

Webinar: Seafood Import Monitoring Program

Presenter: Laurice Churchill, Chief Southwest Region, Office of International Affairs and Seafood Inspection

Date: June 20, 2018, 1:00 pm CT

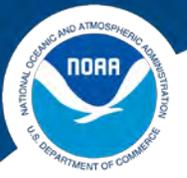
Facilitator: NWX-DOC Conferencing (US)

Coordinator: Welcome and thank you for standing by. At this time all participants are in a listen-only mode. During the Q&A session if you'd like to ask a question, you may press star 1 on your phone. Today's call is being recorded. If you have any objections, please disconnect at this time. Now I'd like to turn the call over to Ms. (Heather Brandon). You may begin.

(Heather Brandon): Thank you. Welcome everyone to this Webinar on the U.S. Seafood Import Monitoring Program. Today we have several people on the phone and I'll introduce them as subject matter experts so that you know who will be able to answer your questions at the end.

The Webinar will be a presentation about the U.S. Seafood Import Monitoring Program with an emphasis on the addition of shrimp and abalone being added to the program. You'll get more details about that during the presentation.

For the other species beside shrimp and abalone, the 11 other species, those are already under mandatory compliance so you'll get more details about that during the presentation but let me tell you who's on the phone because after the presentation is done, we'll have plenty of time for a question-and-answer period.



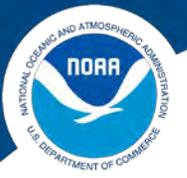
So again my name's (Heather Brandon). I'm an Outreach Specialist working on the Seafood Import Monitoring Program. We have (Dale Jones), he works for NOAA Fisheries Science and Technology Office. He works with brokers and software developers around this program.

We have Celeste Leroux, she is the lead for the Seafood Import Monitoring Program and a presenter today is Laurice Churchill, she's the Chief of Seafood Inspection in Southwest Region and so I'll turn it over to Laurice and at the end of the presentation the operator will tell you how you can get in the queue for asking your questions and we'll have a question-and-answer period so Laurice, take it away.

Laurice Churchill: Oh, thank you (Heather) and welcome everybody to today's call. We appreciate you taking the time to call-in and learn more about some new additions to the Seafood Import Monitoring Program that's been effective since last January for all the priority species and now it's been added, what's been added is shrimp and abalone so next slide, please, moving right along.

Why are we doing this? It's especially important for we to recognize with this \$96 billion U.S. seafood market it was important to address the issue of illegal, unreported and unregulated fishing and seafood fraud. It does threaten global valuable natural resources and it impacts both domestic and foreign law-abiding fishers and seafood producers again putting them at a disadvantage here in the U.S. and abroad.

The Seafood Import Monitoring Program it's intended to really help ensure that these products are not from that didn't reach the U.S. border or enter



# NOAA FISHERIES

U.S. commerce, that they are not part of [IUU] fishing or seafood fraud so next slide, please.

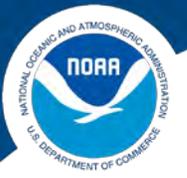
This all started in 2014 and by February of 2016 there was the U.S. government task force to combat [IUU] fishing and seafood fraud had developed a proposed rule for this program and by the end of December of 2016 they had a final rule that was released and it became effective with mandatory compliance in January of 2018 for those priority species of which there were 13 but at the time shrimp and abalone were stayed.

The reason being until it needed comparable traceability documentation reporting requirements for domestic aquaculture which at the time was not established.

Then moving forward in time this April 2018 the stay or the pause whatever on shrimp and abalone was lifted and therefore now they will be rolled into the requirements just like what the other 11 species have already been doing this year and throughout this year the program for that domestic traceability is under development.

And by the end of this year by December of 2018 it will also be mandatory compliance now for shrimp and abalone so that's the focus, the reasoning behind why we're doing these outreach again here and we'll move to the next slide, please so what is this Seafood Import Monitoring Program? Well, next slide, three primary points.

The Seafood Import Monitoring Program established a permit that's required, data reporting and recordkeeping requirements. Now that data



reporting and recordkeeping requirements apply to the certain priority of fish.

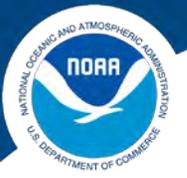
There's now 13 priority fish and fish products or seafood products that have been identified by that task force as being particularly vulnerable to [IUU] fishing and for seafood crime so first we're going to talk about these primary three things, the permit, the data reporting and the recordkeeping today. Next slide.

So which species that I keep talking about 11, 13, adding shrimp and abalone, next slide. For those who may not have the screen up, I'm going to read through the species. The priority species there's two different categories.

There are single species and there are species groups and in the single species listing, we have Atlantic cod, blue crab or Atlantic blue crab I should say, dolphin fish they're also called Mahi Mahi, king crab which also it should be identified as red king crab, Pacific cod and red snapper or a red snapper.

The species groups include now abalone, grouper, sea cucumber, sharks, shrimp, swordfish and the tunas albacore, big eye, skip jack, Bluefin and yellowfin and you're going to learn about hearing talk about HTS codes and Dale will talk further about that later on.

