



Public Webinar: Seafood Import Monitoring Program

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Presenter: Greg Schneider, Senior International Trade Specialist

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 on listen-only mode. During the question-and-answer session, press Star followed by the number 1. Today's conference is being recorded. If you have any objections, you may disconnect at this time. I'd now like to introduce Kerry Turner. Ma'am, you may begin.

((Foreign Language Spoken))

Kerry Turner: Welcome, my name is Kerry Turner and thank you for joining us for a presentation on the Seafood Import Monitoring Program.

((Foreign Language Spoken))

Kerry Turner: Our speaker today is Greg Schneider and Greg is the Senior International Trade Specialist with NOAA Fisheries Office of International Affairs and Seafood Inspection.

((Foreign Language Spoken))

Kerry Turner: We also have the Assistant Director from the Office Christopher Rogers.

((Foreign Language Spoken))

Kerry Turner: Just a few brief notes before we begin. Greg is going to give a brief presentation about the program and after that presentation we will open it up for questions and answers from our experts and so you will have a chance to ask us questions about the presentation about the program.

((Foreign Language Spoken))

Kerry Turner: And information about the seafood import monitoring program can be found at www.iuufishing.noaa.gov.

((Foreign Language Spoken))

Kerry Turner: With that just a reminder about that Website, again it's www.iuufishing.noaa.gov.

((Foreign Language Spoken))



Kerry Turner: With that, Greg, please begin.

Greg Schneider: Thank you Kerry very much for that introduction and buenos dias or buenos tardes y bienvenidos a todos. My intention today is to provide you the audience with an overview of an important rule related to seafood imports into the United States which will come into effect in a few short months.

((Foreign Language Spoken))

Greg Schneider: First slide, please. As this first Slide shows, the seafood import monitoring program or SIMP was developed over a two-year period of time with input from domestic and foreign stakeholders.

((Foreign Language Spoken))

Greg Schneider: And upon entry into force on the 1st of January, 2018 the United States will join other important market states such as the European Union in the global effort to stop illegally-obtained or fraudulently-labeled seafood from entering the U.S. commerce.

((Foreign Language Spoken))

Greg Schneider: Estimates vary but as much as \$23 billion worth of illegally caught seafood may be harvested from the world's oceans every year.

((Foreign Language Spoken))

Greg Schneider: These catches undermine management, distort trade and threaten exhaustible living marine resources.

((Foreign Language Spoken))

Greg Schneider: So why is this important to this audience and to the United States?

((Foreign Language Spoken))

Greg Schneider: Because the United States is the largest single market for seafood imports and because the United States imports an estimated 90% of its seafood supply from global partners.

((Foreign Language Spoken))



Greg Schneider: So what happens or what does not happen in the U.S. market can have significant impact on global markets and pricing and seafood supply sustainability?

((Foreign Language Spoken))

Greg Schneider: Next slide, please, so what is the seafood import monitoring program or SIMP? How does it work? What does it cover? Who is responsible for doing what along the supply chain under the provisions of this rule?

((Foreign Language Spoken))

Greg Schneider: The SIMP rule is a risk-based system and I'll talk more about that later which requires that producers or harvesters and exporters collect harvesting and landing information for certain priority species that can verify that this information can verify that the fish and the seafood products were caught legally and/or properly labeled or represented.

((Foreign Language Spoken))

Greg Schneider: Importers of record will be required to enter this information related to the harvesting and landing events through the normal Customs entry process through the International Trade Data System or ITDS which is the U.S. government electronic single portal Customs window for all products entering the U.S. market, not just for these priority species.

((Foreign Language Spoken))

Greg Schneider: Then the importer of record must retain this information going back through the supply chain to the harvest event for two years in case the transaction is flagged by the U.S. government for an audit at a future date.

((Foreign Language Spoken))

Greg Schneider: Assuming certain requirements are met the importer of record will have obtained an import permit license which can be purchased for about \$30 and takes less than 15 minutes to download.

((Foreign Language Spoken))

Greg Schneider: To be clear all of the information and data requested of exporters to the U.S. market are already collected for U.S. fishermen and producers.

