 1.

(Kerry Turner): And in the meantime just a reminder, the contact information for questions related to their requirements of (unintelligible) you can contact (Celeste L[eroux]), her e-mail address is on the screen.

In reference (unintelligible) about ACE ITDS (Dale Jones) (unintelligible) and technology. His information is on the screen, and they'll be more than happy to respond to any questions that you may have about the program. (Dale) is also a wonderful resource if you have any questions in reference to the pilot testing and you want to know more information about that and how your organization can participate in that we do encourage your participation and so (Dale) would be a wonderful resource for you to reach out with inquiries on that. And I think we have one more question.

Coordinator: (Tom Craft) your line is open.

(Tom Craft): I'm repeating a question that you've already answered but I was scrambling so quick to try and get to the website page that I didn't hear your answer and that is where the model of reporting forms are on the [iuufishing.noaa.gov](http://iuufishing.noaa.gov) website.

(Kerry Turner): When you go to the web portal at [www.iuufishing.noaa.gov](http://www.iuufishing.noaa.gov) right in the middle of the home page there's a link that says Seafood Import Monitoring Program. Just click on that link and when it takes you to that page - on the right side of that page you'll see a list of all the resource materials on top is a model catch certificate form. You can just click on that and you can view that form there.

(Tom Craft): Okay. I was listening carefully this time. I am at the [iuufishing.noaa.gov](http://iuufishing.noaa.gov) and you said in the middle of the page I would see the program?

(Kerry Turner): There's one of the columns that says seafood import monitoring program.



(Tom Craft): Is this at the home page?

(Kerry Turner): I think it might be at the top of the right-side column near the bottom of the page.

(Tom Craft): I see Seafood Import Monitoring Program on the left side at the bottom but it doesn't seem to...

(Kerry Turner): There are three columns, one is announcements, public meetings and hot topics, under hot topics there's a bullet that says U.S. Seafood Import Monitoring Program.

(Tom Craft): Okay all right. On the left column way, down at the bottom there's big letters seafood import monitoring program and that was distracting me. Thank you.

(Kerry Turner): Okay. Again, thank you so much. Again, before we close out this presentation today thank you so much (Laurice Churchill) for presenting on this topic, (Chris Rogers) for being involved in the question and answer discussion portion, and everyone that's participated.

Please do visit the web portal, it has a lot of the resources that I mentioned, a lot of materials and updates will be posted there and also feel free to reach out to (Celeste L[eroux]) or (Dale Jones) with any additional questions. You have a wonderful day or evening depending on where you're calling from and goodbye.

Coordinator: That does conclude today's conference call. Thank you for participating you may disconnect at this time.

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