

# No Questions Asked

Nearly 60% of U.S. Seafood  
Imports Escape Scrutiny



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# Introduction

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**S**eafood consumers have a right to know more about the seafood they eat, including what fish it is, as well as where and how it was caught. In the United States, consumers receive little information about their seafood, and when they do, lax traceability requirements can enable a bait and switch or allow illegally sourced seafood to end up on their plates. Seafood follows a complex path in the supply chain from boats and farms to factories and markets. Sometimes seafood is shipped around the world and can often lose its identity in the process. Despite this complexity and the high demand for seafood, oversight of the seafood supply chain falls short. American dollars continue to support illegal fishing, forced labor, and threaten the livelihoods of responsible fishers across the globe.<sup>1</sup> Ninety-two percent of American consumers agree that they want to be confident in the seafood they eat, including that it is safe, legally caught, honestly labeled, and responsibly sourced.<sup>2</sup>

With the growing threat of illegal, unreported, and unregulated (IUU) fishing surpassing even piracy as the main concern for many enforcement agencies, increasing transparency in the seafood sector is vital to ensure that all seafood is safe, legally caught, responsibly sourced, and honestly labeled.<sup>3</sup> IUU fishing directly contributes to overfishing; threatens the sustainability of fisheries and marine ecosystems; undermines coastal communities and food security; destabilizes maritime security; and economically disadvantages fishers operating legally.<sup>4,5</sup> These activities are often intertwined with other criminal activities like document forgery; money laundering; forced labor; and human, drug, and wildlife trafficking.<sup>6,7</sup> When vessels are already evading laws, they may be more willing to further drive down

costs by exploiting workers through forced labor. Currently, an estimated 128,000 fishers are trapped in forced labor situations at sea worldwide.<sup>8</sup>

In the United States, up to 85% of seafood is imported. In 2022, the United States imported 3.4 billion kilograms of seafood worth more than \$30.4 billion dollars—a 7% increase in value from 2021.<sup>9</sup> To combat IUU fishing and seafood fraud, the National Oceanic and Atmospheric Administration (NOAA) established the Seafood Import Monitoring Program (SIMP) in 2016, which requires catch documentation and traceability requirements for some seafood imports. SIMP applies to 13 species and species groups at risk of IUU fishing and seafood fraud: abalone, Atlantic cod, blue crab (Atlantic), dolphinfish (mahi mahi), grouper, red king crab, Pacific cod, red snapper, sea cucumber, sharks, shrimp, swordfish, and tuna (albacore, bigeye, skipjack, yellowfin, bluefin).

Countries known to conduct IUU fishing, or that have poor enforcement to stop IUU fishing in their waters or by their fleets, are major sources of the seafood consumed in the United States. A 2021 report by the International Trade Commission (ITC) estimated that nearly 11% of U.S. seafood imports were derived from IUU fishing in 2019, worth nearly \$2.4 billion dollars.<sup>1</sup> Identifying the top IUU fishing nations can be a complex and evolving issue, as it often involves illegal activities that are intentionally concealed or difficult to track. Both the United States and the European Union (EU) have systems in place to address nations that have committed IUU fishing violations or failed to stop IUU fishing activities in their waters or by their fleets.



## NOAA's process for identifying IUU nations

Under the High Seas Driftnet Fishing Moratorium Protection Act, NOAA identifies and later certifies nations engaged in IUU fishing. This process starts with an information gathering process to determine whether a nation or entity has engaged in IUU fishing activities. Every two years, NOAA sends a report to Congress that identifies nations with vessels engaged in IUU fishing or the bycatch of protected species on the high seas. Following this identification, NOAA starts a two-year consultation period. At the end of this period, NOAA announces in the next Biennial Report to Congress whether to negatively or positively certify the nation or entity.<sup>10</sup> A nation is positively certified when it takes actions to address the reasons why it was identified. When a country receives negative 'certification', the United States may deny port privileges for that country's fishing vessels and other responsive measures as well.<sup>11</sup>

## EU Carding Process

In 2010, the EU implemented its anti-IUU fishing regulation.<sup>12</sup> The EU's regulation requires countries to certify the origin and legality of the seafood products they are exporting to the EU. In addition to the catch documentation, the regulation also created a system where the EU can take action against countries who fail to tackle IUU fishing, called the carding system. Under the regulation, a non-EU country "may be identified as a non-cooperating third country if it fails to discharge the duties incumbent upon it under international law as flag, port, coastal or market State, to take action to prevent, deter and eliminate IUU fishing."<sup>13</sup> If the EU deems this to be the case, and initial informal discussions between the two parties fail to yield sufficient progress, the non-EU country will begin the carding process, commencing formal bilateral discussions. The issuing of a yellow card (or pre-identification) indicates an official warning that the EU considers a country to be failing in its efforts to take sufficient action against IUU fishing, and it lets countries know that they are at risk of being formally identified as a non-cooperating country pursuant to the IUU regulation (identification or red card). If a yellow carded country is deemed by the EU to take sufficient action to address concerns around non-cooperation, it will have its card revoked, meaning it will have full access to EU markets again. However, should the yellow carded country still fail to take the necessary steps the EU can issue a red card. Upon approval by EU Member States, a red carded country will be officially 'listed as a non-cooperating country.' This means that vessels flying the flag of the carded country will be banned from exporting seafood products to the EU and that EU fishing vessels cannot fish in the waters of the carded country, among other restrictions.<sup>14</sup>





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To understand how much of the seafood imported into the United States is from countries that are at a high risk of IUU fishing and what is covered by SIMP, Oceana analyzed\* data and Harmonized Tariff Schedule (HTS) codes available on NOAA Fisheries' Foreign Trade database, which is produced from the U.S. Census Bureau's Foreign Trade Data Series for 10 countries.<sup>9</sup> This report details trade data from China, Russia, Vietnam, Mexico, Taiwan, Costa Rica, Senegal, Panama, Cameroon, and Cambodia.