((Foreign Language Spoken))



Greg Schneider: SIMP does not specify or dictate in what form the information is gathered. There are of course data and information which are required to aid in verification but no prescribed catch document per se, no specific catch document form such as is required by the European Union.

((Foreign Language Spoken))

Greg Schneider: We will see later in the last slide a Website which will give you information that will provide guidance for filling-out a template for filling-out this information but as I say there is no prescribed form per se.

((Foreign Language Spoken))

Greg Schneider: Importantly the information gathered and retained by the importer of record is strictly confidential.

((Foreign Language Spoken))

Greg Schneider: Next slide, please, so as I was saying the SIMP rule is risk-based and covers all imports of certain priority species or groups of species which you'll see in the upper right-hand corner of this slide.

((Foreign Language Spoken))

Greg Schneider: In addition to direct imports the rule covers reimportation of such priority species that may have been exported from the United States for example, further processed in a third country and then reimported into the U.S. market.

((Foreign Language Spoken))

Greg Schneider: The list of priority fish species and fish products was developed on a determination of which of these species or product forms was considered to be the most vulnerable to illegal fishing and/or seafood fraud.

((Foreign Language Spoken))

Greg Schneider: We are assuming that the list will eventually be expanded to include all imports of seafood but for now only those in the upper-right column or upper-right box are covered.

((Foreign Language Spoken))

Greg Schneider: You may however note in the upper-right box there are asterisks next to two species, abalone and shrimp.



((Foreign Language Spoken))

Greg Schneider: Due to an anomaly in data collection of certain aquatic aquaculture species in the United States, abalone and shrimp are not covered by the rule at this time.

((Foreign Language Spoken))

Greg Schneider: I can however I am rather confident if not absolutely confident that the abalone and shrimp will be covered by this rule at some point considering the importance of shrimp imports to the U.S. market.

((Foreign Language Spoken))

Greg Schneider: If you are exporting a species or product form listed in the harmonized tariff schedule list of coverage which can be found in our information you can draw from in the guidance in the final page of our presentation today. By this rule you will be required to gather and supply the information to the importer of record contained in the two left-side boxes of this slide.

((Foreign Language Spoken))

Greg Schneider: I won't repeat or describe in detail the information on the two left boxes but it gives you information related to the harvesting or producing entity that's the upper-left box and in the lower-left box could be described as a what, when and where. Both of these together will give you a good idea of the information that is required for exporting these priority species into the U.S. market.

((Foreign Language Spoken))

Greg Schneider: And once again to loop back so the importer of record is the entity responsible for collecting and retaining information that was just described on the two left-side boxes and retaining that information for a period of two years and you can see that information, the requirements of the importer of record in the lower-right box of this slide.

((Foreign Language Spoken))

Greg Schneider: So to repeat and emphasize that the SIMP rule will come into force 1st of January, 2018 during the next number of months we will hear in the National Marine Fisheries Service of NOAA Fisheries be engaged in a series of outreach sessions like this one to inform those of interest - those people with an interest in exporting to the United States information - that will help them do that upon entry into force and this information can be found in a number of Websites that are listed in the middle of this final slide.



((Foreign Language Spoken))

Greg Schneider: Finally, I would like to point-out a couple of principle points of contact. Celeste Leroux is mentioned penultimate button here on the final slide for general questions, Dale Jones who will be available for questions following this presentation, his Website is there in addition to Chris Rogers and others that will be found within the documents that you see on this final slide.

((Foreign Language Spoken))

Greg Schneider: And with that I'll conclude my presentation. I encourage those on the line to seek further clarification, ask questions of myself or to others that are in the room or online. Thank you very much for your attention.

((Foreign Language Spoken))

Kerry Turner: Thank you Greg so much for that presentation. We will now be opening-up the phone lines for your questions. Again, we have the various experts on this program available now to answer your questions.

((Foreign Language Spoken))

Kerry Turner: Operator, can you tell everyone how to submit their questions, please?

Coordinator: Yes, at this time to ask a question from the phone lines, please press Star followed by the number 1. Please unmute your line and record your name clearly as prompted so that I'll be able to introduce you. Again please press Star followed by the number 1 to ask a question, and our first question comes from (Aido).

