

Questions for the Record for Austin Brush, Senior Analyst, the Center for Advanced Defense Studies

Questions from Rep. Jared Huffman, CA:

1. The US imports millions of dollars' worth (and tens of thousands of MT) of AK pollock, as well as prepared fish sticks with AK pollock as the main ingredient, from China every year. How does the US know what the origin of this fish is - whether it is from Russian sources of US - if no information on the origin is reported when imported?

Answer: The origin of seafood products that enter the United States from China can be difficult to confirm with absolute certainty due to lacking traceability or transparency requirements. This is made more complicated by the fact that seafood can pass through several countries before entering the United States. Without catch documentation and other traceability requirements, it can be difficult or impossible to trace these products to their true point of origin.

In the case of pollock, Chinese companies often import pollock from Russia, the United States, or Japan. In 2018, Russia was the origin of 90% of the frozen pollock imports into China. In our own research into the groundfish trade, we identified Chinese companies that were simultaneously purchasing Russian seafood and exporting seafood products to companies in the United States. US regulations should be updated to combat this and similar practices so that seafood shipments can easily and consistently be traced back to their true origins.

Enhanced regulations could include reporting requirements for information related to beneficial ownership, both for the vessels linked to the harvest of seafood as well as for commercial entities exporting seafood to the United States. Additionally, information pertaining to the custodians of seafood products throughout the supply chain, such as processing facilities and trading companies, would help illuminate each supply chain in its entirety. Expanding SIMP to require data, such as chain of custody reporting and catch documentation, is critical to establish traceability of seafood products from point of catch to sale and prevent the entry of untraceable seafood products into the United States.

2. While the percentages reported appear small, in reality, the volumes and values of AK pollock product that are moving between the US and China is substantial - in 2021 alone, the US imported more than \$70 million worth of AK pollock (24,558 MT) and exported more than \$40 million worth of AK pollock (18,539 MT). (Source: NOAA Fisheries Foreign Trade Statistics). These figures don't even include the large amounts of fish stick or other prepared meals - the secondary processing - imported from China using AK pollock (\$22 million of fish sticks were imported from China in 2021.) Don't US consumers deserve more clarity when purchasing, that they are in fact buying American-caught seafood?

Answer: We believe that US consumers deserve more clarity when purchasing seafood

and as a result there needs to be improvements to existing traceability mechanisms like SIMP. In research we conducted looking at the trade of groundfish species between the US and China, we identified several instances of risk or traceability concerns, including exposure to potential seafood fraud, safety infractions, and unclear sourcing. This suggests that US groundfish imports are currently exposed to risk that could be mitigated by requiring enhanced traceability measures for more seafood species.

Since enhanced reporting standards and traceability measures already exist within the Seafood Import Monitoring Program, a tenable solution could be to expand SIMP to cover more seafood species frequently imported into the United States. Our past research clearly indicates that seafood supply chains remain relatively opaque, and are therefore exposed to risk. The US government should prioritize the expansion of SIMP to limit the US seafood market and US consumers' exposure to illegally harvested fish or to Russian seafood imports.

3. While there may be restrictions on what can be marketed as "AK pollock" to end-consumers at retail, isn't the same species being imported under the name "AK pollock" as a result of HTS codes for those products? How does a retailer distinguish then when they are sourcing from imported products?

Answer: We haven't examined this aspect of Alaskan pollock supply chains in detail, but without thorough catch documentation and chain of custody reporting, a retailer would struggle to differentiate between different products marketed as "AK pollock."