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October 9, 2020

Inv. No. 332-575
*Seafood Obtained via Illegal, Unreported, and Unregulated Fishing:
U.S. Imports and Economic Impact on U.S. Commercial Fisheries*

PUBLIC DOCUMENT

VIA ELECTRONIC FILING

The Honorable Lisa R. Barton
Secretary of the Commission
U.S. International Trade Commission
500 E Street, SW
Washington, DC 20436

Re: *Seafood Obtained via Illegal, Unreported, and Unregulated Fishing: U.S. Imports and Economic Impact on U.S. Commercial Fisheries (Inv. No. 332-575): Written Submission*

Dear Secretary Barton:

On behalf of the Southern Shrimp Alliance, and pursuant to the *Federal Register* notices regarding the U.S. International Trade Commission's ("Commission") institution of the above-captioned investigation and scheduling a hearing,¹ as well as the Commission's notice of a new hearing date,² we hereby file a written submission concerning the extent to which seafood

¹ *Seafood Obtained via Illegal, Unreported, and Unregulated Fishing: U.S. Imports and Economic Impact on U.S. Commercial Fisheries*, 85 Fed. Reg. 5,704 (U.S. International Trade Commission, Jan. 31, 2020) (Institution of Investigation and Scheduling of Hearing).

² *Seafood Obtained via Illegal, Unreported, and Unregulated Fishing: U.S. Imports and Economic Impact on U.S. Commercial Fisheries*, 85 Fed. Reg. 33,709 (U.S. International Trade Commission, June 2, 2020) (Notice of New Dates for Public Hearing and Transmittal of the Commission's Report).

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products obtained from illegal, unreported, and unregulated fishing are imported into the United States and the potential economic effects on U.S. fishermen of competition with such imports.

This submission is timely pursuant to the Commission's re-scheduling notice.³

Please do not hesitate to contact the undersigned should you require clarification of any aspect of this submission.

Respectfully submitted,

/s/ Nathaniel Maandig Rickard

Nathaniel Maandig Rickard

Counsel to the Southern Shrimp Alliance

³ *See id.*

BEFORE THE UNITED STATES
INTERNATIONAL TRADE COMMISSION

Inv. No. 332-575

*Seafood Obtained via Illegal, Unreported, and Unregulated Fishing:
U.S. Imports and Economic Impact on U.S. Commercial Fisheries*

**WRITTEN SUBMISSION ON BEHALF OF
THE SOUTHERN SHRIMP ALLIANCE**

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October 9, 2020

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**BEFORE THE UNITED STATES
INTERNATIONAL TRADE COMMISSION**

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| In the Matter of: |) |
| |) |
| <i>SEAFOOD OBTAINED VIA ILLEGAL, UNREPORTED, AND UNREGULATED FISHING: U.S. IMPORTS AND ECONOMIC IMPACT ON U.S. COMMERCIAL FISHERIES</i> |) |
| |) |
| Inv. No. 332-575 |) |
| |) |

**WRITTEN SUBMISSION ON BEHALF OF THE
SOUTHERN SHRIMP ALLIANCE**

I. INTRODUCTION

In its prehearing brief to the U.S. International Trade Commission (“Commission” or “ITC”) for this investigation, the Southern Shrimp Alliance described how shrimp harvested through illegal, unreported, and unregulated (“IUU”) fishing is traded internationally and imported into the United States, how National Oceanic and Atmospheric Administration (“NOAA”) Fisheries’ implementation of the Seafood Import Monitoring Program (“SIMP”) may be correlated to significant changes in the supply of seafood at risk of being harvested through IUU fishing into the United States, and how the U.S. seafood market is not self-regulating.¹ In its posthearing brief to the Commission, the Southern Shrimp Alliance attempted to answer questions posed by the agency as well as describe how forced, slave, and child labor has

¹ See Letter from Picard Kentz & Rowe LLP to the U.S. International Trade Commission, Inv. No. 332-575 (Aug. 21, 2020) (“SSA Prehearing Brief”).

corrupted all levels of foreign seafood supply chains.² In this written statement, the Southern Shrimp Alliance presents for the record two updates on the matters addressed in the organization’s prehearing and posthearing briefs.