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\* Each import is assigned a 10-digit Harmonized Tariff Schedule (HTS) code that is used by the Bureau of Customs and Border Protection (CBP) to identify incoming products.<sup>15</sup> Using NOAA Fisheries Foreign Trade database, Oceana analyzed the imports entering the U.S. between 2019 and 2022 from China, Russia, Vietnam, Mexico, Taiwan, Costa Rica, Senegal, Panama, Cameroon, and Cambodia. NOAA Fisheries uses publicly available data provided by the U.S. Census Bureau as part of its Foreign Trade Data Series, which covers all Merchandise Trade (FR900). The data from NOAA Fisheries is a subset of the Census data which only includes fishery relevant products.<sup>9</sup> To isolate the imports covered by SIMP, each HTS number included in the list of imports for each country was compared to NOAA's list of HTS codes monitored under SIMP, which was last updated in July 2021.<sup>16</sup> After identifying which imports were covered by SIMP, the total volume, total value, and percent of the total imports from that country that are covered by SIMP were calculated.

The specific wording of product names and descriptions varies between the NOAA Fisheries data set and CBP's HTS codes list. For the purposes of this report, Oceana uses the product names found in NOAA Fisheries Foreign Trade Database to identify the different types of imports. Some product names were modified from their original format to explain abbreviations and improve overall clarity.

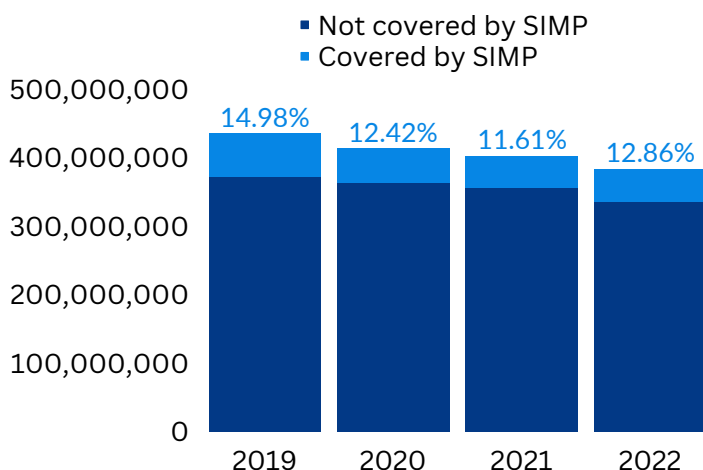
In some instances, SIMP covers a specific species that is part of a larger species group and might be labeled generically. In these cases, the HTS code description does not indicate the specific species that was imported, and it is impossible to determine whether that import was subject to SIMP. For example, only red king crab are currently covered by SIMP, but imports might be labeled as just "king crab" in the product description or appear as one item in a longer list that includes multiple species. To compensate for this, all imports labeled "king crab," "crabmeat king," or "red king crab" were included for the purposes of this report, which means these calculations err on the conservative side.



# China

China has been implicated as the most prolific country in the world for committing IUU fishing.<sup>17-19</sup> China has the world's largest fishing fleet and is a major processor and exporter of seafood. Large subsidies from its government have allowed for rapid expansion and technological advancement of China's distant water fleet (DWF), which consists of thousands of ships operating all around the world.<sup>20</sup> The Chinese fishing fleet has been implicated in IUU fishing activities for violating conservation measures, breaking international laws, and committing human rights abuses and forced labor at sea.<sup>1,21</sup> The actions of China's fleet have a significant impact on global fisheries management.

**Total volume (kg) of seafood imported from China with percentage of volume covered by SIMP**



In 2022, China exported nearly **400 million kilograms** of seafood products, valued at nearly **\$2 billion**, to the United States, which makes up 11.39% of the total volume and 6.37% of the total value of seafood imports to the United States.

In 2022, **12.86%** of the total volume of U.S. imports from China were covered by SIMP.

## Top 10 U.S. seafood imports from China in 2022

by value (USD) and HTS code

1. Frozen tilapia fillet
2. Frozen cod (non-specified species) fillet
3. Frozen Salmon (non-specified species) fillet
4. Frozen haddock fillet
5. Frozen Alaskan pollock fillet
6. Swimming crabmeat (*Portunidae*) in airtight container
7. Groundfish (non-specified species) fillet dried/salted/brine
8. Frozen squid (non-specified species)
9. Frozen tilapia
10. Frozen marine fish (non-specified species)

\*SIMP covered species

In a 2021 report, Oceana found that hundreds of Chinese vessels have been intensely fishing the waters near sensitive marine areas in the Galapagos islands, a UNESCO World Heritage Site.<sup>22</sup> These DWFs were primarily fishing for shortfin squid, a vital part of South America's economy and ecosystem.<sup>22</sup> In another investigation, Oceana also found more than 6,000 events around Argentina where Chinese vessels' tracking devices called Automatic Identification Systems (AIS) were not broadcasting, which might indicate vessels disabling their tracking devices intentionally.<sup>23</sup> By obscuring their location, this could potentially hide illegal behaviors such as crossing into Argentina's national waters to illegally fish.

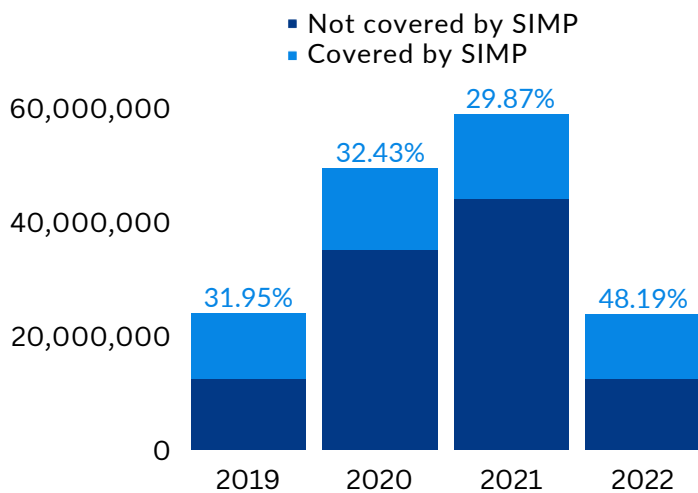
Argentina is not the only country to report IUU fishing activities carried out by Chinese-flagged vessels. Elsewhere in South America, Chinese trawlers have been spotted off the coasts of Ecuador and Peru.<sup>21,24,25</sup> China's DWF also has a growing presence off many African countries' coasts where they have targeted small schooling fish like sardinella. Ghana has detected dozens of Chinese trawlers entering its national waters.<sup>21</sup> Indonesia has also taken action historically, by seizing and detonating Chinese-flagged trawlers to deter poaching.<sup>21</sup>



