



USA: New requirements for the export of some fish species to the USA (2017-10)

Date of issue: 1 December 2017

Date of effect: 1 January 2018

Attention:

Seafood Export Consultative Committee

Export establishments (including vessels) preparing fish and fish products for export to the USA

Licensed exporters

Department of Agriculture and Water Resources—Central and Regional offices

Purpose

To notify exporters of advice from the United States National Oceanic and Atmospheric Administration (NOAA Fisheries) of new requirements for documentation when exporting some species of fish to the USA.

Summary of key points

- The United States of America (USA) has implemented a Seafood Import Monitoring Program (SIM) to be administered by NOAA Fisheries to curb Illegal, Unreported and Unregulated (IUU) fishing practices and identify misrepresented seafood imports before they enter the US Market.
- The SIM program requires importers to provide information and maintain records about the harvest, landing and chain of custody of imported fish and fish products for certain priority species identified as especially vulnerable to IUU fishing and seafood fraud.
- As of 1 January 2018, exports of some species of fish to the USA will need to be accompanied by additional information to enable importers to report and maintain the required records.
- This additional information is required for some but not all products prepared from priority species and includes live, chilled, frozen and some highly processed products but not all (i.e. canned tuna is included but not fish oil, fish cakes or fish balls prepared from tuna).
- Of the priority species included in the SIM program, the species listed are fished from Australian waters and additional information will be required to be provided to gain entry of product to the US:
 - Tunas: Albacore, Bigeye, Skipjack, Yellowfin and Bluefin
 - Sea Cucumbers (all species)
 - Swordfish *Xiphias gladius*
 - Dolphinfish (Mahi Mahi) *Coryphaena spp.*
 - Groupers (Rockcods and Coral Trouts)

- Snappers (Lutjanidae)
- Sharks (all species)
- The species listed are not fished from Australian waters and additional information will only be required if imported into and used in Australia to prepare chilled, frozen dried, salted or smoked fish products for export to the US:
 - Atlantic Cod / Pacific Cod / Northern Cods (*Gadus spp.* including *G. morhua*, *G. ogac*, *G. microcephalus*)
 - Atlantic Blue Crabs (*Callinectes spp.* including *C. apidus*)
 - Red King Crabs (*Paralithodes spp.* including *P. camtschaticus*)
 - Red Snapper (*Lutjanus campechanus*)

If not all fish species or fish products are included, how do I know if I need to provide additional information?

Exporters are strongly encouraged to confirm the requirement for additional information with their importers. A table of priority species fished in Australia as identified in EXDOC including the corresponding 3-Alpha species codes required by US importers is provided at **Attachment 1**. A full list of priority species is available at: www.iuufishing.noaa.gov.

What additional information is required and when do I need to provide it?

There are two parts to the information that needs to be provided to the importer or broker:

1. Harvest and landing information that must be provided to the importer so it can be reported electronically at the time of import. Examples of this information are provided as **Attachments 2 and 3**.
2. Further chain of custody / traceability records that must be provided to the importer and retained by them for two years. These records are subject to audit by NOAA Fisheries. Examples of this information are provided as **Attachments 4 and 5**.

Do I need to use the forms provided as attachments?

No, the forms at **Attachments 2 through 5** are based on examples provided by NOAA and used here to illustrate the types of information required to be provided. You can use your existing documentation if it includes all required information, revise your existing documentation or create your own documents or processes for providing the required information to your importer.

How do I obtain information about the harvesting or transshipment of the fish that I receive and process?

Not all exporters or processors are involved in the fish supply chain from the point of harvest or capture through processing to export. If you are receiving fish that you may process for export to the US you will need to obtain the required information from your suppliers. **Attachments 1 and 2** will assist you in identifying any additional information required to be obtained.

Will fish from every harvest or catch need to be segregated through processing and shipment?

No, while information about each harvest and each unload of catch is required to be reported separately, processed product can be comprised of fish from more than one harvest or unload.

Each harvest or landing of catch is to be identified by a unique catch document number. This number may be an existing unique number (i.e. vessel log book number, transfer certificate number) or one used by the initial purchaser.

