STIMSON

Workshop Summary Report:

Reimagining the Seafood Import Monitoring Program, Workshop I

By Sally Yozell, Sara Lewis, Michele Kuruc, Carolyn Gruber, Lindsay Ceron,
Noah Fritzhand, Alyssa Withrow, and Lily Schlieman

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WISE

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ABOUT STIMSON

The Stimson Center promotes international security, shared prosperity & justice through applied research and independent analysis, deep engagement, and policy innovation. The Environmental Security program conducts research and analysis on pressing environmental challenges facing communities around the globe, including wildlife trafficking, illegal fishing, and the climate emergency. Working with international stakeholders across governments, civil society, businesses, and the security community, the program develops innovative solutions utilizing a research-to-action model.

About FishWise

FishWise works to sustain ocean ecosystems and the people who depend on them by transforming global seafood supply chains. Advancing private sector leadership, building and actively participating in multi-stakeholder collaborations, and strengthening governance reform and policy advocacy, FishWise implements a holistic approach to sustainability in pursuing its mission. For over 20 years, FishWise has developed, tested, and implemented responsible business practices to improve the transparency and sustainable management of complex global seafood supply chains and serves as a bridge between the private sector, governments, and environmental sustainability, counter-IUU fishing, and social responsibility communities.

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Workshop Summary Report: Reimagining the Seafood Import Monitoring Program, Workshop I

This report summarizes the first session of the "Reimagining SIMP" workshop series hosted by the Stimson Center and FishWise in 2024. The workshop series is aimed at crowdsourcing ideas that could improve and broaden SIMP over the short-, medium-, and long-term, and how to implement those new ideas.

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Acronyms

ACE	Automated Commercial Environment
CBP	United States Customs and Border Protection
CTAC	United States Customs and Border Patrol's Commercial Targeting and Analysis Center
CTE	Critical Tracking Event
CTPAT	Customs Trade Partnership Against Terrorism
EEZ	Exclusive Economic Zone
EU	European Union
FAO	Food and Agriculture Organization of the United Nations
FDA	United States Food and Drug Administration
HSDFMPA	High Seas Driftnet Fishing Moratorium Protection Act
HTS Code	Harmonized Tariff Schedule Code
ILO	International Labor Organization
IT	Information Technology
ITC	United States International Trade Commission
IUU Fishing	Illegal, Unreported, and Unregulated Fishing
KDE	Key Data Element
Maritime SAFE Act	Maritime Security and Fisheries Enforcement Act (2019)
MCS	Monitoring, Control, and Surveillance
MDA	Maritime Domain Awareness
NOAA	National Oceanic and Atmospheric Administration
NSM-11	National Security Memorandum 11: "Combating Illegal, Unreported, and Unregulated Fishing and Associated Labor Abuse"
OFAC	Department of the Treasury Office of Foreign Assets Control
OLE	NOAA Office of Law Enforcement
OMB	Office of Management and Budget
OSTP	White House Office of Science and Technology Policy
PREDICT	Predictive Risk-Based Evaluation for Dynamic Import Compliance Targeting
PSMA	Agreement on Port State Measures
RFMO	Regional Fisheries Management Organization
SIMP	NOAA Fisheries Seafood Import Monitoring Program
SIP	NOAA Fisheries Seafood Inspection Program
TIP	Trafficking in Persons Report (Department of State publication)
TTX	Tabletop Exercise
UFLPA	Uyghur Forced Labor Prevention Act (2021)
USAID	United States Agency for International Development
USCG	United States Coast Guard
WRO	Withhold Release Order

Executive Summary

On February 7–8, 2024, the Stimson Center and FishWise co-hosted a two-day workshop dedicated to "reimagining" the Seafood Import Monitoring Program (SIMP). The workshop brought together over 70 stakeholders from the U.S. government, the fishing industry, customs brokers, environmental and labor NGOs, and traceability technology providers to have an open and honest conversation about the opportunities to improve SIMP. This report is a summary of Workshop I, which explored **what** a successful traceability-based import control program for seafood could look like. Workshop II will take place on 13–14 May, 2024, and will explore **how** to operationalize an improved and expanded SIMP. Several key themes emerged during Workshop I and will serve as the basis for discussions during Workshop II.

The content of this report captures the discussion, broad themes, and key ideas raised during the workshop. This report is a summary of the workshop; the findings herein do not indicate consensus.

REDEFINING RISK

- Think more inclusively about "risk," to include contextual risk beyond product- or species-based risk
- Determine how, and not whether, to address forced labor and plan for its enforcement

DIGITIZING THE SIMP PROCESS

- Move beyond electronic versions of supply chain documentation to incorporate and institutionalize true digitization
- Develop a dynamic and responsive import control program that can reflect new and emerging information

IMPROVING INTERAGENCY COORDINATION AND COMMUNICATION

- Share information, intelligence, data with all relevant agencies
- Reduce data collection redundancy across U.S. agencies
- Use information from SIMP to better target at-port and on-the-water enforcement operations to prevent, detect, and deter IUU fishing

FITTING INTO THE BROADER SEASCAPE

- Consider enhancing SIMP with elements of other countries' counter-IUU fishing trade programs, like pre-import screening, catch certificates, chain-of-custody document audits, and in-country capacity building
- Align data collection requests across major market states' import control rules
- Increase transparency and accountability to all stakeholders

Introduction and Overview

Impacts of Illegal, Unreported, and Unregulated (IUU) Fishing

IUU fishing can take many forms—from local, small-scale, and artisanal boats fishing with prohibited gear or without a license, to industrial, foreign-flagged distant-water fishing vessels underreporting their catch or fishing in areas where they are not authorized. In all its forms, IUU fishing directly contributes to unsustainable fishing, which threatens fish stocks and damages the health of marine ecosystems. IUU fishing harms the ecological, economic, and food security of coastal states and communities and undermines law-abiding industry. Illicit practices can also destabilize the security of maritime states, support organized criminal activities, fuel corruption, drive human rights and labor abuses, and undermine good governance, rule of law, and fishers' trust in authorities. IUU fishing is a "crime of convergence," and can be associated with other criminal and illicit activities such as the smuggling of guns, drugs, and wildlife; human trafficking, forced labor, and slavery; as well as financial crimes like money laundering and tax fraud.[1]


DEFINING IUU FISHING

As defined by the Food and Agriculture Organization of the United Nations (FAO), illegal fishing refers to fishing activities in violation of national or international laws by a national or foreign vessel in the waters of a country, or by flag state vessels that are party to a regional fisheries management organization (RFMO), in contravention of conservation and management measures. Unreported fishing refers to fishing activities that have either not been reported or have been misreported to authorities in violation of national laws or RFMO measures. Unreported fishing is fraudulent and undermines fisheries management by skewing the accuracy of the stock assessments on which regulations are based. Unregulated fishing refers to fishing activities that contradict a state's obligations under international law even though the area has fisheries management or conservation measures, including the high seas and areas not managed by a RFMO.[2]

The consequences of IUU fishing are immense. It harms the economic, food, and environmental security of coastal communities. IUU fishing also destabilizes the security of maritime states, supports organized criminal networks, fuels corruption, destabilizes good governance, distorts markets, and drives human trafficking and labor and human rights abuses in the fishing industry. It is estimated that one in five fish worldwide is caught through IUU fishing, valued at least $36 billion. This is a conservative estimate; in today's marketplace this costs may be much higher.[3]

Complexities of the Global Seafood Supply Chain

Seafood—wild-caught and farmed—accounts for over $424 billion in trade each year[4] and is supported by over 59 million people working on vessels to meet ever-growing international demand.[5] Seafood can be harvested in nearshore and coastal waters, territorial seas, exclusive economic zones (EEZ), and on the high seas, while other species can be farmed in commercial aquaculture operations on land and at sea. Seafood generally passes through many hands and critical tracking events (CTEs) before ending up at a final point of sale. At each step, seafood can be commingled with other catches, altered, or mislabeled which can obscure its origin and make it difficult to identify illegally harvested and/or fraudulent seafood. This is certainly not always the case, but the globalized, and often opaque nature of seafood supply chains presents a multi-faceted challenge with consequences for understanding the true environmental and social impacts of seafood production.

