

**TESTIMONY OF
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PICARD KENTZ & ROWE LLP
ON BEHALF OF THE
SOUTHERN SHRIMP ALLIANCE**

**BEFORE THE
INTERAGENCY SECTION 301 COMMITTEE**

**PANEL 14
July 8, 2026**

Good afternoon, my name is Benjamin Duffy-Howard with the law firm of Picard Kentz & Rowe LLP. I am appearing before the panel today on behalf of the Southern Shrimp Alliance.

I am here to express the U.S. shrimp industry's strong support for the United States Trade Representative's determinations in these Section 301 investigations as well as for the USTR's proposed actions.

The domestic shrimp industry, along with many other American seafood producers, has been directly harmed by the failure of our trading partners to implement and/or enforce restrictions on the importation of goods produced through forced labor. As the USTR's report in these investigations correctly recognizes, fishmeal and fish oil are products produced with fish harvested with forced labor. When imported by our trading partners, this forced-labor tainted fishmeal unfairly reduces costs for shrimp and fish farmers allowing them to undersell seafood produced by Americans in the U.S. market.

Our written comments submitted jointly with other American seafood producers show there is significant evidence that seafood exporters in Ecuador, China, India, Indonesia, Thailand, Vietnam, and Mexico can access imported fishmeal inputs that were produced from fish harvested through forced labor. In particular, the U.S. Department of Labor's *2024 List of Goods Produced by Child Labor or Forced Labor* recognized that marine fish in Thailand is harvested through forced labor, that roughly one-quarter of the marine fish harvested in Thailand is used to produce fishmeal and fish oil, and that while this fishmeal is principally used to make animal feed for Thai shrimp and poultry farmers, Thailand also exports billions of dollars of fishmeal to other nations annually.

Relatedly, Appendix C of the USTR's report identifies countries that import fish harvested through forced labor and subsequently export downstream products – including fishmeal and seafood products – to the U.S. market. Although the Southern Shrimp Alliance supports this analysis, we note that by not including farmed seafood raised on forced-labor tainted fishmeal, the USTR's report substantially understates the adverse impacts of declining to limit the importation of forced labor produced goods on U.S. producers.

For example, China, India, Indonesia, and Vietnam each import significant quantities of fishmeal from Thailand. This fishmeal is used in the aquaculture of each of these four countries which export substantial volumes of farmed seafood to the United States each year. If these countries restricted access to their markets for goods produced through forced labor, fishmeal costs would rise, making it more difficult for these exporters to underprice American seafood in the U.S. market.

Our written comments detail fishmeal imports in each of the seven countries and describe the forced labor concerns with significant amounts of these imports, particularly with respect to fishmeal sourced from Peru, Vietnam, Oman, Myanmar, and China. For these reasons, the Southern Shrimp Alliance strongly supports the imposition of additional tariffs on imported merchandise from Ecuador, China, India, Indonesia, Thailand, Vietnam, and Mexico and requests that the USTR ensure that such additional tariffs be imposed on all seafood imports.

Several seafood importers and foreign seafood exporters have provided comments asserting that the U.S. market is fundamentally dependent upon imports. They rely upon market share figures to assert the need for unlimited access to foreign sources of supply. After decades of preferential access afforded to foreign seafood over U.S.-produced seafood, the Southern Shrimp Alliance notes that this argument callously disregards the thousands of American families that have been forced out of the industry while importers engage in their race to the absolute bottom to pad their profits. Beyond running directly contrary to the clearly stated goal of this Administration to increase American seafood production, shrimp importers and their apologists have not demonstrated that meaningful steps have been taken to eliminate forced labor produced inputs from their supply chains. Instead, shrimp importers have elected to object to any increase to their acquisition costs, putting their moral bankruptcy on full display.

On behalf of the Southern Shrimp Alliance, thank you for the opportunity to present the concerns of the U.S. shrimp industry today. I welcome any questions you may have regarding my testimony.