Product processed from combined harvests or unloads is required to identify the source of the products processed by documenting the catch document numbers that contributed to the processed lot. The quantity contributed from each individual harvest or unload is not required.

This information is required as of 1 January 2018, when should I start collecting information?

If you intend to export product to the US after 1 January 2018 that has been prepared from product being harvested or processed prior to that date – you should start to obtain records in preparation for export from your harvesters, processors and shippers.

I already collect this information for fish I export to the EU, how is this different? Can I use the same forms?

The EU require copies of Catch Certificates signed by the State or Commonwealth authority responsible for managing the fishery applicable to the fish for export. The US requirements are essentially the same, but it is the information that is required, not a document verified by a specified authority.

The majority of information required for export of fish to the EU is the same as for the US, with the exception of the US requirement to provide details of the fishing gear used to wild harvest (see table at **Attachment 2**). If this additional information is added to existing EU documentation – the same document can be used to identify harvest vessels.

Is there anything else I need to do?

Much of the responsibility for reporting and retaining information under the SIM Program sits with the importer or their broker who will enter the information you provide into the International Trade Data System (ITDS). To access this system, your importer needs to hold a current International Fisheries Trade Permit (IFTP). As these permits are only available to US residents – this may be via a Broker or agent.

It is strongly suggested that you contact your importer prior to 1 January 2018 to confirm their access to the system and the form in which you will be providing the required information.

Attachments

The attachments are provided to assist in identifying and meeting requirements for providing the required additional information.

Templates are examples only and exporters are encouraged to combine or modify to meet the recording needs of their specific fish products.

Identifying priority species, product types and associated species codes

Attachment 1: Table of EXDOC Product Codes and FAO 3-Alpha species codes

This table can be used to identify fish products that require additional information to be provided to the importer and the associated species codes. As many of the fish species identified by the US as priority species are not exported from Australia, only fish products available through the department's EXDOC system have been identified.

Information required to be collected when landing or harvesting priority species that may undergo primary or secondary reprocessing for export to the US

Attachment 2: Catch Certificate for Traceability – Harvest and landing receipt

This form may be completed for all catches of priority species that may be exported to the US when sourced from an aquaculture facility or a single vessel unloading to shore or a dock.

Attachment 3: Aggregated Catch Certificate for Traceability – Harvest and landing receipt

This form may be completed when unloads from multiple vessels that are all less than 12 metres in length or less than 20 gross tons in weight are consolidated on landing to shore.

Can also be used for aquaculture product received at a single collection point in a single day from multiple small scale aquaculture facilities when each facility delivers less than 1000 kilograms in total on that day.

Note: if multiple small vessels unload to a single larger vessel which then unloads to shore, this is recorded on the form at **Attachment 2**.

Information to be collected when processing landed or harvested fish for export to the US

Attachment 4: Reprocessing Certificate for Traceability – Primary or secondary processing

This form may be completed when packing or processing landed or harvested fish for export to the US. Received lots can be mingled during processing but input must be identified by the Catch Document Identifiers unique to each harvest event.

Information to be collected when fish for export to the US are stored or transhipped by vessel prior to or following harvest or unload.

Attachment 5: Transhipping Certificate for Traceability

Background

The U.S. will use the existing International Trade Data System to collect seafood catch and landing documentation for the priority seafood species. This data system is the U.S. government's data portal for all imports and exports. Information collected through this program is confidential and will not be available to consumers.

January 1 2018, is the mandatory compliance date for most priority species listed in the rule. Due to gaps in availability of information regarding U.S. farmed shrimp and abalone, implementation for these species will be effective at a later date.

For additional information see: [Seafood Import Monitoring Program](#)

The information provided in this advice is current at the time of writing and is intended for use as guidance only and should not be taken as definitive or exhaustive. The Commonwealth endeavours to keep information current and accurate, however, it may be subject to change without notice.

Exporters are encouraged to verify these details with their importers prior to undertaking production/exports. The Commonwealth will not accept liability for any loss resulting from reliance on information contained in this notice.

Further information

Contact dairyeggfish@agriculture.gov.au if you have any queries.