As one of the top major market states, the United States imports approximately 80% of its seafood, and the demand is greater than ever.[6] In 2022, the United States imported 340,000 metric tons of seafood valued at over $30 billion.[7] In 2019 alone, the International Trade Commission (ITC) estimated that $2.4 billion of illegally harvested seafood products entered the U.S. market.[8]
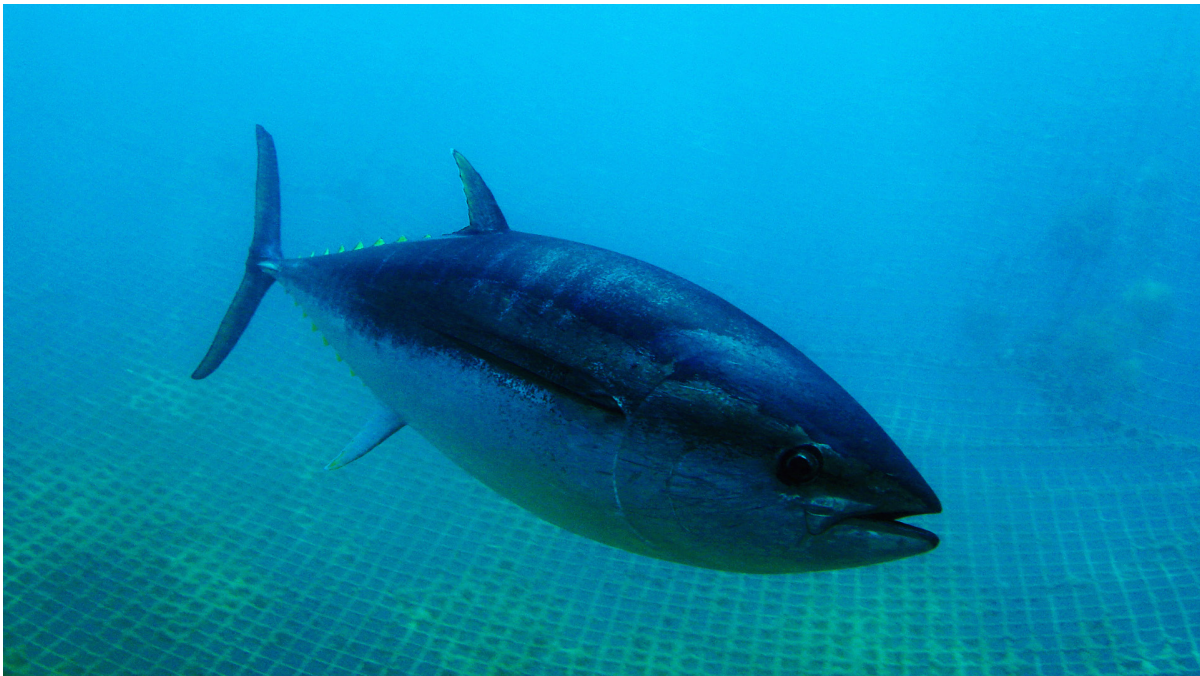
The U.S. Seafood Import Monitoring Program (SIMP)

SIMP is one of four seafood trade monitoring programs implemented by the U.S. government. Managed by the National Oceanic and Atmospheric Administration's National Marine Fisheries Service (NOAA Fisheries), SIMP is the largest and only program that was established explicitly to detect, prevent, and deter the entry of illegally harvested and/or mislabeled seafood into the U.S. market.[9] SIMP was

developed in 2015, under the U.S. Government Task Force on Combatting Illegal, Unreported, and Unregulated Fishing and Seafood Fraud established via Presidential Memorandum in 2014.[10] The program was originally envisioned as a comprehensive risk-based traceability program that could trace all seafood from harvest to entry into U.S. commerce, or "bait to gate," with the ultimate goal of preventing the import of illegal and mislabeled seafood products.[11] SIMP came into force in 2018 (*RIN 0648-BH87*) and covers 13 species groups with 1,100 unique species. These species—which make up approximately 40 percent of all U.S. seafood imports—were identified by the Task Force to be particularly vulnerable to IUU fishing, seafood fraud, or both.[12]

In December 2022, NOAA Fisheries issued a proposed rule to revise SIMP (*RIN 0648-BK85*) to cover additional species and species groups, including squid, cuttlefish, octopus, eel, Caribbean spiny lobster, and queen conch.[13] The proposed expansion was in accordance with the Consolidated Appropriations Act (2021), which directs NOAA Fisheries to reduce human trafficking in the international seafood supply chain; reduce economic harm to the American fishing industry; preserve stocks of at-risk species around the world; and protect American seafood consumers from fraud.[14] The proposed rule was criticized widely. Representatives of industry, non-governmental organizations (NGO), and Congress agreed that the proposed updates to SIMP would neither address illegal and mislabeled seafood imports entering the U.S. market, nor emerging concerns about forced labor in the seafood supply chain.[15] The proposed changes would not improve the program's overall effectiveness or level the playing field for law-abiding seafood companies. Acknowledging this criticism, in November 2023, NOAA Fisheries withdrew the proposed rule and announced that it would "conduct a broad program review to enhance and strengthen the program's overall impact and effectiveness."[16] To support its efforts in this review, NOAA Fisheries is currently seeking engagement with stakeholders from industry, NGOs, other federal agencies, Congressional representatives, and foreign governments.

Overview of the Reimagining SIMP Workshop Series

In response to NOAA Fisheries' request for public engagement throughout its program review, the Stimson Center and FishWise created a workshop series to crowdsource ideas and concepts to improve and broaden SIMP over the short-, mid-, and long-term. Workshop I, described here, explored **what** a successful traceability-based import control program for seafood could look like. Workshop II will take place in on 13–14 May, 2024, and will explore **how** to operationalize an improved and enhanced SIMP.