# Russia

In 2022, President Biden issued an executive order banning the import of Russian seafood and other goods. NOAA has previously identified Russia in the 2021 Biennial Report to Congress for its vessels engaging in fishing activities that violate conservation measures and for failing to take appropriate corrective actions against perpetrators of IUU fishing.<sup>10</sup> Russia is also known to use flags of convenience on its vessels.<sup>26</sup> Countries use flags of convenience by registering their vessels under a foreign flag that bears no association with the nationality of the vessel's owner or operator.<sup>27</sup> While switching flags does not necessarily mean that these vessels are engaging in illegal activity, it is a common tactic used to avoid scrutiny, and in this case, possibly sanctions.

**Total volume (kg) of seafood imported from Russia with percentage of volume covered by SIMP**



In 2022, before President Biden's ban on importing Russian seafood went into effect on June 23, Russia exported nearly **24 million kilograms** of seafood products, valued at over **\$900 million**, to the United States, which makes up 0.71% of the total volume and 3.04% of the total value of seafood imports to the United States.

In 2022, **48.19%** of the total volume of U.S. imports from Russia were covered by SIMP.

## Top 10 U.S. seafood imports from Russia in 2022

by value (USD) and HTS code

1. Frozen red king crab (*Paralithodes camtschaticus*)
2. Frozen snow crab
3. Frozen golden crab/brown king crab (*Lithodes aequispinus*)
4. Frozen blue king crab (*Paralithodes platypus*)
5. Frozen sockeye salmon
6. Frozen cod fillet (non-specified species)
7. Frozen cod (non-specified species)
8. Frozen minced Alaskan pollock
9. Frozen salmon chum
10. Frozen flatfish (Pacific halibut)

\*SIMP covered species

Since 2014, Russian seafood exports to the United States have grown by 173%.<sup>28</sup> In 2021, Russia exported \$1.2 billion worth of crab, cod, pollock, salmon, and other fish to the United States.<sup>29</sup> Currently, Russia is under U.S. sanctions, preventing the import of Russian seafood, oil, and other goods as a response to the country's invasion of Ukraine. Despite the ban, loopholes in SIMP continue to make it possible for Russian seafood to slip into the United States. According to reports from the Wall Street Journal and the Associated Press, Russian-caught seafood is often shipped to other countries like China for processing and relabeling, then imported into the United States without affiliation to Russia.<sup>30,31</sup>

A report from the International Trade Commission found that, while not illegal, over a quarter (26.8%) of the processed wild-caught fish imported to the United States from China in 2019 was caught by Russian ships.<sup>32</sup> This includes 69% of Atlantic cod imports and 50% of Alaskan pollock.<sup>32,33</sup> Another study found that 39% of the processed salmon imported from China also came from Russia.<sup>34</sup>

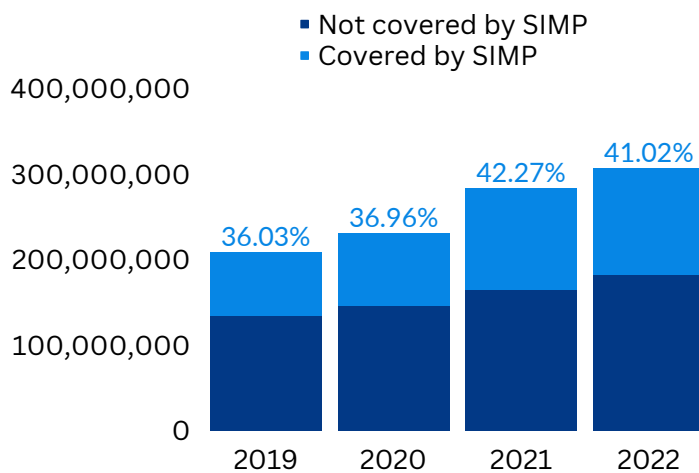
Russian ships have been found operating illegally around the world. In 2022, 18 Russian flagged vessels reportedly re-flagged to other nations including the Marshall Islands, a country which allows vessels from other nations to fly its flag.<sup>26</sup> In 2020, the *F/V Palmer*, a vessel flagged to the Russian Federation, was detected in an area within the Commission for the Conservation of Antarctic Marine Living Resources (CCAMLR) that was closed to all fishing. Photographic evidence showed the vessel equipped with fishing gear.<sup>10</sup>



# Vietnam

Vietnam has struggled to curtail IUU fishing by its fleet. Vietnamese fishing vessels have been caught illegally entering the waters of Pacific Island nations. Vietnam was issued a yellow card warning in 2017 by the European Union when it deemed Vietnam's efforts to discourage IUU fishing to be insufficient due to an ineffective sanctioning system and an overall lack of action to address IUU fishing activities.<sup>35</sup> While Vietnam instituted a new Fisheries Law in 2017, there is still little control of fish landings and processing with weak penalties for IUU fishing activities.<sup>36</sup>

**Total volume (kg) of seafood imported from Vietnam with percentage of volume covered by SIMP**



In 2022, Vietnam exported more than **300 million kilograms** of seafood products, valued at more than **\$2 billion**, to the United States, which makes up 9.11% of the total volume and 7.32% of the total value of seafood imports to the United States.

In 2022, **41.02%** of the total volume of U.S. imports from Vietnam were covered by SIMP.

