



**NOAA
FISHERIES**

Office of
International
Affairs & Seafood
Inspection

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.



Benefits for Commerce Trusted Traders

	Seafood Import Monitoring Program	Commerce Trusted Trader
Data filing for entry into US commerce	<i>11 harvest and landing traceability data elements</i>	<i>Permit and species data elements only</i>
Storing Chain of Custody Records	<i>Directly accessible by US Importer of Record</i>	<i>May be stored throughout a secure supply chain</i>
Accessing Chain of Custody records	<i>Immediate upon entry into US commerce</i>	<i>Retrievable within 14 days upon request</i>



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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