Public Webinar: Seafood Import Monitoring Program

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Presenter: Brian Vaubel, Region Chief
Office of International Affairs and Seafood Inspection (NOAA Fisheries)

Facilitator: NWX-DOC CONFERENCING

Coordinator: Welcome and thank you for standing by. At this time, all participants are in a listen only mode until the question and answer session of the call. To ask a question during that time, please press Star followed by number one. Today's conference is being recorded. Any objections, you may disconnect at this time. now, I would like to turn over the meeting to Celeste Leroux. You may begin.

Celeste Leroux: Hello, everyone. Thank you for joining us for today's webinar on the US Seafood Import Monitoring Program's implementation. My name, again, is Celeste Leroux. I'm coordinating implementation of the seafood import monitoring program for NOAA Fisheries’ Office of International Affairs and Seafood Inspection. I'm joined today by my colleague, Brian Vaubel. He's the Chief of our Southeast Region for the Seafood Inspection Program, as well as Dale Jones. He's a fishery program specialist with the NOAA Fisheries’ Office of Science and Technology.

We have, if at any time you're unable to see the web portion of this, you may visit www.iuufishing.noaa.gov. That's where you'll find a PDF of this presentation that will be shown today as well as transcripts and recordings of previous webinars in this series and about the development of the seafood import monitoring program. After this presentation, we'll have a question and answer session and you will be able to submit your questions via the conference line per the instructions from Angela.

With that, I would like to turn over to Brian Vaubel for our introductory presentation.

Brian Vaubel: Thank you so much, Celeste, for the introduction. Hello, and welcome everybody. Good morning or good afternoon wherever you may be. As Celeste said, I'll be giving you a brief presentation on an important seafood regulation that will be going into effect on January 1, 2018 and it is the Seafood Import Monitoring Program. My hope is to provide you just a better understanding of the program so that as brokers and traders of seafood entering the U.S. marketplace, you can best prepare and be ready for it.
We'll progress through some different elements of the program through just some very short series of some slides and again take some time at the end to answer any questions that you may have. So first of all, what is it? Just as a very broad overarching definition, I'll start there and then we'll go through some specific details.

In summary, it is a U.S. regulatory program that applies to certain specific seafood products that are imported into the United States. It requires that certain harvest and traceability information for those products be declared at the time that those products actually make entry into the United States. This information and data is being collected at the time of entry really to address two main big things. And that's number one, to prevent IUU or illegal unreported unregulated seafood and also number two, misrepresented seafood products from entering into our U.S. commerce and to keep them out of our market.

The goal of this move is just to protect our market, protect our economy, our food security, and promote sustainability of our oceans resources. We have a responsibility to mitigate these products in the U.S. as well as keep IUU and fraudulent seafood out because they undermine the integrity of our markets. So on this slide up here over at the top, you can see a summary of the main driving forces, further describes the rationale behind this action.

Below that you have a timeline. Let's go ahead and just take some steps so we can just see how it kind of got us to the point we are now. So back in June of 2014, the president asked NOAA and other agencies to develop a task force and come up with a list of recommendations on steps that could be taken to combat IUU Fishing as well as seafood fraud. Later on in the same year, the multiagency task force came up with 15 different recommendations and some of those recommendations involved putting in place a risk-based traceability program for seafood starting all the way back to the point of harvest.

So a very short time later an action plan was released for the risk analysis to establish which species this might cover. This was based upon which species were most at risk for IUU and seafood fraud. Bear with me here just a moment. At the end of the 2016, the action plan for which species would be covered. That was released. After that came the proposed rule and public comment was collected and considered. At the end of 2016, the final rule for the Seafood Import Monitoring Program was released and has brought us to the point that we are right now.

This webinar, we have other engagements scheduled as well, are being conducted now just to educate and inform on the final rule as we get closer to the implementation. So finally, that brings us to the end of the timeline,
looking towards the future and that is on January 1, just seven months away from now, that will be the go date for compliance. And if you could please go to the next slide. Thank you.

