



中国水产流通与加工协会

China Aquatic Products Processing and Marketing Alliance

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Ms. Jennifer Clever
Agriculture Attache
US Embassy to China

Comments of China Aquatic Products Processing and Marketing Alliance(CAPPMA) Regarding the Presidential Task Force on Combating Illegal, Unreported and Unregulated Fishing and Seafood Fraud Action Plan Recommendations 14/15 Identifying Species “At Risk” of IUU Fishing and Seafood Fraud

Dear Ms. Jennifer Clever:

Thank you for keeping CAPPMA been updated on the progress achieved by the Presidential Task Force on Illegal, Unreported and Unregulated Fishing (IUU) and Seafood Fraud, and also for the opportunity to propose comments on related issues. Here we would like to briefly state several opinion and would be appreciated if you and your colleagues could assist to convey it to the NOAA and related departments.

COMMENTS ON LISTING SPECIES AT RISK

CAPPMA noted that among the 13 “at risk” species on the list, 8 were Chinese major processing and re-export species to the US market, and 2 among the 8 were farmed species (shrimp and sea cucumber). Thus we’re convinced that it should be more cautious to review the species as the implementation may significantly influence the seafood trade between China and the US. Thus we require:

A. TF should provide legitimate data to support this conclusion on the 13 species. This data again needs to be from government resources instead of experts from related fields. The current description of the risk list species were not rigorous and convinced, so the evaluation behind would probably be public for discussing. For example a complexity of the chain of custody and processing on certain species should not be presumed to be engaged in IUU or fraud.

B. TF should carefully review its evaluation principle such as lacking of enforcement capabilities, insufficient catch documents, low enforcement laws, long history of fishing violation etc. China works diligently with USG on a bilateral agreement negotiation on IUU in a hope to work together eliminating these challenges.

C. If no convinced data information could indicate that one specific species to have “IUU risk” or “Seafood Fraud Risk”, then that species should be removed from the list.

COMMENTS ON TRACEABILITY SYSTEM

CAPPMA would like to remind that the massive traceability program and compliance proposed by the Task Force may cause a serious disruption of supply chain and maybe unrealistic to get implemented. Furthermore on what degree the traceability might be contributed to combat the IUU fishing and seafood fraud should be perceived, consider different key factors and management stage were required by different risks. And we also should mention that trade is a two-way street. In order to create a win-win situation, the USG should comply with WTO laws and ensure proper trade flow between USA and China.

A. Marine Fishing

Refer to the import and process for re-export industry, the processing factory may use the raw fish from different countries, and the flag state may issue one or several catch certificates and each stated the fishing vessel(s) on. But after the cargo being imported and be distributed to different companies, the catch certificate had also been divided by quota. Then with different processing technic

or process the yield rates were different, finally it's hard to track the certain box of product was from which vessel when it was exported. So the key point would be the effective management from the capture to the landing.

For example, among the main flag states for capture cod export to China, the top 3 were Russia, Norway and Iceland, which were believed to have advanced fisheries management system or working with USG closely to eliminate IUU.

Refer to the Chinese vessels capture, domestic capture was supervised under catch license, the gear types was regulated according to specific species. The pelagic fishing was under the RMFOs regulations, as mentioned in last comments, China had participated in almost all the important Regional Fisheries Management Organizations (RFMOs) since 1996¹, Chinese pelagic vessels obey the reservation and management measures of these organizations during their fishing activities oversea.

And in some occasion such as surimi, the imported fish material and domestic capture fish material would be processed together, which brings the traceability more challenges.

B. Aquaculture

Refer to the 13 data elements for farmed seafood required by the traceability system we estimated such a detailed data collection in aquaculture would be more unpractical compared to the wild-capture. On the other hand, aquaculture products has for sure no relations with IUU fishing, but to trace to the pond may not contributed to mitigate seafood fraud as which occurred with high probability after the products entry the US border, by mislabeling or misleading advertising etc.

Conclusion

A. CAPPMA urged that the legitimate data evaluation of the high risk species listing should be public.

¹ China was the member of ICCAT, IOTC, WCPFC, CCAMLR, IATTC, SPRFMO and NPFC.

- B. CAPPMA suggested that the Task Force may take more consideration on the species listing of high risk, and IUU fishing risk should be separate from seafood fraud risk.
- C. CAPPMA insisted that if no convinced data information could indicate that one specific species to have “IUU risk” or “Seafood Fraud Risk”, then that species should be removed from the list. And CAPPMA strongly recommend TF removing all farmed products from the risk list.
- D. CAPPMA urged that the Task Force to review its proposed traceability program, in case which would be unpractical and unnecessary for Chinese business to comply because some of the required information will not help us eliminate IUU fishing and fraud.
- E. CAPPMA again illustrated that the USG to comply with WTO rules and regulations. The massive traceability program and compliance proposed by the Task Force may halt the normal trade between U.S. and China.

Best Regards



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