NOAA NATIONAL MARINE FISHERIES

Public Webinar on: Seafood Import Monitoring Program
Date: June 28, 2017, 11:00 pm CT
Presenter: Heather Brandon, Outreach Specialist, Office of International Affairs and Seafood Inspection
Facilitator: NWX-DOC CONFERENCING

Operator: 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 on your touchtone phone.

Today's call is being recorded. If you have any objections you may disconnect at this time.

Now I'd like to turn the call over to Kerry Turner. Thank you you may begin.

Kerry Turner: Thank you (Cindy). Welcome everyone. Thank you so much for joining us. My name is Kerry Turner. I am a Communications Specialist with NOAA Fisheries Office of International Affairs and Seafood Inspections. And you are joining us for a Webinar on the Seafood Import Monitoring Program. Again that was the Webinar on the Seafood Import Monitoring Program.

And (to) - whether you're calling in from your time zone today or tonight we will be discussing the elements of the program and the implementation of the program and pointing you to some resources available to help you and answer any inquiries you have about the program. So we're going to go directly into a presentation. And we have Heather Brandon who's going to present this Webinar and Heather will give a brief presentation and then we'll open it up for a Question and Answer portion.

Heather is the Outreach Specialist for the Seafood Import and Monitoring Program with NOAA Fisheries Office of International Affairs and Seafood Inspection. We also have the lead for the program Celeste Leroux and also we have Christopher Rogers. Chris is the Assistant Director for International Fisheries Division of the Office of International Affairs and Seafood Inspection. And so we have wonderful experts online that will be here to answer any questions you have about the program.

So Heather will you go into the presentation please?

Heather Brandon: Yes thank you Kerry. Hello to all the participants on the phone including those calling in from Madagascar hopefully you can hear us and I will try to speak slowly for the interpretation.

As Kerry said my name is Heather Brandon and I work with NOAA Fisheries the Office of International Affairs and Seafood Inspection. I will provide you with the slides a brief background on past US activities to address illegal unreported and unregulated fishing and seafood fraud which led to the development of the Seafood Import Monitoring Program.

I will then outline the data entry requirements for importing the 13-priority species to the US and outline the recordkeeping responsibilities for the importer of record and then I will wrap up the presentation which will allow for plenty of time for your questions and for us to engage in the discussion.

The next slide. Kerry I'm just waiting for it to load up. Great thank you. So from this timeline on this slide you can see that activity in the US to address IUU really ramped up in 2014 when the President established a multi-agency taskforce.

The agencies on the taskforce and that included NOAA developed recommendations to combat IUU fishing and seafood fraud. This team's recommendations were developed including the recommendation to implement a traceability program to track seafood from the point of harvest to entry into the US commerce. NOAA Fisheries (unintelligible) during the development of the Seafood Import Monitoring Program engaged the public and stakeholders through an open and iterative process of what we call rule making.

NOAA received and addressed public comment on both the proposed and a final Seafood Import Monitoring Program rule. The last point on the timeline is actually in the future. It is January 1, 2018 that is the mandatory compliance date for US importers of record to report harvest and data harvest data and to keep chain of custody records.

Okay the next slide Kerry. The Seafood Import Monitoring Program requires additional data to be reported. This – so this program is essentially a permitting a data reporting and a recordkeeping program. So who has to get the permit who has to report the data and who will keep the records? It is the US Importer of Record who will obtain an International Fisheries Trade Permit. It is the US Importer of Record who will report the harvest data to Customs and Border Protection at the time of entry filing and they will also keep those chain of custody records for two years.

These data and records will allow NOAA to verify that the seafood product was harvested and produced lawfully. These data which are confidential will be reported to NOAA through the international trade data system. This is a

system that's integrated with the Automated Commercial Environment which we call ACE which is a portal so ACE is a secure data portal. It is the Web access point to connect Customs and Border Protection with their trade partners and with government agencies such as NOAA.

ACE is essentially ACE is the Automated Commercial Environment. It is basically the system where electronic trade show (unintelligible) are conducted and recorded by customs and border protection. The Seafood Import Monitoring Program also applies to Seafood products that are harvested here in the US and then exported and then reimported back into the US if the product is one of the 13-priority species.

