



May 2023

# COMBATING ILLEGAL FISHING

Better Information  
Sharing Could  
Enhance U.S. Efforts  
to Target Seafood  
Imports for  
Investigation

## Why GAO Did This Study

Many illicit activities, such as using prohibited fishing gear, constitute IUU fishing. Such fishing undermines the economic and environmental sustainability of the fishing industry. The illicit nature of IUU fishing means that the size of the problem can be estimated only roughly. However, the U.S. International Trade Commission estimated that about 11 percent of the value of the nation's approximately \$22 billion in seafood imports in 2019 were derived from IUU fishing.

GAO was asked to review federal efforts to combat imports of seafood caught through IUU fishing. This report (1) describes NMFS and CBP efforts to combat such imports; and (2) examines the mechanisms these agencies use to share information on such imports, and related challenges they have identified.

GAO reviewed documents on NMFS and CBP efforts to combat imports of seafood caught through IUU fishing, as well as other relevant agency documents. GAO also interviewed officials from CBP and NMFS at the headquarters and port levels about these efforts and how officials share relevant information on seafood imports.

## What GAO Recommends

GAO recommends that CBP work with NMFS to ensure that NMFS has timely access to information that it needs to combat imports of seafood caught through IUU fishing. The Department of Homeland Security concurred with our recommendation.

View [GAO-23-105643](#). For more information, contact Cardell D. Johnson at (202) 512-3841 or [johnsoncd1@gao.gov](mailto:johnsoncd1@gao.gov)

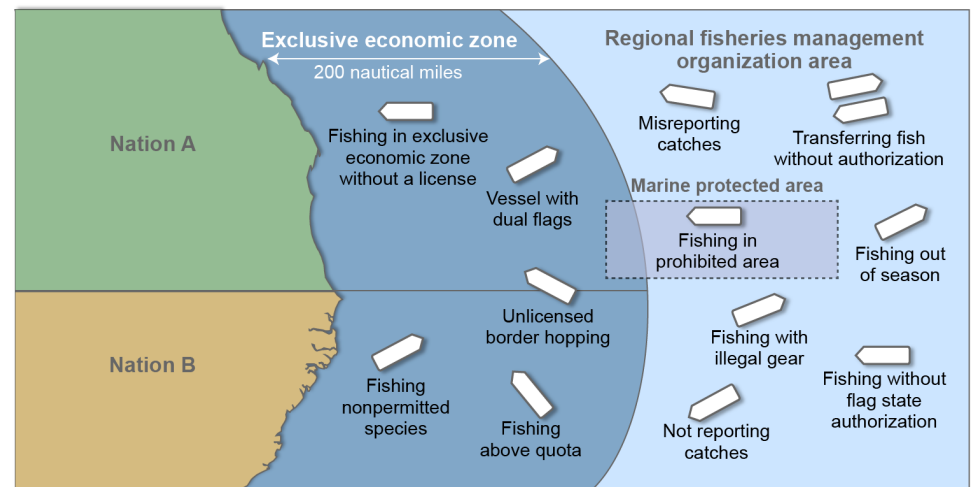
# COMBATING ILLEGAL FISHING

## Better Information Sharing Could Enhance U.S. Efforts to Target Seafood Imports for Investigation

### What GAO Found

The National Marine Fisheries Service (NMFS) and the Department of Homeland Security's U.S. Customs and Border Protection (CBP) work to combat imports of seafood caught through illegal, unreported, and unregulated (IUU) fishing, which comprises many illicit activities (see fig.). For example, NMFS administers four trade monitoring programs that, by regulation, require documentation for imports of specific species. In addition, both agencies manage efforts to identify or "target" seafood imports potentially caught through IUU fishing so that such imports can be investigated or held for further inspection. Targeting efforts can include monitoring incoming seafood imports that fit a pattern of concern, such as importers with past trade violations.

Common Types of Illegal, Unreported, and Unregulated Fishing



Source: GAO analysis of agency information. | GAO-23-105643

CBP and NMFS share information with each other through several mechanisms, including a data analysis tool and a CBP interagency coordination center. However, NMFS officials report difficulties obtaining timely information from CBP. In particular, NMFS officials told GAO that having to request information through CBP's interagency coordination center limits their ability to get the timely information they need. NMFS officials told us that if they want to inspect an incoming shipment, they need sufficient advance notice to coordinate with CBP. In addition, they said that receiving the information they need from CBP's interagency coordination center, in some cases, could take as long as a week. CBP officials told us that coordinating information requests through its coordination center is important to ensure that such requests do not jeopardize or duplicate ongoing CBP operations, among other reasons. Until CBP works with NMFS to ensure timely access to needed information, both NMFS and CBP may miss opportunities to combat imports of seafood caught through IUU fishing.