First, in discussing the U.S. Department of Labor’s Bureau of International Labor Affairs’ (“ILAB”) biennially published list of goods produced by child or forced labor, the Southern Shrimp Alliance’s posthearing brief explained that the agency had not previously addressed documented incidents of forced labor in distant water fishing fleets.³ The posthearing brief noted that:

ILAB is expected to issue an updated *List of Goods Produced by Child Labor or Forced Labor* at some point this month. The Southern Shrimp Alliance anticipates that this updated report is likely to address the lack of discussion of foreign distant water fishing fleets in the *2018 List of Goods Report*.⁴

As discussed in more detail below, since the submission of the posthearing brief, ILAB has published an updated *List* that now addresses incidents of forced labor in distant water fishing fleets.

Second, the Southern Shrimp Alliance’s prehearing brief described the extremely limited amount of testing conducted by the U.S. Food and Drug Administration (“FDA”) of shrimp imports for the presence of banned and harmful veterinary drugs.⁵ In response to a Freedom of Information Act (“FOIA”) request, the FDA recently provided summary information regarding the agency’s sampling of chemotherapeutics in shrimp products from fiscal year (“FY”) 2001

² See Letter from Picard Kentz & Rowe LLP to the U.S. International Trade Commission, Inv. No. 332-575 (Sept. 17, 2020) (“SSA Posthearing Brief”).

³ See *id.* at 10.

⁴ *Id.*

⁵ See SSA Prehearing Brief at 53-61.

through FY2020. Although not directly related to the Commission’s investigation of IUU seafood, as explained in greater detail below, these data demonstrate that the seafood importing industry in the United States has taken little action to eliminate the continuing problem of unregulated use of antibiotics in aquaculture, as the agency reports detecting residues of banned veterinary drugs in nine percent of the eighty-two samples taken of Indian-origin shrimp in FY2020. Moreover, in contrast to claims made to the Commission during this proceeding, these data demonstrate that U.S.-origin shrimp is also sampled and tested for chemotherapeutics and that no residues have been detected in domestically farmed and wild-harvested shrimp in the last two decades.

II. ILAB NOW LISTS SEAFOOD PRODUCED THROUGH FORCED LABOR IN DISTANT WATER FISHING FLEETS

Attached as **Exhibit 1** is ILAB’s 2020 *List of Goods Produced by Child Labor or Forced Labor (Required by the Trafficking Victims Protection Reauthorization Act of 2005)* (“2020 *List of Goods Report*”), published on September 30, 2020.⁶ As explained in the extensive excerpt reproduced below, ILAB has now, for the first time, identified goods produced by forced labor aboard distant-water fishing vessels on its list of goods.

Dangerous Waters

International waters – otherwise known as the high seas – are, by definition, outside of the direct jurisdiction of any particular country. However, that does not mean that these waters are empty and void. On the contrary, distant-water fishing (DWF) fleets flying the flags of various nations log millions of hours in these waters.⁽³²⁾ In addition to the high seas, DWF fleets also operate in other countries’ exclusive economic zones (EEZs). DWF fleets’ crews are comprised of workers from many countries, often recruited through dubious agencies that deceive workers with false information regarding their wages and the terms of the contracts, and require the workers to pay recruitment fees and sign debt contracts.

⁶ U.S. Department of Labor, *2020 List of Goods Produced by Child Labor or Forced Labor (Required by the Trafficking Victims Protection Reauthorization Act of 2005)* (“2020 *List of Goods Report*”), attached as **Exhibit 1**.

This year, ILAB is adding fish from China and Taiwan for forced labor due to reports of adults forced to work in the production of fish on their DWF fleets. Although these activities may not take place within territorial waters, ILAB made these additions because the List of Goods Produced by Child Labor or Forced Labor applies to all goods produced by forced labor or child labor, including seafood harvested on the high seas. The 2020 edition of the List makes clear that fish caught outside of territorial waters will be listed by the country that has flagged that vessel. This is not to say that this is an easy process. The remote nature of this work leads to limitations in the availability of data, in particular, for DWF fleets. Numerous other countries operate DWF fleets and many countries allow their flag to be flown as a “flag of convenience,” or the flag of a state other than that of the vessel’s owner. Vessel owners use flags of convenience to avoid financial charges or regulatory requirements in their own states, as well as to subject themselves to a state’s labor regime that they deem to be beneficial. This year’s List is notable as it represents the first time a country has been added to the List for flagging DWF fleets using forced labor. Read below to learn more about each case.⁷

ILAB identified fish produced from the distant-water fishing fleets of two separate countries, China and Taiwan, as being produced through forced labor. ILAB’s discussion of forced labor aboard Chinese vessels underscored the enormous number of boats encompassed within that fleet, as well as the extensive documentation of forced labor practices within the industry:

