



**NOAA
FISHERIES**



7,000+

Stakeholders Contacted

International Fisheries
Trade Permit Holders

Seafood Industry

Trade Community

Academic Community

Non-Governmental
Organizations

NOAA Marine
Fisheries Advisory
Committee

Additional
Consultations with:



10 U.S.
Government
Agencies



10 Foreign Nations

U.S. Seafood Import Monitoring Program Review: Progress Update

October 2023–June 2024

NOAA Fisheries’ Seafood Import Monitoring Program establishes permitting, reporting, and record keeping requirements for imports of certain seafood products to deter illegal, unreported, and unregulated fish and fish products or misrepresented seafood from entering U.S. commerce. These measures provide additional protections for our national economy, global food security, and the sustainability of our shared ocean resources.

In November 2023, NOAA Fisheries initiated a comprehensive review of the Program to explore ways to enhance and strengthen its overall impact and effectiveness. Between October 2023 and May 2024, we conducted outreach and engaged with a diverse set of stakeholders—spreading awareness of the review, answering questions, and soliciting input on all aspects of the Program. The results of these fruitful conversations will help shape our internal deliberations and inform recommendations for the Program moving forward. In preparation for the next phase of the review—formulation of recommendations—we are conducting in-depth analyses of all feedback collected from stakeholders to date. This Summary Report provides a high-level overview of the themes and questions that emerged in feedback received since October 2023 and does not reflect our recommendations.

Summary of Feedback Themes

To best capture the wide array of interests represented by SIMP's stakeholders, we summarized the feedback we received over the course of this review and grouped it into themes. We incorporated, where relevant, feedback from more than 2,000 public comments and 10 additional inter-agency consultations collected during the 2022 public comment period.

Responsibility for Compliance: Consider transforming SIMP to be a government-to-government program and shift the onus for compliance away from U.S. seafood importers and onto foreign governments. This recommendation was often framed by requests to reduce the burden placed on industry and create new avenues through which to introduce additional enforcement mechanisms.

Changing Species Covered by SIMP: Consider amending the list of species covered under SIMP or even move away from a species-focused program. Suggested changes range from the removal of certain species, to the inclusion of only a select few priority species, to a full expansion that would cover all imported fish and fish products to the United States. Many of the requests to include all species note that SIMP could fill an important information gap when it comes to seafood trade and ensure that entities could not bypass program requirements, either intentionally or unintentionally, through misreporting of species. Opponents to a full species expansion highlight the burden it would cause on seafood importers.

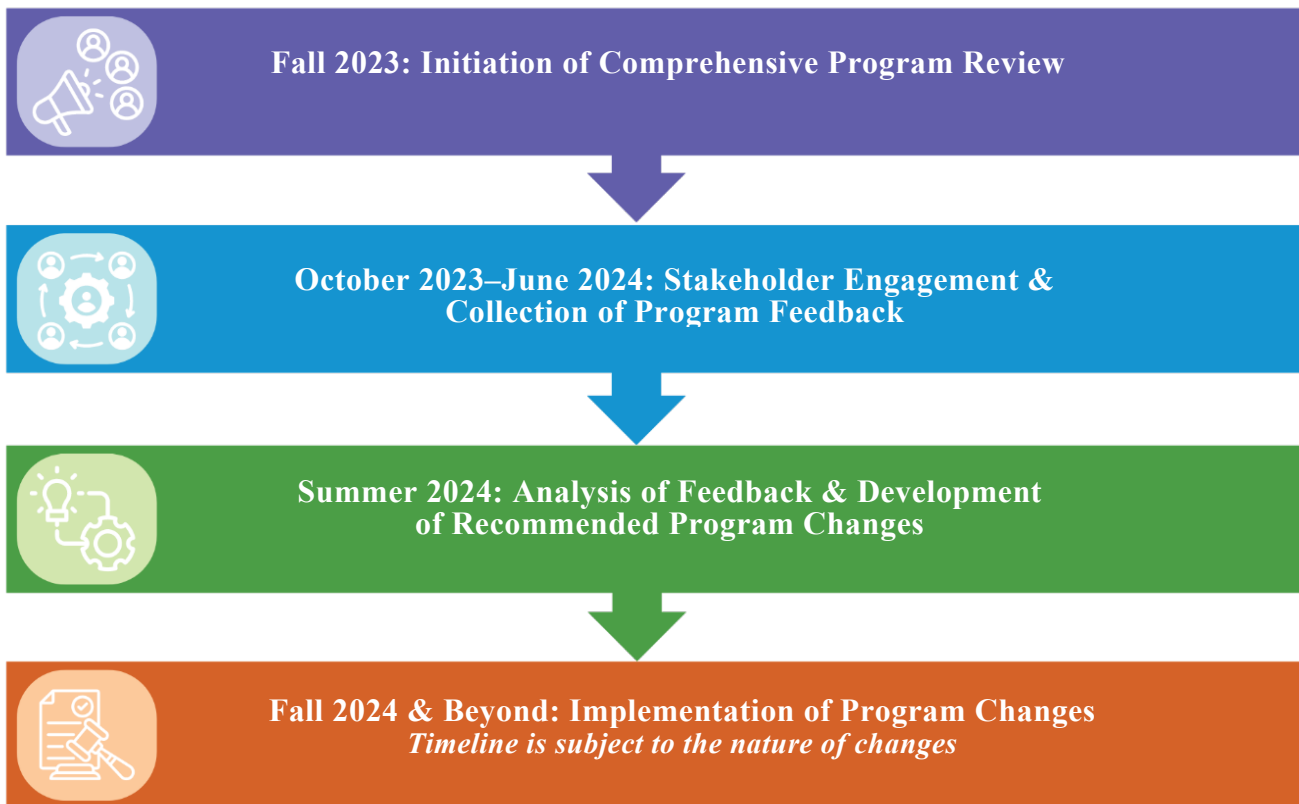
Data Sharing: Consider expanding data sharing capabilities within the limits of confidentiality laws to facilitate improved collaboration across the U.S. government. Additionally, consider sharing data collected under SIMP with foreign nations to improve international seafood traceability schemes to improve the identification of IUU fishing and seafood fraud.

Collection and Analysis of Key Data Elements: Consider evaluating the data input requirements from seafood importers to enable more accurate identification of IUU fishing and potentially forced labor in the seafood supply chain, as well as to facilitate industry compliance with the Program. Additionally, consider harmonizing data requirements for other U.S. agencies and even other nations.

Changes to Risk Criteria: Consider the inclusion of additional risk factors, such as country of origin, in the criteria used to determine which seafood imports are subject to SIMP requirements and selected for audit. Consider basing risk evaluation for imports on an assessment of a nation’s fisheries regulations, efforts to combat IUU fishing, and history of compliance with SIMP.

Timeline and Next Steps

While we continue to welcome stakeholder feedback and engagement during the review process, our focus has now shifted to the formulation of recommendations based on further analysis of the feedback received, and results of targeted follow-up discussions and research. NOAA leadership will review recommendations for proposed program changes, including alternatives and budget considerations, at the end of the summer. Implementation of program changes will begin this fall, and any proposed rulemaking will include opportunities for public comment.



Learn More About SIMP:

<https://www.fisheries.noaa.gov/international/international-affairs/seafood-import-monitoring-program>

Questions? Contact NOAA Fisheries at iuu.fishing@noaa.gov to submit feedback.