Woman: Let me translate that, please so that the audience knows, just a second.

Coordinator: Thank you.

((Foreign Language Spoken))

Kerry Turner: Go ahead. The first question, please?

Coordinator: Our first question comes from (Haido Hernandez). Your line's open.

(Haido Hernandez): Yes, good afternoon. Got and I know that you've probably been asked this many times, with large vessels there's no issue in being able to collect all this information but with artisanal fishermen especially like the area from Central America where you're getting fish from, you know, 30-40-50 little



skiffs, you know, day boats, outboard engines and in many instances where the producer or the processing plant will get this product and perhaps sell it to two-three-four companies.

I mean, the information will be repeated. Is there an issue with that and I mean, or how cumbersome, is there any way to try to summarize this information or are we going to have to put in the names of the vessels and all the information that you were requesting there for 40 tables for each import?

((Foreign Language Spoken))

Christopher Rogers: Okay, thank you for that question, Mr. (Hernandez). This is Chris Rogers. I'll take that one for a response. We did receive a lot of comment on this very issue during the comment period on the proposed rule and have made an allowance for what we call an aggregated harvest certificate or aggregated harvest report.

(Haido Hernandez): Okay.

((Foreign Language Spoken))

Greg Schneider: So we allow for small-scale vessels as you noted, vessels less than 12 gross registered tons or less than 20 meters length overall, 12 gross tons or 20 meters in length and the information doesn't need to be recorded for each vessel but the collector whether that's the processor or a fish aggregator would just report the number of vessels and the total amount landed from each on the catch report.

((Foreign Language Spoken))

Greg Schneider: Sorry, I misspoke there on the metrics. It's 12 meters length overall and 20 tons.

((Foreign Language Spoken))

Kerry Turner: Does that answer your question, Mr. (Hernandez)?

(Haido Hernandez): Yes, I'm sorry, the only thing that I didn't quite get there, you said the information for that aggregate report, we are to keep that, to have that information or it will be the exporter that will have that, you know, all the records and all the pertinence and all that ...

((Foreign Language Spoken))



Christopher Rogers: So eventually the information must be in possession of the U.S. importer who must make the report with the Customs entry file.

((Foreign Language Spoken))

Christopher Rogers: So in the case of the small-scale fisheries that are aggregated on a harvest report, it would be the fish collector or the fish consolidator or if they're delivered directly to a processing plant for a single day, then that would be the initial point of recording the information.

((Foreign Language Spoken))

(Haido Hernandez): Okay, all right, but I'm just trying to will you show a sample of what that report will look like or like at the entry when the brokers got to enter everything into the system or can I find that somewhere, just to see how what information they'll have to collect?

((Foreign Language Spoken))

Christopher Rogers: Yes, thanks for that question of clarification. As Greg mentioned in his presentation we have no required form but we have issued what we call a model form or model catch certificate, both for the regular large-scale vessel and for the aggregation for small-scale vessels are available, both model forms are available on the Website www.iuufishing.noaa.gov.

((Foreign Language Spoken))

(Haido Hernandez): Okay, thank you very much.

Kerry Turner: Next question, please?

Coordinator: Thank you. Our next question is from (Anna Guerrero). Your line's open

(Anna Guerrero): ((Foreign Language Spoken))

((Foreign Language Spoken))

(Haido Hernandez): So the question from (Anna Guerrero) is that in Mexico the community is working right now in terms of exports to the United States, they don't have information in terms of how the transmission of this data is going to be made. How is that information available by ...

Christopher Rogers: This is Chris Rogers again. Thank you for that question so the information should be recorded essentially by the actors in the supply chain and transmitted through those same actors so obviously those parties involved



in the initial harvest, the vessel operator or and in the case of small scale the fish collector would make the initial recording of the information.

And then they would pass that through the supply chain along with any other information that's normally transmitted in the course of business transactions, invoices, manifests, bills of lading, etcetera.

