



Comment on Executive Order: Restoring American Seafood Competitiveness

October 14, 2025

Re: Executive Order 14276 on [Restoring American Seafood Competitiveness](#)

Submitted to nmfs.seafoodstrategy@noaa.gov.

The Institute of Food Technologists (IFT) and the Global Food Traceability Center (GFTC)

The Institute of Food Technologists (IFT) commends NOAA on its efforts to restore American seafood competitiveness. With many components across disciplines and stakeholders to consider, IFT is grateful for the opportunity to provide comments, elevating the expertise of our community. IFT is a global organization of ~10,000 members committed to working across food science and food systems. IFT's Global Food Traceability Center (GFTC) provides stakeholders with resources, standards, and vision to improve food safety, reduce risk, and strengthen supply chains through enhanced traceability. Together, IFT and the GFTC believe science is essential to ensuring a food supply that is sustainable, safe, nutritious, and accessible to all.

IFT has a long history of supporting federal agencies in advancing science-driven policy, including core advisory work on the Food Safety Modernization Act (FSMA) and the publication of widely cited traceability guidance. Since its launch in 2013, the GFTC has co-convened the Global Dialogue on Seafood Traceability (GDST), engaged hundreds of stakeholders across seafood supply chains, and developed actionable Critical Tracking Event (CTE) and Key Data Element (KDE) matrices to support digital traceability adoption. The GFTC continues to advance the science and practice of traceability, recently publishing the Tech-Enabled Traceability Insights Report¹ based on the FDA's Low- or No-Cost Traceability Challenge in May 2023. These efforts position IFT and the GFTC as

¹ IFT. 2023. IFT's Tech-Enabled Traceability Insights Report Based on the FDA's Low- or No-Cost Traceability Challenge. Available from: <https://www.ift.org/gftc/research-and-resources/tech-enabled-traceability-report>



trusted partners in implementing modernized, interoperable traceability systems that balance regulatory, scientific, and industry needs.

Executive Summary

Restoring America's seafood competitiveness requires not only sound fisheries management but also a modernization of how data is collected, shared, and used across agencies and supply chains. Global competitors are already moving in this direction: in February 2025, Indonesia – the world's leading seafood-producing nation – announced that its government fishery platform would align with the GDST standard². To remain competitive in international markets, NOAA must take similar steps to ensure US fisheries keep pace.

IFT recommends placing event-based traceability at the core of fishery data collection. This approach centers on the capture of Critical Tracking Events (CTEs) and Key Data Elements (KDEs), systematically recording the “who, what, when, and where” at each stage of the supply chain. By adopting this model, NOAA can generate a more reliable, real-time picture of American fisheries while reducing duplication, lowering compliance burden, and strengthening both management and market confidence.

IFT-GFTC's core recommendations to NOAA include:

- (1) Publish a CTE/KDE matrix that is aligned with the Global Dialogue on Seafood Traceability (GDST) standards and explicitly outlines which supply chain actor is responsible for each data capture.
- (2) Definitions and identifiers—such as vessel, trip, lot/batch, and transformation events—should be aligned with FDA's Food Traceability Rule and GDST practices. Harmonizing these core elements across regulatory agencies will prevent redundant collection, speed analytics, and enable a single stream of data to serve regulatory, scientific, and market needs simultaneously.

By embracing event-based traceability principles, NOAA can significantly reduce regulatory burden, enhance enforcement through fraud detection, and establish an organized, interoperable database of fisheries data. IFT believes adopting this framework is

² GDST. 2025. Indonesia Leading the Way in GDST Standard Adoption. Available from: <https://thegdst.org/indonesia-leading-the-way-in-gdst-standard-adoption/>



key for strengthening science-based fishery management, and for positioning American seafood businesses as competitive players in global markets where digitization is rapidly becoming the standard.

Comments on NOAA's Priority Issues

To support NOAA's effort to modernize fisheries management and science, IFT provides the following comments on the specific issues outlined in the request for information.

1. Regulations that govern fishing activities that may be suspended, revised, or rescinded:

NOAA should eliminate redundant submissions reporting by aligning traceability submission requirements with an event-based structure, using GDST as a guide. Static forms should be replaced with CTE/KDE matrices covering all segments of the supply chain (i.e. harvest, landing, shipping, receiving, transformation, and transshipment events) that clarify data collection/submission responsibilities by role (fisher, trader, processor, importer, etc.). These matrices would improve data quality, reduce duplicative data submission requirements, and ensure accountability across the supply chain. This would enable a "capture once, share many" model where data provided by industry could be shared seamlessly across NOAA, FDA, USDA, and CBP, reducing paperwork while preserving compliance.

2. Challenges specific fisheries are facing, suggestions for innovative improvements, and examples of existing federal fishery regulations that could be modified to enhance U.S. fishing businesses:

Many American fisheries face persistent challenges with data collection and reporting that limit efficiency and competitiveness. Industry stakeholders regularly cite "portal fatigue" from duplicative, misaligned reporting requirements across agencies, as well as barriers to digitization at the first mile due to connectivity issues, device costs, and limited training. Notably, these obstacles disproportionately affect small vessels and dealers, decreasing their capacity for compliance.