## Top 10 U.S. seafood imports from Vietnam in 2022

by value (USD) and HTS code

1. Frozen catfish (*Pangasius*) fillet
2. Frozen shrimp other preparations
3. Frozen tuna fillet (non-specified species)
4. Frozen warm-water farmed shrimp peeled
5. Frozen breaded shrimp
6. Frozen tuna yellowfin eviscerated head-off
7. Frozen shrimp warm-water shell-on farmed
8. Swimming crabmeat (Portunidae) in airtight container
9. Frozen marine fish fillet (non-specified species)
10. Tuna albacore in airtight container (other) not in oil over quota

\*SIMP covered species

Small Vietnamese fishing vessels called “blue boats” were found illegally entering other nations’ exclusive economic zones (EEZs) to fish on remote reefs for high value species like sea cucumbers and giant clams.<sup>37</sup> Indonesia, Palau, Federated States of Micronesia, Papua New Guinea, Australia, New Caledonia, Malaysia, and Thailand have all reported unauthorized Vietnamese fishing activity in their territorial waters.<sup>38,39</sup> In 2016, Palau authorities set fire to a Vietnamese vessel which was fishing near Tobi Island in Palau’s EEZ. The vessel was reported to have sea cucumbers, shellfish, turtles, and other protected species on board.<sup>38,40</sup>

In 2022, 104 Vietnamese fishing vessels and 919 fishers were detained for possible IUU fishing activities abroad.<sup>36</sup> As result, the EU may choose to issue Vietnam a red card that would ban all seafood exports from Vietnamese flagged vessels from entering the EU.<sup>41</sup> To not receive a red card, the Vietnamese government has made a pledge to end all IUU fishing by May 2023 by imposing sanctions on vessels engaged in IUU fishing activities in foreign waters, increasing surveillance measures, advancing registration systems, and improving fishing license controls.<sup>36,42</sup> However, Vietnam similarly pledged to “end IUU fishing” in the country in 2021, with apparently insufficient results.<sup>43</sup>

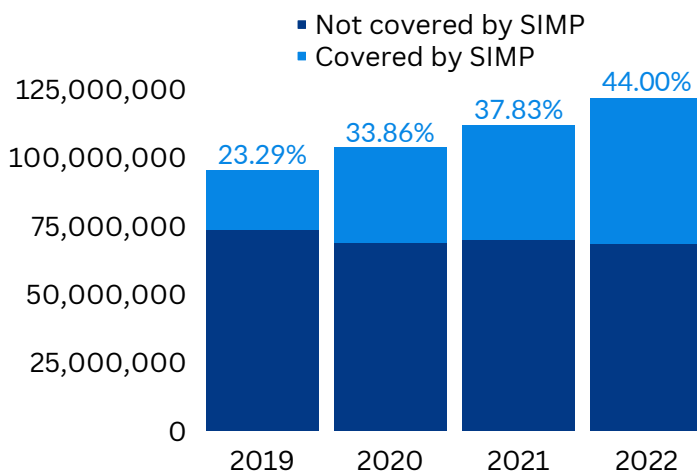
Vietnamese fish have been included on the U.S. Department of Labor’s List of Goods Produced by Child Labor or Forced Labor. This list, last updated in 2022, includes fish from Vietnam due to the high likelihood of child labor. According to a survey by the government of Vietnam evaluating national child labor in 2012, there were an estimated 49,390 child laborers working in the fisheries sector. The survey considered child labor to be when the child is “working an excessive number of hours per week for his or her age, or if the child is engaged in work that is prohibited for underage employees.” Additionally, it was estimated that close to 20,000 of those child laborers worked more than 42 hours a week in fisheries. The majority of these child laborers were found working in hazardous conditions. Another estimated 15,720 child laborers were involved in the post-harvest sector of fisheries, working in processing, preservation, and production of fish and fish products.<sup>44</sup>



# Mexico

IUU fishing is often considered a low-risk, high-reward activity as it has relatively low consequences and provides opportunities for other crimes to occur in tandem.<sup>45</sup> In Mexico, illegal fishing has often been linked to cartel activities including drug smuggling.<sup>46</sup> The U.S. Coast Guard (USCG) has intercepted hundreds of small, Mexican fishing vessels, called 'lanchas' or small boats, and seized thousands of pounds of illegally caught seafood.<sup>47,48</sup> NOAA negatively certified Mexico for IUU fishing in its 2021 Report to Congress. This certification resulted in a ban for all Mexican fishing boats operating in the Gulf of Mexico from entering U.S. ports. This negative certification came after Mexico was identified for having vessels engaged in IUU fishing activities in NOAA's 2015, 2017, and 2019 reports and failed to adequately address this issue.<sup>10,48-52</sup>

**Total volume (kg) of seafood imported from Mexico with percentage of volume covered by SIMP**



In 2022, Mexico exported nearly **122 million kilograms** of seafood products, valued at nearly **\$800 million**, to the United States, which makes up 3.62% of the total volume and 2.63% of the total value of seafood imports to the United States.

In 2022, **44.00%** of the total volume of U.S. imports from Mexico were covered by SIMP.

## Top 10 U.S. seafood imports from Mexico in 2022

by value (USD) and HTS code

1. Frozen wild warm-water Shrimp shell-on < 15
2. Tuna bluefin Atlantic, Pacific fresh
3. Fresh Snapper (*Lutjanidae spp.*)
4. Tuna (non-specified species) in airtight container (other) not in oil over quota
5. Shrimp warm-water shell-on frozen wild 15/20
6. Grouper fresh
7. Fresh marine fish fillet (non-specified species)
8. Shrimp warm-water shell-on frozen farmed 21/25
9. Fish, shellfish meal unfit for human consumption
10. Shrimp warm-water shell-on frozen farmed 31/40

\*SIMP covered species

In 2019, Mexico was identified by NOAA for having fishing vessels engaged in illegal fishing activities in the Gulf of Mexico. These vessels were primarily small, Mexican-flagged vessels called lanchas that were continually entering U.S. waters without authorization and suspected of illegally catching red snapper in U.S. waters.<sup>53,54</sup> In 2020 the USCG indicted 140 lanchas for illegal fishing, twice that of 2019, however this represents less than 0.1% of Mexico's small fishing vessels.<sup>55</sup> In January 2023, the USCG confiscated 159 kilograms of illegally caught red snapper from a Mexican lancha found approximately 59 kilometers north of the maritime boundary line, which separates the 12 nautical mile Mexican sea and the territorial sea and contiguous zone of the U.S., and only 24 kilometers from shore.<sup>56,57</sup> According to U.S. Customs and Border Patrol (CBP), a lancha can have between 2,200 and 6,600 kilograms of illegal red snapper on board.<sup>46</sup> Red snapper is a particularly lucrative species because of its high value in American markets; and in 2022, Mexico exported 4,952,432 kilograms of red snapper to the United States.<sup>9,46</sup>

