

**US SEAFOOD IMPORT MONITORING PROGRAM:
BRIEFING AND ANALYSIS FOR THE PACIFIC ISLANDS FORUM
FISHERIES AGENCY**

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DISCLAIMER

The content of this report including all analysis and opinions are solely the responsibility of the consultant and do not necessarily reflect the position or thinking of the Pacific Islands Forum Fisheries Agency or persons consulted.

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ACRONYMS

ACE	Automated Commercial Environment
ASFIS	Aquatic Sciences and Fisheries Information System
CBP	Customs and Border Protection
EU	European Union
FAO	Food and Agriculture Organization
IFTP	International Fisheries Trade Permit
ITDS	International Trade Data System
IUU	Illegal, unreported and unregulated
NFI	National Fisheries Institute
NOAA	National Oceanic and Atmospheric Administration
SIMP	Seafood Import Monitoring Program
TTVP	Tuna Tracking and Verification Program

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EXECUTIVE SUMMARY

On 1 January 2018, a new regulatory program designed to deter illegal, unreported and unregulated (IUU) fishing and seafood fraud from entering the US market will go into effect. The program, known as the Seafood Import Monitoring Program (SIMP) is a traceability program that establishes permitting, data reporting and record keeping requirements for target species, including albacore, bigeye, skipjack, yellowfin and bluefin tuna. Under SIMP, the importer of record holds central responsibility for collecting, submitting and retaining all required data, and thus is the central actor responsible for ensuring that product is eligible for entering the US market. For product to enter into the US market after 1 January 2018, the importer of record must provide all data required by SIMP, ***even if the product was caught before 1 January 2018***. This dimension of the rule could be significant for importers and suppliers working with frozen product and product destined for shelf stable markets and as such, importers, processors and suppliers should begin communicating on data reporting and import management as soon as possible.

Importers, processors and fishing firms supplying tuna to the US market are already subject to data reporting requirements under the Tuna Tracking and Verification Program (TTVP) associated with the 'dolphin safe' label. There is significant overlap between the requirements of the TTVP and those of the SIMP, though the SIMP requires approximately 25 percent more data, including enhanced reporting on all entities involved at the point of harvest, on the fish itself, and on the vessel and product at the time of harvest. As such, actors across the tuna sector will be familiar with the kinds of requirements that the SIMP reporting system requires for compliance, though there will be significant work and coordination associated with collecting and providing the full set of requirements for compliance. The SIMP is not a labelling program and it does not require any form of government attestation associated with the data reporting process.

A current legal challenge to the rule is under review in US District Court. The new US administration has indicated that it will defend the SIMP in court. In the meantime, the National Oceanic and Atmospheric Administration (NOAA), the agency responsible for SIMP implementation, is preparing for full implementation by the start date of the program, though several details of requirements and implementation have yet to be finalized. NOAA officials are working with importers and customs brokers to pilot and test data entry interfaces. US government representatives recommend that to prevent disruptions, Pacific Island exporters communicate with their importers of record, ensure that those importers are developing plans to comply with the rule and test their data reporting prior to the implementation deadline, and begin to collect the required data as soon as possible.

1. BACKGROUND ON THE SEAFOOD IMPORT MONITORING PROGRAM

In December 2016, the US National Oceanic and Atmospheric Administration (NOAA) released the final rule establishing the Seafood Import Monitoring Program (SIMP), a regulatory program promulgated under the authority of the Magnuson-Stevens Act.¹ The program emerged from a multi-year Presidential Task Force on combatting illegal, unreported and unregulated (IUU) fishing and seafood fraud that was established in June 2014. The Task Force was mandated to offer recommendations for the implementation of a comprehensive framework of integrated programs to combat IUU fishing and seafood fraud with an emphasis on areas of greatest need. The Task Force was co-chaired by NOAA and the State Department and included senior-level representatives from ten federal agencies and five executive offices of the President. It has now transitioned to a standing committee of the National Ocean Council to focus on implementation and continued oversight.