Attachment 1

Product types included:

Tunas—Chilled, frozen, whole, headed and gutted, gilled and gutted, portions, in airtight containers (foil, flexible or other), in oil or not in oil

Sea Cucumbers—Live, chilled, frozen, salted, dried or in brine

Swordfish, Mahi Mahi, Snappers & Groupers—Chilled, frozen, whole, headed and gutted, gilled and gutted, portions, fillets

Sharks—Chilled, frozen, whole, headed and gutted, gilled and gutted, portions, fillets – includes fins

EXDOC Product Type	Fish name	Scientific name	3-Alpha code
ALB	Tuna - Albacore	<i>Thunnus alalunga</i>	ALB
TNB	Tuna - Bigeye	<i>Thunnus obesus</i>	BET
NBT	Tuna - Northern Bluefin	<i>Thunnus orientalis</i>	PBF
TSB	Tuna - Southern Bluefin	<i>Thunnus maccoyii</i>	SBF
TNS	Tuna - Skipjack	<i>Katsuwonus pelamis</i>	SKJ
TNY	Tuna - Yellowfin	<i>Thunus albacares</i>	YFT
FBD / IMP	Tuna, processed	<i>Thunnini</i>	TUN
SWF	Swordfish	<i>Xiphias gladius</i>	SWO
MAH	Mahi Mahi	<i>Coryphaena hippurus</i>	DOL
SEP	Snapper - Tropical	<i>Lutjanidae spp.</i>	SNX
GSN	Snapper Golden	<i>Lutjanus johnii</i>	SNX
CSP	Snapper - Crimson	<i>Lutjanus erythropterus</i>	SNX
MSP	Snapper - Moses'	<i>Lutjanus russelli & Lutjanus sp.</i>	SNX
SSP	Snapper - Stripey	<i>Lutjanus carponotatus</i>	SNX
SES	Snapper - Saddletail	<i>Lutjanus malabaricus</i>	SNX
EPR	Emperor - Red	<i>Lutjanus sebae</i>	SNX
RDS	Red Bass	<i>Lutjanus bohar</i>	SNX
BDM	Sea Cucumbers	<i>Species of families Holothuriidae</i>	WBX
BDM	Sea Cucumbers	<i>Species of families Stichopodidae</i>	CUX
BWR	Deepwater Redfish (Sea Cucumber)	<i>Actinopyga echinites</i>	KUE
BSF	Stonefish (Sea Cucumber)	<i>Actinopyga lecanora</i>	YVV
BDU	Surf Redfish (Sea Cucumber)	<i>Actinopyga mauritiana</i>	KUY

EXDOC Product Type	Fish name	Scientific name	3-Alpha code
BBB	Blackfish (Sea Cucumber)	<i>Actinopyga miliaris</i>	KUQ
BBF	Burrowing Blackfish (Sea cucumber)	<i>Actinopyga spinea</i>	YGS
BTF	Leopardfish (Sea Cucumber)	<i>Bohadschia argus</i>	KUW
BBS	Brown Sandfish (Sea Cucumber)	<i>Bohadschia vitiensis</i>	BDV
BCH	Chalkfish (Sea Cucumber)	<i>Bohadschia marmorata</i>	KUH
BDB	Oval Blackfish (Sea cucumber)	<i>Cucumaria frondosa</i>	KHG
BDL	Lollyfish (Sea Cucumber)	<i>Holothuria atra</i>	HFA
BBP	Pinkfish (Sea Cucumber)	<i>Holothuria edulis</i>	HFE
BDW	White Teatfish (Sea Cucumber)	<i>Holothuria fuscogilva</i>	HFF
BET	Elephants' Trunkfish (Sea Cucumber)	<i>Holothuria fuscopunctata</i>	HOZ
BDG	Golden Sandfish (Sea Cucumber)	<i>Holothuria lessoni</i>	JCO
BDS	Sandfish (Sea Cucumber)	<i>Holothuria scabra</i>	HFC
BDA	Black Teatfish (Sea cucumber)	<i>Holothuria whitmaei</i>	JDG
BLF	Blackspotted Sea Cucumber	<i>Pearsonothuria graeffei</i>	EHV
BGF	Greenfish (Sea Cucumber)	<i>Stichopus chloronotus</i>	JCC
BCU	Curryfish (Sea cucumber)	<i>Stichopus herrmanni</i>	JNG
BDP	Prickly Redfish (Sea Cucumber)	<i>Thelenota ananas</i>	TFQ
BAM	Amberfish (Sea Cucumber)	<i>Thelenota anax</i>	HLX
BBC	Deepwater Blackfish (Sea Cucumber)	<i>Actinopyga palauensis</i>	YGP
BRC	Rockcod - Bar	<i>Epinephelus spp.</i>	Refer to species list at: www.iuufishing.noaa.gov
BWC	Rockcod - Birdwire	<i>Epinephelus merra</i>	EER
BTC	Rockcod - Blacktip	<i>Epinephelus fasciatus</i>	EEA
ERC	Rockcod - Goldspotted	<i>Epinephelus coioides</i>	ENI
HRC	Rockcod - Longfin	<i>Epinephelus quoyanus</i>	EFQ
MRC	Rockcod - Maori	<i>Epinephelus undulatostratus</i>	EIU
YSR	Rockcod - Yellowspotted	<i>Epinephelus areolatus</i>	EPR
CTR	Trout - Coral	<i>Plectropomus & Variola spp.</i>	Refer to species list at: www.iuufishing.noaa.gov
RCC	Rockcod	<i>Aethaloperca, Anyperodon spp.</i>	Refer to species list at: www.iuufishing.noaa.gov
SHK	Shark	<i>Chondrichthyes</i>	Refer to species list at: www.iuufishing.noaa.gov