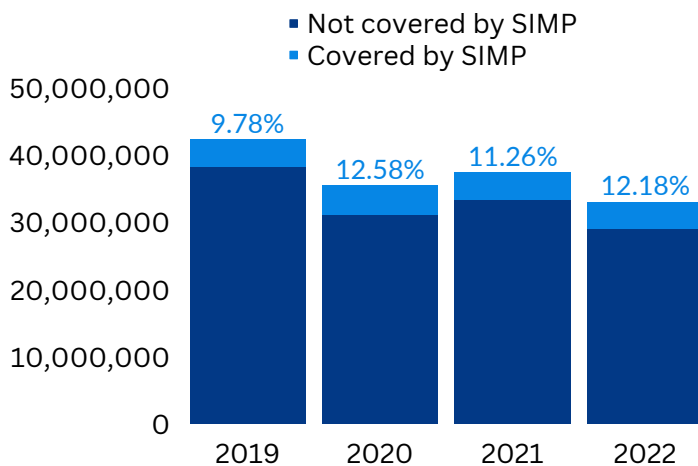
IUU fishing in Mexico also highlights its connection to other types of organized crime. Vessels engaged in illegal fishing activities have also been linked to cartels operating in Mexico.<sup>46</sup> According to reporting by NPR, these vessels are aiding in the trafficking of drugs and, in return, the cartels are allegedly helping fund replacements boats for fishermen who are caught by law enforcement.<sup>46</sup>



# Taiwan

Vessels flagged to Taiwan have participated in IUU fishing and human rights abuses. In 2019, the U.S. Department of Labor linked Taiwanese seafood to forced labor.<sup>58,59</sup> Taiwanese crews have also reported instances of serious human rights violations onboard vessels.<sup>59,60</sup> NOAA identified Taiwan in the 2021 Biennial Report to Congress for having vessels that violated conservation measures in multiple conservation areas between 2018 and 2020, and for failing to take appropriate corrective actions for those violations.<sup>10</sup>

Total volume (kg) of seafood imported from Taiwan with percentage of volume covered by SIMP



In 2022, Taiwan exported nearly **33 million kilograms** of seafood and seafood products, valued at nearly **\$182 million**, to the United States, which makes up 0.98% of the total volume and 0.60% of the total value of seafood imports to the United States.

In 2022, **12.18%** of the total volume of U.S. imports from the Taiwan were covered by SIMP.

## Top 10 U.S. seafood imports from Taiwan in 2022

by value (USD) and HTS code

1. Frozen tilapia
2. Frozen tuna fillet (non-specified species)
3. Frozen dolphinfish fillet
4. Frozen marine fish (non-specified species)
5. Frozen tilapia fillet
6. Frozen squid (non-specified species)
7. Frozen marine fish fillet (non-specified species)
8. Caviar substitute
9. Frozen tilapia (non-specified species)
10. Squid (non-specified species) dried/salted/brine

\*SIMP covered species

Taiwan has the second largest DWF in the world with over 1,000 Taiwanese-flagged and more than 200 Taiwanese-owned, foreign-flagged DWF vessels.<sup>61</sup> In 2020, U.S. Customs and Border Protection (CBP) determined that there was evidence of forced labor on a Taiwanese fishing vessel.<sup>62</sup> Vessels flagged to Taiwan were issued a Withhold and Release Order (WRO) by CBP for imports with suspected connections to forced labor.<sup>62</sup> Under the Tariff Act, goods either fully or partially produced with forced labor are not allowed into the United States. When CBP issues a WRO, those imports are automatically detained at the port of entry and prevented from entering the United States unless the importer can demonstrate that the merchandise was not produced with forced labor.<sup>62</sup>

There have been several reports of debt bondage, withholding wages, human trafficking, physical abuse, and even murder at sea.<sup>61,63,64</sup> It is estimated that there are more than 700,000 migrant workers aboard Taiwanese vessels from Indonesia, the Philippines, Vietnam, and Cambodia.<sup>61,64</sup> Some of these migrant workers may end up on DWF vessels and can remain at sea for a year or more. Despite receiving 1,521 complaints from migrant fishers working in coastal fishing between 2017 and 2019, with 110 aimed at a single third-party brokerage agency, the Taiwanese government has yet to address the systems in place that allow for these human rights abuses to continue.<sup>64</sup>

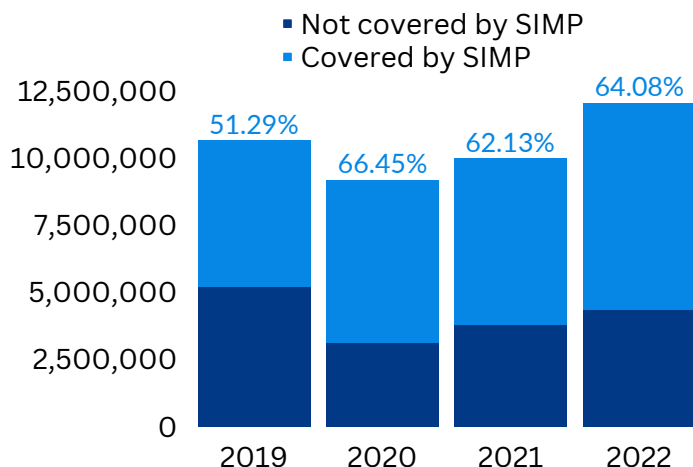
Seafood products caught by Taiwanese vessels were included in the 2022 U.S. Department of Labor's List of Goods Produced by Child Labor or Forced Labor. Inclusion on the list does not result in punitive actions by the government. Rather, it is a tool used to raise public awareness about forced labor and child labor. It is primarily a resource for researchers, advocacy organizations, companies, and other groups working to combat forced labor and child labor.<sup>44</sup>



# Costa Rica

Costa Rica has failed to effectively manage and control its fishing fleet.<sup>10</sup> Costa Rica was identified by NOAA in its 2021 Biennial Report to Congress for having vessels engaged in IUU fishing activities by violating international conservation agreements and fishing regulations within International Commission for the Conservation of Atlantic Tunas (ICCAT).<sup>10</sup>

Total volume (kg) of seafood imported from Costa Rica with percentage of volume covered by SIMP



In 2022, Costa Rica exported more than **12 million kilograms** of seafood products, valued at nearly **\$94 million**, to the United States, which makes up 0.36% of the total volume and 0.31% of the total value of seafood imports to the United States.

