



MARINE MAMMAL COMMISSION

25 March 2016

Mr. Mark Wildman
Office for International Affairs and Seafood Inspection
NOAA Fisheries
1315 East-West Hwy
Silver Spring, MD 20910

Dear Mr. Wildman:

The Marine Mammal Commission (the Commission) has reviewed the National Marine Fisheries Service's (NMFS) 5 February 2016 proposed rule (81 Fed. Reg. 6210) on the Seafood Import Monitoring Program. As the Commission noted in its letter of [16 January 2015](#) commenting on Illegal, Unreported, and Unregulated (IUU) Fishing and Seafood Fraud, the Commission's primary focus and duties are the protection and conservation of marine mammals, including the health and stability of the marine ecosystems that support these marine mammals. As such, the Commission promotes fishing practices that are sustainable not just for the target species, but for the marine ecosystems that support target and bycatch species. Consistent with its duties, the Commission has repeatedly emphasized the responsibility of the United States, as one of the major importers of both wild and farmed seafood products, to consider the impact of those imports on global marine ecosystems and the species they support.

The proposed rule outlining the seafood import monitoring program is an important step in the direction of addressing U.S. responsibilities as consumers of globally harvested and farmed seafood. The streamlining and integration of current filing and recordkeeping procedures for tracking seafood imports will greatly simplify the monitoring of seafood imports and reduce the administrative burden on government agencies responsible for these programs. Shifting from paper to electronic systems and eliminating redundant or duplicative requirements will also enhance the quality of the information, while reducing the burden on the seafood industry. The Commission welcomes this important step in implementing the Presidential Memorandum to combat IUU fishing and seafood fraud.

The Commission understands that the design of this import monitoring program will allow the addition of species and products whose imports may need to be closely monitored in the future, such as seafood products from fisheries whose marine mammal bycatch programs have been determined not to be comparable to U.S. standards. As the Commission noted in its [9 November 2015](#) letter commenting on the implementation of the fish import provisions of the Marine Mammal Protection Act (MMPA), there will be a need for a very accurate traceability system to implement any future bans on imports of seafood under that rulemaking. The information needs for the envisioned MMPA import monitoring program will have to be sufficiently rigorous to track and differentiate between similar products originating from the same country depending on how those products were caught and the impact of each fishery on marine mammals.

Mr. Mark Wildman

25 March 2015

Page 2

The Commission supports the implementation of this seafood import monitoring program.

Sincerely,

A handwritten signature in blue ink that reads "Rebecca J. Lent". The signature is written in a cursive style with a prominent flourish at the beginning.

Rebecca J. Lent, Ph.D.

Executive Director