China’s fleet is the largest in the world, with an estimated 3,000 fishing vessels, and contains a wide variety of vessels, from longliners to purse seiners, operating on the high seas and in foreign countries’ EEZs in every region of the world.(33-36) The majority of the crews on board are migrant workers from Indonesia and the Philippines, who are particularly vulnerable to forced labor and who are sometimes recruited by agencies that deceive workers with false information regarding their wages and the terms of the contracts, and require the workers to pay recruitment fees and sign debt contracts.(32; 33) According to media reports, the U.S. Department of State, and NGOs, numerous incidents of forced labor have been reported on Chinese fishing vessels. While on board the vessels, workers’ identity documents are often confiscated, the crew spends months at sea without stopping at a port of call, and they are forced to work 18 to 22 hours a day with little rest. Workers face hunger and dehydration, live in degrading and unhygienic conditions, are subjected to physical violence and verbal abuse, are

⁷ *Id.* at 33.

prevented from leaving the vessel or ending their contracts, and frequently are not paid their promised wages.(37)⁸

ILAB also identified fish harvested from Taiwan’s distant water fishing fleet as being produced through forced labor:

Taiwan’s fleet is the second largest in the world, after China, with more than 1,100 fishing vessels, comprising approximately 36 percent of the world’s tuna longliner fleet. The fleet operates on the high seas and in the EEZs of more than 30 countries, employing an estimated 35,000 migrant workers mostly from Indonesia and the Philippines.(37-40) According to media reports, the U.S. Department of State, and NGOs, numerous incidents of forced labor have been reported on Taiwan-flagged fishing vessels. Similar to crews on Chinese-flagged vessels, crews on Taiwan-flagged vessels face confiscation of documents, long days with little rest, physical and verbal abuse, and lack of payment.(41; 42) . . .⁹

In ILAB’s most recent list, “fish” was once again identified as one of the goods with the most child labor and forced labor listings by number of countries.¹⁰ When all types of fishery products are consolidated – comprising seven different seafood products from twenty different countries – seafood accounts for the second most child and forced labor listings by number of countries, trailing only “gold.”¹¹ These listings are summarized in the table below:

| Good | Child Labor | Forced Labor | Child Labor & Forced Labor |
|--------------------------|--|-------------------------|---------------------------------------|
| Dried Fish | | | Bangladesh |
| Fish | Brazil, Cambodia, Kenya, Paraguay, Peru, Philippines, Uganda, Vietnam, Yemen | China, Thailand, Taiwan | Ghana, Indonesia |
| Lobsters | Honduras | | |
| Nile Perch (fish) | Tanzania | | |
| Shellfish | El Salvador, Nicaragua | | |
| Shrimp | Bangladesh, Cambodia | Burma | Thailand |
| Tilapia (Fish) | | | Ghana |

⁸ *Id.*

⁹ *Id.*

¹⁰ *See id.* at 25 (behind “gold,” “bricks,” “sugarcane,” “coffee,” “tobacco,” “cotton,” and “cattle”).

¹¹ *See id.* at 20-24.

The *2020 List of Goods Report* also highlighted the working conditions on board some of these distant water fishing vessels through the experience of one migrant laborer:

Irwan, an Indonesian man, signed a contract to become a fisher with the recruitment agency in his hometown; however, he did not receive a copy of the contract. He then flew from Jakarta to Dakar, Senegal, and boarded a vessel to transport him to a Taiwan-flagged longliner. He was promised a monthly salary of USD 450, but he did not know that multiple fees would be deducted for the first 8 months to pay the local recruitment agency and a “guarantee deposit” for his employer in Taiwan. After all the fees had been deducted, he was left with about USD 50 per month. On board, Irwan joined a crew of other migrant fishers from Indonesia and the Philippines. The captain of the ship had confiscated their passports. He worked for 16 to 18 hours per day, with only an average of 2 or 3 hours of sleep. However, if he did not catch anything, he would be forced to continue working – sometimes for as long as 34 hours – until the work was finished, and only then was he allowed to rest. Irwan had no days off, no health insurance, and no protection from violence aboard the ship. He experienced beatings from his captain, and at times, from fellow crew members who were ordered to do so by the captain. Irwan also witnessed the deaths of fellow migrant fishers from abusive working conditions, their bodies wrapped up and stored in the freezer or thrown into the sea. In the vast distant waters, workers are isolated and there is very little oversight. At sea, it is difficult and often impossible for fishers to escape these conditions.¹²

