Magnuson-Stevens Fishery Conservation and Management Act; Seafood Import Monitoring Program

To the Members of the National Ocean Council Committee on IUU Fishing and Seafood Fraud

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INTRODUCTION
Thank you for the opportunity to comment on the proposed Seafood Import Monitoring Program. The Global Food Traceability Center (GFTC) is pleased to provide its comments on the seafood import monitoring program. This briefing is one of a series of commentaries that the GFTC has delivered to the Presidential Task Force on Combating Illegal, Unreported, and Unregulated (IUU) Fishing and Seafood Fraud and to the National Ocean Council (NOC) Committee.

GFTC (www.globalfoodtraceability.org) is a science-based, non-profit initiative within the Institute of Food Technologists (IFT) which focuses on providing research insights, education and training, as well as pragmatic guidance on food traceability. It is the global resource and authoritative voice on food traceability.

In 2014 and 2015, the GFTC undertook a project on behalf of seafood stakeholders to examine the importance and impact of traceability as a means for the industry to more effectively manage the dramatically changing nature of its business. This year-long research study provided the foundation for our previous comments to the Presidential Task Force and NOC Committee.

The GFTC has continued to advance on its study of seafood traceability, embarking on a broad international project to design a common ‘technology architecture’ or blueprint for a global, interoperable seafood traceability system. Early findings from that project help to inform this briefing.

GFTC COMMENTS
GFTC supports the inclusion of all seafood within this monitoring program thereby reducing redundant and sometimes conflicting requirements for stakeholders that handle multiple types of seafood. We also request that the requirements set forth under this proposed rule be aligned with the additional record-keeping requirements for food traceability being developed by the U.S. Food and Drug Administration under Section 204 of the Food Safety Modernization Act.

We commend the Committee on proposing the implementation of an electronic reporting mechanism through the single window International Trade Data System for the purposes of collecting recordkeeping information. Due to the large amount of data that flows through global seafood supply chains, moving to an electronic data management system will eventually reduce costs and improve reliability of data for the industry as well as regulatory agencies. At the same time, provision of adequate data during import should not imply legality of catch. Verification processes need to be enforced to ensure validity of the data through rigorous inspections, audits and data analytics. As technology evolves, there may be new and novel methodologies for verification of data as well as authentication of foods. An iterative approach to incorporating these advances in software and hardware technologies will ensure cost and operational effectiveness when dealing with eliminating IUU fishing.
We also agree with the proposal to implement a Trusted Trader Program to help businesses that are already doing the right thing to gain access to the US market more efficiently. A tiered and targeted approach with increasing ease of access based on historical performance and availability of reliable and verifiable data will urge the industry baseline traceability capabilities to improve overtime and make significant strides in enhancing electronic track and trace.

To address the issue of data availability, reliability and validity, GFTC published an Issues Brief in the Comprehensive Reviews for Food Science and Food Safety that outlines the current barriers and challenges to achieving global interoperable business to business traceability. One of the key barriers identified in the brief is the need for capacity building and training in traceability best practices for small and mid-sized enterprises (SMEs) that need to improve their traceability performance in order to comply with the spirit of the regulations being proposed by the Committee. We urge the Committee to consider providing resources, guidance, training and relevant support structures including enough time for such SMEs to comply with the new rules. More information about this publication can be found at http://onlinelibrary.wiley.com/doi/10.1111/1541-4337.12187/pdf.

GFTC, among other organizations, has made significant progress in bringing together key stakeholders to address and remove any barriers to improved traceability in the global seafood supply chain. While harmonization across jurisdictions should be the ultimate goal, alignment of key data elements for the purpose of traceability is achievable and desired by all stakeholders today. The Global Food Traceability Center welcomes the opportunity to serve and assist the food industry and governments in moving seafood traceability forward.

About IFT
Since 1939, the Institute of Food Technologists (IFT) has been committed to advancing the science of food. Our non-profit scientific society—more than 17,000 members from more than 100 countries—brings together food scientists, technologists and related professionals from academia, government and industry. For more information, please visit http://www.ift.org.

About the Global Food Traceability Center
The GFTC is a public-private partnership program within IFT that was created for the express purpose of being the global resource and authoritative voice on food traceability. Its mission is to serve all parts of the food system by providing applied research, objective advice, and practical expertise about data collaboration and food product traceability for the purposes of business benefit and public good. For more information, please visit http://www.globalfoodtraceability.org.