On February 7–8, 2024, the Stimson Center and FishWise co-hosted a two-day workshop dedicated to "reimagining SIMP." The workshop, which was conducted under Chatham House Rule, brought together over 70 stakeholders from the U.S. government, the fishing industry, customs brokers, environmental and labor NGOs, and traceability technology providers to have an open and honest conversation about improving SIMP. The participants were encouraged to think expansively and identify opportunities to develop an effective traceability-based import control program for the United States. **Participants were asked to explore "blue sky" ideas for what SIMP *could* be.** The goal of the workshop was to develop a framework for the future of SIMP through facilitated stakeholder-led conversations with NOAA Fisheries and its interagency partners, and to provide feedback on key questions as NOAA Fisheries engages in its comprehensive review of SIMP.

The first day of the workshop included three scene-setting panels, featuring speakers from the U.S. government, the seafood industry, customs brokers, technology providers, and environmental and labor NGOs. Following the panels, participants were evenly divided into groups to work through two hypothetical tabletop exercise (TTX) scenarios. Discussions were guided by five questions, with input from NOAA Fisheries in advance:

1. What are the **key risk factors**—species, flag states/administrations, market share, labor practices, sanctions imposed, others—that should be considered by an effective traceability-based import control program?

2. What are the **critical components of an effective import control system** that identifies, prevents, and deters the import of IUU-caught and mislabeled seafood across the U.S. government?

3. What is the **whole-of-government approach** (roles, responsibilities, and who is accountable and how) to achieve a successful traceability-based seafood import control program?

4. There are several seafood import control models, ranging from SIMP (business-to-government) to catch certification (like the EU's government-to-government approach) to a hybrid model. **What lessons are learned from each, and how can they serve as models for an effective SIMP?** Are there other approaches, models, and/or tools needed to identify, assess, and act on the key risks identified in the first scenario?

5. How can the U.S. government **leverage engagement and cooperate with governments of exporting and importing nation**s to prevent and deter imports of illegally harvested and misrepresented seafood and seafood products that harm natural resources, compete with well-managed fisheries, and do not follow fair labor practices?

On the second day, participants reconvened to share the key takeaways of two TTXs and engage in a broader group discussion to highlight the goals of SIMP and articulate blue-sky ideas for the program's future. The outcomes of this workshop, summarized in this report, identify **what** stakeholders believe could be included in the next iteration of SIMP. The second workshop will explore **how** SIMP can operationalize these additional components.

Workshop I: Panels

Panel One: SIMP Risk Targeting Considerations

The first panel featured five speakers from U.S. government agencies involved in seafood trade monitoring and counter-IUU fishing efforts, including from the Departments of Commerce, Labor, Homeland Security, and State. The goal of the panel was twofold: (1) highlight risks related to IUU fishing beyond the fish species being harvested (e.g., labor), including risk information from other federal agencies which could help inform risk targeting in SIMP; and (2) explore how data and information collected by SIMP could help other agencies better identify IUU fishing risks across the seafood supply chain.

The first speaker described the U.S. government's diverse authorities and capabilities related to combating IUU fishing. This speaker emphasized using the full suite of authorities and a whole-of-government approach to improve SIMP is a priority for the agency moving forward.

The second speaker shared recent advancements in CBP's Automated Commercial Environment (ACE) portal, and how data sharing is critical to identify risks deeper in seafood supply chains, beyond the species currently covered by SIMP. This speaker also noted the importance of looking deeper into the supply chain to incorporate various kinds of risks into decision making and the crucial role that technology plays to support those efforts.

The third speaker stressed the importance of increased enforcement against violators throughout the seafood supply chain and how to use financial consequences to bolster SIMP's effectiveness.

The fourth speaker outlined the importance of engaging with exporting nations to improve "first mile" compliance and noted that the re-imagining of SIMP is an opportunity for the U.S. to consider the advantages and disadvantages of the European Union's (EU) catch certification scheme.

The fifth speaker shared the importance of data interoperability to help improve on-the-water enforcement actions against vessels suspected of IUU fishing and labor law violations.

THE "FIRST MILE" OF THE SEAFOOD SUPPLY CHAIN

For this workshop, the first mile refers to the period between when the seafood is caught or harvested and its first point of sale or transfer. This first point of sale can include the at-sea or dock-side processes that might occur after harvest. The first mile is an important time for data collection because it is the point at which the who, what, when, where, and how of the catch is recorded. This stage, however, is also when data can be the most difficult to collect due to IUU fishing and the possibilities of transshipment and/or commingling.[17] Since SIMP only collects data at the time of import,[18] it is difficult to verify whether the data was truly and accurately collected within the first mile, and whether information was falsified (intentionally or not) at any point in the supply chain.

Panel Two: Views from the Seafood Supply Chain

The second panel featured speakers from the U.S. seafood industry, customs broker agencies, and labor-focused NGOs. This panel offered diverse perspectives on SIMP implementation, including firsthand experiences, lessons learned, and future considerations from stakeholders to uncover what an efficient and effective traceability-based import control system means for each.

The first speaker, a customs broker, discussed current challenges with industry data and information reporting requirements. They noted that the structure of data reporting is challenging due to the minutiae of data required, especially for certain species groups. Furthermore, it was explained that other actors in the supply chain may be unwilling to provide the level of data required because they do not understand why it is necessary to do so.

The second speaker, a representative of the U.S. fishing and processing industry, highlighted that industry, NGO, and government stakeholders all share the same objectives—to prevent and deter IUU fishing, and allow for the free flow of lawfully harvested and processed seafood. This speaker also proposed moving towards an EU-type catch certificate system, with concrete requirements for imports and a government-to-government certification process.

The third speaker, representing the U.S. shrimp industry, highlighted the negative economic impacts of seafood fraud and mislabeling on the U.S. fishing industry, noting that there is a robust market for imported seafood caught illegally or fraudulently. Access to high profit margins can drive illegal and fraudulent activities. This speaker suggested that importers are not subject to the same level of scrutiny as domestic fishers, who operate within a heavily regulated fisheries management structure that is often subject to intense oversight by NOAA Fisheries.

The fourth speaker, representing the labor and human rights NGO community, noted that the IUU fishing challenges SIMP was created to address are inextricably linked with forced labor, and stressed that U.S. producers cannot compete with foreign seafood caught and processed with forced labor. They further suggested that SIMP has a logical role to play in addressing forced labor concerns.

All four panelists emphasized that effective and complementary enforcement regimes within and across governments are critical to ensure compliance with any traceability-based seafood import control program.