The codes for these particular species are categorized are what's highlighted and you will be working with when you enter the information into the International Trade Data System for importing into the U.S. and we'll come back to that. Next slide, please, so what's the information so we've got permit, data reporting, recordkeeping, next slide.



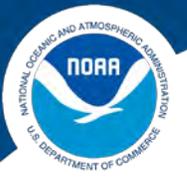
The permit, the U.S. importer record will hold the International Fisheries Trade Permit, it's the IFTP, it's available online. It's \$30. It's available now and it's annually renewable.

The individual who holds this permit we're calling the U.S. importer of record must have a U.S. residency and it's also the one, the entity that is responsible for keeping the record, got documents, the harvest information and the chain of custody, in other words the traceability. This rule is about traceability of this product to ensure and prevent [IUU] fishing and seafood fraud.

So the documentation of the harvest and the chain of custody. It can be trans-shipment, it can be processing, co-mingling, captains, weathers, things like that, what you're going to include.

There are models or sample reporting forms that are available on our Website and then but that importer of record, the person holding that international fisheries trade permit is the primary person responsible for having that information and those documents and for being the primary [contact] also for being audited so we'll go into more detail about this too. Next slide, please.

So we talked about the permit credentials and we who can hold that permit, the import of record. Now the harvest information this is going to be the harvest event data on like where's the vessel flag state, where do they come from, is there a license, evidence of authorization to fish?



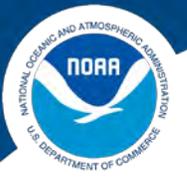
We know that some places may or may not have these. A unique vessel identifier, sometimes there is or is not a registration number, the type of fishing gear used, the name of the farm production site or aquaculture facility and/or if it's wild capture, the area of wild capture.

That could be an FAO area or maybe it's, you know, the waters off someplace and then the other part of the harvest type dataset that needs to be collected is also the offloading information or the first offloading as it's labeled here and so you're going to talk about the species of fish.

Remember we just went through the list of species and there's [HTS] codes that go with, excuse me, I apologize, not [HTS]. The three alpha codes that go with those specific species which is part of this aquatic sciences fisheries information system but I think if people are familiar with it at all, it's the three alpha codes.

They're also going to need the form, the product form and weight at the time of landing, this whole head and gut kind of thing like that, what's the landing date, where is it being landed, where's the delivery location and the name and contact of the primary entity and for indoor facility it could be the production facility at which the fish were first landed and delivered, okay?

So this is your harvest-type information you're going to need to enter into the system. Next slide, please, during the initial comment period for the rule, there were a lot of comments made about small entities, small fisheries or small aquaculture production facilities and meeting the demand of the data requirements, the data reporting, putting the data together.



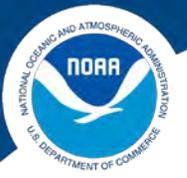
So an exception was made for small-scale fisheries and/or farms such as aquaculture farms so if a fishing vessel is 12 meters or less or weighs 20 gross tons or less or is an aquaculture production facility that delivers 1000 kilograms or less, those types of delivery that are collected at one collection point on a given day or one day, one collection point can be aggregated and use an aggregated harvest report.

Therefore you wouldn't need to put down the individual vessel and the individual farm, things like that but the rest of the information would be required, yes, but there is a (plot) that's for having an aggregated harvest report for either small-scale fisheries or the aquaculture small-scale farms. Next slide, please.

So the primary points we've talked about a permit that's required and we've talked about the harvest information that's required. What are the rest of the key points that pull this all together for traceability of [IUU] fishing and seafood fraud. Next slide.

This program the Seafood Import Monitoring Program applies only to seafood entering the U.S. from a foreign country and it does include seafood that is reimported into the U.S. It might be harvested in the U.S., go to another country for being processed and when it comes back it's reimported into the U.S. if it still applies. Next.

The importer of record must hold a U.S. residence and have a current International Fisheries Trade Permit or IFTP permit. I will also note here that IFTP permit is one some of you may be familiar with or is used for three



other types of programs and those include the tuna what some people call the tuna tracking verification program or dolphin-safe program.

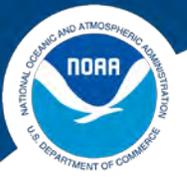
There's an Antarctic Marine Living Resources or AMLR permit and then there's the highly migratory species permit which I think is tuna, swordfish, shark and whatnot and then there's this program for Seafood Import Monitoring Program. It's the same permit for all of those so if you hold it for one, it's used for all. It can be used for this one too. Next, please.

So traceability information is the harvest information and the paperwork for chain-of-custody records that showed that can verify where that product went from the time of harvest to the point of entry into U.S. commerce.

So the harvest and landing information must be reported electronically at the time of import through the International Trade Data System and then the chain of custody records that document and trace where that product was from that point of harvest to the point of entry.

The importer of record has those two sets of information, the harvest and the chain-of-custody records and they've got to hold it for up to two years because it can be required to be audited. Next, please, so and the information once it's collected is considered confidential.

Next, please, and the number for shrimp and abalone, the other 11 priority species that are already in effect, they were already complying with this. Now you have December 31 to roll-in shrimp and abalone into the program because after December 31st it's mandatory for them too. Next, please.