The next slide. What are the 13-priority species? If you look at the box so the 13-priority species they are Abalone, Atlantic Cod, Atlantic Blue Crab, Dolphinfish which we also call Mahi Mahi, Grouper, Red King Crab, Pacific Cod, Red Snapper, Sea Cucumber, Sharks, Shrimp, Swordfish and Tuna. However, you might note that two of 13-priority species have a little star by them Abalone and Shrimp.

And these two species have a postponed effective date and that is and we are waiting until they have comparable domestic reporting and recordkeeping requirements and then they will be part of the program. So rest assured that for Abalone and Shrimp NOAA will provide you with adequate and advanced notice and so that you are able to comply with the program for those two species as well. So for all of these priority species NOAA will require information about the harvest and landing. And you might ask what specifically will be reported?

So take a look at the harvesting and producing entity box and then I'll also go over the fish what when and where box. So the importer will tell NOAA the name and flag of the harvesting vessels. That's the same permit number a unique vessel identifier if there is one. The gear type used for harvesting. If it's an aquaculture operation and the name of the facility. The fish species a landing date, the point of first landing and the name of the entity to which the fish was landed or delivered if it was a boat where it was delivered.

The product forum and weight and also the harvest area or the aquaculture place of harvest. These data will be reported by the importer of record the US Importer of Record and that's the last box. The importer will need an international fisheries trade permit number to enter the message set. The message set is all of this data at the time that the product enters the US. The US importer of record will also keep chain of custody records and these would be things that would tell us about transshipment reprocessing and comingling.

And I'm ready to go to the next slide Kerry. So this is my final slide and I want to tell you that in summary the mandatory compliance date for reporting data on the priority species is January 1, 2018. It's at (unintelligible). In

addition to two documents that NOAA produced the fact sheet and the compliance guide we will also provide additional Webinars and later this month we intend to have in person presentations domestically in or around Seattle, Long Beach, Miami and Newark.

And those documents and also translates the fact sheet and the compliance guide have also been translated into several languages and also future meeting information can all be found at the Web address that is on the slide which is www.iuufishing.noaa.gov. Hopefully you're looking at the slide and you can see that. NOAA is working with Customs and Border Protection right now to provide a test phase for importers and that will happen later this year but prior to the compliant date. NOAA is also developing a [Commerce Trusted Trader] Program for US importers.

And finally at the bottom of the slide – Kerry you can go back to the last slide. Oh it didn't do it. Well as Kerry is getting that up there is contact information. There you go. There is contact information for two of NOAA's subject matter experts one of whom is on the phone Celeste Leroux and her email address is there and Dale Jones and his email address is there and both of them can help answer your question.

And now on the phone I would like to turn it back over to Kerry who will take your questions either over the phone or you can type them on the WebEx and the group that's on the phone Celeste, Chris and myself we will answer your questions thank you.

Kerry Turner: Thanks Heather. That is – so we have a lot of information that was that has been presented to you and we want to open this up to a discussion if any questions you may have about the Seafood Import Monitoring Program and about anything that Heather presented on. And so a reminder right on your screen you should see the Web address www.iuufishing.noaa.gov. Now that is our Web portal where you will find a lot of information about the program and a lot of resource materials.

And it includes the compliance guide, a facts sheet and some model (task certificate) forms regarding this program. And when we have upcoming events such as additional Webinars or meetings like that we post them on that Web site so I would encourage you to bookmark that Web site and also the contact information that Heather mentioned.

(Cindy) can you let everyone know how to get into the queue to ask a question to one of our experts?

Operator: Certainly. If you do have a question please press Star 1 on your touchtone phone. You will need to record your name when prompted. Your name is required to introduce your question. Once again if you do have a question please press Star 1.

Kerry Turner: And as we wait for any questions from our participants a reminder you can also submit a question via the Web site that you are currently viewing this presentation on. There is a chat feature so you can submit your questions that way if you prefer as well. So via the phone line or the Web we are here to take your questions and to answer to the best of our ability. Celeste or Chris or Heather is there anything you would like to share about the program in the meantime as we wait for questions?