((Foreign Language Spoken))

(Anna Guerrero): ((Foreign Language Spoken))

(Haido Hernandez): So we understand that the information has been captured by the exporter and transmitted to the importer in the United States, that is this information there's a structure that we have a question about, is that going to be all does it all have to be captured in some sort of structure then be conveyed, transmitted ultimately?

Christopher Rogers: Okay, thank you. This is Chris Rogers again. As Greg mentioned in his presentation we have no prescribed format or method. We wanted the program to be flexible to take into account the mechanisms for communication in the supply chain that already exists.

Whether those current methods are on paper, transmission of paper, paper invoices, paper catch documents, etcetera, or electronic so it can be by any means as long as the U.S. importer is in receipt of this information that will be required for the importer to make that entry.

((Foreign Language Spoken))

(Haido Hernandez): ((Foreign Language Spoken))

Woman 2: ((Foreign Language Spoken))

Woman 1: ((Foreign Language Spoken))

Woman 2: ((Foreign Language Spoken))

Woman 1: (Unintelligible) on paper. That's clear.

Woman 2: ((Foreign Language Spoken))

(Haido Hernandez): First, we understand that we have to enter the information to the ACA portal, the (unintelligible) portal in a software program following a chain of the process is that the only the way the information is going to be accepted or can we continue from that point on January 1st to use paper?



Christopher Rogers: Okay, thank you again for that question. To clarify, the U.S. importer will have to enter the information electronically through the ACE Portal, the Automated Commercial Environment, and making the customs entry filing. How that importer gains the information is up to the supply chain. The U.S. importer and the foreign exporter should work it out, decide what method is best, whether on paper or electronic format to transmit that information from the exporter to the importer.

But once the U.S. importer receives that information, the U.S. importer will be responsible for entering it electronically.

Woman 2: ((Foreign Language Spoken))

Woman 1: ((Foreign Language Spoken))

Woman 2: The test for the software vendor for ACE, is there a date for that? When do they start? I don't know...

Man 1: (Dale), do you want to take that question? I guess presuming we're talking about a pilot test.

Woman 2: ((Foreign Language Spoken))

(Dale Jones): Yes, work is being done now on the programming by customs and we hope to have that wrapped toward the end of September. And then in October, there should be opportunity for testing in the first level of the environment and then next will be production level testing which will be with actual shipments and that will probably occur toward the beginning of November of this year.

Woman 2: ((Foreign Language Spoken))

Woman 1: ((Foreign Language Spoken))

Woman 2: Thank you.

Woman 3: Operator, can you tell us one more time how to submit questions?

Coordinator: Yes, thank you. At this time, again, as a reminder, if you do have a question from the phone line, it will be Star followed by the number one. Please unmute your line and record your name clearly as prompted so that I'll be able to introduce you. Again, to ask a question, it is Star followed by the number one.

Woman 2: ((Foreign Language Spoken))



(Haido Hernandez): While we wait for any additional questions, just as a reminder, on the website, at www.iuufishing.noaa.gov, we have several resource materials about the seafood import monitoring program.

Woman 2: ((Foreign Language Spoken))

(Haido Hernandez): The materials available include a facts sheet, a compliance guide, and the model forms that (Greg) and (Chris) mentioned. These materials have been translated into several languages including Spanish and they are available for you to use.

Woman 2: ((Foreign Language Spoken))

(Haido Hernandez): Also, when we have events such as webinars or public meetings across the U.S. or international meetings, we also post those events on that website so please visit that website for any additional information.

Woman 2: ((Foreign Language Spoken))

Woman 3: Operator, next question please.

Coordinator: Thank you. Our next question is from (Juan Carlos Fertedes Anego). Your line is open.

(Juan Carlos Fertedes Anego): ((Foreign Language Spoken))

(Haido Hernandez): Yes, I'm calling from Cancun, Mexico and just to clarify, as the exporters all we have to do is collect the information and send it to the importer and the importer is responsible for entering all of the information in the portal. So as far as our responsibility here on our side from Mexico, we only have to collect all of that information, make it available to the importer. Is that correct?

Man 1: Yes.

(Haido Hernandez): ((Foreign Language Spoken))

Woman 3: Thank you so much for your question. Next question please.

Coordinator: Thank you. Our next question is from (Haido Hernandez). Your line is open.