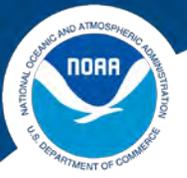
So how can you get ready for this shrimp and abalone mandatory compliance at the end of this year? Next. Remember, you've got to have your harvest load, you've got to have your harvest information, collect that data about the processors and the shippers and where it's been and make sure the importer of record has that information.

And that importer of record also has to hold the International Fisheries Trade Permit and whoever is responsible for this and eventually they can conduct just like the other priority species. Those folks that were entering that data had the option for shrimp and abalone they will have the option or maybe coming-in to do a sample audit of record, it's optional.

You don't have to do it but that helps them to lead into also the developing the software, it's a handshake with the system and to test-out pilot testing which is available to make sure you know how to get the data into the Customs and Border Protection International Trade Data System. Next, please.

So I'm going to turn it over to Dale Jones right now, he's our expert on the line and can go into far better detail and greater detail as to what I've mentioned, pilot testing and making the software handshake and getting that data entered at the point of import. Dale?

Dale Jones: Yes, so thanks, Laurice, appreciate it and good day to you all, appreciate you participating in the Webinar. I want to start-out by reiterating something that's already been said and that is that if you've already been importing under the SIMP program and have been doing that since the first of this year,



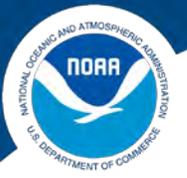
the primary 11 species that were listed prior to shrimp and abalone are being included were already mandatory.

So if you're already doing that, your broker, your buyers, all are submitting that SIMP data, there is not a lot of difference between what you'll need to do for shrimp and abalone. This business rules within Customs that are provided a network through the [ACE] system will remain the same. There'll just be a new list of additional HTS codes that are flagged for our SIMP program.

So there's going to be about 28 additional HTS codes give or take a few and those are all mostly shrimp with the exception of a couple for abalone so it would be different sizes, etcetera, of shrimp will be included in that and that is for those of you who are familiar with the filing process, those will be flagged as NM8 National Marine 8 which is a designation for those different HTS codes that we required PGA data to be submitted for.

So the next thing that I'd like to outline too is that we're really talking about four primary entities that are involved in this process and sometimes it helps to take a look at the rules to be sure we're preparing for the pilot testing and the process so you have the foreign exporter and those are all the folks that Laurice just listed earlier that are in that supply chain in other countries and maybe even back to our country.

But those people in the supply chain that are collecting information at every step along the way so that you have what you need when you go to conduct an entry to the United States and have the correct information so those folks



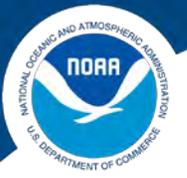
would all have to be informed as to what you need for this product. Next is the U.S. importer of record or the IFTP holder.

As Laurice mentioned, this permit is necessary to have and that will be the person and party who will be responsible for after the import audit and holding the records up to two years but the critical thing that I want to point-out as far as the filing and testing is that IFTP permit number so if you do not have an IFTP (pip) permit already as the importer - not the broker but as the importer - you'll need to get that.

So that you can provide it to your broker and that's available through the connection that's on our Website. You can pick that up for 30 bucks. It takes about a half hour to apply for the permit and you can download it as soon as you're finished applying for it so then the next key person involved in this is the broker or filer and then if you are on the line, you probably fit that role.

So it's pretty cool for you to be working with your software developer to ensure and that is our fourth party, the software developer so the broker and the software developer working together to be sure that they have their software setup correctly for SIMP if you're not already filing and feel free to contact myself or your Customs client rep to work through that.

So that when a broker gets the information they need from those first two entities the foreign exporter and the U.S. importer, they have what they need to keystroke into the Customs automated broker interface or [ACE] system and file what they need to get a may proceed for these products including now shrimp and abalone so the software developers are really key people to include here.



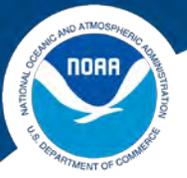
If you haven't already been involved or if you haven't had any new updates to what parts of products you're working-on, right, where you need to be sure they're included so they have these setup and ready to go so next we'll do once we move into this, we'll do some certification-level testing and some production-level testing.

And again the key here is for those people who are new to the process and haven't tested this stuff before and if they're building new software, the certification-level testing is testing that's initially started using mock data, it's not a real import.

And again usually your software developer is really integrated into that process and just saying let's throw some numbers in and see if it works and pretend that we're filing something in the certification environment.

You'll have to coordinate that with your customer's client rep and have that setup to be able to do that as a broker or a filer. We look for or at least we're hoping and don't hold me to this but we're hoping to see the latter part of August or somewhere late in the summer to have certification-level testing available for this if not early fall at the latest.

Then once you're working okay operative and the certification level, we'll move into the actual filing environment, the production-level testing so from there if you have some shipments coming-in, if you actually want to test this for you got some shrimp or abalone that you're importing, we look to move to production-level testing in possibly October hopefully no later than early



November and then through November-December through the end of the year before this becomes mandatory.