The program aims to prevent illegal, unreported and unregulated (IUU)-caught and/or misrepresented seafood from entering US commerce as well as to provide additional protections for the US national economy, global food security and the sustainability of shared ocean resources. The Seafood Import Monitoring Program is the mechanism for achieving these goals. The SIMP establishes permitting, data reporting and record keeping requirements to fully trace certain priority fish and fish products that the Task Force identified as particularly vulnerable to IUU fishing and/or seafood fraud from the point of entry into US commerce back to the point of harvest or production. The aim is to verify that products were lawfully harvested or produced. The SIMP is *not* a labeling program. Albacore, bigeye, skipjack and yellowfin tuna have been identified as priority species and thus must comply with the terms of the SIMP in order to maintain access to the US market. Bluefin tuna are also included to avoid different treatment of tuna products.

The timeline of the development of the Seafood Import Monitoring Program is as follows:

- December 2014: Task Force released recommendations to develop a risk-based traceability program to track seafood from point of harvest to entry into US commerce.
- March 2015: Task Force released an action plan for implementation of the traceability program.
- February 2016: NOAA Fisheries released a Proposed Rule for a Seafood Import Monitoring Program and opened that rule for public engagement, which included publishing the rule in Federal Register notices, opening the public comment period and holding public meetings.
- December 2016: NOAA Fisheries released a Final Rule for a Seafood Import Monitoring Program that responded to concerns posed during the public engagement period.
- 1 January, 2018: Mandatory compliance date for most priority species listed in the rule, including tuna species.

The resulting SIMP establishes permitting, data reporting and recordkeeping requirements for priority species and products. It will collect information about the harvesting or producing entity, the fish and the importer of record (Table 1). The collection of catch and landing documentation will be accomplished through the International Trade Data System (ITDS) via the Automated Commercial Environment (ACE),

¹ Complete text of the final rule is available at: <https://www.federalregister.gov/documents/2016/12/09/2016-29324/magnuson-stevens-fishery-conservation-and-management-act-seafood-import-monitoring-program>

the US government’s existing single data portal for all import and export reporting.² The ITDS, as described in section 405 of the Security and Accountability for Every Port Act of 2006 (the ‘Safe Port Act’, Public Law 109-347), is an electronic information exchange capability, or ‘single window’, through which businesses transmit data required by participating agencies for the importation or exportation of cargo. The SIMP establishes a business-to-government reporting system to allow US government agencies to confirm fish and fish products seeking entry into the US market are accompanied by all legally required data. The information collected in the ITDS under the SIMP is confidential and since it is highly sensitive commercial, financial, and proprietary information, it is generally exempt from requirements for public disclosure.

2. SIMP OBLIGATIONS, DATA REQUIREMENTS AND COMPLIANCE TIMELINE

The importer of record is the central actor responsible for data collection, management, input and storage under SIMP and has ultimate responsibility for compliance. The importer of record – who must be a US citizen – is required to apply for and maintain an International Fisheries Trade Permit (IFTP), which can be purchased and issued immediately for US\$30.³ The importer of record will be required to keep records regarding the chain of custody of the fish or fish product from harvest to point of entry into the US and to have these data available in the event of an audit, even if the importer of record works with a customs broker in order to submit required data into the ITDS. Notably, importers of products subject to documentation under the Tuna Tracking and Verification Program (see below) have been required to hold an IFTP since 20 September 2016.

Table 1 details the information required under the SIMP. Appendix 1 includes sample certificates that NOAA has provided for detailing data collection at the harvest and landing, transshipment and storage, and primary and secondary processing stages in the chain of custody. The **sample certificates in Appendix 1 are not required** and are designed only to demonstrate the required information for compliance with the program and to offer a sample format for data collection. **Importers of record may develop any data collection system that works for them and suppliers as long as it collects and inputs all required data.**

² The ITDS is the reporting system, while ACE is the user interface that will be developed to input required data. These are inseparable and often referred to by government officials and in official publications as ACE/ITDS.