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## Abbreviations

CBP	Customs and Border Protection
CTAC	Commercial Targeting and Analysis Center
IUU	Illegal, unreported, and unregulated
NOAA	National Oceanic and Atmospheric Administration
NMFS	National Marine Fisheries Service

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May 19, 2023

The Honorable Dan Sullivan  
Ranking Member  
Subcommittee on Oceans, Fisheries, Climate Change, and Manufacturing  
Committee on Commerce, Science, and Transportation  
United States Senate

The Honorable John Thune  
United States Senate

The Honorable Roger F. Wicker  
United States Senate

Illegal, unreported, and unregulated (IUU) fishing is a global problem that may undermine the economic and environmental sustainability of fisheries, jeopardize food and economic security, and benefit transnational crime. IUU fishing encompasses many illicit activities, ranging from underreporting the number and types of fish caught to using prohibited fishing gear, such as unauthorized driftnets.<sup>1</sup> The U.S. is one of the largest seafood import markets globally and is the second-largest consumer of seafood.<sup>2</sup> The National Marine Fisheries Service (NMFS) estimates that the U.S. imports from 70 to 85 percent of the seafood consumed here<sup>3</sup>—in 2021, about 7.3 billion pounds of imported seafood

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<sup>1</sup>Driftnets are large nets designed to drift with the current and entangle fish in the nets' webbing.

<sup>2</sup>U.S. International Trade Commission, *Seafood Obtained via Illegal, Unreported, and Unregulated Fishing: U.S. Imports and Economic Impact on U.S. Commercial Fisheries*, Publication Number 5168 (Washington, D.C.: Feb. 2021).

<sup>3</sup>NMFS is within the Department of Commerce's National Oceanic and Atmospheric Administration (NOAA). The imported seafood in the estimate may include a substantial portion of domestic catch exported for processing and then imported to the U.S. in a processed form—for example, lobster harvested in the Northeast U.S. and processed in Canada; salmon and other finfish, such as pollock and cod captured off the coast of Alaska and processed in China; and tuna caught by U.S. vessels in the Pacific Ocean and processed in Asia and South America. See U.S. Department of Commerce, National Marine Fisheries Service, *Fisheries of the United States, 2019*, NOAA Current Fishery Statistics No. 2019 (Silver Spring, MD: 2021); and United States International Trade Commission, *Seafood Obtained via Illegal, Unreported, and Unregulated Fishing*.

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valued at nearly \$28.5 billion, according to our analysis of foreign trade data.<sup>4</sup>

Although the illicit nature of IUU fishing means that the size of the problem and its negative consequences can be estimated only roughly, the U.S. International Trade Commission estimated that about 11 percent of the value of the nation's \$22 billion in seafood imports in 2019 was derived from IUU fishing.<sup>5</sup> Various factors can make it difficult to identify and intercept such imports, including the volume and variety of species imported and the complex supply chains of imported seafood.<sup>6</sup>

In 2021, we reported on federal efforts to combat IUU fishing at sea, including how the U.S. works with other nations, identifies potential incidents of IUU fishing, and coordinates its related interagency efforts.<sup>7</sup> Subsequently, you asked us to review federal efforts at U.S. ports to combat imports of seafood caught through IUU fishing. NMFS leads federal efforts to combat IUU fishing and works in coordination with U.S. Customs and Border Protection (CBP), within the Department of Homeland Security, to address U.S. imports of seafood potentially caught through IUU fishing. This report (1) describes NMFS and CBP efforts to combat such imports; and (2) examines mechanisms these agencies use

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<sup>4</sup>National Marine Fisheries Service, Office of Science and Technology, Foreign Trade Query, available at: <http://www.fisheries.noaa.gov/foss>, accessed October 5, 2022. At the time of our analysis, 2021 was the most recent full year for which data were available. According to NMFS, the agency purchases foreign trade data from the Foreign Trade Division of the U.S. Census Bureau. The bureau receives the data from U.S. Customs and Border Protection, which receives the data from importers and exporters. Our analysis of these data indicates that 94 percent of the weight of fishery products imported in 2021—and 98 percent of their dollar value—were edible products. In this report, the term “seafood” may include the small amount of inedible imported fishery products, such as fish meal.

<sup>5</sup>U.S. International Trade Commission, *Seafood Obtained via Illegal, Unreported, and Unregulated Fishing*. This report was prepared in response to a congressional request in 2021, and the U.S. International Trade Commission has not published any subsequent reports focused on seafood obtained via IUU fishing.

<sup>6</sup>For example, catches from several smaller boats may be combined at sea onto a bigger vessel before transport to shore for processing. This practice may combine legal and illegal catches before they are landed. In addition, multiple seafood harvests may be processed together into seafood products, which could also combine legal and illegal catches. Seafood products may then be combined and divided multiple times as they change hands at wholesale facilities before further distribution.

