



May 31, 2022

ATTN: RBC-NAP  
Office of Investment Affairs (EB/IFD/OIA), Room 4669  
2201 C St. NW  
Washington, DC 20520

Dear Secretary Blinken:

As the U.S. government is shaping its commitments in the U.S. National Action Plan (NAP) on Responsible Business Conduct, FishWise recommends that Customs and Border Protection close existing gaps in supply chain data to support and strengthen enforcement of Section 307 of the Tariff Act and the Uyghur Forced Labor Prevention Act (UFLPA). This could be done by building on the existing Seafood Import Monitoring Program (SIMP) model. In particular:

Require importers to provide detailed, comprehensive disclosure of supply chain information, regardless of country of origin, including the name and address of every entity and every facility involved in the production process, including in the harvesting, mining, and processing of raw material. If an importer fails to report this data or the data is false, the goods may be denied entry and the entity should be subject to penalty. Similarly, importers could be required to maintain chain-of-custody information and documentation, and this documentation could be subject to audit, which could lead to penalties to the entity for noncompliance or false or missing documentation. While initially these requirements could apply to high-risk products under the UFLPA, ultimately CBP should require comprehensive disclosure of supply chain information from all importers.

Sincerely,

Sara Lewis  
Traceability Division Director  
FishWise