³ IFTP information and application is available at:

https://fisheriespermits.noaa.gov/npspub/pub_cmn_login/index_live.jsp

Table 1 Information to be collected under the Seafood Import Monitoring Program⁴

Entity	Information Required
Harvesting or Producing Entity	<ul style="list-style-type: none"> • Name and flag state of harvesting vessel • Evidence of authorization to fish (permit or license number) • Unique vessel identifier (when available) • Type(s) of fishing gear used • Name(s) of farm or aquaculture facility <p><i>Note: The fishing area and type of fishing gear should be specified per the reporting convention and codes used by the competent authority exercising jurisdiction over the wild capture operation. If no such reporting requirements exist, the Food and Agriculture Organization fishing area and gear codes should be used.</i></p>
Fish	<ul style="list-style-type: none"> • Species: Scientific name, Acceptable market name, and FAO ASFIS number • Harvest date(s) • Product form(s) at time of landing including quantity and weight of product • Area(s) of wild capture or aquaculture harvest • Point(s) of first landing • Name of entity(s) to which the fish was landed or delivered <p><i>Note: In cases where entries and products comprise more than one harvest event, each event that is relevant to a shipment must be reported but the importer does not need to link each event to a particular fish or portion of the shipment, or to segregate harvest events through the supply chain.</i></p>
Importer of Record	<ul style="list-style-type: none"> • Name, affiliation and contact information • NOAA Fisheries issued international fisheries trade permit (IFTP) number • Importer of record is responsible for keeping records regarding the chain of custody • Information on any transshipment of product (declarations by harvesting/carrier vessels, bills of lading) • Records on processing, re-processing, and commingling of product

In response to feedback during the comment period, the final rule includes simplified reporting for small-scale operators. The program exempts an importer from the requirement to individually identify small-scale vessels – or small-scale aquaculture facilities – if the importer provides other required data elements based on an **aggregated harvest report**. An aggregated harvest report is defined as a record that covers: (1) harvests at a single collection point in a single calendar day from small-scale vessels (i.e. twelve meters in length or less or 20 gross tons or less); or (2) landing by a vessel to which catches of small-scale vessels were made at sea.⁵

Importers that are already managing tuna products entering the US market have experience with several reporting requirements in the Highly Migratory Species International Trade Program and the Tuna Tracking and Verification Program that have significant, but not seamless, overlap with the SIMP harvest, landing and chain of custody elements. Both TTVP and SIMP will use the ACE/ITDS system for data entry.

⁴ NOAA Fisheries, no date. FACT SHEET U.S. Seafood Import Monitoring Program.

⁵ NOAA Fisheries, no date. Compliance guide for the U.S. Seafood Import Monitoring Program.

Though there are overlapping data elements in the two programs, overlapping data will not automatically populate both the TTVP and SIMP requirements in ACE/ITDS. Customs brokers will be central in creating programs that can populate required overlapping data points into ACE/ITDS in ways that will avoid inserting data required for both programs twice. NOAA Fisheries has indicated that the implementation of SIMP data requirements aims to avoid creating redundant reporting and recordkeeping requirements for importers of tuna products and that NOAA Fisheries may revise the Tuna Tracking and Verification Program to reflect new reporting and recordkeeping requirements as appropriate.⁶ Importers and brokers already working with tuna products will have familiarity with the format as well as the majority of data that will be utilized for SIMP compliance. NOAA representatives estimated that approximately 25 percent more data is required under SIMP than what is required under the TTVP.⁷ Key information required under SIMP that is **not** encapsulated by TTVP requirements includes:

- Documentation of all entities involved in first offload of product,
- More comprehensive information on the fish itself, including the scientific name, acceptable market name, and the 3-alpha Aquatic Sciences and Fisheries Information System (ASFIS) number assigned by the United Nations Food and Agriculture Organization (FAO) (Table 2 offers an example of this information, which will be required, but the final forms of which have not been released by NOAA at the time of writing),⁸
- More detailed information on the vessel and the product at the time of harvest.

