Public Webinar on: Seafood Import Monitoring Program

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Office of International Affairs and Seafood Inspection (NOAA Fisheries)

Facilitator: NWX-DOC CONFERENCING

Coordinator: Welcome and thank you for standing by. All participants will be in a listen-only mode until the question and answer session of today's call. At that time you may press Star then 1 to ask a question from the phone lines.

I would also like to inform all parties that this call is being recorded. If you have any objections, you may disconnect at this time.

I would now like to turn the call over to your host, Ms. Kerry Turner. Thank you, ma'am. You may begin.

Kerry Turner: Thanks, (Katie). Welcome, everyone. Thank you so much for joining us today. My name is Kerry Turner. I am the communication specialist here at NOAA Fisheries Office of International Affairs and Seafood Inspection.

And our discussion today is going to be about the Seafood Import Monitoring Program. Again, this Webinar is about the Seafood Import Monitoring Program, and we're going to discuss the program. We're going to have a brief presentation. And then we're going to open this call up for your questions about the program, about the presentation, its implementation, and so on.

We have a wonderful group here that is here to answer your questions. We have our speaker for today, Glynnis Roberts, who's - she's the outreach specialist for the Seafood Import Monitoring Program here at NOAA Fisheries.

And also we have a wonderful group of experts -- Christopher Rogers. Chris is the assistant director for the International Fisheries Division of the Office of International Affairs and Seafood Inspection. And we also have Dale Jones. And Dale is a fisheries specialist for the Office of Science and Technology here at NOAA Fisheries.

So we're going to have this wonderful group of experts discuss the program, and then take your questions. We're going to leave a good amount of time at the end of the presentation for you to ask those questions.

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Just a note, a housekeeping note. If at any time you're disconnected and you're not able to view the presentation, we do have a copy of the presentation at our IUU Task Force Web portal. And that address is iuufishing.noaa.gov. Again that was www.iuufishing.noaa.gov. And there's where you'll find a ton of information to help you with implementation of the Seafood Import Monitoring Program.

Okay, I'm going to turn this over to Glynnis as she takes you through the presentation. Glynnis?

Glynnis Roberts: Thanks, Kerry, for that introduction. Hello and welcome, everybody. My name is Glynnis Roberts. It's a little tricky one, so I thought I'd repeat it again. I do have to apologize a little bit in advance. I have a bit of a summer cough, so hopefully it won't be too distracting. But do bear with me if you hear any of that.

I'll be giving you a brief presentation on the Seafood Import Monitoring Program, as Kerry said, which will be going into effect January 1, 2018. My hope today is to answer the who, what, where, when, and why, so that you can best prepare and be ready at the time of implementation.

So what is it? What is the Seafood Import Monitoring Program? It's a US regulatory program that applies to certain seafood products that are imported into the United States. It requires particular data information and recordkeeping, traceability information, for those products that are declared at the time of entry into the United States.

Why this program? Why the Seafood Import Monitoring Program? This information and data being collected at the point of entry into the United States really addresses two big things. Number one, preventing IUU fishing seafood products, IUU being illegal, unreported and unregulated products. And number two, to prevent misrepresented seafood products from entering into US commerce and our markets.

The goal of this is really to protect our market, our economy, our seafood security, and to promote sustainability of our oceans. IUU and fraudulent seafood undermine the integrity and value of the products that are traded by our honest brokers. And it's really our responsibility to reduce these products in the US trade stream.

So as you can see on the slide here, we have a timeline. This is How Did We Get Here? In June of 2014, NOAA and other agencies were asked to develop
a task force and come up with a list of recommendations or steps that we could take to combat IUU fishing and seafood fraud.

Some of these recommendations involve phasing in a risk-based traceability program for seafood, starting at the time of harvest and following into the moment of entry into US trade.

I would like to note that throughout this process you can see all these key moments here that inform this process. We did have a lot of outreach and engagement with stakeholders and the public, so this has been a very interactive process to get us to where we are today.

At the end of 2016, the final rule for the Seafood Import Monitoring Program was released. And that really brings us to this moment.

January 1, 2018, just a few months from now - January 2018 is the date for compliance for these priority species under the Seafood Import Monitoring Program. And we will go into what the species are in just a few moments. Go ahead and move forward.

So what I would really like for you to take away today are five key points that you should know about this program.