In 2022, **64.08%** of the total volume of U.S. imports from Costa Rica were covered by SIMP.

## Top 10 U.S. seafood imports from Costa Rica in 2022

by value (USD) and HTS code

1. Fresh tilapia fillet
2. Fresh dolphinfish
3. Fresh snapper (*Lutjanidae spp.*)
4. Fresh yellowfin Tuna
5. Tuna in airtight container (other) in oil (non-specified species)
6. Fresh swordfish
7. Fresh marine fish fillet
8. Frozen dolphinfish fillet
9. Tuna albacore in airtight container (other) not in oil over quota
10. Tuna (non-specified species) in airtight container (other) not in oil over quota

\*SIMP covered species

In the 2021 Biennial Report to Congress, NOAA found that Costa Rica did not regularly or fully report data as required by the International Commission for the Conservation of Atlantic Tunas (ICCAT).<sup>10</sup> Vessels flagged to Costa Rica caught North Atlantic swordfish without having a quota and exceeded catch limits of Atlantic white marlin. Overall, Costa Rica has failed to effectively manage or control the activities of its fleet and comply with international agreements.<sup>58</sup>

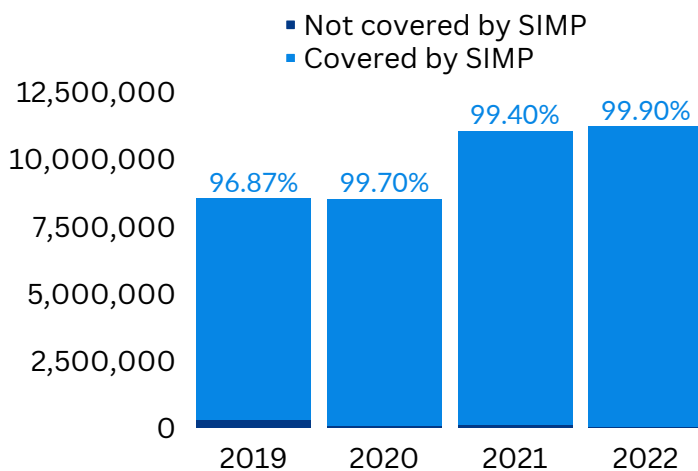
NOAA also identified Costa Rica for catching sharks in violation of international conservation agreements and then failing to investigate this activity or take corrective actions.<sup>10,65</sup>



# Senegal

IUU fishing is a serious threat to Senegal's economy and food security. Seafood accounts for approximately 40% of the animal protein consumed in Senegal.<sup>66</sup> The country lost an estimated 3.2% of its total GDP to IUU fishing activities in 2012.<sup>67</sup> In recent years, Senegal has taken steps to improve its response to IUU fishing, including creating a national action plan to combat IUU fishing. However, IUU fishing activities persist in the country. Senegal has a relatively low capacity for detecting and deterring IUU fishing. While Senegal developed a new Fisheries Code with a decree on enforcement, challenges remain in ensuring its effectiveness and ability to monitor vessels flying its flag.<sup>67-69</sup>

**Total volume (kg) of seafood imported from Senegal with percentage of volume covered by SIMP**



In 2022, Senegal exported nearly **12 million kilograms** of seafood products, valued at nearly **\$72 million**, to the United States, which makes up 0.35% of the total volume and 0.24% of the total value of seafood imports to the United States.

In 2022, **99.90%** of the total volume of U.S. imports from Senegal were covered by SIMP.

## Top 10 U.S. seafood imports from Senegal in 2022

by value (USD) and HTS code

1. Tuna (non-specified species) in airtight container (foil or flexible) not in oil over quota
2. Tuna (non-specified species) in airtight container (foil or flexible) in oil
3. Fresh grouper
4. Shrimp peeled dried/salted/brine
5. Shrimp warm-water peeled fresh
6. Frozen octopus
7. Frozen cuttlefish
8. Frozen marine fish (non-specified species)
9. Fresh dolphinfish
10. Fresh marine fish (non-specified species)

\*SIMP covered species

Despite apparent efforts to strengthen its combatting of IUU fishing, Senegal still struggles with its capacity to identify instances of illegal fishing and enforcement efforts. Many of Senegal's most lucrative, high market value fisheries are fully or overexploited.<sup>67</sup> Other countries like Russia and China have taken advantage of Senegal's lack of enforcement and sending their DWFs into Senegalese waters with relatively little fear of repercussion.<sup>69</sup> According to Senegal's government, foreign vessel owners may be fined up to \$1.8 million for illegal fishing, but a weak surveillance system means that many vessels are still slipping through without punishment.<sup>66</sup>

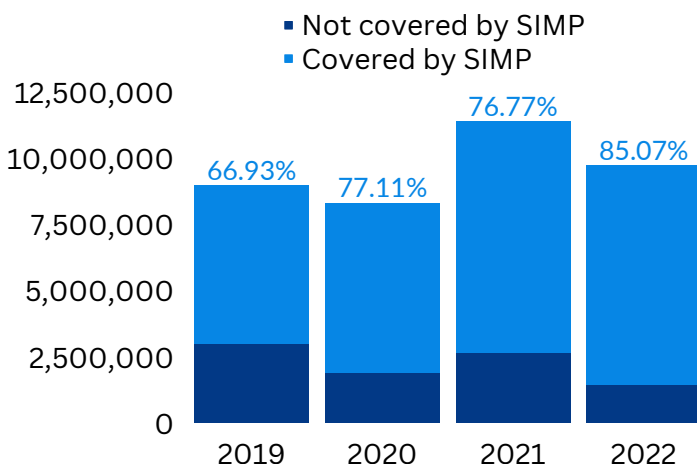
More pressure than ever is being put on Senegal's fisheries as it has been increasing its exports of fish and fisheries products.<sup>70</sup> Seafood products account for around 10.2% of Senegal's exports. Many of these exports include species like small, migratory fish, which are an important part of local diets.<sup>71</sup>



