Proposed Commerce Trusted Trader Program

[Melissa Beaudry, Quality Officer, IASI]
Agenda

- Goals and Objectives

- Overview: NOAA’s Proposed Commerce Trusted Trader Program (CTTP)
  - Qualifications to become a Commerce Trusted Trader
  - Application Process
  - Program Requirements

- Discussion
Commerce Trusted Trader Program (CTTP)

- Designed to support the objectives of the Seafood Import Monitoring Program (SIMP) in preventing Illegal, Unreported and Unregulated seafood from entering the US market.
- CTTP, a voluntary program, would reduce the reporting and recordkeeping requirements for U.S. importers who maintain robust internal traceability and auditing measures.

Key Objectives

- Secure seafood supply chains
- Reduce SIMP costs to government and industry
- Streamline processing of import entries under SIMP
  - not intended replace or supersede the traceability requirements of SIMP.
<table>
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<tr>
<th>Benefits for Commerce Trusted Traders</th>
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<tr>
<td><strong>Data filing for entry into US commerce</strong></td>
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<tr>
<td>11 harvest and landing traceability data elements</td>
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| Storing Chain of Custody Records | **Directly accessible by US Importer of Record** | **May be stored throughout a secure supply chain** |

| Accessing Chain of Custody records | **Immediate upon entry into US commerce** | **Retrievable within 14 days upon request** |
Qualifications and Application for Prospective Commerce Trusted Traders:

- Importer must currently or plan to import species subject to SIMP
- Complete an online CTTP application
  1. Current International Fisheries Trade Permit
  2. Affirmation of compliance with state and federal programs and regulations
  3. One-time application fee (approx. $30)
  4. Trusted Trader Compliance Plan
Trusted Trader Requirements:

I. Routine

- At least 1 annual trace-back for each SIMP species
- Review internal operations outlined in Trusted Trader Compliance Plan and update procedures as needed
- Contract a third party audit of Commerce Trusted Trader Program compliance annually

II. Responsive

- Take action upon receipt of information about illegally harvested or misrepresented fish entering the supply chain
  - Ensure product is removed from commerce, and
  - Prevent further shipments from entering commerce
- Comply with NMFS audit requests
Third Party Audits

Must be performed by a certified auditor with no conflict of interest

- Review of the Commerce Trusted Trader (CTT)’s Compliance Plan and adherence to it;
- Product trace-backs of at least 3 SIMP import entries;
- Verification of the CTT’s product trace-backs; and
- Provide a written report to the CTT and NMFS.
Public Comments

- Commerce Trusted Trader Program requirements
- Economic impacts, both costs and benefits
- Maximizing benefits to industry while meeting the objectives of the Seafood Import Monitoring Program

How to submit

- **Online**: http://www.regulations.gov
  Search: NOAA-NMFS-2016-0165-0001 or “Commerce Trusted Trader Program”

- **Snail Mail**: Melissa Beaudry, NOAA Fisheries
  Office of International Affairs and Seafood Inspection
  1315 East-West Highway
  Silver Spring, MD 20910

Deadline: March 19, 2018
Listening Sessions

1. Webinar - February 15, 2018  10:00 am (EST)
2. Webinar - February 28, 2018  3:00 pm (EST)
3. In-Person - March 12, 2018 3:00PM (EST) Seafood Expo North America -

Website

www.iuufishing.noaa.gov

Program Contacts

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