First, this rule only applies to seafood that is entering the US from a foreign country. So this rule does not apply to domestic products that are harvested here within the US. It does not apply to seafood that has already entered the US.

Number 2. This data that we're asking to be collected and recorded really follows the chain of custody from the moment of harvest up until the point that the seafood product listed under this program enters the United States.

Three. This information that we're asking, the data and traceability information, will be collected via the standard customs clearance process, also known as the International Trade Data System or ITDS. This is the US government's single data portal for imports. And this won't be a separate program or entity. It will be folded into ITDS.

And finally, Number 5. As I mentioned earlier, this rule only applies to products that are harvested outside the US and then brought in. But there is something important to note. If any product that is harvested in the US is then exported, for example, for processing, and then re-imported into the United States, and that product is listed under the priority species that we'll cover, that does apply to the rule.
So here we have the species that we're talking about, the 13 priority species that are covered under this rule. Again, these were identified for their risk for IUU fishing and seafood fraud.

I would like to note that you can see there's two species listed here, abalone and shrimp, that have a star next to their name. This is because those two species have a stay or a temporary suspension under this rule. And there's a reason for this. The United States has stayed the abalone and shrimp under the SIMP rule until we have a comparable reporting system for our own domestic aquaculture production of abalone and shrimp.

As you can see on this list of the species, all the other species that are harvested in the US, we have the information that we're requesting under this program, such as catch data, landing information, and so forth.

But for [inaudible] abalone and shrimp, this doesn't occur right now. And we are not requiring any imports under this rule to comply with the rule until we have closed these gaps on our own end for US aquaculture production of shrimp and abalone.

This is something that we're working on, and something that we expect to be accomplished. When that happens, the stay or suspension for shrimp and abalone will be lifted, and we'll make sure to give plenty of advance so that traders may adapt as that comes into compliance.

The box underneath, titled Harvesting or Producing Entity, you can see here this includes the information that we're requesting at the point of entry, such as gear type, fishing permits. And in terms of aquaculture, the facility or the farm. Go ahead.

So here we have information in the first box about the fish or the seafood product, what we're looking for: what species it is; the weight; what form it's in, and information such as that.

The box underneath that's titled Importer of Record is really the who -- who is responsible under the Seafood Import Monitoring Program -- for all of this information. And this is the importer of record. Now we're asking the importer of record to maintain records that support the chain of custody and data elements that we're asking. And you can see some of those here on the slide, listed in that box.
This is really important, primarily to support a chain of custody from the 
moment of harvest to entry into the US, and also will be very important in 
case of a future audit for any importer of record.

The one thing that I do want to underscore is that the US has taken a very 
flexible approach in terms of the documentation that we are requesting that 
supports this chain of custody information. We don't have a specific 
document, form or certificate that's required. Most of what you probably have 
in your current business practices would suffice -- things like bill of sale, 
landings, invoices, manifests, documentation such as that.

I do also want to note that this does apply to any transshipments, so 
documentation that you might have related to that is also required under the 
chain of custody documentation we're asking for.

And finally in addition we're asking for the importer of record to have a 
NOAA Fisheries-issued International Fisheries Trade Permit, or an IFTP. 
This is something that is easily available online. You can get it now if you 
want. I think it's something like $30. So that is another requirement that 
we're requesting. You want to move to the next slide.

All right, so that is the basic outline of the Seafood Import Monitoring 
Program. I did want to point out some of what we're doing with outreach and 
supporting materials to help anyone who might need further information.

You can see that first bullet point. We have a Web portal. Kerry mentioned it 
in the beginning -- www.iuufishing.noaa.gov. This is where we are posting all 
the information that we have for the public -- fact sheets, compliance guides, 
Webinar information.

We have the audio and transcripts for some of the public Webinars that we've 
already had. And we'll also be posting future information as we release more 
information, Webinars and products moving forward.

We'll also be initiating pilot testing for importers of record to participate in if 
they wish to. Not required. This will assure that their message set is 
formatted correctly to submit electronic data to the International Trade Data 
System. That's something that we're working on, and we'll let you know when 
that rolls out.

The other program to mention is the Commerce Trusted Trader Program. 
This is something that's also coming. The idea here is to reduce the burden on 
trade with respect to reporting and recordkeeping for those that achieve a 
Trusted Trader status. This is in development. We will let you know when
this is defined, and it's something that I would suggest everybody be on the lookout for.