Christopher Rogers: Yes…

Heather Brandon: Hey just looking at your screen – sorry Chris – just looking at your screen can you make that last slide big again so that people can write down the Web site…

Kerry Turner   Okay.

Heather Brandon: …or write down Celeste and Dale's email address because…

Kerry Turner: Okay.

Heather Brandon: …that's (it's) really small.

Kerry Turner: Okay.

Heather Brandon: Thanks. Great thank you.

Christopher Rogers: …okay this is Chris Rogers. Just based on some questions that have been asked at previous seminars I'll provide a little bit more detail on the program. The program is very flexible as Heather said the US importer of record is the responsible party for making the data the electronic data entry here on the US side of the import transaction. But those US importers will be dependent on the foreign suppliers to provide that information to them. And the program is very flexible in terms of how that data is supplied to the US importer.

It could be a paper based system. It could be a electronic system government systems that exist in the local area where the harvest occurs can be used if there are fish products subject to regional test documentation schemes. Those documents can be used. If products from a particular fishery may be shipped to the EU and the EU IUU certificates are being generated at the point of harvest those also can be used to provide information through the supply chain to the US importer of record.

So again our program is very flexible and how the information can be recorded and transmitted through the supply chain but it's important that the US importer receives that information along with the shipment so (what) then

when they make the entry they can provide that harvest event information that Heather went through in detail.

Kerry Turner: Thanks Chris. Celeste or Heather please let me know if any – I'm sorry Celeste or (Cindy) please let me know if any questions come through the Web portion the audio portion.

Celeste Leroux: Certainly.

Heather Brandon: I'm not seeing any.

Kerry Turner: Particularly for our international stakeholders Celeste is there any information that you would like to share that they would be interested to know?

Celeste Leroux: Sure so one point I think it would be helpful to make and Chris can talk a little bit more about this if you're interested is that this program really puts the impetus of reporting this information and recordkeeping on the US importer of record. And foreign countries foreign exporters that are looking to support compliance with the US Seafood Import Monitoring Program will need to develop a mechanism system to be in touch with that importer of record to transfer information to them.

                            So we strongly encourage engagement with your industry partners in implementation of this program. Chris if there's anything else you'd like to add about engagement with the importer of record I'm sure it'll be welcomed.

Christopher Rogers: Okay yes thanks Celeste. Well it's important to recognize that although the compliance date is January 1, 2018 fish may be harvested presently that will take some time in the supply chain whether through processing or cold storage to arrive in the United States. So folks involved in the trade need to understand how their supply chain works and when the products may end up at the US import stage and if it's likely their products will be imported after January 1, 2018 they will be subject to this requirement even though they're harvested at this point in time.

                            So foreign suppliers harvesters processors should anticipate by working as Celeste mentioned with the US importers that they are currently working with and anticipate the time delay that may occur in terms of processing cold storage transport to ensure that the information is being collected now and that there is an effective mechanism to transmit that information through the supply chain along with the products so that the US importer can comply with those requirements beginning January 1, 2018.

Celeste Leroux: (Unintelligible) Kerry…

((Crosstalk))

Celeste Leroux: …I'm not seeing any questions – sorry go ahead.

Kerry Turner: Yes we do have a question on the Web. We have participants from Madagascar and one of our participants from Madagascar is inquiring whether the rules are the same for live and frozen seafood? Again whether the rules are the same for live and frozen seafood.

Heather Brandon: This is Heather, I'll take that one. The program does apply to live fresh frozen product and it's really to know if you're – if you need to report this extra data up this the chain of custody to the US importer you can look at the harmonized trade system codes HTS codes and we have those on the Web page that's listed here and we have a link to those codes. And if you know what code you export your products under you'll be able to see if this if your products are part of this program. And it does apply to fresh and frozen seafood products.

Kerry Turner: (Cindy) can you remind participants how to get into the queue one more time?

Operator: Certainly once again if you do have a question please press Star 1.

