Action Plan to Improve the U.S. Seafood Import Monitoring Program

November 2024

In November 2023, NOAA's National Marine Fisheries Service (NOAA Fisheries) initiated a comprehensive review of the Seafood Import Monitoring Program (SIMP) to explore ways to enhance and strengthen its overall impact and effectiveness. During the review, NOAA Fisheries connected with more than 7,000 individual stakeholders on all aspects of the program. This diverse set of stakeholders included Customs brokers and business owners in the seafood trade and shipping industries, representatives of foreign governments, university researchers, non-governmental organizations (NGOs) and civil society groups, U.S. government agencies, and interested members of the public.

This action plan serves as a roadmap that NOAA Fisheries will use to strengthen SIMP. It reflects the extensive stakeholder engagement and feedback collected during the comprehensive review of SIMP. Together, the internal and regulatory actions outlined here will significantly strengthen SIMP and enhance our ability to prevent and deter illegal, unreported, and unregulated (IUU) fish and fish products from entering the U.S. market.

The actions outlined in this plan will enable NOAA Fisheries to accomplish the following goals:

GOAL 1	GOAL 2	GOAL 3	GOAL 4
Enhance NOAA Fisheries' ability to combat IUU fishing through improved traceability and risk detection, strengthening the sustainability of seafood globally	Contribute to government-wide efforts to address forced labor in the global seafood supply chain	Strengthen the integrity and fairness of global seafood supply chains by promoting fair seafood trade practices around the world	Improve NOAA Fisheries' implementation of SIMP and build our capacity to maintain and grow the program

Putting goals into action:

Actions under this goal will require an increase in staff capacity to implement.

Actions under this goal will require technology updates to implement.

Actions under this goal will require rulemaking to implement.

Actions under this goal will require coordination with other government agencies and are subject to their respective time and resources.

1: Enhance NOAA Fisheries' ability to combat IUU fishing through improved traceability and risk detection, strengthening the sustainability of seafood globally

Action: Expand SIMP traceability requirements to all U.S. seafood imports

NOAA Fisheries plans to publish a proposed rule that would consider establishing a two-tiered system to cover all seafood imports to the United States. NOAA Fisheries would propose to have one tier that would include all species and species groups currently included in SIMP, as well as any additional species or species groups determined to be at higher risk for IUU fishing and seafood fraud, while a second tier would include all other seafood imports. NOAA Fisheries would propose that the existing full set of SIMP data reporting requirements (known as "key data elements" (KDEs)), as well as any modifications we make to that data set (discussed below), would apply to the first tier, while the second would be subject to a smaller subset of KDEs, including but not limited to the country of harvest. The proposed rule would explain the process for periodically reviewing and adjusting the species list for each tier based on risk analysis, moving species between tiers as needed.

Action: Enable pre-entry screening of SIMP imports

NOAA Fisheries plans to publish a proposed rule that would consider requiring seafood importers to submit SIMP-required data in advance of entry into U.S. commerce, rather than at the time of entry, as is currently required. Using its Global Seafood Data System, NOAA Fisheries would be able to screen entries to identify products at risk of IUU fishing and seafood fraud and work with U.S. Customs and Border Protection to keep these products out of the U.S. market.

Action: Develop pilot program for a voluntary government-to-government import data program

NOAA Fisheries plans to publish a proposed rule that would consider establishing a voluntary program to allow partner nations to share harvest data on U.S. imports directly in near real time, which would allow us to verify entry data for faster, more precise risk screening and audits. This system would facilitate open communication and transparency between industry and governments working collaboratively to improve traceability and reduce risks in the seafood supply chain.

2: Contribute to government-wide efforts to address forced labor in the global seafood supply chain

Action: Strengthen partnerships with U.S. Customs and Border Protection and the Department of Labor

NOAA Fisheries will strengthen our engagement with Customs and Border Protection and the Department of Labor through data sharing arrangements and collaboration in investigations and enforcement. With additional inputs from these key interagency partners, the U.S. government could take more targeted and proactive measures to detect, deter, and prevent products produced by forced labor from entering U.S. commerce.