Attachment 2

The information in this form is required **to be provided to the importer to enable entry of exported product into the US**. It is intended to provide details of the unique harvest event that provided the raw materials of the fish product being exported and is required for fish products prepared at registered establishments in Australia, including products prepared from imported fish of priority species.

Model Catch Certificate for Traceability - Harvest and landing/receipt		
(1) Unique Catch or Production Document Identifier <i>(Unique number used to identify the harvest event)</i>	() Wild capture fishery (Complete section 2) () Farm raised (Complete section 3)	
(2) Complete this section for wild capture fish products		
Flag State of vessel: <i>(Country where vessel is registered)</i>	Name of harvesting vessel	Vessel registration or documentation number: <i>(IMO/Lloyd's no. or radio call sign or AMSA 6 digit registration no.*)</i>
Fishing permit number: <i>(Fishing licence no. issued by the relevant local authority)</i>	Fishing/catch area: <i>(Catch area code as reported to local authority – or FAO zone**)</i>	Fishing gear: <i>(Gear code as reported to local authority or FAO gear code***)</i>
(3) Complete this section for farm raised fish products		
State of jurisdiction:	Facility License or Authorisation: <i>(Aquaculture licence no. issued by the relevant local authority)</i>	Name & location of aquaculture facility:
(4) Complete this section for receipt of fish products		
Name of recipient, processor or buyer:	Telephone: Email:	Business address
Receiving facility or vessel:	Date of landing/transhipment:	Landing port or delivery location:
Species of fish (ASFIS 3-Alpha code) <i>(See Attachment 1)</i>	Landed or delivered weight (kg)	Product form (i.e. whole, H&G, G&G, fillets)
1		
2		

* In Australia this will be the IMO/Lloyd's number or International Radio call sign or 6-digit registration number as per the AMSA register www.amsa.gov.au/vessels/shipping-registration/australian-general-register/

** www.fao.org/3/a-az126e.pdf

*** Table 6.3.3 www.fao.org/docrep/005/X8923E/X8923E09.htm

Attachment 3

The information in this form is required **to be provided to the importer to enable entry of exported product into the US**. It is intended to provide details of the unique harvest event that consolidated the raw materials of the fish product being exported and is required for fish products prepared at registered establishments in Australia, including products prepared from imported fish of priority species.