Table 2 Example of data on tuna species required under SIMP

Commodity Scientific Name	Commodity Market Name	Product ASFIS 3 Alpha Code
Thunnus alalunga	Albacore	ALB
Thunnus obesus	Bigeye tuna	BET
Katsuwonus pelamis	Skipjack tuna	SKJ
Thunnus albacares	Yellowfin tuna	YFT
Thunnus thynnus	Atlantic bluefin tuna	BFT
Thunnus orientalis	Pacific bluefin tuna	PBT
Thunnus maccoyii	Southern bluefin tuna	SBF

*Note: The three categories listed in this table will be required under SIMP. The information populating the columns was gathered from the FAO ASFIS database. **However, NOAA representatives stress that they have not specified the final species types that will be required to be reported on and scientific name, commodity name and ASFIS 3-alpha codes for less common tuna species might also be included in final directives.***⁹

⁶ NOAA Fisheries, no date. Compliance guide for the: U.S. Seafood Import Monitoring Program.

⁷ Personal Communication, NOAA representatives, 9 June 2017.

⁸ The complete ASFIS list of species for fishery statistics purposes is available at: <http://www.fao.org/fishery/collection/asfis/en>

⁹ Email communication, NOAA representative, 13 June 2017.

For those producers that are also exporting tuna products to the European Union (EU), there is overlap with data reporting requirements for EU IUU regulation.¹⁰ Key differences between SIMP and the EU IUU regulations include:

- SIMP **does** require information on gear type, while the EU IUU regulation does not.
- SIMP **does not** require government attestation of the data, while the EU IUU regulation does.

Compliance with reporting and record keeping requirements in the rule will be mandatory starting 1 January 2018 for all priority species other than shrimp and abalone. As of the effective date, entries of product into the US market will require a complete ‘message set’ – a combination of the harvest event data and a US importer that has registered and has a valid International Fisheries Trade Permit.¹¹ Entries subject to the SIMP that are filed without a complete message set will be rejected and will not be released by Customs and Border Protection (CBP) until the message set is complete. Such delays would be particularly problematic for highly perishable fresh products.

Imported fish that enters into US commerce after 1 January 2018, but that was harvested prior to that date, will still need to comply with the rule and to provide a complete ‘message set’, even though fishing activity occurred in advance of the compliance date. **Suppliers will need to ensure that information on the harvest event exists for any product in the supply chain that will be entered after the compliance date, regardless of when it was caught.** This requirement might be significant for frozen and shelf-stable products that might have been caught in advance of the 1 January 2018 entry into force of the rule.

NOAA Fisheries and the broader US government intend to provide assistance to exporting nations to support compliance with the requirements of the rule, subject to the availability of resources. NOAA Fisheries have identified assistance priorities as capacity building for undertaking effective fisheries management; strengthening fisheries governance structures and enforcement bodies to combat IUU fishing and seafood fraud; and establishing, maintaining and supporting systems to enable export shipments of fish and fish products to be traced back to point of harvest.¹²

NOAA have identified several concrete steps that it will be taking to facilitate implementation in the coming months:¹³

- A technical implementation guide will be published, likely by the end of the July.
- NOAA will continue working with customs brokers to create the user interfaces for data entry. Brokers will also apply to Customs and Border Protection to begin pilot testing the system with mock data.
- In October 2017, pilot testing with real data will begin to refine software development and test the data entry process.
- In the future, NOAA have been tasked with establishing a ‘Commerce Trusted Trader Program’ that would streamline the importation process for consistent and reliable importers. Publishing a proposed rule that is open for a comment period will be the first step in this process.

¹⁰ NOAA Fisheries, no date. Final Rule to Implement Seafood Monitoring Program RIN 0648-BF09: Final Regulatory Impact Review and Final Regulatory Flexibility Analysis.

¹¹ The application for the IFTP permits are available through the following website: https://fisheriespermits.noaa.gov/npspub/pub_cmn_login/index_live.jsp

¹² NOAA Fisheries, no date. Compliance guide for the: U.S. Seafood Import Monitoring Program.