ILAB noted that the horrific treatment of men like Irwan made the listing of distant water fishing fleets necessary: “This all-too-common story is why the addition of Taiwan and China for fish produced by forced labor to this year’s List is important.”¹³

As with the previous version of the *Report*, ILAB explained that it had been focused on the seafood sector for quite some time and provided a brief summary of several projects intended to improve the seafood supply chain that were supported by the agency:

ILAB has a long history of working to counter labor exploitation in this sector, and currently supports a portfolio of projects to address forced labor and child labor in the seafood supply chain. This includes the Safeguarding Against and Addressing Fishers’ Exploitation at Sea (SAFE Seas) project, which strengthens

¹² *Id.* at 34.

¹³ *Id.*

government enforcement capacities to identify and address labor exploitation on fishing vessels and deepens related engagement among fishers, the private sector, and civil society in Indonesia and the Philippines. ILAB also supports the Fostering Accountability in Recruitment for Fishery Workers (FAIR Fish) project that works with seafood-processing companies in Thailand, as well as their recruitment agencies, as they develop a responsible recruitment pilot model for small-and medium-sized enterprises built on the principles of the Business Social Compliance initiative. Other projects include Child Labor improvements in Bangladesh (CLIMB), which is working to build the capacity of civil society to more effectively detect and counter forced child labor in the dried fish sector; and the Measurement, Awareness-Raising, and Policy Engagement (MAP16) Project on Child Labor and Forced Labor, which includes support to the ILO to strengthen the identification of forced labor in the fishing industry through a unique multi-layered approach involving research and the development of forced labor indicators in the fishing sector.¹⁴

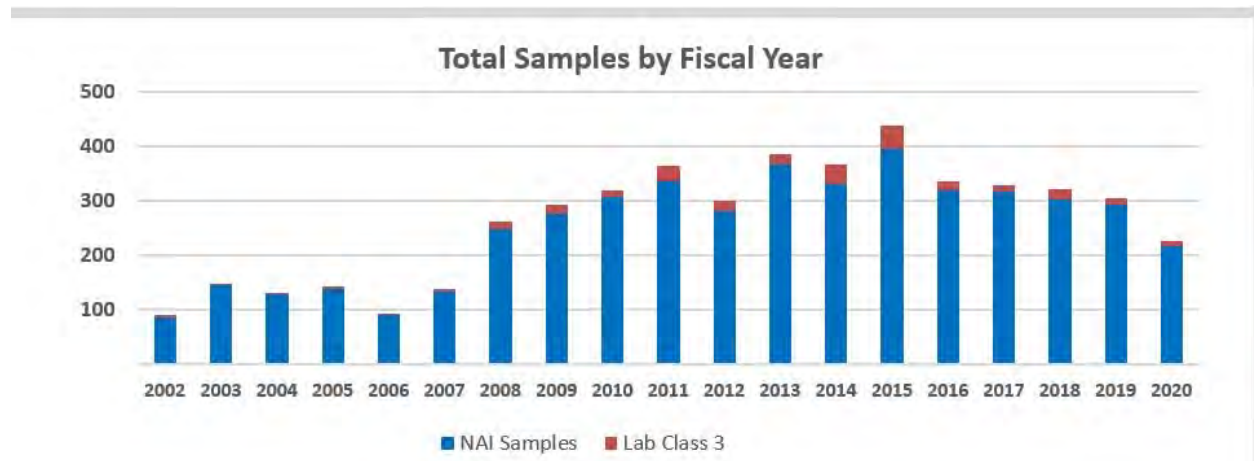
Importantly, the *2020 List of Goods Report* did not discuss improvements in labor conditions in previously identified seafood supply chains with forced and/or child labor. The updated *Report* did not remove any seafood products from the list, but instead began to incorporate slave labor in distant water fishing fleets in addition to the seafood produced in territorial waters. In summary, ILAB's updated report again confirmed the prevalence of forced labor in seafood supply chains and helped to further demonstrate that the definition of IUU fishing should be understood as encompassing forced and child labor.

III. FDA TESTING OF IMPORTED SHRIMP DEMONSTRATES THAT THE U.S. SEAFOOD IMPORT MARKET IS NOT SELF-REGULATING

In response to a FOIA request, the FDA recently released data regarding the agency's scope sampling of shrimp products as part of its "Chemotherapeutics in Aquaculture Seafood Compliance Program" through September 15, 2020. To accompany the data generated by the agency in response to the FOIA request, the FDA produced summary charts and tables. For example, in the FDA produced table below, the agency summarizes the number of samples of

¹⁴ *Id.*

shrimp taken between FY2002 and FY2020 with a “NAI” (No Action Indicated) result (represented by the blue bar), along with the amount of those samples found to include residues of veterinary drugs, described as “Lab Class 3” (represented by the red bar).