RETHINKING SIMP:
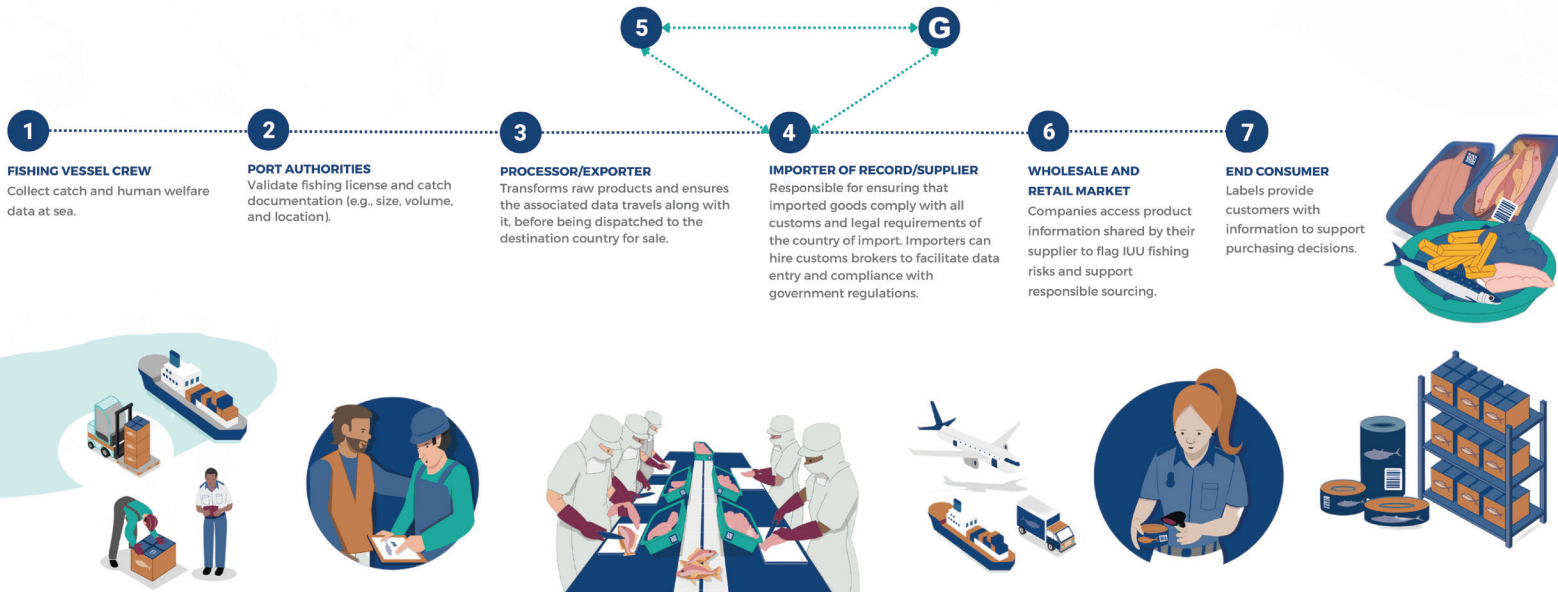
EXAMPLE OF TUNA SEAFOOD SUPPLY CHAIN ACTORS

CUSTOMS BROKER
Act as an intermediary between importers and customs agents to facilitate compliance with import regulations by preparing and submitting necessary documentation to customs authorities for clearance.

UNITED STATES GOVERNMENT
Receives importer and broker-reported information through the Automated Commercial Environment (ACE).

1 FISHING VESSEL CREW
Collect catch and human welfare data at sea.

2 PORT AUTHORITIES
Validate fishing license and catch documentation (e.g., size, volume, and location).

3 PROCESSOR/EXPORTER
Transforms raw products and ensures the associated data travels along with it, before being dispatched to the destination country for sale.

4 IMPORTER OF RECORD/SUPPLIER
Responsible for ensuring that imported goods comply with all customs and legal requirements of the country of import. Importers can hire customs brokers to facilitate data entry and compliance with government regulations.

6 WHOLESALE AND RETAIL MARKET
Companies access product information shared by their supplier to flag IUU fishing risks and support responsible sourcing.

7 END CONSUMER
Labels provide customers with information to support purchasing decisions.

Panel Three: DASHing (Digitize, Analyze, Standardize, and Harmonize) to the Future

The third panel featured speakers from the NGO community, as well as a seafood importer and distributor and a privately owned trade tracking technology provider. The panelists focused on the possibilities to leverage technology and tools used in other countries to improve the effectiveness and efficiency of U.S. traceability-based seafood import control programs.

The first speaker, a representative of an environmental NGO, discussed the EU's new (as of 2024) requirement to digitize the EU catch certificate (IT CATCH). The speaker explained the major benefits of IT CATCH, including the capabilities of almost instantaneous data sharing, and standardized advanced risk analytics. This expert also discussed the EU IUU Regulation carding scheme and emphasized the importance of government-to-government dialogue and IT CATCH working together to inform decision-making. This speaker clarified that the EU's system does not currently account for farmed fish, nor does it address challenges related to forced labor. Considerations of labor practices, in particular, may be incorporated into the program in the future.

The second speaker, representing a private technology provider, explained the power and importance of using tools for advanced risk-based analyses of import data. This speaker described the advantages of the U.S. Food and Drug Administration's (FDA) PREDICT system, which conducts risk-based screenings of all food, drug, and medical product imports for health, safety, and mislabeling. This speaker emphasized that these tools are dynamic and adaptable because they are supported by machine learning, pattern discovery, and data mining and can respond to the changing landscape of IUU fishing risks.

The third speaker, a representative from the U.S. seafood industry, talked about the importance of shared standards for data interoperability and supply chain transparency. The representative proposed that digitization and global standards will work together to support better traceability, advanced risk targeting, and make compliance easier. The final speaker, from the environmental NGO community, discussed the lack of coordination across the suite of existing trade tracking programs and actionable steps to improve SIMP. This expert focused on the need for both inter-governmental and intra-governmental harmonization, collaboration, and data sharing. This speaker went on to explain that it might be necessary to reexamine the KDEs that are currently collected, specifically adding some basic labor KDEs could help stop labor abuses.

Workshop I: Categories of Discussion

The following section describes "blue sky" ideas, concepts, and themes that could improve future traceability-based seafood import control programs.

The Next Iteration of SIMP

GOALS FOR THE FUTURE

While the objective of the workshop was to envision what a more comprehensive traceability-based seafood import control program could look like, lessons learned from the last six years of SIMP implementation were cited throughout the panels and TTX discussions. Since 2018, the stated goal of the program has been to, "detect, prevent and deter IUU-caught and misrepresented seafood from entering U.S. commerce."[19] However, participants from industry and environmental and labor NGOs stressed that SIMP has not lived up to this goal; illegally harvested and mislabeled seafood continues to enter the U.S. market. Representatives from NOAA Fisheries were confident that SIMP is doing what it is designed to do and is an effective data collection program but acknowledged that it was not living up to the expansive program that was originally envisioned.

To better understand what the goals of a future traceability-based seafood trade monitoring program could be, workshop participants were asked to answer this question anonymously on a notecard before beginning the TTX: **What do you think is the goal of a successful SIMP?** This short exercise aimed to uncover the many, diverse perspectives and expectations of what a re-imagined SIMP could do and basic elements (e.g., environment, legality, labor) that the program should include.

Twenty-four percent of respondents agreed to update the original goal of the program—to detect and prevent illegally-harvested and misrepresented seafood from entering U.S. commerce—**to include** consideration of forced labor. Seventeen percent of respondents said that the original goal should remain, but NOAA Fisheries needs to improve implementation. An additional 18 percent of participants responded that the program's goal should be to collect data to enable a whole-of-government approach to combatting IUU fishing and associated human rights and labor abuses in the seafood supply chain. Sixteen percent said the goal of the program should be to protect U.S. businesses and consumers from illegally harvested seafood and seafood produced with forced labor. Several respondents suggested rewarding "good" actors in the supply chain in addition to punishing "bad" actors. Thirteen percent wrote that the goal should be to reduce IUU fishing activity broadly and promote greater transparency throughout seafood supply chains. Six percent of respondents noted the goal should be to have a globally harmonized import control program to prevent and deter IUU fishing and forced labor, while an additional three respondents believe the goal of SIMP should be a proactive import control program that addresses IUU fishing, and seafood produced with forced labor before it gets to the U.S. border.