Kerry Turner: And while we wait for any additional questions through audio and Web I would like to discuss the pilot testing that I know (unintelligible) encouraging those that are interested to be involved in Chris or Heather or Celeste can you talk a little bit about the pilot testing please?

Christopher Rogers: Hi this is Chris Rogers again. We are currently working with US Customs and Border Protection to program in the ACE portal. Heather mentioned the ACE portal that's the Automated Commercial Environment it's the single window for electronic reporting for all import and export information in US trade. So customs is programming the requirements for this program into the system and as soon as the program is completed we will be opening up a pilot test.

So then US importers can use the system to report the data that would be required would be mandatory after January 1, 2018 on a pilot basis so there would be no penalties for errors or stop shipments if information is not complete but it will help the importers get use to the system and ensure that they're supplying the data and the proper electronic format and being read correctly by the system.

So it's very important not only for the importers US importers but for the government as well to engage in that pilot testing to work out the system and ensure that it will be fully operational by January 1, 2018. So we will announce when Customs has certified the software the business rules in the system and we'll be opening up for pilot testing and we'll be actively seeking US importers to participate in that test. We anticipate that later this summer.

Kerry Turner: Okay for as a reminder for questions related to the pilot testing or the use of the automated commercial environment (ITDS) if you contact Dale Jones who's in our office the NOAA's Fisheries Office of Science and Technology and Dale's email address and information is right there on the screen at the bottom it's dale.jones@noaa.gov. And we do have a question via the Web and the participant is asking for additional info or explanation of ASFIS number and the IFTP number.

Again they're asking for additional info or an explanation about the ASFIS number and the IFTP number.

Kerry Turner: Okay.

Heather Brandon: Okay this is Heather. The – we are asking one of the data points that we are asking for when seafood is at the point of import to the US in one of these 13 species is being imported to the US is what species of fish it is and we are using the ASFIS 3 alpha code numbers from the FAO to identify the species of fish. So that would be the 3-alpha code is what would be entered as that data point by the importer of record to identify the species of fish that is harvested and being imported.

The other number they asked about was the international fisheries trade permit number.

Kerry Turner: Yes.

Heather Brandon: And okay. And that is a permit that is issued by NOAA Fisheries to a US importer of record. So an importer the US importer would apply for that permit and provide the necessary data to obtain that permit and pay the fee and then they would get a permit number and that is one of the things that must be entered when the data is filed with customs importer protection.

Kerry Turner: Okay thank you…

Heather Brandon: I don't know if Chris might want to add more I don't know.

Christopher Rogers: Well yes that's certainly correct Heather the two points of information that will help us understand exactly what species of fish is being imported and who is importing it will be represented by those numbers so the IFTP - the International Fisheries Trade [Permit] identifies the US importer as an authorized importer for these species and the (unintelligible) Fisheries Information System number as Heather said that's a system developed by FAO for identifying fish species would be used to identify the particular species.

So the US importer of record obviously would know their own IFTP number when they make the entry filing but they would have to perhaps look up or we

will provide some information sheets for US importers later this summer on the codes that should be used. It's a very large information system at FAO approximately 17,000 codes I believe for different species but not all of those codes would be necessary to memorize or be available to the US importers because our initial phase of the program is restricted to the 13-priority species.

So some subset of those codes would be used by the US importers and of course they'll have to work with their suppliers to be sure which species are contained in the shipment.

Kerry Turner: Thank you Chris. (Unintelligible) as previously mentioned we do have materials on the Web portal at www.iuufishing.noaa.gov. Celeste can you just give us a brief explanation of the type of materials and what type of resources that are included that have been listed there?

Celeste Leroux: Certainly. So on the IUU portal that Kerry just mentioned iuufishing.noaa.gov we have a number of resource materials available for stakeholders to support compliance with the Seafood Import Monitoring Program. We've also recently translated our materials into a number of additional languages. You can find those online but they include Spanish, Portuguese, French, Mandarin and Indonesian. We are happy to provide that and if there's a language that you are looking for a translation that would be helpful for you please feel free to contact me.