At the very bottom we have points of contact that are really useful. For any questions related to compliance, clarifications, the Trusted Trader program, and basically all things SIMP, please feel free to reach out to Celeste Leroux. Her email is celeste.leroux@noaa.gov.

If you have specific questions on ITDS, data entry filing or the pilot program, please feel free to reach out to Dale Jones. His email is dale.jones@noaa.gov.

And lastly, just to recap, the Seafood Import Monitoring Program establishes data reporting and recordkeeping for the importation of certain priority fish and fish products that are particularly susceptible to IUU fishing and seafood fraud.

January 1, 2018 is the mandatory compliance date for those products, with shrimp and abalone having a suspension that we will let you know about once we become compliant under this rule.

And finally, you can see a landing page there for our Web portal, www.iuufishing.noaa.gov. That is a one-stop shop of sorts. You can see an arrow pointing at the bottom right-hand corner. If you can see under Hot Topics, that first line does say US Seafood Import Monitoring Program. And if you click on that link, it will take you to all the products that we've discussed so far.

And with that, I have my colleagues Chris Rogers and Dale Jones here. And we are happy to open it up for questions. Kerry?

Kerry Turner: Thank you so much, Glynnis. Now we've had - we've unpacked a lot of information for you in that presentation. And as I mentioned early on, we want to open this up for a robust question and answer session. So I see a lot of questions already come in through the Web portion, and we'll definitely read those out.

But I would like to give some instructions on how you can ask you questions about the Seafood Import Monitoring Program implementation, and anything that was mentioned in the presentation as well. And as Glynnis mentioned, we have a group of experts on the program here that'll also be coordinating those questions, those answers, as well.

So, (Katie), can you give instructions on how they can ask their questions, please?
Coordinator: Yes. If you would like to ask a question from the phone lines, please press Star then 1, unmute your phone, and record your name when prompted. If you need to withdraw your question, please press Star then 2. Once again, to ask a question from the phone lines, please press Star then 1, and record your name when prompted. One moment, please, while questions queue up.

Kerry Turner: (Katie), while we wait for questions to come in, I'm just going to read a question that we have from the Web portion first.

And the question is in reference to, on the model catch documents on the species of fish, ASFIS, 3-alpha code is required. Is there a list on the Web showing all species covered in the regulation, with the scientific name, common name, and ASFIS code?

Glynnis Roberts: So this is Glynnis. And thank you for that question. That information is actually available on the Website, the iuufishing.noaa.gov Web site. We have the Federal Register notice there. And in that notice it does list out those codes. I will turn it over to Chris or Dale for further clarification.

Chris Rogers: Yeah, this is Chris Rogers, just to clarify. What Glynnis referenced to was the Harmonized Tariff Schedule Codes, which is in the Federal Register notice. So when you make an entry filing, electronic entry filing, you have to list the commodity code, the Harmonized Tariff Schedule of the US. And we have listed those codes to which this program applies.

Now within those codes, you also have to identify the exact species. Some of those codes have a one-to-one correspondence. In other words, if the tariff code itself applies to yellowfin tuna, then yellowfin tuna has a 3-alpha code. Some tariff codes are a little bit more generic, and can cover multiple species. And therefore you do have to look up and describe the exact species which is in that shipment.

There is a complete list of ASFIS, that's the Aquatic Scientist Information System, codes at the Food and Agricultural Organization of the United Nations Web site. And we do have links to that on our resource page.

However, we are working on an abbreviated list since, as Glynnis indicated, there are only certain number of species subject to this program at the initial phase. We're going to subset those species which would be pertinent to this program, to make it a little less burdensome to sort through the larger list that's available at FAO.

Kerry Turner: Thanks, Chris. (Katie), do we have a question on the audio line?
Coordinator: We do have a question from the phone lines. It comes from Darcey McKay. Your line is now open.

Darcey McKay: Hi, it's Darcey McKay calling from High Liner Foods. I think this question's probably for Chris. I know that on the documentation requirements there's requirements that are for any transshipment that happens at sea. But my question is related to the actual harvest data entry at the time of customs entry into the US.