Here are some key points that are very important in understanding the rule. Number one, it is only for seafood entering the U.S. from a foreign country. It does not apply to any domestic seafood or any seafood that has already entered into the U.S. The importer or very specifically the importer of record at the time of product entry, will be the responsible party to keep records, which support declarations made at the time of import into the U.S.

Number two, all data collected will be relative to the harvest event and all steps in the supply chain leading up to the point where it enters into the United States. Number three, all the data will be collected via the standard customs clearance process using the international trade data system, commonly referred to ITDS. This is a U.S. government data portal for all import reporting. This will not be separate from that and will be integrated together with that.

Number four, all the data collected is confidential. The information is simply being used to confirm legality of the imported seafood and it will be held securely. And finally down at the bottom of the list, number five, as I mentioned earlier, this rule does not apply to U.S. domestic seafood. However, it would apply to any U.S. seafood that is exported out of the United States and sent back again. For example, if a priority species is exported to a foreign country for processing and then sent back to the United States that would be subject to the requirements of this rule.

Next slide please. If we can, can we just kind of cycle? Yes, thank you very much. One more. Thank you. This slide very specifically demonstrates exactly what will be required and for what products. Specific information must be declared in ITDS at the time of U.S. Customs clearance for certain species and that’s what you see represented in front of you as the bullet points. This is the information that will be required and collected. If we start up with the box kind of in the upper left-hand corner, this is the harvest info. Again, the rule established is that the importer of record is the responsible party. They will have to have a NOAA Fisheries issued International Fisheries Trade Permit.
IFTP, and this permit can be acquired online. That's how it's done. It's an easy process so that's something that importers need to do if they have not done so already. Against, it's an easy process. It costs $30 and it's an annual permit that must be renewed annually.

The importer of record must maintain records that support the chain of custody and the data elements that you see over to the left and all those bullet points that are declared at the time of entry. We've taken a very flexible approach as to the records that must be kept. The rule is not prescriptive and there is no specific documents or certificate required. The documents can be any that are already in use in the chain of custody. Examples include landing tickets, bills of sale, invoices, manifests, et cetera. So documents that already exist during the normal business of the supply chain can be used -- are adequate.

As we move down the list, you can see any products that are transshipped are all included in this chain of custody and documents showing this transshipment must be maintained. So in summary, I think the key point, takeaway point here, is that the documents that are required of the importer of record must be -- must use to confirm the data, of course, declared. These records are not something that have to be submitted for every single entry. It's just that the importer of record must have them available. Should the specific entry be selected for audit those documents will come into play in support of the data collected, but it's not something that has to be done each and every time.

And so that moves us over to the upper right-hand corner. These are the priority species that were affected in the rule, against selected by risk of IUU and seafood fraud. One thing that I would like to bring to your attention is there are two species up on this list that have an asterisk next to them. That is abalone and shrimp. Currently, the rule's effective date has been temporarily suspended or stayed for these two species until -- and the United States has a comparable reporting system for domestic aquaculture production of these species.

The data that we are collecting for these imports is data that we have for our U.S. fisheries. It's just that there are some gaps on the aquaculture side for these two particular species and until those gaps are closed, we will not be requiring that imports comply to the rule. Once those gaps are closed, once we have that reporting, the stay or the suspension will be lifted and there will be notification and there will be plenty of advance notice -- adequate advance notice provided so that traders may adapt once abalone and shrimp are -- once that suspension has been lifted.
So next slide please. Thank you very much. From the final rule release to compliance date was about a year, again, January 1, 2018 is the compliance date for products entering U.S. commerce on that date or after, okay. Thirteen species, again, except abalone and shrimp will need compliance. Abalone and shrimp will be included at a later to be determined date. We are conducting other webinars. Other stakeholder meetings are scheduled between now and the January 1 implementation date. The kind of single spot web portal is listed right there, www.iuufishing.noaa.gov. Please visit that.