¹³ Personal Communication, NOAA representatives, 9 June 2017.

Throughout implementation, NOAA will be conducting outreach and consultations through webinars, roundtables, documentation, and individual consultations and encourages users or affected parties to contact them directly for consultation or to participate in pilot testing (see Appendix 2 for contact information).

3. REVIEW OF LEGAL CHALLENGE TO SIMP

On 6 January, 2017, the US National Fisheries Institute (NFI) (which represents US canned tuna branded processors Bumble Bee and Chicken of the Sea), six companies and two associations have joined together to file suit against the US Department of Commerce and NOAA Fisheries arguing that the regulation violates federal law. The companies filed their complaint in the US District Court in the District of Columbia.

The suit asks for a delay and review of the law with complainants arguing that the rule would reduce exports to the US, increase the costs of catching, processing and importing seafood, and put reporting and compliance burdens on small and subsistence producers in developing countries, as well as the processors and buyers who coordinate with disaggregated suppliers in developing regions.¹⁴ The suit argues that in a rush to publish the rule before the end of Obama's term, the Administration did not disclose the data that it used to create the rule as required by the Administrative Procedure Act. One of the primary challenges is that the rule was promulgated in violation of the Secretary of Commerce's rulemaking authority and the Appointments Clause of the Constitution; Plaintiffs argue that neither the individual who signed the rule, nor the individual that the Federal Defendants asserted promulgated the rule has the statutory or constitutional authority to engage in rule making. It also argues that the rule is based on miscalculated compliance costs and that it violates the Regulatory Flexibility Act, which requires agencies to solicit and consider flexible regulatory proposals and to assess the impacts that various regulatory alternatives would have on small entities, including small business, and to determine if there are ways to minimize those impacts.

In the Final Regulatory Impact Review and Flexibility Analysis (which provides the analysis that is a subject of the complaint), the US Government Office of Management and Budget estimated cost of the rule in terms of economic impacts, affected entities, and effects on trade and businesses. The analysis deemed that the seafood traceability program would not have an annual effect on the economy of US\$100 million or more (a threshold for determining if the impacts of a regulation are 'significant'), and found that the costs to the seafood industry for developing and deploying supply chain information systems are not anticipated to be significant, relative to a baseline in which no action is taken. The suit counters that the estimated costs to businesses was based only on the costs of additional permits, software and data entry work required on each container, and that the actual costs of full implementation would be much higher than the government estimated.¹⁵

¹⁴ Christine Blank, 'NFI sues NOAA over new IUU rule', *SeafoodSource*, 9 January 2017. Available at: <http://www.seafoodsource.com>

¹⁵ Alfa International Seafood Inc., Fortune Fish & Gourmet, Handy Seafood Incorporated, Dulcich Inc. d/b/a Pacific Seafood Group, Pacific Seafood Processors Association, Trident Seafoods Corporation, West Coast Seafood Processors Association, Libby Hill Seafood Restaurants, Inc., National Fisheries Institute v. The Honorable Penny Pritzker, The Honorable Kathryn D. Sullivan, Eileen Sobek, Samuel D. Rauch III. Case 1:17-cv-00031, Filed 6 January 2017 in the United States District Court for the District of Columbia; Tom Seaman, 'NFI, seafood giants sue US gov't over traceability rule', *Undercurrent News*, 10 January 2017.