And what's - in terms of the entity landing, if it is, in fact, transshipment at sea where the harvest vessel is - that's the date of landing, I guess, that's being used, is when it gets transferred off the harvest vessel. Would the entity at landing be the ship that it gets transferred to? Or would it be, you know, the company that eventually it gets landed to, you know, off of the ship that it gets transferred to? Or can you clarify that at all?

Chris Rogers: Yes. Thanks for that question, Mr. McKay. It would be the entity to - what we call the first receiver. So in this case it would be the vessel, the transshipment vessel, the carrier vessel, that receives the fish.

So the harvest event would be completed when the harvesting or catching vessel offloads to that transshipment vessel. And that transshipment vessel should be identified as part of that harvest event. So the catching vessel, and then the receiving vessel.

For the recordkeeping requirement, chain of custody, that's where the eventual owner or receiver, processor, who receives those fish would be identified; not in the report, the electronic report required at entry, but in the chain of custody documents that are a recordkeeping requirement for the US importer of record.

Darcey McKay: Fair enough. Thank you.

Coordinator: We do have one other question from the phone lines. It comes from (Nicholas Rogino). Your line is now open.

(Nicholas Rogino): Okay, can you hear me?

Chris Rogers: Yes.

(Nicholas Rogino): No?

Chris Rogers: Yes.
(Nicholas Rogino): Okay, good morning. I have a few questions. I'm here with several stakeholders of the Peruvian Mahi Mahi Fishery. I have one first question is, how will seafood be verified that it was locally harvested?

Chris Rogers: This is Chris Rogers. And if I understand the question, how will it be verified that it's harvested locally? So that's the harvest event information that will be recorded at the point of harvest, indicating the harvesting entity, the receiving entity.

That information would be passed through the supply chain along with the shipment. Those records would be kept along the supply chain, transferred to the US importer. Then the US importer, in making the electronic entry filing, will include that harvest event information in the entry filing. So that will be the point of origin for those fish products.

If that particular entry is subject to audit, we will contact the US importer of record, who will furnish to us the complete supply chain records, and we will do a trace-back to that reported harvest event. And hopefully everything will check out, and then we will be able to confirm that the products that were admitted into the US were, in fact, accurately described in terms of their origin event.

(Nicholas Rogino): Okay, next question. And how is (unintelligible)?

Chris Rogers: Excuse me? I was having trouble hearing you? Which records?

(Nicholas Rogino): How will the records be verified (unintelligible)?

Kelly Turner: How will you verify that the records are legal?

(Nicholas Rogino): Legal, yeah.

Chris Rogers: Well the audit process will link the admitted goods here on the US side of the transaction to that harvest event that was reported. In terms of legal acquisition for those products, that's a criterion that is determined by the competent authority in that area of jurisdiction.

So if we have any concerns about lawful acquisition, we will be consulting the competent authorities in that area of jurisdiction. In other words, was it a Department of Fisheries that was authorizing the vessels? Was the vessel operating according to its authorization? In the right fishing area? Right season? Using proper gear? Was the catch properly recorded and reported to those authorities?
So that's a conversation, a dialog, we will have with the competent authorities in that area of jurisdiction that are indicated by the harvest event that was reported to us.

(Nicholas Rogino): Okay, thanks. I had another question. Will there be any penalty for an exporter if a batch is audited and it lacks any information or has any fraudulent information?

Chris Rogers: Well this is Chris Rogers again. The regulation applies to the US importer of record. So there would be administrative penalties applied to the US importer if there were any problems, both in the report itself or any of the recordkeeping requirements. No strict or direct penalties for the exporter or harvesting entities, or the foreign entities in the supply chain, per se under the US regulation.

However, a US importer would certainly become wary about working with suppliers abroad if the information reported to the US importer turns out to be false or incomplete. And therefore the US importer is subject to penalties. So the penalty, if you will, would be applied through the marketplace by the US importer selecting more judiciously who the foreign suppliers will be for their entry transactions.

(Nicholas Rogino): Okay, so audits will be determined - they will be random? Or they might be looking at certain (unintelligible) may not be compliant with the information?

Chris Rogers: It will be a combination of both. It will be some random audits on the US import side. But also we can apply screening and targeting criteria that may be developed through our experience of where we find problems and want to increase inspection or audit rate.