# Panama

Panama is considered a flag of convenience country, meaning foreign vessels can fly the Panamanian flag in order to gain access to other waters, avoid regulations they would face in their own countries, reduce operating costs, or avoid scrutiny for their illegal activities.<sup>72</sup> Flags of convenience can also hide human rights violations at sea as a lack of clear jurisdiction allows for more opportunities for ship owners to take advantage of workers.<sup>27</sup> The country currently has a yellow card from the European Union, meaning they are under warning for having inadequate measures in place to prevent and deter IUU activity.<sup>73</sup>

**Total volume (kg) of seafood imported from Panama with percentage of volume covered by SIMP**



In 2022, Panama exported nearly **10 million kilograms** of seafood products, valued at nearly **\$109 million**, to the United States, which makes up 0.29% of the total volume and 0.36% of the total value of seafood imports to the United States.

In 2022, **85.07%** of the total volume of U.S. imports from Panama were covered by SIMP.

## Top 10 U.S. seafood imports from Panama in 2022

by value (USD) and HTS code

1. Fresh yellowfin tuna
2. Fresh snapper (*Lutjanidae* spp.)
3. Shrimp warm-water shell-on frozen wild
4. Fresh grouper
5. Fresh dolphinfish
6. Frozen dolphinfish fillet
7. Fresh marine fish (non-specified species)
8. Frozen tuna fillet (non-specified species)
9. Swordfish fresh
10. Frozen marine fish fillet (non-specified species)

\*SIMP covered species

The EU issued Panama a yellow card warning for its illegal fishing activities on two separate occasions. The EU lifted the first yellow card in 2014 as a result of action taken by the Panamanian government. However, it was unable to maintain its forward momentum. Due to “significant backtracking,” Panama was issued another yellow card in 2019 due to the use of Panama acting as a flag of convenience.<sup>73</sup> Panama has several cases of Panamanian-flagged vessels that were accused of IUU fishing.<sup>72</sup>

Panama has one of the world's largest registries for fishing vessels. Its relatively lax requirements for the information shared for registration is one of the many reasons why Panama's flag has been so popular for foreign companies. This vessel registry is also a very lucrative enterprise for Panama which generates around \$87.3 million annually from the activity of flagging ships.<sup>72,74</sup>

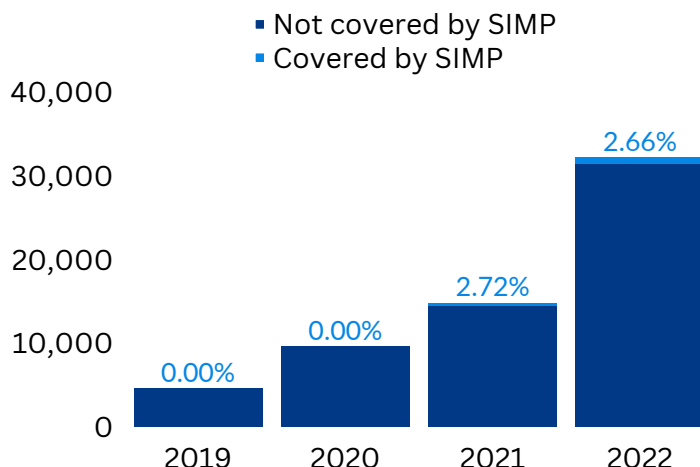
Panamanian-flagged vessels have been accused of illegal fishing off the coast of Africa, Antarctica, and South America. Chinese-owned vessels have also been reported to fly the Panamanian flag in cases of transshipment, which is when one ship transfers its catch or supplies to another vessel, often while still at sea. Transshipment is considered a common method used to obscure illegal fishing activities as the catch from several vessels can be combined together, hiding the origin of seafood.<sup>1</sup> A 2022 investigation by Mongabay Latam and Bloomberg Linea revealed that 28 out of the 32 Panamanian-flagged vessels that were sanctioned by Panama's Maritime Authority between 2019 and 2021 were reefers, which are large, refrigerated ships used to transport catches from fishing vessels at sea.<sup>72,75</sup> All of the sanctioned reefers belonged to foreign companies.<sup>72</sup>



# Cameroon

Cameroon has some of the highest rates of IUU fishing incidences of all the coastal African countries.<sup>76</sup> Cameroon has been noted by the European Union for its lack of alignment with international laws, insufficient collaboration between the administrations that are responsible for fisheries management, and an overall weak system of monitoring, control, and surveillance (MCS).<sup>77</sup> Cameroon has failed to adequately control vessels flagged to its country and not taken enough action to end IUU fishing by its fleet. Cameroon issues flags of convenience, registering vessels that are owned by foreign entities and operate outside its waters.<sup>77,78</sup>

**Total volume (kg) of seafood imported from Cameroon with percentage of volume covered by SIMP**



In 2022, Cameroon exported more than **32,000 kilograms** of seafood products, valued at nearly **\$234,000**, to the United States, which makes up less than 0.01% of the total volume and less than 0.01% of the total value of seafood imports to the United States.

In 2022, **2.66%** of the total volume of U.S. imports from Cameroon were covered by SIMP.

