

Oppose SIMP Expansion (H.R. 3075)

- Customs Brokers and Forwarders handle about 97% of all import transactions and almost the same amount of export transactions with Customs and Border Protection (CBP) and approximately fifty (50) additional partner government agencies (PGAs).
- The U.S. government licenses NCBFAA members who undergo continuing education to support compliance with U.S. laws and data requirements.
- The Seafood Import Monitoring Program (SIMP) already exists and is a well-intentioned program to deter illegal, unreported and unregulated fishing by collecting more data upon import than any other program, yet it is ineffective in stopping IUU shipments.
- NOAA administers the program and has stated that expansion of the SIMP is not the answer.
- H.R. 3075 calls for a significant expansion of SIMP to cover all seafood imports and collect certificates verified by a third party at every transfer point of the seafood at least 72 hours in advance of every single entry. It further widens NOAA's mission by requiring data on labor conditions in the harvest and processing of seafood.
- There is no "certifying" third party in the high seas and it is not clear what these certifiers would be certifying; there is no comparable requirement in any other country.
- The data elements to be entered on a typical shipment that contains fish from 10 or more supply chains – with dozens of harvest events in each supply chain and each chain having anywhere from 10 to 50 participants, the number of data elements would be exponentially higher – potentially 10,000 or more per entry.
- The CBP data system does not have the capability to handle all the data elements currently being submitted and has frequent "down time" causing supply chain delays.
- H.R. 3075's proposal for 72-hour prior notification would lead to delays and further report backups and would be impossible for fresh catches.
- NOAA has implemented a new initiative – the CALM Cs – to build public-private partnerships collaborating on efforts to end forced labor and improve working conditions in seafood supplies.
- We encourage engagement with the trade community versus the mandates of H.R. 3075.



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