They could also be, as a result of dialog with the competent authorities in the area of jurisdiction. In other words, if there are particular problems in a region or country where illegal fishing is occurring, we may, through our dialog with those competent authorities, select certain entries for increased inspection.

(Nicholas Rogino): Okay. And another question is, will the Seafood Import Monitoring Program be also looking at audits regarding seafood safety and quality, besides the legal aspects?

Chris Rogers: That is a separate program. In the US, our Food and Drug Administration has the authority to look at food products from the safety, food safety, perspective.
The Food and Drug Administration requires certain information to be reported as well during the entry process. And, in fact, they have what they call a prior notice requirement for food imports, so that Food and Drug Administration can assess any food-borne risks.

We will be working closely with our colleagues at Food and Drug Administration on the information that is reported to them, to make sure that the information reported to us, which is with respect to lawful acquisition, comports with the information that FDA receives with respect to food safety. So there's some overlap in the requirements in terms of what the product is and where it came from, that is of interest to Food and Drug Administration from the food safety perspective, that is also of interest to National Marine Fishery Service from the lawful acquisition perspective. So we will work together. But again, each agency has its own jurisdiction and its own responsibilities.

Again, for National Marine Fisheries Service, it's our authority with respect to lawful acquisition. For the Food and Drug Administration, their authority's with respect to food safety.

(Nicholas Rogino): Okay, that's great. I had a final question for now at least. In the case of small-scale fisheries that should have aggregated harvest reports, what would happen if part of a container, of a batch, is missing from records or has fraudulent records? Would the whole batch be sent back? Or how would that work?

Chris Rogers: Well that would be dependent on the circumstances. In most cases, I suspect that the entry would be processed and the cargo released from the US port, and it would be a follow-up process, administrative process, with the US importer of record to determine exactly what information was either misreported or missing, and see if the US importer can correct that entry after the fact.

But if there's continued problems with a particular importer or with a particular origin of products, we may select for enhanced screening and targeting, and try to examine - do what we call a Hold for Inspection at the port in such case, if we do determine that the products were not lawfully acquired, or the records cannot support that they were lawfully acquired. In such case we could reject the shipment or portions thereof. So it would be very situation-specific.

Kerry Turner: Okay. Thank you very much, (Nicholas). We do have a question coming through on the Web portion. And it says on January 1, 2018, the IUU
regulation will be implemented. My question is, will the fish that is caught (sic) on 2017 and exported to the USA in 2018 also need a catch certificate?

Glynnis Roberts: So this is Glynnis. And thank you for your question. The rule does go into effect January 1, 2018. So any products under that priority species list, save the abalone and shrimp which are under suspension - any products that come in on January 1, 2018 are subject to the requirements that we have outlined here, so all the chain of custody documentation that we've outlined.

That does include if something was harvested in 2017 but not imported into the US, or not put into the ITDS system before January 1, 2018. All those products will be required to have that documentation for chain of custody from the harvest event to the moment of entry.

Kerry Turner: Thank you, Glynnis. Let's have - (Katie), if you can let people know one more time how to get into the queue to ask their questions via the phone line, that would be great.

Coordinator: Thank you. Once again if you would like to ask a question from the phone lines, please press Star then 1, unmute your phone, and record your name when prompted. If you need to withdraw your question, please press Star then 2. Once again, if you would like to ask a question from the phone lines, please press Star then 1 and record your name when prompted. One moment, please, while questions queue up.

Kerry Turner: While we wait to see if there are any more questions on the phone line, I just wanted to just give a reminder about the IUU Web portal that we have. The information is up on the screen -- www.iuufishing.noaa.gov. And there you will be able to find a lot of information. We have the compliance guide. We have fact sheets.

We also have the transcripts and recordings of these Webinars that we've been doing. We have added this series of Webinar presentations to reach out to all the interested stakeholders on the Seafood Import Monitoring Program.

We are also in the stages of planning in-person roundtable meetings across the US. And we do have - intend on doing outreach internationally as well. And we will post that information at www.iuufishing.noaa.gov. And so I would recommend you go there. You can also sign up for updates there on the program as well.

We've translated a lot of the documents related to this program in various languages. So I would advise you to check them out on that Web page. You
can see a screen copy of that, and just click on US Seafood Import Monitoring Program. It will take you to that information.

So let's go back to the audio lines one more time for any additional questions.