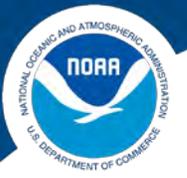
We'll have a couple of months to test and make sure everybody's SIMP-ready for filing that is actually providing PGA data to us under this SIMP program as required under the new requirements for shrimp and abalone so that's the production-level testing from there. Next slide.

So this slide just outlined a lot of what I've already mentioned so I won't go through in too much detail but again the first key point here is confirm that your software test and you actually do some testing in the certification environment. Check with your software vendor and work from there.

Next point there is contact the Customs client representative to setup the cert account if you don't already have that and confirm that is up and running to allow PGA testing. The third bullet point there is work with CBP to create the flat file that contains the entry data and/or the PGA data that comes-in, make sure you're ready to go with that.

And then lastly as a vendor or filer you'd submit the file to the certification environment first and then ultimately your next try, some actual testing in the production-level environment so next slide.

So I think that essentially covers it. I'll turn it back to Laurice to follow-through with you on the trusted trader program and if you have more questions about the [certification] testing or the details on the filings, I'll be available at the conclusion of the Webinar here today to answer more questions along with the others.



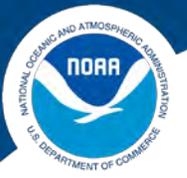
And you'll see my e-mail later there if you have questions you're also welcome to follow-up with me in the coming weeks and months so again I'll turn it back to Laurice at this point. Thank you.

Laurice Churchill: Great, good, thank you Dale and thank you for that excellent those explanations. The slide you're looking at right now, also during the original rulemaking there was to be a proposal for a commerce trusted trader program.

The final rule for this is expected to be released later this year and it's developing or a more streamlined entry process to again expedite the flow of trade and potentially reduce the burden of meeting the program recordkeeping requirements.

So look for that and one way let's go to the next slide, there's the [iuufishing.noaa.gov](http://iuufishing.noaa.gov) Website - next slide, please - that I want you to not forget so next slide. First we'll talk about so remember that the mandatory compliance date for shrimp and abalone is December 31, 2018 and the U.S. importer of record will supply that data to Customs.

So there'll be the harvest entry data at that point and Customs in order to clear Customs to [import] into the U.S. and then retain also not just the harvest data but also the chain-of-custody data records to be supplied, kept by the importer of record and in addition the harvest [and landing] data to be supplied in case you're audited.

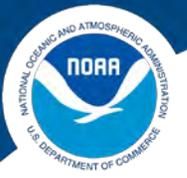


Next slide, and one way to really keep on top of being notified of things for those that are new to the program, go to the Website [www.iuufishing.noaa.gov](http://www.iuufishing.noaa.gov). At the bottom of that first large page is a lot of information on there is a way to sign-up for e-mail notifications of changes to the program such as the trusted trader program or has been such as adding or looking to stay on shrimp and abalone and information about that.

So do go to that Website, do sign-up for those e-mail notifications and stuff, a good resource to have. A few other points I'll run through, also on this slide, real important is if you've got questions, there's two - we've got four resources - here but first you have a general e-mail contact which is manned and responded to quickly.

And there's also a phone-in, call-in support line for problems if you're having trouble especially with entering the data or something is glitching-up, your primary contact being Celeste Leroux. We are going to hear from possibly during the if she's answering some of your questions here shortly and Dale Jones again with the pilot testing and the interface with the ITDF system is your best contact there and his e-mail is up there as well.

If you have a point, I'll note is that for those of you unfamiliar with this at all, when you go to the Website, the HTS codes that are involved in this for the 13 priority species, there is a document on there with all of those. With the addition of shrimp and abalone, there are probably about 28 or 30 codes added for shrimp and abalone to the approximate 100 codes that are on that list for these 13 priority species.



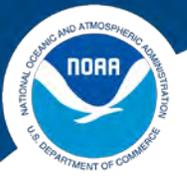
And remember that the when it comes to auditing the audit records include both the harvest records and the chain-of-custody records that show that and verify that traceability of where that product's been from the point of harvest to the point of entry into U.S. commerce and when audited, we have a policy now that's been established that should you provide it electronically when you're inquired of for this information. They allow five days to turn it in.

If you instead are sending paper copy or by mail, they allow 10 days to turn it in so those are some updates to the program for those new and existing in the program. I'm also trying to see, double-check, there are I know we mentioned yesterday, I don't think we've mentioned it today, the importer of record Dale you might want to jump back in here but if I say this wrong but there's two definitions now with the definitions of the importer of record.

The existing one includes foreign entities but for the Seafood Import Monitoring Program it does require a U.S. residence to hold that IFTP permit, okay, so that and that's the person responsible for the record so remember there are two different definitions there.

Also there are models or examples, reporting forms on that Website I talked about, [www.iuufishing.noaa.gov](http://www.iuufishing.noaa.gov). There's a compliance guide for the entry filers that's very useful and again the HTS codes and the three alpha codes on that Website. There's a lot of information there. Go there and look for it.

It will be helpful for those especially new to the program so I think that's the end of it. Use their resources, they're great and we thank you all for calling-



in. I'll turn it back to (Heather) now that we can go to questions and answers.

