

April 27, 2023

Rachael Confair
Office of International Affairs, Trade, and Commerce
National Marine Fisheries Service
1315 East-West Highway (F/IS5)
Silver Spring, MD 20910

Dear Rachael Confair,

Our companies represent major buyers and retailers who provide seafood to millions of consumers throughout the U.S. every year. We take pride in serving consumers products that are harvested responsibly and we are committed to responsible sourcing of seafood.

The Seafood Import Monitoring Program (SIMP) was created to prevent illegally caught and fraudulently labeled products from entering the U.S. market. However, it currently only applies to a select set of species groups, excluding 55% of imported seafood. We note with interest NOAA's release of a [proposed rule](#) in December 2022, that includes additional species and other changes to SIMP. We support expansion of SIMP to cover all imported seafood in the forthcoming rulemaking and efforts to address current implementation challenges. However, there is not currently enough information in the proposed rule for companies to adequately assess the impacts on the efficacy of the program or impacts to our businesses.

Increasing government transparency around SIMP's implementation would shed light on the effectiveness of the program and could inform expectations for suppliers and sourcing guidance. U.S. companies would also benefit from an improved understanding of the criteria NOAA used to identify species as high risk for IUU fishing, especially those that have long been known to have substantial IUU, mislabeling, and/or social risks.

Additionally, we support U.S. government efforts to increase the capacity of supply chains to comply with SIMP via efforts such as supply chain trainings, resources in numerous language, and updated guidance materials. These important steps will reduce risks to American companies, encourage the global adoption of electronic traceability systems, and level the playing field for imports across all species. The proposed rule mentions the review and refinement of some required data, but it is not clear if these changes will reduce redundancy or

streamline the data needed across other import programs. Efforts should be made to clarify if changes will reduce the significant costs of compliance, allowing our suppliers to devote more resources to implementing best practices.

Thank you for NOAA's continued efforts to combat illegal, unreported, and unregulated fishing.

Sincerely,



Hy-Vee, Inc.



Target Corporation