There is a series of facts documents there as well as a schedule of upcoming events him. As those events are confirmed those events will be listed as well. So that will be changing as well. The programming and other technical issues associated with ITDS are currently being addressed and all systems will be in place certified prior to the rule's effective date. We will be offering a Trusted Trader Program in the future to reduce the burden on trade with respect to reporting and recordkeeping for those that achieve this trusted trader status. This is still in development and will be published in the federal register when it is defined. So this is a something to kind of be ready and be on the lookout for.

At the bottom of the slide, you see some key points of contact that are a good resource for information, for questions, that sort of thing. And with that, that takes us to the bottom of the -- the end of the slideshow. Thanks for listening to this presentation and let's go ahead and open this up to any questions that you all may have. Thank you.

Celeste Leroux: Thank you very much, Brian. in advance. Just to reiterate some of Brian's closing points, you are welcome to access any of our materials and resources at www.iuufishing.noaa.gov. On that site, in addition to the compliance guide, which is a Q&A style response to common questions on the seafood import monitoring program, we have a quick reference fact sheet. We have model forms that can be used if industry is interested for compliance with this rule, as well as numerous other materials. And again, you're welcome to contact myself or Dale Jones with any further questions if we aren't able to address them today or if you need a little bit more time to prepare your queries.

With that, I'd like to turn it over to Angela to explain to us how you may ask questions.

Coordinator: Thank you. We will now begin the question and answer session. If you'd like to ask a question, please press Star one and record your name clearly. Our first question comes from (Brendan Sweeney). Your line is open.
(Brendan Sweeney): Hi. How are imports being identified as being required to file this information? How is the species being identified when the product is imported?

Brian Vaubel: As products enter in, as entry filings are made, it is based upon the HTS codes. So the harmonized tariff schedule code, those codes are actually -- what those codes exactly are, are available, and that will queue the system and the message set required for the seafood import monitoring rule. So the additional information that we kind of went over earlier in the slide, that's what triggers it.

So it would be those species and also the associated product forms of those species. So again, the way this works is it's again it's by that specific code.

(Brendan Sweeney): Okay. Another question is will there be an example data entry form available for us to prepare for what will be required to fill in?

Brian Vaubel: Yes, absolutely. So like I said earlier, there's no specific form required. This is not a required certificate much like many are familiar with like the catch certificate for the EU. However, we do have some just as kind of as a resource, as a help. Celeste, you can correct me if I'm wrong. I believe those are available on that web portal, that www.iuu.fishing.noaa.gov. There are a variety of forms that may help people with their supply chain in terms of keeping documents together with fields and information on there.

So yes, I would use that resource. Like I said, consider it a starting point. You're free to adapt or do this in a way that just best meets the needs of you and again of your supply chain.

Celeste Leroux: Hi, Brian. Thanks for that response. This is Celeste. Yes, those forms are available online and I was thinking this question offered a good opportunity for us to have Dale give a brief explanation of the entry filing process and next steps for pilot testing.

Dale Jones: Sure, I'd be happy to do that. This is Dale Jones again, you have my name there on this last slide if you should need to reach out to me. I'm happy to help with any email responses or phone calls thereafter. But the overall process involves the input of the specific data points as shown on the next to the last slide by the broker or the filer, whoever is providing that information.

So if you're the foreign importer coming from another country, you'll be working with the importer of record here in the United States who is the permit holder and then typically whoever the importer is, is working with a broker. The broker would be the person responsible to file that specific data into the customs age system using the automated broker interface. So they put
in their permit number and add the additional details that are required depending on what the harmonized tariff schedule code is.

So if it's one of the products that is listed as these 11 species, there will be data required such as for example where the fish was harvested and the name of the harvesting vessel and the country or flag state of the harvesting vessel, those sorts of things would all have to be keystroked in or entered. Typically what happens is the broker will work in advance, with their software developer, to put together a system that is a user interface with customs through what they call their automated broker interface system.

So we will be putting out a more technical list of specifications known as the implementation guide that should be posted with customs in the coming weeks. We're still finalizing the details of that so that the brokers and their software developers can look at that, see which HTS codes are listed, and then develop the software that they need so that their filers can input those specific data points as you see required on the next to the last slide.