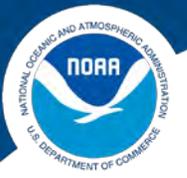
(Heather Brandon): Great, thank you so much Laurice. I think that was the excellent presentation. You made everything very clear and now we have plenty of time for our question-and-answer phase and I think the operator on the call will be able to tell anyone on the call how they can let us know that you have a question and get into the queue. (Ted)?

Coordinator: Yes, the phone lines are now open for questions. If you'd like to ask a question over the phone, please press star 1 and record your name. If you'd like to withdraw your question, press star 2. Thank you.

Celeste Leroux: So this is Celeste Leroux. While we're waiting for folks to join the queue, I just wanted to highlight an outreach material that we recently posted on our Website that I think might be helpful to importers or those who are supporting providing chain-of-custody records to an importer of record.

We have released guidance for audits so if you would like to review that, if you have any questions about what the chain of custody records might entail, I would encourage you to visit our Website which is listed on the slide here in the Webinar and take a look under our resource materials for that audit guide which has a lot of helpful information for you. Looks like we have some questions.

Coordinator: The first question in the queue is from (Matthew Harris) with DSV. Your line is now open.



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(Matthew Harris): Yes, hi, how you doing today?

(Heather Brandon): Good. Go ahead, (Matthew).

(Matthew Harris): My first question is, is as far as the filing so there's going to be a test phase and then it'll go into production but my question is will filers ultimately be required to file electronically once this is in production via the \*(A-cert) [correction: ACE] environment?

Celeste Leroux: For the, go ahead Laurice.

Laurice Churchill: Yes, I was going to say yes, (Matthew) it is all electronic. There is a filing step in order to clear Customs to receive the may proceed is now required, has been active and it will continue that way.

(Matthew Harris): Okay, and then the only other question I had was I know that we said that there has to be a U.S. responsible party but my question there is can and that be the consignee or did the party - if it's a foreign importer - do the parties have to be related so if it's a foreign importer of record, can it just be the U.S. consignee who, you know, holds the records, has the recordkeeping or do they have to be related to that foreign importer?

((Crosstalk))

Laurice Churchill: Dale, do you have a ...

Dale Jones: Sir, this is Dale ...



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Laurice Churchill: ... yes.

Dale Jones: ... basically they can be completely separate. They don't have to be related. The person who is the U.S. importer of record for this program is going to be the IFTP permit holder as has been mentioned and that party or entity is taking responsibility for holding the records on the traceability of this product for any audit that will come forward for a period of two years.

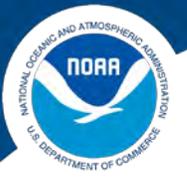
So if that party as a U.S. resident agent is allowing their permit to be used and stepping forward to provide that service if you will or their permit to be used for the import, then that's what they are basically committing to is to take-on that responsibility and they do not necessarily have to have a direct relationship as far as being a company or part of the company that's the exporter from the foreign company.

The other distinction that I'll try and make a little bit further is that the importer of record that is currently designated for Customs definition for Customers purposes still will exist and still will be the same.

So in effect you could have an importer of record that's a foreign company under the Customs importer of record person designated or entity designated and then a second importer of record which would be our IFTP holder that takes responsibility for this audit from there so hopefully I hope that clears (that up).

(Matthew Harris): Yes, no, understood, thank you very much.

Dale Jones: Good.



(Matthew Harris): That was all I had.

Coordinator: Next question in the queue is from Raymond Rodriguez with RAR Logistics.  
Your line is now open.

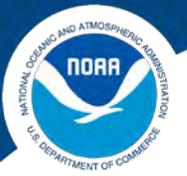
Raymond Rodriguez: Thank you very much. This Webinar, will this be available to folks or the participants offline?

Celeste Leroux: Hi, this is Celeste so yes, we typically will post a transcript within a week or so of the Webinar and we would expect to post the PowerPoint as well but if you would like a copy of the PowerPoint presentation early, you're welcome to e-mail me and I can send you individually a copy before we post it online.

Raymond Rodriguez: Okay, and what is your name, I'm sorry? Just to make sure I got your e-mail address, oh, okay, I see your e-mail address here on this page, okay, great. One other last question that I have is the with SIMP where can I locate the message set to find-out what exactly goes where just to make sure I do these things properly?

((Crosstalk))

Dale Jones: Oh this is Dale Jones. There's a when you go to the [SIMP] site that's listed here on the right-hand side you'll see a column that has resource materials and then there's another even less below that that says other links if you look through those but what you're going to be looking for there is called the implementation guide.



And the implementation guide will tell you exactly what you need and how your software has to be setup. You can also search for it online through the Customs Website and they have it posted as well relative to their [CATAIR] and how that's, you know, basically for what we have to enter.

Raymond Rodriguez: Great, thank you very much Dale, appreciate it.

Dale Jones: Yes, if you can't find it, just send me an e-mail to my address on there.

Raymond Rodriguez: Yes, I'm sure I will. We've communicated in the past, thank you.

Dale Jones: Sure.