## U.S. seafood imports from Cameroon in 2022

by value (USD) and HTS code

1. Fish waxes (non-specified species), may include spermaceti
2. Snail other than sea snail live/fresh/frozen/salted
3. Crustaceans prepared/preserved (non-specified species)
4. Snail other than sea snail prepared/preserved
5. **Smoked fish (non-specified species)**
6. Rock lobster dried/salted/brine (non-specified species)
7. **Frozen yellowfin tuna**
8. Frozen mollusks (non-specified species)

**\*SIMP covered species**

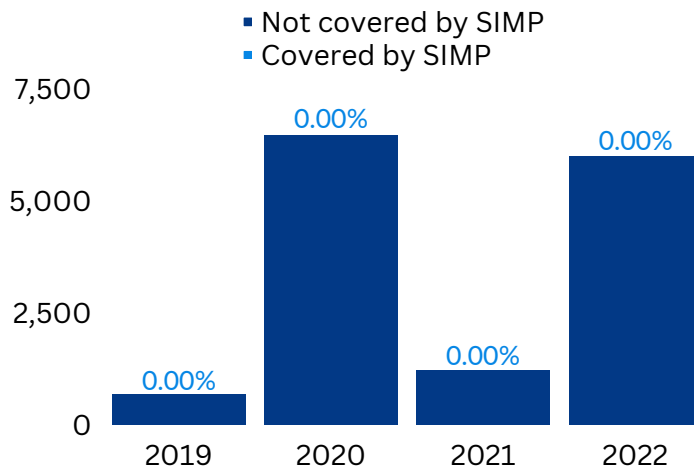
Cameroon first received a yellow card in 2021 from the EU, which is a warning to improve its efforts to tackle IUU fishing.<sup>79</sup> Cameroon has since had an increase in the number of vessels that were listed for IUU fishing activities, an increase in the use of the Cameroonian flag as a flag of convenience, ineffective efforts to control or monitor fishing activities, and an overall lack of cooperation and communication with the EU.<sup>14,80</sup>

In January 2023, the EU issued Cameroon a red card for IUU fishing for its lack of cooperation in the fight against IUU fishing.<sup>14,79,81</sup> The receipt of a red card means that vessels flagged to Cameroon are unable to export fish to the EU and prohibits EU flagged vessels from fishing in the waters of Cameroon. However, Cameroon can still export seafood to the United States. With the new red card and Cameroon looking for new markets to send its exports, the United States will likely see even more imports from this “non-cooperating country.”<sup>81</sup>

# Cambodia

Open access to Cambodia's fisheries with additional fishing pressure from many foreign vessels operating in its EEZ has led to overexploited fish stocks.<sup>82</sup> Cambodia was issued a red card from the European Union in 2013 for: its failures to implement international law obligations, linked in particular to the failure to adopt an adequate legal framework; the lack of adequate and efficient monitoring; the lack of a control and inspection scheme; and the lack of a deterrent sanctioning system. Other identified shortcomings relate, more generally, to compliance with international obligations and the conditions for the registration of vessels according to international law. This red card came a year after Cambodia was given a yellow card warning. In the interim year, the EU determined that the country was falling short in terms of adopting legal frameworks, effective monitoring, and the lack of a deterrent scheme.<sup>83</sup>

**Total volume (kg) of seafood imported from Cambodia with percentage of volume covered by SIMP**



In 2022, Cambodia exported nearly **6,000 kilograms** of seafood products, valued at nearly **\$40,000** to the U.S., which makes up less than 0.01% of the total volume and less than 0.01% of the total value of seafood imports to the United States.

In 2022, none of the U.S. imports from Cambodia were covered by SIMP.

## U.S. seafood imports from Cambodia in 2022

by value (USD) and HTS code

1. Analog product containing shellfish

\*SIMP covered species

After Cambodia was issued a red card by the EU, the Food and Agriculture Organization of the United Nations (FAO) announced that Cambodia would be among eight countries selected for projects aimed at combatting climate change and curbing IUU fishing. According to FAO's evaluation, some of the main challenges Cambodia faces are unregulated foreign fishing activities in its domestic waters and the use of child labor in the fisheries sector.<sup>84</sup> Despite interest from investment groups and international organizations, the country has yet to show sufficient efforts to curb its IUU fishing activities to warrant the removal of its red card status.

The U.S. imports analog products from Cambodia. Analog products like surimi are formed from minced sea creatures, turned into gelatinous paste that is often sold as imitation crab. Identifying ingredients that make up processed seafood products can be incredibly difficult. In fact, NOAA stated that "NMFS will not apply SIMP to HTS codes representing products such as fish oil, slurry, sauces, sticks, balls, cakes, puddings, meal and other similar highly processed fish products" because it is "operationally infeasible" to track these types of products at this time.<sup>85</sup>

By not tracking processed products, illegally sourced seafood can be directed to the processed seafood products to evade detection. It increases the opportunity for seafood fraud and mislabeling, as well as further obscuring the origins of seafood products and how they were produced. As a result, it is even more difficult to tie some of these products to IUU activities, forced labor, and other human rights abuses in the fisheries sector.





# Conclusion and Recommendations

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**T**he past three U.S. Presidents and their administrations have claimed to have combating IUU fishing as a major goal.<sup>86-88</sup> Yet slow progress and improvements to the United States' oversight of the seafood supply chain has contributed to the influx of IUU fishing products onto Americans' plates. The Seafood Import Monitoring Program has the potential to shed light on notoriously opaque seafood supply chains. However, gaps in the program create loopholes where IUU seafood can slip through the U.S. border. According to the Presidential Task Force on Combating IUU Fishing and Seafood Fraud's recommendations made in 2014, the original goal of the U.S. government was "to eventually expand the program to all seafood at first point of sale or import." As of today, the program still only covers around 40% of the seafood imports coming into the United States.<sup>89</sup>

The intent was always to expand the program to all seafood. In the seven years since NOAA issued the SIMP regulations, the federal government has not met that goal. Illegally sourced seafood, and seafood produced with forced labor and other human rights abuses, is still entering U.S. markets, making up an

estimated 11% of the total U.S. seafood imports and potentially reducing U.S. fishers income by an estimated \$60.8 million per year.<sup>1</sup>

To ensure all imported seafood is safe, legally caught, responsibly sourced, and honestly labeled, Oceana recommends the following:

- **Expand** the catch documentation and traceability requirements of SIMP to all seafood.
- **Improve** SIMP implementation by updating the data collected and tracked under the program to allow for better screening and enforcement.
- **Extend** traceability from the boat or farm to the dinner plate and provide consumers with basic information about the seafood they purchase.
- **Build** mechanisms to address forced labor and other human rights abuses into SIMP.



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