Overall, the diversity of responses surrounding SIMP's scope highlights an opportunity to both address these goals as part of NOAA Fisheries' review process.

ROLES AND RESPONSIBILITIES OF SIMP PARTICIPANTS

Many participants agreed that both the seafood industry and the U.S. government are responsible for preventing and deterring illegally harvested and/or mislabeled seafood, including seafood produced with forced labor, from entering U.S. commerce. Representatives from the U.S. government and environmental NGOs stated that seafood companies have responsibility over the products they profit from. Several representatives from the U.S. fishing and processing industry agreed, but argued that the design and implementation of SIMP places an unfair onus on customs brokers and importers of record. Customs brokers are responsible for inputting data into U.S. government trade programs, often without seeing the product. Importers of record collect and maintain harvest and landing information and provide chain of custody records in order to comply with SIMP requirements. Seafood companies suggested the development and use of U.S. government-issued catch certificates will bolster government responsibilities and oversight in exporting nations. Broker and importer participants suggested providing incentives for law-abiding importers of record, such as public acknowledgements or a program like Customs Trade Partnership Against Terrorism (CTPAT), to expedite the import process. Ultimately, stakeholders agreed that NOAA Fisheries, as the implementing agency for SIMP, has the responsibilities to: (1) ensure the program's effectiveness; (2) communicate and share data and information with other agencies involved in counter-IUU fishing efforts; and (3) be transparent with industry and the public on the program.

Interagency Communication and Collaboration

DATA, INFORMATION, AND INTELLIGENCE SHARING

Representatives from both government and industry emphasized that, in its current form, SIMP's primary value is as a data collection tool. There are, however, challenges with sharing and reporting the data collected between and across different U.S. agencies and with the public. This challenge is the result of NOAA Fisheries' understanding of confidentiality requirements, limited effective interagency communication mechanisms, and a lack of interoperable data sharing platforms. A representative from CBP noted that ACE was designed to be a platform for data collection and sharing, but because data is still entered as scanned forms, (i.e., not digitized) the full power and potential of ACE as a single-window data entry platform is not yet realized. An importer suggested that some of this burden could be alleviated if the ACE portal was improved to streamline the uploaded information and suggested that industry participate in the redesign of ACE 2.0 to facilitate these modernization efforts. Additionally, a broker suggested improving IUU fishing data sharing agreements which could be modeled around other interagency and public-private partnerships such as CTPAT. They also suggested the development of a domestic maritime domain awareness fusion center to facilitate information sharing between relevant federal agencies. Several government representatives agreed, noting that increased information sharing between the NOAA's Office of Law Enforcement (OLE) and CBP could bolster enforcement efforts. A participant from an environmental NGO proposed that to improve both interagency communication and enhance the utility of seafood import controls, and the vast amounts of data they collect, any new trade monitoring programming would need to be co-developed with all relevant agencies.

Representatives from industry and both labor and environmental NGOs highlighted the benefits of a two-way data-sharing arrangement wherein non-confidential (i.e., aggregated) data and information can be exchanged between the U.S. government and interested stakeholders for enhanced transparency. An importer noted that the industry needs to learn about risks associated with specific RFMOs, ports, and other intelligence/product data to better ensure SIMP compliance and support sustainable sourcing decisions. An environmental NGO representative suggested NOAA Fisheries and other federal agencies could better leverage external databases, like Global Fishing Watch, and work together with stakeholders via private-public partnerships to eliminate gaps in IUU fishing datasets (e.g., vessel-level information).

STREAMLINING DATA COLLECTION REQUIREMENTS

Industry and environmental NGO representatives noted that many of the key data elements (KDEs) required for seafood imports are duplicative. Brokers are required to input KDEs for different agencies and use separate (often custom) data collection and sharing platforms. An industry representative noted that this is not only time consuming, but also creates an increased likelihood of human error, which detracts from effective risk targeting. A stakeholder from an environmental NGO highlighted that even within NOAA Fisheries' trade monitoring programs, the same KDE (e.g., harvest location) may be required to be entered multiple times and in different formats (e.g., FAO Major Fishing Area, RFMO Convention Area, latitude/longitude coordinates). Participants from industry and environmental NGOs suggested that NOAA Fisheries and other U.S. agencies could standardize and streamline their data collection requirements to reduce the data entry burden on industry and better target enforcement efforts.

Multiple industry participants stressed that while often duplicative, the data and information collected by SIMP is valuable and can effectively identify and further incentivize industry players who are following the rules. Representatives from labor NGO groups noted that SIMP data is also extremely valuable in identifying shipment and vessel information for CBP to analyze when issuing withhold release orders (WRO) and addressing forced labor in the seafood supply chain.

WITHHOLD RELEASE ORDERS

Section 307 of the U.S. Tariff Act of 1930 prohibits the importation into the U.S. of any goods produced "wholly or in part" using forced labor, in any part of the world.[20] This statute is implemented by CBP and gives it the power to issue a Withold Release Order (WRO) should "reasonable but not conclusive" evidence arise that imported goods were produced with forced labor.[21] Anyone can bring a petition to CBP to issue a WRO. Once a WRO has been issued, CBP detains the product at the border until an importer can prove the absence of forced labor.[22] If a conclusion is not reached on the shipment, the goods may be destroyed. There are 5 current WROs applying to four individual fishing vessels (flagged to Taiwan, Fiji, and Vanuatu) and one fishing fleet (the Chinese-owned Dalian Ocean Fishing Co., Ltd).

Beyond CBP, it was noted that SIMP data could help the U.S. Coast Guard (USCG) or NOAA's OLE better target their on-the-water or in-port enforcement operations, as well as support capacity building activities in source or supplier countries. Subsequently, a seafood industry consultant noted that SIMP data could be useful to support international enforcement efforts, such as validating information gathered by import control programs in the EU and Japan, as well in support of broader maritime security programming, like the projects led by the United Nations Office on Drugs and Crime. However, it was repeatedly emphasized that for other programs and agencies to benefit from the data collected by SIMP, there needs to be better and more inter- and intra-government communication, data sharing agreements, and a shared understanding of statutory confidentiality limitations.

Capacity Building

OPERATIONALIZING THE GOALS OF SIMP

Various industry and environmental NGO stakeholders highlighted the need for NOAA Fisheries to increase capacity building activities with industry groups and foreign governments to improve SIMP compliance and program literacy within overseas supply chains. Several participants noted that when SIMP was first implemented in 2018, NOAA Fisheries conducted outreach with industry groups and foreign governments. This kind of outreach has since stopped, but workshop participants generally believed it would be helpful for that kind of outreach to continue. Industry representatives stressed that companies need NOAA Fisheries' assistance to understand the evolution of SIMP's data reporting requirements and procedures. Similarly, NOAA Fisheries needs to maintain this opportunity for dialogue

with industry representatives to better understand and reflect the evolution of industry best practices. These participants noted that domestic capacity building that is focused on operationalizing SIMP is also a way to build and maintain trust between government and industry groups. An industry representative suggested that NOAA Fisheries could lead trainings for brokers on SIMP compliance. A fisheries consultant also noted that failed audits and/or enforcement actions are opportunities for NOAA Fisheries to be explicit with industry stakeholders about non-conformance and/or non-compliance and what steps can be taken to support SIMP compliance in the future.