In addition, the FDA created summary tables, attached as **Exhibit 2**, of the samples taken and results determined across the entire program on a country-by-country basis. As shown in the table below, although just two percent of shrimp samples taken were found to have veterinary drug residues between FY2003 and FY2006, detection rates have continued to be higher in every year since.

| ALL COUNTRIES | | | |
|---------------|-------------|-------------|------|
| Fiscal Year | NAI Samples | Lab Class 3 | %VAI |
| FY01 | 17 | 1 | 6% |
| FY02 | 84 | 6 | 7% |
| FY03 | 144 | 3 | 2% |
| FY04 | 128 | 3 | 2% |
| FY05 | 138 | 3 | 2% |
| FY06 | 90 | 2 | 2% |
| FY07 | 133 | 5 | 4% |
| FY08 | 247 | 13 | 5% |
| FY09 | 276 | 17 | 6% |
| FY10 | 307 | 12 | 4% |
| FY11 | 334 | 29 | 8% |
| FY12 | 281 | 19 | 6% |
| FY13 | 365 | 21 | 5% |
| FY14 | 330 | 35 | 10% |

| | | | |
|--------------|--------------|------------|-----------|
| FY15 | 394 | 44 | 10% |
| FY16 | 319 | 15 | 4% |
| FY17 | 317 | 11 | 3% |
| FY18 | 302 | 19 | 6% |
| FY19 | 292 | 11 | 4% |
| FY20 | 215 | 11 | 5% |
| TOTAL | 4,713 | 280 | 6% |

The FDA’s sampling data and the results of the agency’s testing demonstrate that just a handful of countries account for the vast majority of contaminated shrimp. Of the 280 samples found to have residues of veterinary drugs, over three-quarters are from just four nations: China, India, Malaysia, and Vietnam (219 of 280 or 78.2 percent). At the same time, these four countries account for less than half of the samples found to not have such residues (2,324 of 4,713 or 49.3 percent).

The table below summarizes the cumulative results of the FDA’s sampling program for shrimp for each country in which more than twenty samples were taken over the last twenty years.

| Summary of Sample Results – FY01-FY20 by Country | | | |
|---|-----------------|--------------------|-------------|
| Lab Class 3 | Country | NAI Samples | %VAI |
| 65 | Vietnam | 741 | 8.1% |
| 64 | India | 1,064 | 5.7% |
| 58 | <i>Malaysia</i> | 212 | 21.5% |
| 32 | <i>China</i> | 307 | 9.4% |
| 21 | Indonesia | 723 | 2.8% |
| 12 | Bangladesh | 118 | 9.2% |
| 11 | Thailand | 658 | 1.6% |
| 4 | Venezuela | 43 | 8.5% |
| 3 | Ecuador | 433 | 0.7% |
| 2 | Mexico | 198 | 1.0% |
| 2 | Honduras | 63 | 3.1% |
| 2 | Peru | 49 | 3.9% |
| 2 | Philippines | 23 | 8.0% |
| 0 | United States | 66 | 0.0% |
| 278 | Total | 4,698 | 5.6% |

Of the seven countries with a violative test result rate of higher than five percent (India, the Philippines, Vietnam, Venezuela, Bangladesh, China, and Malaysia), just two, China and Malaysia, are subject to an Import Alert that authorizes detention without physical examination of shrimp exported by companies within a broad geographical area. With the imposition of these Import Alerts, a sample taken of Chinese shrimp under this program has not been found to have residues of veterinary drugs since FY2018, while no sample taken of Malaysian shrimp under the program has been found to have such residues since FY2016.