(Brendan Sweeney): Okay, thank you.

Coordinator: Our next question comes from (Eden Leon). Your line is open.

(Eden Leon): Yes, I was wondering -- I come from Belize. We are here in our company, we export spiny lobsters and queen conch. How would we enter the (unintelligible) for further clearance here in Belize? What would be the mechanisms that we would have to (unintelligible) for us to enter the (unintelligible) internationally?

Brian Vaubel: If I could just ask, I think the species that you mentioned are not part of this rule.

(Eden Leon): Correct, they are not listed.

Brian Vaubel: That is correct. So I think it was lobster and queen conch.

(Eden Leon): How can we be prepared for these new rules?

Brian Vaubel: How can you become prepared for this new rule? Again, for the species listed, if you deal with those species and if you export those products into the United States, this rule will be applicable. We will need the data that is required that will be the importer of record's responsibility and that importer of record will have to have documents that support the data.

So my advice would be to look at your current documents, look at your current supply, look at your current supply chain, find out where that data
exists in those documents that you already use and already have, and anywhere it does not or there may be gaps, that one might be a time now in order to prepare for this rule as it's coming in January, to develop documentation in order to support that. Because your importer of record, the importer of record here in the United States will need that information to be able to import that product into the U.S.

(Eden Leon): And one more question, with regards to our buyer (unintelligible) can we liaise with him and find out exactly what other information he would be needing for import to be on the right foot?

Brian Vaubel: Yes, you definitely want to work with your customer, the importer in the United States in preparation from this rule so that when January comes along that that importer has everything that they need for compliance. So it would be very advisable to do that.

(Eden Leon): Thank you very much, sir.

Coordinator: The next question comes from (Judy Sambodi-Wall). Your line is open.

(Judy Sambodi-Wall): Hi, could you please repeat the web address for the copy of this presentation?

Celeste Leroux: Yes, absolutely. The web address is www.iuufishing.noaa.gov.

Coordinator: Our next question comes from Kathleen Russell. Your line is open.

Kathleen Russell: Yes, good morning. I work for FedEx Transport and Brokerage. We are a brokerage firm and I work in -- we have two divisions, the euro ocean border and the express clearance operations division. And in our express clearance operations, we serve as the nominal importer of record on these small package imports.

So my question to you becomes you are saying that the importer of record has to apply for a permit, keep the information on file. Are you stating the importer, the ultimate consignee, the actual importer of the goods is responsible, or the importer of record on the customs entry? Because in the express clearance world, we will be the importer of record but we are not the importer.

Brian Vaubel: So yes, the rule does define that the importer of record at the time of entry is the responsible party.
Kathleen Russell: So in other words, we would have to get bonds and power of attorney for all our importers in our express operations so they could be importer of record for U.S. Customs purposes?

Brian Vaubel: Dale, do you think that's something that maybe you can address in terms of the importer of record and just the whole process, the whole customs clearance process?

Kathleen Russell: I'm very familiar with the process. The definition of importer versus importer of record -- importer of record is the company that extends their bond against the U.S. Customs entry but the importer is the company that is actually responsible for the importation of the goods. So I guess my question to you is how do you define importer versus importer of record and will there be a clear definition in your guidance that you will put out?

Dale Jones: I'll defer to Chris Rogers if he happens to be on, but again, as you define the importer of record is going to be often the person who has the U.S. address or the U.S. residence, if you will, who is taking responsibility for this import. So whether that is you acting on behalf of some other importer, you can do that and you can obtain an international fisheries trade permit. Or it could be that it is the other party that you're referring to so that each individual and separate import that you do for someone else, they would have to have the -- they would have to be the U.S. resident and have that -- what we call the international fisheries trade permit, the IFTP.