INTERNATIONAL EFFORTS TO COMBAT IUU FISHING

Participants highlighted that SIMP could be a powerful tool for prioritizing international capacity building efforts to combat IUU fishing. One fisheries consultant stated that most IUU fishing activities take place in the EEZs of countries with weak fisheries management frameworks. Information gathered through SIMP could help identify where international capacity building is needed most.

Unregulated and unreported fishing cannot be managed solely by the markets. Reducing unregulated and unreported fishing requires improved fisheries management, governance, and capacity building. The Maritime Security and Fisheries Enforcement (SAFE) Act, which prioritizes four regions and five flag states (Ecuador, Panama, Senegal, Vietnam, and Taiwan), could be used to better target U.S. engagement on counter-IUU fishing, sustainable fisheries management, and seafood supply chain improvement efforts.

A representative from an environmental NGO noted that the EU IUU regulation (including its catch certificate scheme) includes a government-to-government component with extensive in-country consultations. These EU-led in-country government-to-government consultations are somewhat similar to the steps taken by the U.S. in its outreach to governments as provided by the High Seas Driftnet Moratorium Protection Act (Moratorium Protection Act). Through these consultations the EU seeks to work with the country toward improvement of identified wide-ranging shortcomings in legislation; effectiveness of monitoring, control, and surveillance; adequate discharge of international obligations; and more to help develop a more robust system in-country. The two systems are not totally analogous, however. Through the Moratorium Protection Act, NOAA Fisheries focuses its efforts on vessel-level actions in consultations with the relevant government. The negative consequences of these consultations are port access and potential import restrictions, but those have rarely been imposed. The EU's system is aimed more broadly at the country level, and as a result the consequences are applied country-wide.

Technology

TOWARDS A DIGITIZED DATA COLLECTION SYSTEM

Some of the documentation required by SIMP can be submitted to ACE as scanned PDFs of hard-copy paper files. Industry and NGO representatives noted that paper documentation (i.e., chain of custody records) can be susceptible to both unintentional mistakes or intentional falsification. Paper-based traceability systems are not only inefficient and outdated, but also prevent the use of advanced technology that can perform basic (and complex) risk analytics through machine learning and artificial intelligence.

A representative from the White House Office of Science and Technology Policy (OSTP) noted that scaling SIMP is constrained by available funding and personnel for the program, as well as by auditing capacity. SIMP receives and processes large volumes of paper and PDF documents in foreign languages. In FY2023, SIMP received 147,000 entries out of 377,000 total seafood imports.[23] The workshop participants discussed how adding supply chain-wide digitization to the existing electronic system could boost SIMP's processing and auditing capacity. A representative from industry agreed, noting that domestic seafood supply chains do not have problems with traceability, but rather with the inefficiencies of paper-based systems. An environmental NGO representative from the EU highlighted that their digitized system (i.e., IT CATCH) provides the EU authorities with easy access to large quantities of data. However, a truly digitized system takes a long time to establish and requires constant upkeep; the IT CATCH program has been under development since 2015 but is expected to be rolled out in 2025.

Several participants from both industry and government stressed that, while more data can be helpful to identify IUU fishing risks, it is critical that the data is of good quality and can be verified and used. Technology providers noted that any system—whether paper-based or digitized—that collects and screens data, especially import/export data, needs to have built-in points of redundancy to prevent system failure if a single data point is unavailable or input incorrectly.

APPLYING RISK ANALYTICS TO IUU FISHING

Digitization is crucial for effective and efficient risk analytics programs. SIMP was developed as a risk-based program but lacks a discrete risk analytics platform or program to synthesize the enormous quantities of data provided by the seafood industry. Other federal agencies that employ risk-based trade control programs, such as the FDA, have their own automated risk targeting systems. The FDA uses the Predictive Risk-based Evaluation for Dynamic Import Compliance Targeting (PREDICT) tool. NOAA Fisheries noted that they are currently developing an automated risk screening tool; it is in the early stages of deployment. Workshop participants from other government agencies, industry, and NGOs overwhelmingly suggested that NOAA Fisheries consider adopting a modified version of PREDICT instead of reinventing a new system to be used as the foundation for a future SIMP-related risk analytics program or at minimum, learn more about how PREDICT works to adopt learnings and shape the development of NOAA's in-house solution, the Global Seafood Data System (GSDS).[24]

PREDICT: APPLYING RISK ANALYTICS TO THE IMPORTS PROCESS

The FDA uses the PREDICT tool to electronically screen all regulated shipments of food, drugs, and medical equipment. PREDICT uses automated data mining, pattern discovery, and previous FDA database entries to identify risky shipments. This risk-based program considers inherent risk and the previous compliance history of importers, manufacturers, and shippers when making a rapid determination of risk. Lower-risk products are allowed into U.S. commerce without further FDA inspection. When a product is flagged as high-risk it is held for further inspection by FDA analysts before being released or permanently stopped.[25]

Risk Targeting

EXPANDING OUR UNDERSTANDING OF IUU FISHING RISKS

When the SIMP program was initially created, the 13 species groups originally covered by SIMP were determined by an interagency working group to be at higher risk for IUU fishing or seafood fraud. However, since SIMP's original implementation in 2018, there is a growing understanding that risk factors for IUU fishing, seafood fraud, and mislabeling extend beyond simply the original species list. Risks can occur at various nodes of the seafood supply chain beyond the point of harvest (i.e., the first mile). Participants proposed additional risk indicators that could be included in future traceability-based seafood import control programs, such as vessel information (including registration, authorizations to fish, vessel flag, and unique vessel identifier), vessel captaincy and ownership, harvest location, port of landing, transshipment vessel and location, and catch certificate. Others proposed contextual risk indicators which refer to events, factors, or dynamics that occur in the broader environment, but remain important to provide a backdrop for the global IUU fishing landscape and help stakeholders illuminate broader risks associated with seafood products. Some contextual risk indicators suggested include allegations or evidence of government corruption, EU carding status, U.S. listing status, flags of convenience, status of ratification of the Port State Measures Agreement (PSMA), sustainability of the fishery, and relevant details regarding the fisheries management frameworks. Participants also noted that risk factors for IUU fishing are not static; periodic risk reviews will need to be built into the program. Additional flexibility to add new and emerging trends or incidents of IUU fishing, e.g., the recent reporting from *The Outlaw Ocean Project* regarding the squid fishery on the high seas off the Pacific coast of South America, would make the program more adaptive and dynamic.