Innovative improvements should focus on shifting from static, form-based reporting to an event-based model anchored in standardized CTE/KDEs (as described in comment #1). When paired with consistent identifiers, such as trip IDs and lot IDs, traceability data can



be maintained across the entire supply chain, reducing data gaps and enabling real-time insights. To make this approach practical for all fleets, NOAA should encourage the development and deployment of low- or no-cost first-mile data capture technologies that can comply with common data standards. Prioritizing interoperability over mandating single-vendor solutions will allow industry participants to meet multiple regulatory and market requirements with one data stream and use the solution that best fits their needs.

To support this transition, federal requirements that mandate static, form-based reporting should be revised to accept event-based submissions. The FDA's Product Tracing System provides a useful model, as it accepts multiple data formats and converts them into EPCIS files for analysis. Aligning data elements with FDA's Food Traceability Rule wherever feasible would further support harmonization across federal agencies. By streamlining processes and adopting consistent definitions across agencies, NOAA can reduce reporting burden, improve compliance, and position American fishing businesses to compete in global markets where digital traceability is increasingly the norm.

3. Ways to improve fisheries management and science, including:

- **How can less expensive and more reliable technologies and cooperative research be used to support fisheries assessments?**

Less expensive and more reliable technologies can strengthen fisheries assessments when they are fit-for-purpose and reflect system goals, available infrastructure, and local context. NOAA should prioritize solutions that meet the practical needs of fishers and dealers while delivering data in formats that regulators, scientists, and buyers can readily use. Technologies should be built on common data standards and designed for interoperable exchange, so a single stream of information can serve compliance, scientific, recall, and market purposes. This will reduce the technology and administrative burden on data collectors, improve assessment data, and ultimately accelerate adoption across fisheries.

- **How can NOAA Fisheries modernize data collection and analytical practices to improve the responsiveness of fisheries management to real-time ocean conditions?**

NOAA can modernize data collection and analysis by adopting interoperable technologies that enable data to move seamlessly across fleets, regulators, and markets. By capturing



information at the fishing level and transmitting it digitally, NOAA can build a more accurate, near real-time picture of activity on the water. Event-based fishing and traceability data in standardized formats will allow regulators to integrate harvest, bycatch, vessel data and environmental observations quickly into analytical systems. This would enable management decisions to reflect current ocean conditions rather than relying on delayed or incomplete reports.

- **What types of data, forecasting tools, or information products are most needed by U.S. fishing businesses to adapt their operations effectively to changing economic and/or environmental conditions and maintain access to fishery resources, and how can NOAA Fisheries best support the development and dissemination of such resources?**

Traceability data is the backbone of sustainability and should be prioritized as the core data stream US fishing businesses need to adapt to changing conditions. Event-based traceability records – capturing when, where, and how fish are harvested, landed, and sold – can provide regulators and industry with near real-time insight into fishing effort and stock status. When consistently collected and standardized, these data not only strengthen compliance but also feed directly into stock assessments and forecasting models, allowing businesses to adjust operations in response to shifting environmental or market dynamics. To maximize value, NOAA should invest in the development of interoperable systems that allow traceability data to serve multiple purposes at once: compliance reporting, science inputs, and business decision support.

4. How to expand exempted fishing permit programs to promote fishing opportunities nationwide:

EFP programs could be expanded to serve as pilots for traceability innovation. By allowing fishers to test different methods of collecting traceability data – whether it be paper records, mobile apps, or other digital tools – NOAA and industry can identify which approaches are most practical and effective. These pilots would provide valuable insight into how event-based data can be integrated into fishing operations with minimal burden, while generating lessons that could inform broader adoption of standardized CTE/KDE requirements in the future. EFP programs also provide a valuable opportunity for fishers to test new technologies outside of their normal operations, when trialing new processes can otherwise be burdensome.



Conclusion

IFT appreciates the opportunity to provide input on this important initiative. We view the effort to restore America's seafood competitiveness as a critical step toward strengthening both US fisheries and global market position. NOAA can draw on advice from IFT's Checklist for Governments³, developed in partnership with FishWise to support governments in designing and implementing lasting and scalable traceability systems in their seafood sectors. Event-based traceability offers a practical and forward-looking foundation for achieving these goals, and IFT stands ready to partner with NOAA Fisheries, industry, and other stakeholders to support implementation.

Thank you for considering our comments. Please contact Blake Harris, IFT-GFTC's Managing Director (bharris@ift.org), or Anna Rosales, IFT's Vice President of Science and Policy (arosales@ift.org) if IFT-GFTC can be of further assistance.

³ Seafood Alliance for Legality & Traceability, IFT-GFTC. 2022. Checklist for Governments: Lasting & Scalable Seafood Traceability. Available from: https://media.salttraceability.org/wpcontent/uploads/2022/12/09143734/Final_Checklist_for_Governments_SALT_12_9_22.pdf