Coordinator: We do have one question from the phone lines. It comes from (Nicholas Rogino). Your line is now open.

(Nicholas Rogino): I have another question coming from the audience. This is a question coming from (Renato Wasell). He was wondering in the case of a (unintelligible) that hasn't a regulated situation with one of the priority fishes, in this case mahi mahi, would that mean the market could be closing for the Peruvian mahi mahi going to the US?

And in any case, would there be any adaptation programs? Or what would be a possibility for this to happen?

Chris Rogers: Okay, thanks, (Nicholas). If I understood the question correctly, if there is a situation in a local jurisdiction where the fishery is unregulated, does that pose a problem for admissibility into the United States? Did I get the question correctly?

(Nicholas Rogino): Yes. Yes, that was the first part of the question, yes.

Chris Rogers: Okay. So the admissibility criteria under this authority is that the fish were taken in accordance with a foreign law or regulation that pertains to that fishing situation. So if there is a situation where the fishery is unregulated, there's not a violation of that foreign law or regulation.

Certainly we would hope that harvesting entities and competent authorities where fisheries occur do regulate their fisheries; do regulate them for sustainability; do regulate them for reporting, catch reporting, so that they can do proper stock assessments.

But if there is not a foreign law or regulation that is violated by the harvest event that is described to us, it is admissible into the United States.

Now it may stimulate the US to have a dialog with competent authorities about best practices for regulating the fisheries, and whether the United States can offer any assistance, send any capacity building for fisheries management and fisheries regulation. But again, if it's not a violation of a foreign law or regulation, then the goods are admissible into the US marketplace.
(Nicholas Rogino): In the case of the regulations not being complied, that would mean that that could mean some trouble for the Seafood Import Monitoring Program.

Chris Rogers: Yes.

(Nicholas Rogino): (Unintelligible) been complied.

Chris Rogers: So yes, exactly. If the harvest that resulted in products being shipped to the United States was not in compliance with foreign law or regulation, those products are not admissible into the US market.

And on the basis of the information reported to us by the US importer, again we'll do audits on a screening and targeting basis, or on a random basis, and identify the competent authorities abroad who would be responsible for managing those fisheries, and confer with them as to whether the fish that were sent to the United States were taken in accordance with their law and regulation.

And if not, the US would take action certainly against the US importer. But we would also expect that the competent authority in that area of jurisdiction would take the necessary action against the harvesters who are not complying with those laws and regulations.

(Nicholas Rogino): Okay. And another question that is coming from an artisanal mahi mahi fisherman. This question is related to the first stage of the supply chain, the harvesting. Currently in Peru there's a process of licensing the fishing vessels, but it's currently ongoing. Would this be enough for the compliance with the Seafood Import Monitoring Program? Or would it have to be already - the licensing process become completed?

Chris Rogers: Okay, thank you for that question. So again, the criterion for admissibility into the US market is that the fish were taken in accordance with the foreign law or regulation.

So if at this point in time there's not a licensing requirement, it would not be a violation if a fishing license cannot be reported by the US importer or record. But at such time that the licensing program does come into effect, then it would be required for the US importer to report that license in order for compliance with this program, because that would be a requirement in that local area of jurisdiction.

So once the licensing requirement is in effect, that would be a requirement for the US importer to report the fishing authorization or license.
Kerry Turner: Thank you so much, (Nicholas), for those questions. I don't see any more questions at this time, so we are going to wrap up this presentation, the discussion.

I just wanted to reiterate again for any additional information, on the screen you see some contact information. For questions related to the requirements of SIMP, Commerce Trusted Trader program, please reach out to Celeste Leroux. Her information, her email address, is on the screen.

And for everything you'd like to know, for question related to the use of the automated commercial environment, ITDS, and also pilot testing -- we do encourage participation in our upcoming pilot testing program -- please reach out to Dale Jones. He is our expert on that. And his information is dale.jones@noaa.gov, as you see up there on the screen.

Again, we will be continuing to do these Webinars. We'll also, as I mentioned before, scheduling international and domestic in-person outreach. And you can check at www.iuufishing.noaa.gov for any updates on that.

Again thank you so much for joining us on this presentation about the Seafood Import Monitoring Program. And please have a wonderful day or evening, depending on your time zone. Thanks.

Coordinator: That concludes today's conference. Thank you for participating. You may disconnect at this time.

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