Given the change in administration since the final rule was issued, the judge overseeing the case asked the Federal Defendants to file a status report advising the court of the new Administration's position on the litigation. The Defendants responded with a confirmation that the Federal Defendants support the Final Rule at issue in the litigation and will continue to assert defenses to the claims and allegations made by Plaintiffs in the Complaint.¹⁶ Several environmental organizations in the US have submitted an *Amici Curiae Brief* in support of the Defendants, showing the support of the environmental community for the traceability regulation.¹⁷

On 7 June 2017, a public hearing was held to hear oral arguments and review Plaintiff and Defendants' requests for summary judgement.¹⁸ In late July, the judge released a Memorandum Opinion and Order that left the Plaintiff and Defendants' requests for summary judgement open for further deliberation, but that ruled against the Plaintiff on one of the primary challenges: that the rule was promulgated in violation of the Secretary of Commerce's rulemaking authority. In the Memorandum Opinion and Order, the judge deferred ruling on the Plaintiff's broader challenge to the agency's authority to engage in rulemaking and, instead, afforded the Federal Defendants an opportunity to submit a signed statement acknowledging that the Department of Commerce would re-promulgate the rule in the same manner, even if it were required to re-start the notice and comment process.¹⁹ The Department of Commerce complied with this order on 30 June, 2017.²⁰

From this point, the remaining components of lawsuit remain active. The most recent Memorandum Opinion and Order released by the judge did point out that 'the parties' legal arguments and factual contentions demonstrate that Plaintiffs' statutory and Appointments Clause challenges are not trivial matters'.²¹ The court will hear and rule on these concerns in due course. The ultimate decision could range from the judge enjoining the rule, to the judge upholding certain parts of the rule and requiring NOAA to redesign specific elements of the rule, to determining that the rule will stand as currently written. It is unlikely, however, that these decisions will be made prior to 1 January 2018. In the meantime, NOAA representatives are continuing to prepare for full implementation. In summary, the lawsuit remains active, and the court has given no material indication that importers need not be prepared to comply.

4. PREPARATIONS FOR IMPLEMENTATION

As reported above, NOAA proposes to work closely with importers of record and sales brokers in order to develop the ACE/ITDS system and test it prior to implementation. For tuna products, current requirements under TTVP set several foundational SIMP requirements in place including that importers of record will already be holders of the IFTP, have familiarity with the ITDS system, and have experience with the kinds of data that will be required for the SIMP.

However, compliance with the SIMP will require developing a more expansive data collection system that includes all elements of data required in the program and close collaboration among suppliers, transport firms, processors and the importer of record to ensure proper documentation of the entire chain of custody. Industry consulted for this report suggested that data reporting requirements would be

¹⁶ Federal Defendants' Status Report on Litigating Position, Case 1:17-cv-00031-APM Document 36, Filed 22 March 2017.

¹⁷ Civil Docket for case # 1:17-cv-00031-APM, downloaded from PACER database on 1 June 2017.

¹⁸ Civil Docket for case # 1:17-cv-00031-APM, downloaded from PACER database on 1 June 2017.

¹⁹ Memorandum Opinion and Order, Case 1:17-cv-00031-APM Document 83, Filed 22 June 2017.

²⁰ Federal Defendants' Response to Order of the Court, Case 1:17-cv-00031-APM Document 84, Filed 30 June 2017

²¹ Memorandum Opinion and Order, Case 1:17-cv-00031-APM Document 83, Filed 22 June 2017, pg 1.

burdensome and costly, and indicated that they were only beginning to work on compliance and communication through their supply chains. Both government and industry representatives consulted for this briefing emphasized that the importer of record holds the responsibility for complying with the rule and retaining all required data and thus holds a key position in the compliance process, ensuring traceability across all steps in the supply chain, and in communicating with NOAA to get feedback on their implementation plan. Government and industry representatives suggested that to prepare for compliance, Pacific Island producers should:

- Clarify who their importers of record are, confirm that importers have the IFTP, and proactively communicate with importers about the rule;
- Review the model certificates (Appendix 1) for traceability and ensure that they can provide all required information – but also note that these **model certificates are not required** and that **importers are free to develop whatever data collection format works best for their purposes, as long as they provide all required information**;
- Work with the importer of record to determine a method for recording and submitting the required information;
- Where possible, encourage importers and brokers to test their import system prior to the start date of the rule to anticipate and correct any problems;
- Be prepared to move quickly to prepare for implementation, despite the ongoing legal challenge to the rule, which is unlikely to be decided prior to the implementation date; and,
- To the extent possible, encourage importers to begin collecting SIMP data as soon as possible. This is particularly important for product destined for frozen and shelf-stable markets that might be harvested prior to 1 January 2018, but enter into the US market after that date. **Any product entering the US market after 1 January 2018 will be required to comply with the rule, regardless of when the product was caught.**

Appendix 1: Model certificate documentation

Attached are model data collection certificates for the multiple phases of seafood value chains. These model certificates offer complete summaries of the data that is required for compliance with the SIMP.