And then that person will then be the person who is responsible to retain those records and ensure that you or whoever is filing for you, on your behalf, the broker, has the detailed information that they need including that import permit to be able to file through customs for these particular products. So it's not quite -- sometimes we find that the definitions that are used by customs per se are not the same exact definitions that we are using in our role. So you just have to take a look at the rule itself and if you'd like to, you're welcome to send me a follow-up email on this and then I'll get you further clarification in writing just be sure that we're answering your question specifically as you request.

But again, my understanding is that really it could be either you or the other person but whoever does pick up that permit and file using their permit number is going to be the party who is responsible to retain the records and file the appropriate information.

Kathleen Russell: And your email address is, sir?

Dale Jones: It's the last slide in the presentation, dale.jones@noaa.gov.
Kathleen Russell: Okay, Dale. Thank you.

Coordinator: Our next question comes from Evan Freeman. Your line is open.

Evan Freeman: Hi, I appreciate you taking the time. I've got a question. How specific is the area of capture? Are we talking about a port of landing, a specific bay, a map of where the boat traveled? How specific is that information?

Dale Jones: There's quite a bit of latitude in what is used there so it depends upon the fishery that's involved. So some may be more specific than others. So in some cases you may be giving using the food and agriculture organization, the United Nations Ocean Areas of Harvest as they list them or the fisheries may be using a very specific local area of harvest that's relative to a specific country. So depending on what is used and what information you are provided as the importer from -- through the chain of the harvest record -- that's the information you would use. So it could be as general as Eastern Tropical Pacific. So there would be a code that you would put in that just would be ETP that shows it was harvested there or it could be a Western Pacific Ocean. That would be a (unintelligible). But again, it depends on the harvester and what information that they're providing. So it can be pretty general to pretty specific.

Evan Freeman: I appreciate that and then I've got one more -- a technical question. How is the data protected and who has access to it, the data that you collect?

Dale Jones: The data goes into customs and of course, only customs personnel will have access to that information and then it is passed on to our agency, to the National Marine Fisheries Services, and have it in a secured network as well. So the only persons who have access to this data are persons who are in and have the role of monitoring these products to ensure that the filings and that the transactions are done in compliance with the regulation. So it could be anyone from our program personnel to our enforcement personnel and likewise with customs, all the various different customs entities such as the port agents and people like that, that our doing inspections when the product comes in. But it's not released and it's not used for publication of any data that's released.

Coordinator: Our next question comes from Kristen Williams. Your line is open.

Kristen Williams: Hi, good morning. My question is in regards -- I actually have two questions. My first is in regards -- you said that HTS codes were going to be flagged to let you know that this was incorporated. But what about the all-encompassing HTS codes say for pet food and things like that? How will we know which products will need to be flagged and which products will not when they're all under the same tariff number?
Dale Jones: Our implementation guide will provide a list of the HTS codes that will require filing. So this role is unique in that it's very specific to -- tied to HTS codes. So if the code is there, you do have to provide a filing. If it happens to be, for example, something that you would provide a disclaimer for that would be a different issue. But in these cases we have specific HTS codes that will be listed and we've intentionally left out those very general HTS codes probably of the type that you're referring to that involve pet foods and things like that because we didn't necessarily want folks to have to be filing extensive details and data for a very minor portion of the product content.

So it's not likely that those types of codes will be on the list at all, but if they are, you would have to provide all the data. There would not be a disclaimer with this specific program.

Kristen Williams: Okay, so if we are doing small imported canned cat food, that customer wouldn't necessarily apply to this program even if the product inside of the can was these priority species?

Dale Jones: It's not likely if that general HTS code for the pet foods is not likely to be on the HTS list for this, no. If it is -- when the implementation guide is released, which again will be posted in a few weeks, it will have all those specific codes listed. And if it is and you have questions about it, feel free and we'll follow-up at that point to clarify for you whether or not you need to provide details and if they have to have a permit or not.

Coordinator: Our next question comes from Darcy McKay. Your line is open.

Darcy McKay: Hi, this is Darcy McKay calling from (Highliner) Foods. I just have a question for you regarding the declared weight on the -- or not for the customs entry but for the harvest weight. Is there a specific unit of measure that you're looking for or would it be just any -- based on the documentation that we're provided?