In stark contrast, the incidents of findings of veterinary drug residues have increased significantly in FY2020 for India shrimp, despite a long and well-known history of abuse of antibiotics in Indian shrimp aquaculture. As shown in the table below, in FY2020, roughly nine percent of all the Indian sampled by the FDA was found to have residues of veterinary drugs. Although a significantly lower number of samples were taken in FY2020 than the prior three years, the total number found to be contaminated (eight) was tied for the highest number of violative findings in a single year along with FY2015 and FY2017.

| India | | | |
|--------------------|--------------------|--------------------|-------------|
| Fiscal Year | NAI Samples | Lab Class 3 | %VAI |
| FY01 | 2 | 1 | 33% |
| FY02 | 13 | 0 | 0% |
| FY03 | 24 | 1 | 4% |
| FY04 | 30 | 1 | 3% |
| FY05 | 15 | 0 | 0% |
| FY06 | 6 | 0 | 0% |
| FY07 | 8 | 0 | 0% |
| FY08 | 10 | 0 | 0% |
| FY09 | 31 | 7 | 18% |
| FY10 | 28 | 1 | 3% |
| FY11 | 82 | 5 | 6% |
| FY12 | 36 | 4 | 10% |
| FY13 | 93 | 4 | 4% |
| FY14 | 69 | 6 | 8% |
| FY15 | 124 | 8 | 6% |
| FY16 | 79 | 3 | 4% |

| | | | |
|--------------|-------------|-----------|-----------|
| FY17 | 100 | 3 | 3% |
| FY18 | 124 | 8 | 6% |
| FY19 | 108 | 4 | 4% |
| FY20 | 82 | 8 | 9% |
| TOTAL | 1064 | 64 | 6% |

As the table above indicates, since FY2019, shrimp from India has consistently been found to be contaminated with banned antibiotics. Nevertheless, there has been absolutely no effort by U.S. seafood importers to prevent contaminated Indian shrimp imports from entering the United States. The industry has left it to the FDA’s extremely limited sampling program to catch violative shipments while all other Indian shrimp slips through unencumbered and unchecked. In result, if the percentage of violative samples was applied to the volume of Indian shrimp imported during the first ten months of FY2020 (data are currently available for October through July), the results of the FDA’s sampling program imply that at least 60,216,694 million pounds of contaminated Indian shrimp entered the United States this fiscal year.¹⁵

This estimate is a staggering volume of shrimp and, the Southern Shrimp Alliance believes, a dramatic example of the failure of the seafood importing industry to police itself regarding an issue that poses a health risk to American consumers. The Commission has received extensive commentary from seafood importers complaining about the imposition of SIMP along with expressions of strident opposition to any federal government oversight of imported seafood. But, as the seafood importing industry’s response to the use of banned

¹⁵ See Dataweb. Estimate is reached through the total volume of imports from India under HTSUS six-digit headings 0306.13, 0306.16, 0306.17, 0306.23, 0306.26, 0306.27, 0306.35, 0306.36, 0306.95, 1605.20, 1605.21, and 1605.29 from October 2019 to July 2020 (307,280,985 kilograms or 677,437,805 pounds) multiplied by 0.088889 (8 violative samples out of a total of 90 samples taken).

antibiotics in shrimp aquaculture establishes, a failure to take steps to address IUU seafood is tantamount to a concession that we, as a nation, tolerate and accept IUU fishing.

IV. **CONCLUSION**

Again, the Southern Shrimp Alliance appreciates the opportunity to participate in the Commission's important investigation of the impact of IUU seafood on the U.S. commercial fishing industry. The Southern Shrimp Alliance believes that estimating the extent of the adverse impact of IUU seafood on U.S. commercial fishing will promote efforts to further counteract these practices. However, regardless of the outcome of this investigation, the continued tolerance for imported seafood harvested through IUU fishing, including through the use of forced and child labor, greatly aggravates U.S. commercial fishermen across sectors. While required to compete in this market and overseas for sales against lightly-regulated foreign competition, U.S. fishermen confront ever-increasing regulatory oversight. Seafood harvested by domestic fishermen through IUU fishing cannot be sold in the U.S. market without those involved risking substantial penal and regulatory consequences. Foreign seafood producers and suppliers should be held to the same standard.

Respectfully submitted,

/s/ Nathaniel Maandig Rickard
Nathaniel Maandig Rickard

Counsel to the Southern Shrimp Alliance
PICARD KENTZ & ROWE LLP

Dated: October 9, 2020

EXHIBIT LIST

| Number | Title |
|---------------|---|
| 1 | U.S. Department of Labor, <i>2020 List of Goods Produced by Child Labor or Forced Labor (Required by the Trafficking Victims Protection Reauthorization Act of 2005)</i> |
| 2 | U.S. Food and Drug Administration, <i>FDA Scope Sampling of Shrimp Products Chemotherapeutics in Aquaculture Seafood Compliance Program 10/01/2001 – 9/15/2020 (Sept. 30, 2020)</i> |