*****These are not required forms*****

*****Firms and importers may create a reporting platform that works best for their purposes, as long as it includes all required information*****

In addition, the importer of record can provide the chain of custody documentation record in any form. The reporting is designed to be flexible, but the flexibility can also raise question about if the requirements are met. NOAA thus encourages importers to consult with NOAA about their plan in advance of the deadline to avoid disruptions.

Model Catch Certificate for Traceability - Harvest and Landing		
Unique Catch Document Identifier*	() Wild Harvest or () Farm Raised	
Company Name of Landing Recipient, Processor or Buying Entity	Address	Telephone: Email:
Facility or Vessel Landed To	Harvest Date(s)	
Catch Area or Location of Aquaculture Facility	Landing Port or Delivery Location	Trip Number (if applicable)
Name of Harvesting Vessel or Aquaculture Facility	Flag State of vessel	Unique Vessel Identifier (registration, documentation, or license number)
Type of Gear (applicable to wild harvest)	Fishing Permit or Authorization	
Commodity Scientific Name	Commodity Market Name	Product ASFIS#
Total Landed Weight [()lbs or () kg]	Catch Processed [()lbs or () kg]	Finished Product Weight [()lbs or () kg]

*Note: A Unique Document Identifier is provided by the harvester or landing recipient and should reflect the unique identifier of a catch or landing certificate.

<u>Model Documentation Form for Transshipment and Storage</u>		
() Wild Harvest or () Farm Raised		
Referenced Unique Catch Document Identifier(s)*		
Port or Storage Location of Loading/Unloading		
Name of Vessel/Cold Storage Unloaded from	Unique Unloaded Vessel Identifier (registration, documentation, or license number)	Date(s) of Unloading/Loading
Name of Vessel/Cold Storage Loaded to	Unique Receiving Vessel Identifier (registration, documentation, or license number)	
Commodity Scientific Name	Commodity Market Name	Product ASFIS#
Transshipped Weight [()lbs or () kg]	Transshipped Lot Identifier(s) ^b	Transshipped Product Form
Production Date(s)	# of Packages	Type of Packaging

*Note: A Unique Document Identifier is provided by the harvester or landing recipient and should reflect the unique identifier of a catch or landing certificate.

^bNote: A Lot Identifier is generated by the shipper based on its cargo tracking and record-keeping protocols.

<u>Model Documentation Form for Primary or Secondary Processing</u>			
() Wild Harvest or () Farm Raised			
Referenced Unique Catch Document Identifier(s)*		Company Product Received From:	
Processor Name	Processor Address	Processor Approval or Registration Number	Phone: Email:
Commodity Scientific Name	Commodity Market Name		Product ASFIS#
Received Weight [()lbs or () kg]	Received Lot Identifier(s) ³	Received Product Form	
Processed Weight [()lbs or () kg]	Finished Product Lot Identifier(s) ³	Finished Product Form	
Finished Product Weight [()lbs or () kg]			
Production Date(s)	# of Packages	Type of Packaging	

*Note: A Unique Document Identifier is provided by the harvester or landing recipient and should reflect the unique identifier of a catch or landing certificate.

³Note: A Lot Identifier is generated by the processor based on its product tracking and record-keeping protocols.

Appendix 2: Contact information at NOAA for implementation consultation

Officials from multiple offices at NOAA are available for consultation about the rule and its implementation.

For questions about SIMP requirements and implementation:

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For questions about the ACE/ITDS system:

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