Brian Vaubel: It would be based upon -- my belief is based upon the information that you were provided so whether that's in kilos or whether that's in pounds, whatever the case may be.

Darcy McKay: Or metric tons or something like that.

Brian Vaubel: Yes. It depends upon how it's reported through your supply chain. If it's reported in metric tons than that would be adequate.

Darcy McKay: Okay, fair enough. And also for Dale or IT folks on our end have some technical questions for you that I believe that they emailed to you recently. So
I won't get into those detailed questions regarding specifics on ACE and so on. But if you're able to take a look at that, that would be great. And I think that's all I had. Thank you.

Coordinator: Our next question comes from (Eileen Sorahan). Your line is open.

(Eileen Sorahan): Can I ask if these requirements will be extended to other seafood in addition to these priority species? And if so, what is the implementation date for other species?

Brian Vaubel: Yes, this is Brian. There is the 13 species of course for two of those we will not see immediate implementation but that will be coming. When that is kind of depends upon other things. I mentioned closing some gaps in our reporting here. Could this possibly extend to other species in the future that are at risk for (unintelligible). That is possible. As far as when that might happen would be just highly speculative at this point but there definitely is that possibility. And if that were to happen, there will of course be adequate notification to all parties.

(Eileen Sorahan): Thank you and can I ask one further question? For the list, for the priority species, is there a matching list with the Latin or scientific name just for clarity?

Brian Vaubel: Do we have a resource out there, folks, on this, on genus species?

Dale Jones: We will be posting that. Effectively, what we're going to be using that will tie into this is the FA[O]'s system for classifying scientific names and common names of seafood. So there's about 12,000 different species listed on that and each of those species has what we call a three alpha code. In other words, it's a three letter conference for each specific species.

So we are going to post essentially what will look like a spreadsheet once we're certain that the technical requirements are in place and that we have all the right names involved. So you'll be able to go on the website and look at those and you'll be able to see, for example, with grouper, there's about 118 different species of grouper. So you'll be able to look at those listed, the different types of grouper and then you'll also be able to look to see what the three alpha code is for the specific type that you're importing and then you use that three alpha code as part of the filing for the import.

So we will be requiring that scientific name and will in fact post that much for you and we probably will distribute it and have it posted with the implementation guide that has the technical requirements and the list of HTS codes with it.
Coordinator: And our next question comes from (Lisa Weddick). Your line is open.

(Lisa Weddick): Thank you. I want to add onto a question earlier about the HTS codes that are all encompassing. What about the codes that include non-priority species? I'm thinking of red snapper and the other snappers that are all encompassed in the same code. How does that importer then not have to file information for those non-priority snappers?

Dale Jones: The red snapper that is required is a very specific code in fact so there's really actually one key code for that one, even though there are numerous other snappers that are out there. So that one should be covered but if you go to the other example of grouper that I just mentioned, there's about 118 different species of grouper and they're all collected under one code. So for grouper, essentially whatever kind of grouper it is, it will still require a submission.

If you were to get into a general HTS code like one that covers cat food as an example was used earlier, we've tried not to list those in this specific list. So one of the key things that we're going to build into this process and that's one of the things we're finalizing with customs is that when you have that HTS code listed and then the next step would be that you'd put in the SIMP code, we'll have that list of those, excuse me, not the SIMP code, the three alpha code that shows you what scientific name is. So if it's not a three alpha code that's listed, you basically when you do the filing you would not end up having to put additional information.

So the message would truncate. You'd have to put a little bit less information so you wouldn't file a disclaimer but you wouldn't have to provide all additional information under that HTS if it's a three alpha code that's not something that we're specifically interested in. So again, we're finalizing the steps of that with Customs and with technical (unintelligible).

Coordinator: And we have no further questions at this time.

Celeste Leroux: All right, as we wait for any further questions, this is Celeste, I just wanted to remind you again that you can find all of our outreach materials available at the IUU taskforce web portal at www.iuufishing.noaa.gov. On that portal, you can find our compliance guide, fact sheet, additional reference materials, including sample forms and future information on additional webinars and public meetings that we'll be holding. You're also welcome to contact myself or Dale Jones if you have any further questions that we didn't get to today.