(Haido Hernandez): Yes, one more question there. It's same thing in regarding like most of the smaller plants in Central America and even Mexico where sometimes even when the larger vessels, where they might come in with 10,000 pounds in one entry but that product is going to be going two or three different importers.



The catch record would show 10,000 pounds and then we just distribute that to all the importers or you got to break it down and make one third of the trip or make some kind of clarification? Will the numbers have to exactly match from what the catch record or the report says to what the client is receiving?

Woman 2: ((Foreign Language Spoken))

(Christopher Rogers): Okay, thank you for that question. (Christopher Rogers) here. So the initial information from each catch should be recorded as it occurs. So as you give an example, if a vessel lands 10,000 pounds, the original catch report should indicate 10,000 pounds. If that is received at a processing plant along with catch of other vessels and is processed, you should have a record from the processing plant of receipts from each vessel, with the amount that each vessel landed.

Woman 2: ((Foreign Language Spoken))

(Christopher Rogers): So if you're let's say shipping from the plant for export 10,000 pounds, and that is derived from three harvest events or three vessels offloading, you don't need to indicate how much from each. Just the catch records that contributed to the output from the plants. So for example, if each vessel came in with 10,000 pounds, you are shipping to one customer, 10,000 pounds, you would indicate that that 10,000 pounds came from these three vessels, but you don't have to indicate of that 10,00 pounds how much came from each vessel.

Woman 2: ((Foreign Language Spoken))

(Haido Hernandez): Okay. I was just glancing at the reports you recommended to look at and it does ask for the catch, the volume, pounds or kilos.

Woman 2: ((Foreign Language Spoken))

(Christopher Rogers): Yes, what we call the harvest event or the offloading from the vessel. That should -- must record the total amount by species for that vessel. But as it is processed and passed through the plant, you only need to keep track of which vessels it came from in those corresponding catch reports, not the -- on the amount shipped from the plant, not the amount within that shipment, the precise amount that came from each one of those harvest reports, which harvest reports contributed to the shipment.

Woman 2: ((Foreign Language Spoken))

(Christopher Rogers): So if you have a very specific example that you would like to send to us, we have some email addresses in the presentation. We can take a look at your scenarios and advise you with more detail.



Woman 2: ((Foreign Language Spoken))

(Haido Hernandez): Okay, thank you very much.

Woman 3: Operator, just repeat one more time how they can submit any questions.

Coordinator: Thank you. Again, to ask a question it is star followed by the number one, unmute your line, and record your name clearly as prompted.

Woman 2: ((Foreign Language Spoken))

Woman 3: And while we wait for any additional questions, reminder, on the screen there's email address for contacts to ask any additional questions you have about the seafood monitoring program. So ask Celeste Leroux from our office of international affairs and seafood inspection and Dale Jones. He will be able to assist you on any questions regarding (unintelligible).

Woman 2: ((Foreign Language Spoken))

Woman 3: Operator, next question please.

Coordinator: Thank you. Our next question is from (Jorge Valosteros). Your line is open.

(Jorge Valosteros): Hi, good evening. I would like to know if, for example, our company, we load one truck with either one, two, or three boats. How do we give the information to you, by each boat or just put the whole unloading to that truck?

Woman 2: ((Foreign Language Spoken))

(Christopher Rogers): Thank you for the question. This is (Chris Rogers). So if there are small scale vessels loaded to a truck, you could use what we're calling the aggregated report. However, if there are large scale vessels, you should have a report for each vessel. Each vessel that's offloading, the place where it fished, the date and place of offloading, and the amount of -- weight of the product by each species product form. So each what we call harvest event or offloading from the vessel should be recorded separately except in the case of small scale vessels and then they can be consolidated by the collector, the fish aggregator, or delivered directly to a processing plant. They can be aggregated by the processing plant.

(Jorge Valosteros): Okay, thank you.

Woman 2: ((Foreign Language Spoken))



Woman 3: Thank you so much for that question. As a reminder, please visit our website, www.iuufishing.noaa.gov for those resource materials that I mentioned. Feel free to send an email to either Celeste or Dale for any additional questions and we will be continuing to do outreach, both domestically and internationally on the seafood import monitoring program and you can visit our website for that information.