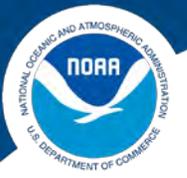
Raymond Rodriguez: Thank you. All right, thanks a lot, guys.

Coordinator: Next question is from (Antonio Torres) with Meridian Products. Your line is now open. (Antonio), if you're there, your line might be muted. And again if you would like to ask a question, please press star 1 and record your name. Thank you.

Celeste Leroux: Was there a question from Meridian Products?

(Heather Brandon): It looks like he disconnected but we're getting another question coming in.

Celeste Leroux: Okay.



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Coordinator: There is a question in the queue from Demetrio from K&K International Logistics LLC. Your line is now open.

Demetrio Kyriakis: Hi, good morning to all. I have a question. I believe that it was on the first or the second slide where you're listing all these specifications of the reporting of the information, where the vessel, the landing port, etcetera, it mentions I believe a fishing permit but you also mentioned the IFT permit for the importer of record or the U.S. responsible party.

Now is this permit or license on - here it is, thank you - this permit or license number, this is for the actual fishing vessel or the harvest party, correct? This is completely separate from the IFTP?

Dale Jones: That is correct.

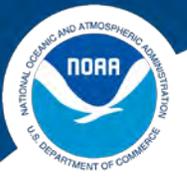
Laurice Churchill: That would be correct, yes.

Demetrio Kyriakis: Okay, perfect. Thank you, that was it.

Coordinator: And again if you would like to ask a question over the phone, please press star 1. It looks like there is a question in the queue from (Antonio Torres) with Meridian Products. Your line is now open. (Antonio), if you're there, your line may be muted.

(Antonio Torres): Would the registry include it?

Celeste Leroux: Oh, (Antonio), could you repeat that please? We got part of your last end of the sentence.



(Antonio Torres): Would the [breaded shrimp] included while reporting?

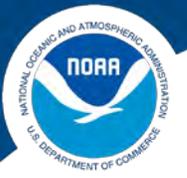
Celeste Leroux: So this is Celeste Leroux Mr. (Torres). We have on our Website a list of all of the harmonized tariff schedule codes that are included in this rule but we generally have selected items that are not highly processed so bald cakes pastes but breaded shrimp would be included. I would just encourage you to take a look on our Website of the specific list of HTS codes to ensure that the one you use is covered under this program.

Coordinator: The next question is from (Alan Stephens) with (Piazzo Seaford World). Your line is now open.

(Alan Stephens): Good afternoon, everyone. We are a relatively small importer and we do self-filing. I've got a copy of the implementation guide and I've kind of fumbled my way through it. It's not exactly written for importers as much as it's written for software developers but I believe what the several entries that I've done so far that the information that I'm entering is done correctly and it's the correct information in the correct fields.

My question is, is there a way to verify this short of asking for an audit so that someone can take a look at it, entry that, I've done and said yes, you're doing it right or not, this goes here or this is completely incorrect, you know, fix it or this is what you need to do.

Dale Jones: Yes, we would certainly be happy to do that for you. We could really look at it a couple of different ways but if you submit the data and it does not get accepted by Customs, we cannot see it but we can get in Customs, have



them engage to take a look at it to see what the problem is but if it goes through and you get a may proceed on it, then we can view it and I can take a look at it.

Again this is Dale Jones. I can take a look at that for you through the Customs portal and make sure it's there. All I would really need from you is just contact me, send me an e-mail and say I've filed entry number such and such and provide me with the entry number and I can take a look over it and see what's there and how it looks and make sure that you have what you need.

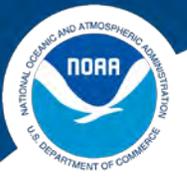
(Alan Stephens): Okay, great, thank you very much.

Dale Jones: Sure.

Coordinator: Next question is from (Alan Rosenplatt) with (J.F. Moran and Company). Your line is now open. (Alan) if you're there, your line may be muted.

(Alan Rosenplatt): Can you hear me now? Okay, so during the Webinar, I heard the following. Not an exact quote, that there was not a lot of difference so with shrimp and abalone in terms of the filing versus what we are already doing, so my question is, is it fair to ask or reasonable to ask that there will be a summary published somewhere indicating what those differences are?

Dale Jones: This is Dale, you can probably attribute that statement to me and again really what I was referring to is the details of what particular field you have to enter. The only difference that I can think of is that we anticipate much



more shrimp coming-in as an aquaculture species versus a wild capture harvest.

So there may be some different types of things that you would have to enter in terms of an aquaculture species that you wouldn't normally enter for a wild capture harvest so and again as you well know that could be the way you could have wild capture shrimp as well.

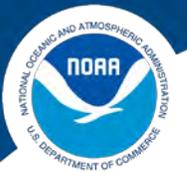
And I don't know that we have anything really distinguishing those differences now but when you go through the implementation guide as the last caller mentioned and you look at that, you'll see that there's a different code that you use for the aquaculture species just to show that.