Do we have any other questions at this time?

Coordinator: We have no questions.
Celeste Leroux: All right, Angela, if you could remind our participants how to ask a question that would be great.

Coordinator: As a reminder, if you'd like to ask a question, please press star followed by number one. Okay, we do have another question that came up. (Calia Carter), your line is open.

(Calia Carter): (Unintelligible) I'm representing (unintelligible) I only just joined the program. I was trying to join you online but I didn't have an event (unintelligible).

Dale Jones: I didn't understand the question there.

(Calia Carter): There wasn't a question. I just joined the program so I've just given my name and company representative.

Dale Jones: Thank you. Understood.

(Calia Carter): My question was about (unintelligible). I did a course sometime last year in traceability (unintelligible) from 2018 I take it.

Celeste Leroux: Hi, I just wanted to remind our participants that this PowerPoint in PDF form and our additional reference materials are available on our portal at www.iuufishing.noaa.gov. You can find a copy of this presentation there if you weren't able to view the webinar for any reason. We can wait another moment if there are any other questions.

Just a reminder that we are -- the mandatory compliance date for the seafood import monitoring program is January 1, 2018. Before that, we will have a pilot testing phase of the ITDS programming. You can also expect a proposed rule on the commerce trusted trader program to come out later this year. Again, any outreach materials and information on further meetings is available at www.iuufishing.noaa.gov. You're also welcome to contact myself or Dale Jones with any further questions.

Dale Jones: This is Dale. I would just also add in addition to your points there that we would anticipate, again, the implementation guides, the technical requirements would be coming out in the coming weeks. And then as the companies and software providers are able to develop these technical capacity for the individual companies there will be two levels of testing that will be available for this. One is in the full test environment and it's just called the certification environment. So they'll be able to test those probably going into the late summer or early fall. And then by mid-fall or so, we would anticipate that we will be able to start doing what's called production level testing and that is where companies that are ready to go and have their software in place and have an actual shipment coming in, we'd be able to work and test that.
So we'd hope to do quite a bit of production level testing before the full requirement implementation date of January 1 throughout the latter part of the fall and into the end of the calendar year. So companies that will be interested in testing early and want to work with us on that, we certainly welcome that interest and we'd be happy to accommodate any early test that you'd like to engage in. So thank you.

Celeste Leroux: Thank you very much, Dale. I believe we have one last question.

Coordinator: Yes, we do have a question from (Gi Song). Your line is open.

(Gi Song): Hi, my name is (Gi Song). Thank you for your time. My question is can you tell me a little bit more about international fisheries treaty permit? Like timewise, like applicant timeline and where can I find the materials on that part?

Chris Rogers: Thank you for the question. This is Chris Rogers. The permit is available now. It's through our National Permitting System. I believe the website, the presentation has the link to that site. It's a self-service site. You log in, provide your information. The permit currently costs $30. That can be paid online and then the permit can be printed off once the application process is complete and that permit information will then be transferred to U.S. Customs and Border Protection for validation on the entries during the entry process once the program comes online in January.

So permits are available now. They should be less than 15 minutes to apply and receive a permit. The permit is required for U.S. importers of record. The permit is not required for foreign exporters and the permit is restricted to U.S. residents. So U.S. residents only can obtain that permit. Hopefully that answers your question.

(Gi Song): Thank you very much. That was very helpful.

Celeste Leroux: Thank you very much as well and to all of our participants for joining today's webinar on implementation of the seafood import monitoring program. One last time, you can access all of our reference materials and more information at www.iuufishing.noaa.gov and we are happy to answer any further questions that you might have, either myself, celeste.leroux@noaa.gov or dale.jones@noaa.gov. With that, I'd like to turn over to Angela to close up our webinar today.

Coordinator: Thank you for your participation in today's conference. Please disconnect at this time.
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