Workshop participants also highlighted that these broader risks are already being considered by several different U.S. agencies, as well as by other countries' trade tracking programs. Participants suggested that NOAA Fisheries could use information on IUU fishing risks collected by other seafood trade monitoring programs, (e.g. Tuna Tracking and Verification Program; Antarctic Marine Living Resources Program; and Atlantic Highly Migratory Species International Trade Program); other regulatory programs (e.g. Marine Mammal Protection Act; High Seas Driftnet Moratorium Protection Act; and the State Department's Section 609 Program); other U.S. government programs (e.g. the State Department's annual Trafficking in Persons (TIP) Report; the DOL's annual List of Goods Produced by Child or Forced Labor, and the FDA's Red and Green Lists (i.e., FDA Import Alerts). Additionally, several stakeholders suggested considering the risks with those identified by other international bodies, like international import control programs (e.g., EU carding decisions, the International Labor Organization's (ILO) Indicators of Forced Labor, and RFMO vessel lists). Similarly, information from NGOs and industry could also be used to support improved risk targeting. This would require a regular opportunity for non-government stakeholders to engage with the relevant government agencies.

WORKING TOWARDS PRE-IMPORT SCREENING FOR SEAFOOD PRODUCTS

NOAA Fisheries only audits a small fraction of seafood imports covered by SIMP. NMFS utilizes a random audit process to select entry filings for audit. Import entry filings are randomly selected for audit after the product has entered U.S. commerce. The total number of SIMP entry filings in FY 2020 was 135,911. The SIMP audit team, consisting of six full-time auditors, completed 1,131 audits in FY 2020. This is less than one percent of shipments audited for FY 2020.[26]

Of SIMP audits, 40 percent are identified for noncompliance and the majority of audit fails are for paperwork issues (non-substantive errors) rather than intentional violations of U.S. trade law.[27] It was noted that audits can occur up to two years after entry, which causes a burden on importers and does not prevent IUU fish products from entering the U.S. market because these audits occur long after the product has been sold. Brokers and importers noted that these audits are a burdensome and time-consuming paperwork exercise that do not actually prevent the entry of illegally harvested or fraudulent seafood. At the time of audit, the product being reviewed under question has already entered U.S. supply chains. and potentially reached its final point of sale. Workshop participants from the industry, NGOs, and the U.S. government suggested that if seafood imports were screened for risk and audits were conducted before shipments reach the U.S. border, products of illegally harvested and fraudulent seafood may have a much better chance of being flagged and therefore prevented from entering U.S. commerce. A broker noted that this could better incentivize brokers and importers to submit audit documentation earlier for monetary reasons, as products held at the border cost both brokers and importers.

Several participants discussed the merits of the EU system, which requires importers to submit shipment data 72 hours in advance for frozen seafood and four hours in advance for fresh seafood.[28] This allows EU customs authorities to hold or deny entry of shipments suspected to contain IUU-caught seafood **before** those products have the chance to enter EU commerce. Industry participants, however, noted that adopting this model would require the development of an automated risk screening system to speed up the review and approval process (akin to the FDA's PREDICT tool). A representative from the U.S. fishing industry suggested that such a program should be designed to accommodate existing industry best practices. An automated system like the EU's also requires fully digitized import data. Government stakeholders noted that a pre-import program would require increased coordination between enforcement agencies, particularly between CBP and NOAA OLE.

Forced Labor

ADDING TO THE DEFINITION OF IUU FISHING

The definition of IUU fishing as used in SIMP does not explicitly include seafood caught or processed with human rights violations and/or labor abuses.[29] NOAA Fisheries and other federal agencies have begun to incorporate labor and human rights considerations into other counter-IUU fishing programming such as the 2023 Report to Congress on Improving International Fisheries Management[30] and the National 5-Year Strategy for Combatting Illegal, Unreported, and Unregulated Fishing 2022–2026.[31] However, representatives from the labor and environmental NGOs stressed that the definition of IUU fishing needs to be amended to include seafood caught or processed with forced labor in order to increase enforcement and prosecution of illicit behavior. However, a representative from the seafood industry said that including labor considerations in the IUU fishing definition would make it more difficult for processors, suppliers, and importers to verify the legality of their seafood supply chains.

INCLUDING FORCED LABOR IN SIMP

Representatives from the U.S. government and labor and environmental NGOs suggested two options to improve SIMP's ability to screen for and target risks associated with human rights abuses and forced

labor by adding new KDE requirements to the program. There was discussion around several potential KDEs; adding an attestation to current import documentation; including length of time a vessel is at sea; or stating whether a vessel has Wi-Fi on board and if it is available to workers. A participant from the U.S. Department of State suggested that KDEs related to a vessel's time at sea, the vessel and gear type, and any species harvested, processing location(s), caught, would be most useful. A representative from a labor NGO cautioned that distinguishing between state-imposed and other types of forced labor is important because these two challenges have very different solutions, but suggested a KDE related to Wi-Fi access onboard fishing vessels which could identify both forms. Rather than adding a KDE, a representative from DOL proposed adding an attestation to catch and processing chain of custody documentation to affirm that there is no forced labor occurring onboard the vessel nor in the processing facility. Another participant noted, however, that is already covered by existing laws.

Stakeholders also discussed possibilities of how data and information collected on forced labor in seafood supply chains could be operationalized. A representative from CBP suggested that the Commercial Targeting and Analysis Center (CTAC) and ACE already serve as venues for this. CTAC facilitates data and information collection and sharing across participating agencies to prevent, deter, interdict, and investigate violations of U.S. trade laws.[32] Agencies that do not have enforcement authority, such as DOL and the Department of State could serve to provide relevant labor-related information and communicate to enforcement personnel, including USCG, CBP, the Department of Justice (DOJ), and NOAA OLE. Participants from all sectors stressed the importance of improved communication, data and information sharing, and harmonization across government agencies and international enforcement agencies. NOAA Fisheries representatives made clear that the effort required to collect information on additional KDEs would only be worthwhile if the information were used (as opposed to simply collected) by its partner agencies for enforcement, otherwise it was an additional burden without utility.

CORPORATE RESPONSIBILITY AND DUE DILIGENCE

Industry representatives agreed that combatting forced labor in seafood supply chains is a bipartisan issue; no one wants forced labor in their seafood supply chains. Some stakeholders suggested that there should be an avenue to address forced labor concerns in the fishing industry, but that SIMP may not be the appropriate mechanism to do this. SIMP is administered by NOAA Fisheries; other partner agencies with specific expertise in addressing forced labor and human trafficking would be a more appropriate fit. Some brokers also cautioned that additional KDEs could be more burdensome because of the increase of data and information that would be required to collect. Rather than take the time to comply with new KDEs or attestation requirements, companies may choose to simply send their products to other markets. Other participants suggested that using market power is essential; if other countries, like the EU and Japan, were to use the same KDEs or require the same information inputs, there would be very few other options for exporters. Participants noted that there are several additional traceability programs under development, including in Australia, the Republic of Korea, and possibly in Canada and the United Kingdom. Interoperability will be essential and would further boost market power.

