

December 13, 2021

Dear Senator/Representative,

We, the undersigned scientists and researchers, call for federal action on illegal, unreported, and unregulated (IUU) fishing, seafood fraud, and human rights abuses in the seafood industry. IUU fishing threatens the sustainability of fisheries, the livelihoods of fishers internationally, and the well-being of workers in the industry. As concerned scientists, we are insisting that measures be undertaken to address these issues across the seafood supply chain.

IUU fishing and human rights abuses like forced labor and human trafficking often occur in tandem due to unsustainable fishing practices that push fishing vessels further out to sea for longer time periods. As distant-water fishing results in higher costs for vessel operators who must go further out and remain at sea longer to achieve a sizeable catch, some fishing companies rely on forced labor and other human rights abuses while utilizing fishing practices that overexploit distant fish stocks. The interconnected issues of IUU fishing and human rights violations demand the United States take action to ensure that only safe, legally caught, responsibly sourced, and honestly labeled seafood is imported into our domestic market. The human rights abuses prevalent in the seafood sector make it clear that the United States needs to build in labor protections for those working at every stage in the seafood supply chain.

Not only are IUU fishing and human rights abuses linked, but seafood fraud further weakens the integrity of the seafood supply chain. Seafood fraud is a rampant issue - a [2019 Oceana report](#) found one in five seafood products tested at U.S. grocery stores, restaurants, and sushi bars were mislabeled and swapped for a different fish species. And globally, [1 in 5 seafood tested worldwide](#) was mislabeled in more than 200 seafood fraud investigations. This practice requires action by the United States government to protect consumers and fish stocks as species substitutes hide the true origins of the fish.

As scientists, we urge the United States to expand transparency of the seafood supply chain from boat to plate by establishing stronger import controls and monitoring for IUU fishing, seafood fraud, and human rights abuses. Following the work of the Presidential Task Force on Combating IUU Fishing and Seafood Fraud, which led to the establishment of the Seafood Import Monitoring Program (SIMP) in 2016, the Biden-Harris Administration has an opportunity to lead in the fight against IUU fishing, seafood fraud, and human rights abuses. SIMP requires documentation and traceability for 13 types of species and species groups determined to be at risk of illegal fishing and seafood fraud from fishing vessel or farm to importation at the U.S. border. Although a step forward for combatting illegal fishing and seafood fraud in imports, SIMP excludes many species that account for approximately 60% of the volume of imports and does not require traceability from the point of import to the final point of sale, resulting in significant gaps in SIMP's traceability requirements. The 2019 Oceana report found that after SIMP's implementation, seafood fraud persisted for species not covered by the program, indicating that the gaps allow for fraudulent practices to continue.

We endorse the expansion of the catch documentation and traceability requirements in SIMP to all seafood species sold in the United States and extend traceability requirements throughout the entire supply chain from boat or farm to plate. Lack of strong traceability requirements allows products of IUU fishing and fraudulent seafood to slip into the domestic market. SIMP's limited scope means that products caught using IUU fishing practices and forced labor abuses will continue to enter the United States unless SIMP is expanded to all species and ensures full supply chain traceability, as well as improved program implementation. By building in lessons learned in traceability and transparency from

the first years of SIMP, expanding SIMP's species and supply chain coverage, better utilizing existing technology, and addressing forced labor and other human rights abuses in our import controls, the United States can be a global leader in the fight against IUU fishing, seafood fraud, and forced labor in the seafood industry.

The United States should likewise build upon the foundation of existing monitoring technology to support traceability and transparency efforts. Devices already in place on many fishing vessels like automatic identification systems (AIS) can serve to expand transparency at sea once required for all United States fishing vessels. The intended use of AIS is to transmit vessel locations in regular intervals to prevent collisions at sea, yet the system has utility beyond vessel safety. AIS allows the tracking of foreign and domestic vessels during their fishing excursions, making their fishing activity transparent and in effect deterring illegal fishing practices. By expanding transparency of U.S. fishing vessels, the U.S. can demand transparency as a condition of import, allowing the government to identify the high-risk shipments for increased inspections, audits, and enforcement actions. As U.S. vessels can turn off AIS tracking at will, mandatory AIS requirements are a necessary condition for traceability and transparency in the global seafood supply chain.

We ask that the federal agencies support regulatory and congressional action that combat IUU fishing, seafood fraud, and human rights abuses in seafood by taking strong and immediate action on extended regulation, monitoring, and enforcement in the United States. Only by thoroughly addressing these interrelated issues can we protect our oceans and the people dependent on them. Thank you for your consideration and attention to these important issues.

Sincerely,

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