

June 21, 2016

*Via email to the Gulf of Mexico Fishery Management Council: [gulfcouncil@gulfcouncil.org](mailto:gulfcouncil@gulfcouncil.org)*

Kevin Anson, Chair  
Gulf of Mexico Fishery Management Council  
2203 N. Lois Avenue, Suite 1100  
Tampa, FL 33607

**RE: Oceana's Written Comment on IUU and Seafood Fraud**

Dear Chairman Anson:

As you know, NOAA published a proposed rule in February of 2016 that outlines a seafood traceability program<sup>1</sup>. This program is one of fifteen recommendations outlined in the Action Plan put forth by the Presidential Task Force on Combating Illegal, Unreported and Unregulated (IUU) Fishing and Seafood Fraud and is a strong step in the right direction to combat seafood fraud and ensure that all seafood is safe, legal and honestly labeled.

The proposed rule outlines traceability requirements for seafood "at risk" of IUU fishing and seafood fraud. The rule proposes tracing "at risk" seafood from the catch location or farm to the first point of entry into the U.S. Although the proposed traceability program is a huge step in the right direction, it doesn't go far enough to fully address seafood fraud and leaves significant gaps that Oceana recently detailed in the cited report.<sup>2</sup> Studies conducted by Oceana found 50 types of mislabeled seafood, yet the proposed rule only mandates traceability for 13 (or 74%) of them. Oceana also found that 78% of the mislabeled seafood cases identified in our study occurred within the U.S.<sup>2</sup>, yet the proposed Seafood Traceability rule only tracks seafood until it arrives at the border.

Oceana would therefore like to ask the GMFMC to remain engaged in the rulemaking process for this important measure to protect honest fishermen. The Seafood Traceability rule as proposed must be strengthened to be effective in combatting IUU fishing or seafood fraud including a number of species managed by the South Atlantic Fishery Management Council and caught by fisheries in the SE region. The rule must be amended to add a timeline to expand traceability for all species and to outline additional efforts to extend its range to include all points in the supply chain.

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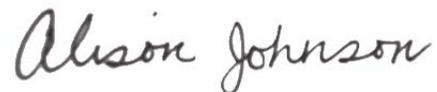
<sup>1</sup> Fed. Reg. Notice (81 FR 6210, February 5, 2016). *available at:* <https://www.federalregister.gov/articles/2016/02/05/2016-02216/magnuson-stevens-fishery-conservation-and-management-act-seafood-import-monitoring-program> )

<sup>2</sup> GAP Report, Oceana Reveals Shortfalls in Proposed Traceability Rule to Address Seafood Fraud. *available at:* [http://usa.oceana.org/sites/default/files/fraud\\_gap\\_report\\_final\\_6\\_6\\_16.pdf](http://usa.oceana.org/sites/default/files/fraud_gap_report_final_6_6_16.pdf)

Oceana is committed to work with the Council to further protect management efforts and affected industries in our region from IUU fishing and mislabeled seafood. Seafood fraud hurts the fishery, consumers as well as honest fishermen who play by the rules.

We appreciate the opportunity to provide input and thank you for your time. We will continue to be engaged in this process moving forward.

Sincerely,

A handwritten signature in black ink that reads "Alison Johnson". The signature is written in a cursive, flowing style.

Alison Johnson  
Southeast Campaign Manager  
Oceana, Inc.

*Oceana is the largest international advocacy organization focused solely on ocean conservation. We run science-based campaigns and seek to win policy victories that can restore ocean biodiversity and ensure that the oceans are abundant and can feed hundreds of millions of people. Oceana victories have already helped to create policies that could increase fish populations in its countries by as much as 40 percent and that have protected more than 1 million square miles of ocean. We have campaign offices in the countries that control close to 40 percent of the world's wild fish catch, including in North, South and Central America, Asia, and Europe. To learn more, please visit [www.oceana.org](http://www.oceana.org).*