Several importers and processors stressed that they know their seafood supply chains are free of forced labor and human rights abuses because they interact with suppliers and can see working conditions first-hand. However, labor and environmental NGOs highlighted that the investigative reporting by the *Outlaw Ocean Project* shows that seafood produced with labor abuses and human rights violations onboard vessels

and at processing facilities continues to be imported into the United States.[33] This has also been seen in the supply chains of suppliers who claim to engage in responsible sourcing and processing practices.[34] To address this, labor and environmental NGOs proposed implementing mandatory corporate due diligence requirements similar to those required in the EU. **All** companies that do more than $500 million of business in the EU are required to prevent, mitigate, and remedy identified human rights abuses and forced labor in their supply chains.[35]

Enforcement & Compliance ⇄

Workshop participants from all sectors agreed that one of SIMP's primary shortcomings is the lack of **preventing** illegally-caught fish from entering U.S. commerce. The United States imported an estimated $2.4 billion worth of seafood derived from IUU fishing in 2019—nearly 11 percent of total U.S. seafood imports.[36] It was noted that random audits are the only form of enforcement offered through SIMP. These audits can occur on average two to three months and up to two years after a product has already entered U.S. commerce. NGO and industry stakeholders stressed that these audits do little to support SIMP's goal and original mandate to prevent and deter illegally harvested and fraudulent seafood from entering U.S. commerce. A redesigned traceability-based seafood import control program should have real or near -time enforcement capabilities. In addition, several participants noted the importance of information sharing between and amongst governments, particularly in support of enforcement operations. This would require a global and interoperable information sharing system.

Representatives from the domestic fishing and processing industry noted that SIMP's enforcement failures undermine the confidence of American seafood consumers and disadvantage American producers who are subject to stringent fisheries management regulations. However, multiple industry representatives stressed that a successful traceability-based seafood import control program should do more than identify and punish "bad" actors. They highlighted that incentives are also a critical component of compliance. One broker proposed developing a seafood-specific program like CTPAT. Entities who join CTPAT demonstrate that they can provide the highest level of cargo security throughout their supply chain. In return, CTPAT members receive benefits such as a reduced number of CBP examinations, shorter wait times at the border, and eligibility for other U.S. government pilot programs.[37] Some highlighted how this could be like the previously proposed Trusted Trader Program (RIN 0648-BG51). Other industry representatives proposed that NOAA Fisheries could publicly recognize "good" actors, which could improve consumer confidence in products harvested, processed, and/or sold by those companies.

Mixed-Model Approach

MARKET STATE SYNCHRONIZATION

Stakeholders across the government, industry, and NGOs proposed increasing major market state collaboration on import requirements, risk identification and targeting, and capacity building. A U.S. government representative proposed that major market states like the United States, Japan, and the European Union, could improve coordination on import requirements to reduce the burden of duplicative forms and data entry on the seafood industry. Currently, importers that bring their product into multiple markets submit separate forms for each point of entry, many of which require the same or very similar data and information. An importer noted that foreign exporters often are required to learn multiple seafood import systems, which differ widely in data granularity and data submission. One industry representative suggested jointly developing an import monitoring platform or interface that would allow for brokers to input the required KDEs for multiple countries' regulations. This could be facilitated by the United States adopting the EU's catch certificate system which would increase general efficiency and the programs' credibility with industry groups. Furthermore, it could allow the governments of the EU, Japan, and the United States to work together on risk flagging and share the burden of document verification. It was emphasized that IUU fishing is an inherently global issue; the risks in one country's seafood supply chain may mirror those in others. These shared risks could be identified through improved dialogue, coordination, and information-sharing with other countries that have existing or developing seafood trade monitoring programs, such as Australia, the EU, Japan, and South Korea.

ADDING IN A CATCH CERTIFICATE PROGRAM

The EU's approach to combatting IUU fishing is a government-to-government system where governments of importing and exporting nations work together with EU officials to confirm whether seafood products entering the EU were the result of IUU fishing. The EU has a three-pronged regulatory system: (1) a catch certification scheme, (2) a red-yellow-green card process; and (3) penalties for EU citizens engaged in IUU fishing activities. The European Commission identifies EU trading partners with inadequate measures to prevent and deter IUU fishing. The EU assesses a country's legal framework, the fulfilment of flag state obligations to control the activities of flagged vessels, the implementation of conservation and management

measures, regional and multilateral cooperation in fisheries management and enforcement, and market state measures and traceability.[38] Countries with inadequate measures in place are issued a yellow card as a formal warning to improve. If a country fails to improve, they may be issued a red card, which results in an import ban. Nonetheless, NGO, government, and industry workshop participants noted that the EU carding system is not perfect; the European Commission has not issued a yellow or red card to the People's Republic of China, for example, despite clear and obvious violations of the EU's assessment framework.

In addition to the carding system, the EU also uses a catch certificate program. Catch certificates are import documents that must be validated by the flag state to certify that products were caught in compliance with domestic fishing laws, as well as with the appropriate international conservation and management measures.[39] Catch certificates are intended to provide a government-to-government assurance that the seafood is legally harvested. However, a representative from the EU specified that catch certificates only verify information related to the point of harvest and do not verify any intermediary steps in the seafood supply chain. Noting the importance of the harvest event in the seafood supply chain (i.e., the first mile), representatives from environmental NGOs suggested that NOAA Fisheries could include a new government-to-government certification in the next version of SIMP. However, others cautioned that government-to-government certifications should be combined with additional due diligence and data reporting requirements for industry. It is important to note that the EU's system does not cover farmed fish products. Aquaculture and farmed fish—especially shrimp—are an important component of SIMP. Ensuring traceability for these products will only become more important as demand and supply for farmed fish grows.

Public Engagement

Workshop participants repeatedly stressed that SIMP lacks transparency and accountability to the public. This reduces trust between NOAA Fisheries and relevant stakeholders in the seafood industry, and NGOs. As originally envisioned by the 2015 Task Force, SIMP was created to enhance collaboration with interested stakeholders on specific IUU fishing and seafood fraud concerns including through an annual, public, in-person forum of interested stakeholders and the creation of a public web portal to relevant information held by agencies.[42] This was to be complemented by annual progress reports. Environmental NGO groups noted that, since the inception of the SIMP, NOAA Fisheries has published only two of the required Reports to Congress (2021 and 2022). It was highlighted that more information from NOAA Fisheries is needed to demonstrate the effectiveness of the program and its enforcement actions to interested stakeholders.

Industry and NGO groups also agreed that transparency is a powerful tool to deter would-be bad actors and suggested NOAA Fisheries adopt a more aggressive "name and shame" campaign. A broker suggested that audits could be shared publicly; clean audits could be announced as an incentive, and failed audits listed as a warning. Several industry and NGO representatives suggested that CBP and NOAA Fisheries communicate enforcement actions beyond press releases, to include investigations and penalties. Noting that CBP does not publicize penalties, a representative of the U.S. fishing and processing industry proposed SIMP could model the Uyghur Forced Labor Prevention Act (UFLPA), which has a live dashboard that shows the percentage of shipments detained, where they were imported from, and their ultimate destination.

Next Steps

This workshop was the first in a two-workshop series. This first workshop included more than 70 stakeholders representing the seafood industry, seafood brokers, a cross section of relevant government agencies, and both environmental and labor NGOs. It was designed to illicit thoughtful discourse and "blue sky" thinking on "Rethinking the Future of the Seafood Import Monitoring Program." The workshop focused on **what** is needed for a successful seafood traceability-based import control program designed to combat IUU fishing, seafood fraud and labor and human rights abuses. The next workshop, on May 13–14, 2024, will be dedicated to exploring **how** to implement and operationalize the ideas described in this first workshop.

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