The forms that we have online and other resource materials include sample forms those for general catch and processing stats as well as a special aggregated catch certificate for small scale fisheries. While the Seafood Import Monitoring program does not require any specific forms be submitted to us we did want to provide these as an option for those who don't have current forms that they use. So feel free to reference and use those materials as it would be helpful.

You'll also find online a compliance guide. That document walks through frequently asked questions about implementation of the program in an easy to read and understand question and answer format. We also have a quick fact sheet just a short document giving the most important points about the Seafood Import Monitoring Program. We have this presentation available in a number of different languages that you've seen today. And we also have in English only the final and proposed rule for this program as well as additional information on the proposed commerce trusted trader program.

There was – this is another effort that we are in development of with NOAA. We are preparing a proposed rule for that program which is designed to reduce the burden of the Seafood Import Monitoring Programs reporting requirements for trusted traders. You can expect to see a proposed rule released for public comment sometime later this year and we will be doing separate outreach on that effort when it is ready.

Kerry Turner:	(Unintelligible) thank you Celeste. And again you can find the materials resource materials and you can also sign up for updates about the Seafood Import Monitoring Program at www.iuufishing.noaa.gov. And again both Celeste and Dale's information are listed on the slide that you see on your screen for any questions you have related to their (requirements and/or) the automated commercial environment (ITDS) is a pilot test in that was mentioned before.

And just one more time checking to see if we have any additional questions via the phones or the Web and you can submit those or again you can submit your questions to the individuals listed. And before we wrap up Heather did you have any final comments that you'd like to share with (us)? |
Heather Brandon:	Well actually I was wondering if the question that came from Madagascar the very first question that we got about live and frozen seafood products I wonder if that person who asked the question if they feel like sharing what products they what seafood species they export live and frozen to the US? I'd be curious to know especially the live product and if they fall within the list of species that are part of the Seafood Import Monitoring Program. But I know that that question was typed so I don't know if that person is on the phone if they feel comfortable in (unintelligible)…
Kerry Turner:	There are…
Heather Brandon:	…in the dialogue about that?
Kerry Turner:	…there are submitting a question and (Thomas) your if your line is open you can ask that question via the phone or you can continue to submit those questions via the Web. So we could have one more question coming from the group in Madagascar.
Operator:	Okay and I – this is (Cindy) I have opened the line in Madagascar if you did want to verbalize your question.
(Thomas):	So can you hear us?
Operator:	Yes we can hear you.
(Thomas):	All right hang on. So our participants we have about a dozen fisheries (ministries) and exporters here in the room and our participant is in the process of typing his question into the chat window.
Kerry Turner:	Okay.
(Thomas):	All right he's just sending it and he's adding a little bit more so just give us just a second thank you.

Kerry Turner: Okay. The question that I see coming through is, "How to implement those rules for (unintelligible) fisheries for which information like fishing gears fishing are hardly accessible? Basically how to implement those rules for which information like fishing gear fishing site that type of information is hardly accessible.

Heather Brandon: Oh. If I may not understand the questions fully but surely the gear is known to someone to the harvester whether it's a dive fishery or yes and a trap and that information can be passed up the chain of custody. So if that harvester is landing their products on shore at say an aggregating site. So a place that gathers up different deliveries then the aggregation location that entity that's aggregated in the catch could use our model form that we have developed.

They don't have to it's not required but we have a form that has all of the data that we will ask for that the US importer will be asked for and the aggregation entity whether that's a processor the first landing site or like a tendering vessel could fill out that form. But I am having a hard time imaging that essentially you wouldn't know what gear. I mean the harvester definitely knows and they would have to pass that information along to the first point of landing. And I – if Celeste and Chris understand the question…

Celeste Leroux: (Unintelligible) to me.

Heather Brandon: …feel free to jump in.

Christopher Rogers: Hi this is Chris Rogers again. Yes we were – I understand the question. The important thing to remember about this program is that the US is interested in closing its markets to illegally acquired fish products. So that as long as the fish was harvested in a authorized fishery and a legal fishery in the area of jurisdiction where the harvest occurs it is acceptable it's admissible into the US market. So it's really the competent authorities in the local area of jurisdiction for that harvest activity that determines what is legal and what is not legal.