Aggregated Catch Certificate for Traceability - Harvest and landing/receipt		
Only for small-scale harvest events: vessels ≤20 measured gross tons or ≤12 meters length, or aquaculture facilities deliveries ≤1,000 kg		
(1) Unique Catch or Production Document Identifier <i>(Single unique number used to identify the consolidating harvest event)</i>	() Wild capture fishery (Complete section 2) () Farm raised (Complete section 3)	
(2) Complete this section for <u>wild capture</u> fish products		
Flag State of vessels: <i>(Country where vessels are registered)</i>	No. of deliveries:	
Fishing/catch area: <i>(Catch area codes as reported to local authority – or FAO zone**)</i>	Fishing gear: <i>(Gear code as reported to local authority or FAO gear code***)</i>	
(3) Complete this section for <u>farm raised</u> fish products		
State of jurisdiction:	Facility license or authorisations: <i>(Aquaculture licence no. issued by the relevant local authority)</i>	Names and locations of aquaculture facilities
(4) Complete this section for receipt of fish products		
Name of recipient, processor or buyer:	Telephone: Email:	Business address:
Receiving facility or vessel: <i>(If vessel include name, flag state and identifier*)</i>	Date of landing/transhipment:	Landing port or delivery location:
Species of fish (ASFIS 3-Alpha code) <i>(See Attachment 1)</i>	Landed or delivered weight (kg): <i>(Total weight of consolidated harvest event)</i>	Product forms (i.e. whole, H&G, G&G, fillets):
1		
2		

* In Australia this will be the IMO/Lloyd's number or International Radio call sign or 6-digit registration number as per the AMSA register www.amsa.gov.au/vessels/shipping-registration/australian-general-register/

** www.fao.org/3/a-az126e.pdf

*** Table 6.3.3 www.fao.org/docrep/005/X8923E/X8923E09.htm

Attachment 4

The information in this form is required **to be provided to the importer for their records**. It is intended to provide details of the unique harvest event/s that contributed the raw materials of the fish product being exported and is required for fish products prepared at registered establishments in Australia, including products prepared from imported fish of priority species.

Reprocessing Certificate for Traceability - Primary or secondary processing			
() Wild harvest or () Farm raised			
Referenced Unique Catch Document Identifier(s) <i>(Unique numbers used to identify the harvest events that contributed fish to this export lot)</i>		Company product received from:	
Processor name	Processor address	Processor approval or registration number	Phone: Email:
Commodity scientific name <i>(See Attachment 1)</i>	Commodity market name <i>(See Attachment 1)</i>	Species of fish (ASFIS 3-Alpha code) <i>(See Attachment 1)</i>	
Received weight (kgs): <i>(Total weight of input to production of this export lot)</i>	Received lot identifier(s):	Received product forms (e.g. whole, H&G, G&G, fillets):	
Processed weight (kgs):	Finished product lot identifier(s):	Finished product form (e.g. G&G, fillets, cans, pouches):	
Finished product weight (kgs):			
Production date(s):	No. of packages:	Type of packaging:	

Attachment 5

The information in this form is required **to be provided to the importer for their records**. It is intended to provide details of any transshipment related to the harvest event/s that contributed the raw materials of the fish product being exported or the fish products to be exported following processing and is required for fish products prepared at registered establishments in Australia, including products prepared from imported fish of priority species.

Transshipping Certificate for Traceability		
() Wild harvest or () Farm raised		
Referenced Unique Catch Document Identifier(s): <i>(Unique numbers used to identify the harvest events)</i>		
Port or storage location of loading/unloading:		
Name of vessel/cold storage unloaded from:	Unique Unloaded Vessel Identifier (registration, documentation, or license number): <i>(IMO/Lloyd's no. or radio call sign or AMSA 6 digit registration no. *)</i>	Date(s) of unloading/loading:
Name of vessel/cold storage loaded to:	Unique Receiving Vessel Identifier (registration, documentation, or license number): <i>(IMO/Lloyd's no. or radio call sign or AMSA 6 digit registration no. *)</i>	
Commodity scientific name: <i>(See Attachment 1)</i>	Commodity market name: <i>(See Attachment 1)</i>	Species of fish (ASFIS 3-Alpha code) <i>(See Attachment 1)</i>
Transhipped weight (kgs)	Transhipped lot identifier(s):	Transhipped product form (i.e. whole, H&G, G&G, fillets, cans):
Production / harvest date(s):	Number of packages:	Type of packaging:

* In Australia this will be the IMO/Lloyd's number or International Radio call sign or 6-digit registration number as per the AMSA register www.amsa.gov.au/vessels/shipping-registration/australian-general-register/