Action: Collect additional Key Data Elements to address forced labor risks in seafood supply chains

NOAA Fisheries plans to publish a proposed rule that would consider collecting new KDEs for species in the first tier on fishing vessel trip dates and details of transshipment activities not currently collected. NOAA is considering to propose the collection of this information to increase transparency in seafood supply chains and inform forced labor investigations. These new KDEs would also strengthen our ability to identify shipments at risk of IUU fishing and seafood fraud.

Action: Update permitting and reporting procedures

NOAA Fisheries plans to publish a proposed rule that would consider clarifying SIMP permits and reporting procedures. NOAA Fisheries is considering changes that would clarify:
1) the NOAA Fisheries International Fisheries Trade Permit holder's responsibilities for program compliance;
2) the definition of the small-scale fisheries harvest accommodation for consistent interpretation; and
3) the recordkeeping requirement for chain of custody documents through digital means to reflect current procedures.

Action: Modify current data requirements

NOAA Fisheries is considering amending the Key Data Elements (KDEs) required under SIMP to improve data quality and accuracy and harmonize SIMP requirements with other domestic and international traceability schemes. The KDEs under consideration for amendment would include standardized catch area inputs and other data points to simplify reporting. Certain KDEs would no longer be required to be submitted through the Automated Commercial Environment (Customs and Border Protection's centralized system through which the trade community reports imports) to import product, but would instead only be required for audits.

Action: Improve SIMP compliance materials

NOAA Fisheries will provide U.S. importers, foreign exporters, and Customs brokers with training and education on program requirements to facilitate compliance with SIMP. New and accessible informational resources would provide useful references to stakeholders, ensuring importers can quickly identify the most appropriate custody documentation for their supply chains. Updated training resources would improve program efficiency by increasing the accuracy and relevance of reported data, resulting in faster, more effective audits and strengthening our understanding of seafood supply chains.

Action: Modernize the National Permit System

NOAA Fisheries plans to develop a more user-friendly International Fisheries Trade Permit application, upgrade National Permit System capacity, and dedicate administrative support to improve and expedite the permit process.

Action: Introduce a *de minimis* exemption to SIMP requirements

NOAA Fisheries is considering proposing a de minimis exemption for reporting requirements that would allow seafood products not intended for commercial use (e.g., research specimens, trade show samples, or personal use products) under a certain value threshold to enter the United States without submitting the full SIMP data set.

Reparse

4: Improve NOAA Fisheries' implementation of SIMP and build our capacity to maintain and grow the program

Action: Stabilize and expand the SIMP team

NOAA Fisheries plans to hire additional federal staff to ensure program stability and knowledge retention and expand our capacity to implement program changes and deliver on the goals of the program.

Action: Increase the NOAA Fisheries International Trade Data System capacity

NOAA Fisheries plans to increase the capacity of ITDS to support the expansion of SIMP traceability requirements. Greater ITDS capacity would allow us to receive and review expanded seafood import data, and more efficiently transmit these data to our new Global Seafood Data System (GSDS) for risk screening and analysis.

Action: Increase analytical capacity

NOAA Fisheries will evaluate historical and future SIMP data and increase in-house analytical capacity. With improved data analytics, and by leveraging related IT investments at NOAA, we would employ proactive and dynamic risk-flagging capabilities based on trends and would transition away from post-entry reviews of reported data. We will leverage GSDS, which automates analytics and reporting, and recognizes risk by identifying trends, anomalies, and potential trade monitoring issues. The system enables advanced risk screening and seafood data analysis and is an essential tool for strengthening SIMP.

Next Steps

We will implement actions that do not require regulatory change as soon as possible within available resources.

We plan to publish a proposed rule, with opportunities for public comment, and a final rule thereafter.

As we carry out the action plan, existing SIMP requirements and reporting obligations remain active.

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.

NOAA FISHERIES

Office of International Affairs, Trade, and Commerce