So it's the foreign entities the exporters the harvesters the competent authority of the government in those areas that makes that determination. So in situations where the local government or national government has a catch reporting system that would indicate who harvested and what their authorization was where they fished fishing area fishing gear (vessel) identifiers et cetera that information would be recorded as normal in that area of jurisdiction and pass through the supply chain.

If there is not a formal program for catch accountability in that local area of jurisdiction what we have is the ability to use some FAO gear codes FAO fishing area codes to describe that harvest event. So those codes are available through the FAO Web site. We do have some references. Two of them and

our materials but the FAO does have a levered system of fishing area codes as well as the fishing gear codes and they could be used to describe those harvest events.

And again as Heather said the harvesters and the receivers know where the fishing occurs know what gear is used. If there's not a convention or requirement in that local area of jurisdiction for reporting in a certain way the FAO codes can be used to describe that event and again pass information through the supply chain so that the US importer of record has access to that information and can report it.

Kerry Turner: Okay the participant is satisfied with that response and but they did have an additional question and that question is, "These rules are for the 13-mentioned species does any aspect (unintelligible) apply to the export import of live i.e., aquarium ornamental fish not for conception?"

Christopher Rogers: No this is Chris Rogers as Heather said earlier in the presentation this is the first stage of the program and we had a process to identify the subset of species to which the initial phase of the program would apply based on the risk of illegal fishing and seafood fraud has occurred been evidenced in the past for those species. So the initial phase of the program and the way it will be implemented as Heather mentioned would be through the tariff codes.

So we have a list of harmonized tariff scheduled codes for which the information is required and the custom system the electronic reporting system those codes will be flagged they'll be identified as required additional information in order to process the entry. For the most part these are codes in Chapter 3 if you're familiar with the world customs organization harmonized tariff schedule which would be live fresh chilled and frozen fish but largely unprocessed Chapter 16 gets into more highly processed products and packaged products canned products.

And we do have a list of tariff codes which the program applies. So that's the important thing for exporters work with your importers here in the United States and understand which tariff codes are being used to import those particular products and then see if those tariff codes are on the list for applicable products and for the initial phase of this program. In large measure aquarium fish live fish for aquarium trade not to consumption would not be included at this phase of the program.

Kerry Turner: Thanks Chris. Do we have any questions on the phone line?

Operator: We do not have any questions on the phone.

Kerry Turner: Okay thanks (Cindy). And just a reminder we do have a contact information for our personnel here that will either Celeste or Dale that would be – that are available rather to answer any additional questions that you may have and

we're going to go ahead and wrap this up. And before we do let me just ask the participants in Madagascar if they had any questions they would like to submit over the phone?

(Thomas):   Everybody satisfied?

Man 1:   (Unintelligible)…

(Thomas):   (Was any questions)…

Woman 1:   (I did).

(Thomas):   …(all right).

Woman 1:   Only (question).

(Thomas):   All right (unintelligible)…

Man 1:   …(unintelligible).

(Thomas):   …okay.

Man 1:   (Unintelligible).

(Thomas):   Okay.

Man 1:   (Unintelligible) some question (unintelligible)…

((Crosstalk))

Woman 2:   (Unintelligible)…

Man 1:   …(unintelligible).

Kerry Turner: I think what we are hearing is the translation happening for all those on the line.

(Thomas):   (Unintelligible) could you ask the question over the phone?

Man 1:   (Yes).

(Thomas):   Okay. So he said so (unintelligible).

Man 1:   No (France) (unintelligible)…

((Crosstalk))

Man 1:   …(unintelligible). The (unintelligible) is (unintelligible).

Man 2:   (Unintelligible).

Man 1:   Okay. (Unintelligible)…

Man 2:   …no nothing.

Woman 2:   (Unintelligible).

(Thomas):   Okay, okay.

Man 2:   (Unintelligible).

Man 1:   …(unintelligible).

Woman 2:   (Unintelligible).

Man 1:   (Unintelligible)…

((Crosstalk))

Man 2:   …(unintelligible)…

((Crosstalk))

Man 1:   Yes (unintelligible)…

((Crosstalk))

Woman 2:   (Unintelligible).