But then when you also show where the shrimp is being offloaded and where it comes from, the harvested, they're going to be actually very similar but you might be showing the location of a shrimp farm or a shrimp pond\* versus an ocean area environments, that type of thing so that's really where the key differences are going to be between and again that's probably only if it's an aquaculture shrimp versus a wild capture harvest. \*[Correction: only the farm location is needed, not the pond level]

(Alan Rosenplatt): Thank you.

Dale Jones: Sure.

Coordinator: Next question is from ...



(Heather Brandon): This is (Heather), oh, sorry. Can I just add that [regulatory] (sic) there is no difference between the program requirements that exist now and what will exist when shrimp and abalone are added. Assume there's it's the same requirements that exist now. There isn't a difference. What Dale is talking about, you know, difference between like say product shipments and where the product or it's made from so go ahead, sorry (Ted), with the next question.

Coordinator: Next question is from Eric Hansel with C.H. Powell. Your line is now open.

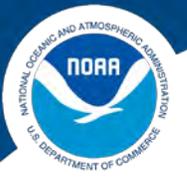
Eric Hansel: Good afternoon, this is a follow-up to the breaded shrimp question. I was just curious how this would extend to I guess primarily shrimp as an ingredient in other food products and I guess is the HTS what prevails so far as inclusion in the reporting requirements or if it's just the presence of shrimp overall? Thank you.

(Heather Brandon): Go ahead, Dale.

Dale Jones: Go ahead, go ahead (Heather).

(Heather Brandon): Well, I was going to say refer back to the HTS code list that we have on our Website and that you should look at that HTS code list and see if the product that you're importing is imported under that HTS code. Those are the HTS codes that are flagged for the SIMP PGA datasets to be entered.

And as of now the HTS codes that are included for shrimp in relation or for all species is products code that are not highly processed and for shrimp specifically the shrimp would be a recognizable shrimp in the product so for



example oils or fish meal or a powder. Those are not included in the SIMP program right now. Those are not HTS codes that are flagged.

Dale Jones: So just to ...

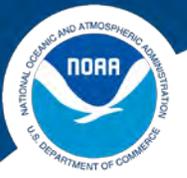
(Heather Brandon): You were going to add something Dale?

Dale Jones: ... yes, just taking it one step further. For those of you who are familiar with the HTS codes, what you're going to see primarily listed are what's called Chapter 3 HTS codes so the more processed product when you get into Chapter 5 and Chapter 16, you're not likely to see as many as those, I'd have to look back again to see if we have listed or not but I know that I think Celeste just showed it on the screen here briefly some of the HTS codes.

But that is really the key difference here so you see here these are all listed now on your screen as Chapter 3 type of codes and I don't think we have anything listed in Chapter 16 or Chapter 5 for shrimp, for shrimp and abalone so again this is also to distinguish that the driver is the HTS codes.

So that's how we flag it and not to get into too many details but in this particular program SIMP versus our other programs, in the SIMP program our rule is dictated according to the HTS code and then any potential replacement HTS codes for that product that would become new HTS codes.

But for the other programs that we run so for example if you required the report for a certain type of tuna, it's based on that tuna regardless of what HTS code is used so there's a little bit of a distinction there between this program and our other three monitoring programs so I hope that helps.



Celeste Leroux: This is Celeste Leroux. I just wanted to jump-in and say wanted to show you our Website so this is what it looks like when you go to [iuufishing.noaa.gov](http://iuufishing.noaa.gov) and click-on Seafood Import Monitoring in that page, it will take you here and on the right column under resource materials is where you will find the type of information we've been referring to.

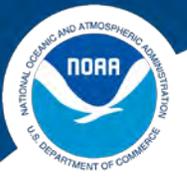
So at the top is the guide for audit requirements, there's the final rule we issued adding shrimp and abalone to SIMP and all of the other materials including the harmonized tariff schedule code list and the mandatory full message species which is that three-letter code associated with the scientific name of every species included under this program including shrimp and abalone.

Eric Hansel: Great, thank you very much.

Coordinator: And again if you would like to ask a question over the phone, please press star 1 and record your name. There is a question from Demetrio with K&K International Logistics. Your line is now open.

Demetrio Kyriakis:Hi, again. I think this question is more for Dale. Dale, we are U.S. Customs brokers that file with our software system that's already setup to transmit and it's in compliance with SIM. However, as you stated fish in particular has been required yet.

My question is because it is HTS-derived, if we were to transmit a shrimp entry right now, would you still be able to receive the information and check to see that everything is coming-in properly or do we have to wait until the



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fall as you stated in the or sometime in the fall as you stated in the presentation earlier?

Dale Jones: Well, that's an interesting question. My guess is that we would get it and be able to receive it and look at it so if you have an HTS code for shrimp and provided all the filing data through your system and voluntarily gave that PGA data, my sense is that probably would be able to see that. I'm not positive of that until we discussed it but if you would want to give that a try, we could.

Demetrio Kyriakis: Oh, that would be great so we don't have to wait until necessarily in the fall, we can get started ASAP if we have the ...

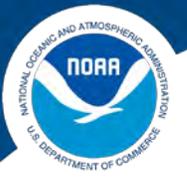
((Crosstalk))

Dale Jones: I don't think so. I think we could look at it but again I just would throw the caveat on, we'd have to test it to see. I don't think there's anything can stop it.