Woman 2: ((Foreign Language Spoken))

Woman 3: (Greg), (Chris), or Dale, do you have any additional comments?

Woman 2: ((Foreign Language Spoken))

(Christopher Rogers): This is (Chris). If any exporters have any additional questions, certainly they can ask of us here at the fishery service. But I would also encourage all to work with their U.S. importers to make sure that the U.S. importers are receiving the information that they will need in the format that suits them. So again, the program is very flexible but it's incumbent upon the exporters and importers to know the requirements for information and to work out the proper means of transmitting that information.

Woman 2: ((Foreign Language Spoken))

(Greg): This is (Greg). I would suggest as (Chris) mentioned earlier that if there are specific instances that pertain to your business that you would like to have some reactions to or clarifications about, please use the resources that we have here at NOAA fisheries to answer those questions so there are no surprises come January 1, 2018.

Woman 2: ((Foreign Language Spoken))

Woman 3: Okay, Dale. Any additional comments?

Dale Jones: Yes, a couple of basic points. First, I would remind everyone that the holder of the permit, the international fisheries trade permit, must have a United States or U.S. resident address.

Woman 2: ((Foreign Language Spoken))

Dale Jones: So to effectively transmit this information through our customs bureau, this permit will be necessary to use.

Woman 2: ((Foreign Language Spoken))



Dale Jones: Then last, I would emphasize that the person who typically does the filing of the information to our customs agency is usually a broker or a full-time filer with a company. These people will have to work together to assure that they have the right software in place to file this information through ACE.

Woman 2: ((Foreign Language Spoken))

Dale Jones: And once again, if you, or your filer, or software developers, or brokers have questions, they can reach me through the email address that has been provided.

Woman 2: ((Foreign Language Spoken))

Woman 3: It looks like we have one additional question. Go ahead please.

Coordinator: One moment please.

Woman 2: ((Foreign Language Spoken))

Coordinator: (Sebastian), your line is open. You may ask your question.

(Sebastian): ((Foreign Language Spoken))

(Haido Hernandez): The question from (Sebastien) is that for origin plants that produce products for several importers, the customs broker or the person in charge of entering the data, do they have to complete 100 information pertaining to 100% of that vessel even if it's going to be distributed amongst several importers or how would they do that?

(Christopher Rogers): Thank you for the question. (Chris Rogers) again. As I said before, the complete information for this vessel must be reported in the original catch document or harvest certificate. From that point on, the information has to be passed through the processing plant, through the export shipment to the U.S. importer but it does not have to differentiate what portion of that harvest is represented in that shipment. So we recognize that the harvest from individual vessels may be split up or it may be consolidated. What is important is that the U.S. importer has information on the origin point of the fish, which should be the complete loading record for that vessel.

(Haido Hernandez): ((Foreign Language Spoken))

(Christopher Rogers): As an example, if a U.S. importer receives a container of fish, 10,000 pounds and that fish is comprised of five harvest events from five different vessels, each landing 10,000 pounds, the U.S. importer does not need to show or report how much of the 10,00 pounds imported came from each vessel,



only that the five vessels contributed to that 10,000 pounds and the catch record for each of those five vessels.

Woman 2: ((Foreign Language Spoken))

(Sebastien): Muchas gracias.

Woman 2: Thank you very much.

(Christopher Rogers): De nada.

Woman 3: As a reminder, very important reminder, this program, the seafood import monitoring program, mandatory compliance date is January 1, 2018.

Woman 2: ((Foreign Language Spoken))

Woman 3: Please visit our website, www.iuufishing.noaa.gov. for additional information. Please reach out to our experts. We are here to answer your questions and assist you as you move towards compliance of this program on January 1, 2018.

Woman 2: ((Foreign Language Spoken))

Woman 3: Thank you all for joining us and have a wonderful day or evening depending on your time zone.

(Haido Hernandez): ((Foreign Language Spoken))

Coordinator: Thank you. This does conclude today's conference call. You may disconnect your lines and thank you for your participation.