Man 2:   …(unintelligible)…

Man 1:   …(unintelligible)…

((Crosstalk))

Woman 2:   (Unintelligible)…

((Crosstalk))

Man 2:   …(unintelligible)…

((Crosstalk))

Woman 2:   …(unintelligible).

Man 1:   …can you hear me?

Kerry Turner: Yes we can…

((Crosstalk))

Kerry Turner: …hear you?

Man 1:   Yes so the question is here sometimes we work with traditional fisherman who work canoes like traditional (vessels) and is it necessary to report all the information concerning those people also and their canoes their official materials and for (unintelligible) purposes…

((Crosstalk))

Woman 2:   (Unintelligible) (solutions).

Man 1:   …need to (unintelligible)…

((Crosstalk))

Man 1:   …because that's (unintelligible) that reporting the…

((Crosstalk))

Man 1:   …(chain of custody)?

Kerry Turner: Okay…

((Crosstalk))

Man 1:   I don't know if the question makes any sense to you…

((Crosstalk))

Kerry Turner: …all right Heather or Chris would you like to respond to that in terms of the question?

Christopher Rogers: Sure this is Chris. (Unintelligible). I heard a little bit of the French there but I will respond in English. We do recognize that there are a lot of small scale artisanal fisheries that will end up exporting products to the US market.

We did receive comments on this situation during the rulemaking process as Heather and Celeste had mentioned that we did a proposal we took comments on that rule and then we issued a final rule during the comment period a number of parties mentioned this issue of small scale fishing and we did

recognize when if you recall from the presentation the several boxes of the information has required a lot of the information about the fishing vessel the fishing operation was fishing authorization numbers fishing vessel name fishing vessel identifiers.

Those kind of things normally would not apply in an artisanal fishing situation. I heard the French word (unintelligible) used in this conversation so the canoes obviously too small in most cases they'll have fishing permits or vessel identifiers…

((Crosstalk))

Christopher Rogers: …so what we have or arranged for is what we call an aggregated harvest certificate in the case of the small scale fishing operations they can be aggregated at a collection point. So if the canoes are returning to the beach or to a dock at the end of the day the first receiver or the fish purchaser the buyer the consolidator can create one harvest certificate just indicating the place of landing and the fishing area since these are small scaled vessels we would presume they would be operating in an area relatively close to shore so the fishing area could be described and based on the landing point.

And the individual vessels will not have to be named just the harvest gear that is used by those vessels when fishing with lines hooks or nets and again the fishing area the porter landing and who is the entity who was consolidating or collecting the catches that day. So that's what we call the aggregated harvest report and that's available to be used by small scale fishing activities.

Kerry Turner: (Thanks)…

((Crosstalk))

Kerry Turner: …thank you Chris. (Thomas) were there any additional questions?

(Thomas):   If you can hear me now I think that's it for us from Madagascar. Thank you very much for your patience. Some of our participants got hung up at the Embassy entrance gate and so we missed the first couple of minutes. But I appreciate you moving back and filling us in. Thanks very much.

Kerry Turner: You are welcome. Thank you for joining us. Again and just a reminder to all the participants for additional information please visit our Web portal www.iuufishing.noaa.gov and of course we have our personnel Celeste Leroux and Dale Jones their contact information is listed on the slide. Feel free to reach out to them for any additional questions. And we'll – they'll be more than happy to respond. Celeste, Heather or Chris if you have any additional notes here before we wrap up?

Man 1:   (Unintelligible).

Christopher Rogers: Nothing for me Chris Rogers but I'll say (Unintelligible) Madagascar.

Heather Leroux: Nothing for me.

Celeste Leroux: No thank you all for participating…

Kerry Turner: Okay. Thank you all for joining us have a wonderful day or evening depending on your time zone and we look forward to sharing more information in the future about the Seafood Importing Monitoring Program. Again reminder January 1, 2018 is the mandatory compliance date for most product fishes in this world and please visit our Web site www.iuufishing.noaa.gov. Have a wonderful day or evening.

Operator: And this concludes today's conference. I want to thank you for your participation you may disconnect at this time.

END