Demetrio Kyriakis: Okay, good deal, I'll touch base with you in the near future to see if we can get that going, I appreciate it, thank you.

Dale Jones: Okay, sure.

Coordinator: And just a reminder if you would like to ask a question, please press star 1.



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Celeste Leroux: Laurice or (Heather) are there any points about the presentation or reminders that you'd like to share with our audience? It looks like we may be close to wrapping-up.

Laurice Churchill: Hi, this is Laurice.

(Heather Brandon): I would, no.

Laurice Churchill: Go ahead, (Heather).

(Heather Brandon): Go ahead. No, that's okay. Okay, so I would just add that there is one more Webinar with Spanish interpretation. It's next week on June 27th at 2:00 pm Eastern Time and again that's listed on the [iuufishing.noaa.gov](http://iuufishing.noaa.gov) Website under upcoming public meetings and it's pretty much it is exactly the same presentation as what was given today and then interpretation, consecutive interpretation and then a question-and-answer period.

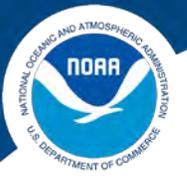
So if you have folks that you work with in a Spanish-speaking country who would be interested in hearing this information and asking questions, feel free to share in that Webinar information with those folks.

Celeste Leroux: Thanks, (Heather). It looks like we have another question.

Coordinator: Yes, (Ellen Check) with Pegasus Shipping. Your line is now open.

(Ellen Check): Hi, hello? Can you guys hear me?

(Heather Brandon): Yes.



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(Ellen Check): Okay, I recall that one of the other person ask if the importer is foreign party then the permit holder who will have to keep all the records here in the United States needs to be a U.S. entity, right?

(Heather Brandon): The International Fisheries Trade Permit holder needs to be a U.S. entity.

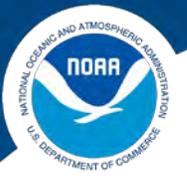
(Ellen Check): And does that permit holder who need to keep all the record need to be the company or maybe a U.S. agent that the shipper hire or does it have to be the broker who files the entry if they don't have another U.S. agent?

(Heather Brandon): That is a business arrangement that would have to be done business to business so if you if an importer is a Customs importer of record is a foreign company that doesn't have a U.S. address or a U.S. residence that can be the International Fisheries Trade Permit holder, then the foreign exporter would have to find an entity that can hold the permit for their product to enter the U.S. and for the filing to happen so ...

(Ellen Check): It could be one of their buyers or it could be a separately hire agent, something like that, right?

(Heather Brandon): ... correct, correct, that's right.

Dale Jones: That's correct, you can have a U.S. resident agent that you'd hire or you could have sometimes there have been brokers and it's suggested they may consider doing this, I don't know that there are any that are permanent yet and/or could be others but as (Heather) says correctly it's just the business arrangement with that particular entity that gets the permit.



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(Ellen Check): Okay, because, you know, as a broker you end-up having a whole list of their SIMP form that they sell out so I was just wondering if the U.S. broker will have to end-up coming into the picture if they are like, you know, if their customer is the foreign entity, you know, from the shipper. All right, thank you.

Coordinator: I'm showing no further questions at this time.

Celeste Leroux: Thanks. (Ted) could you remind our participants how to ask a question?

Coordinator: Sure, again if you would like to ask a question over the phone, please press star 1 and record your name.

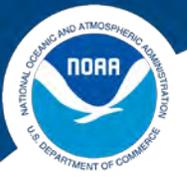
Celeste Leroux: And Laurice said it sounded like you had some points you wanted to make?

Laurice Churchill: I think (Heather) covered it, thank you.

Celeste Leroux: Perfect so ...

(Heather Brandon): Yes, this is (Heather) again. Regarding that upcoming public meeting section of our Webpage, we are going to do additional Webinars most likely the same as this one at additional times for stakeholders and additional international outreach.

So if you feel there is a need for business partners of yours internationally that would like to hear this information, that would be helpful information for us to hear and you can let us know at the [simpsupport@noaa.gov](mailto:simpsupport@noaa.gov) e-mail



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so that is [simpsupport@noaa.gov](mailto:simpsupport@noaa.gov) and several of our team members look at that e-mail and answer it every day and same thing with the SIMP support line which is listed here on the left slide.

And I can read it out, the toll-free number is 833-440-6599 or you could call the Silver Spring number which is 301-427-8301 so those are all answered by the SIMP support team and including myself and you can contact us there if you have additional questions or if you feel there is a need for additional outreach. Are there any other questions, (Ted) in the queue?

Coordinator: I'm showing no further questions at this time.

(Heather Brandon): Okay, well with that I think we will wrap-up and I would like to thank all the participants on the phone for calling-in and for your questions and don't hesitate to contact us if you have additional questions about SIMP that come-up after this phone call is over and thank you to Laurice, Dale and Celeste for being on the phone and participating as well and with that I think we'll end the call.

Celeste Leroux: Thank you, everyone.

Coordinator: This concludes today's call. Thank you for your participation. You may disconnect at this time. Speakers, please standby.

END