<sup>7</sup>GAO, *Combating Illegal Fishing: Clear Authority Could Enhance U.S. Efforts to Partner with Other Nations at Sea*, [GAO-22-104234](https://www.gao.gov/products/GAO-22-104234) (Washington, D.C.: Nov. 5, 2021).

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to share information with each other on such imports, and related challenges they have identified.

To describe NMFS and CBP efforts to combat imports of seafood caught through IUU fishing, we reviewed documents and interviewed officials from each agency to determine what programs are in place and how they operate. We reviewed NMFS program reports and forms for imports, guidelines on information that importers must provide, and the agencies' written responses to our questions. We interviewed relevant agency officials about each agency's roles and responsibilities with respect to seafood imports. For example, depending on the agency, we discussed how the agency screens seafood shipments before entry to commerce, inspects random or selected shipments in ports, and identifies—through audits or other investigations—imports potentially caught through IUU fishing once those shipments have entered U.S. commerce.

To examine the mechanisms that NMFS and CBP use to share information with each other on seafood imports, and related challenges that they have identified, we reviewed documents and interviewed officials from each agency. We reviewed interagency agreements, documentation on relevant CBP data systems and analysis tools, related correspondence between agencies, and NMFS' and CBP's written responses to our questions about their information-sharing mechanisms. In our interviews with relevant agency officials, we discussed mechanisms that they use to share information to combat imports of seafood caught through IUU fishing, challenges that they face in sharing such information, and potential opportunities that they identified to improve coordination. We evaluated one of the information-sharing mechanisms that agency officials identified against a relevant interagency memorandum of understanding.<sup>8</sup>

We also interviewed agency officials from two selected ports to (1) describe how the agencies coordinate to combat imports of seafood caught through IUU fishing; and (2) identify examples of effective coordination, coordination challenges that the agencies face, and potential opportunities for improving coordination, as identified by these agencies. To select these ports, we first selected two customs districts, with one chosen to represent a customs district with a high volume of

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<sup>8</sup>See Customs and Border Protection et al., Addendum to *Import Safety Commercial Targeting and Analysis Center Memorandum of Understanding Among the Import Safety Commercial Targeting and Analysis Center, Partner Government Agencies* (2017).

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seafood imports and the second chosen to represent a medium-volume customs district.<sup>9</sup> Because the customs districts include multiple ports, we then selected the ports with the same names as the customs districts. We also incorporated geographic diversity by selecting districts/ports on both the East and West Coasts of the U.S. The selection of ports does not provide a generalizable sample of U.S. ports.

We conducted this performance audit from January 2022 to May 2023 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Background

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### Definition of IUU Fishing

The importation of fish harvested through IUU fishing is prohibited under several federal laws, including the Magnuson-Stevens Fishery Conservation and Management Act and the Lacey Act.<sup>10</sup> IUU fishing is a broad term that generally includes activities that violate national law or

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<sup>9</sup>According to CBP officials, the term “customs district” is no longer used, and ports are now organized by CBP field offices; however, at the time of our selecting ports, the data on seafood imports were organized by customs districts.

<sup>10</sup>The Magnuson-Stevens Fishery Conservation and Management Act makes it unlawful to import, export, transport, sell, receive, acquire, or purchase in interstate or foreign commerce any fish taken, possessed, transported, or sold in violation of any foreign law or regulation or any treaty in contravention of any binding conservation measure adopted by an international agreement or organization to which the U.S. is a party. 16 U.S.C. § 1857(1)(Q). The Lacey Act prohibits the import, export, transport, sale, receipt, acquisition, or purchase in interstate or foreign commerce of any fish taken, possessed, transported, or sold in violation of any law, treaty, or regulation of the U.S., or in violation of any foreign law. 16 U.S.C. § 3372(a). Additionally, several statutes implementing the various regional fisheries management organization conventions to which the U.S. is a party provide enforcement tools to address imports of IUU fish. See, e.g., Tuna Conventions Act of 1950, 16 U.S.C. § 957(a); Antarctic Marine Living Resources Convention Act, 16 U.S.C. §§ 2435, 2437, 2439; Northwest Atlantic Fisheries Convention Act, 16 U.S.C. § 5606.



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international fishing regulations or agreements.<sup>11</sup> The Department of Commerce's National Oceanic and Atmospheric Administration (NOAA) generally describes each aspect of IUU fishing as follows:<sup>12</sup>

- **Illegal fishing** refers to fishing activities conducted in contravention of applicable laws and regulations, including those adopted at the regional and international level.
- **Unreported fishing** refers to fishing activities that are not reported or are misreported to relevant authorities in contravention of national laws and regulations or reporting procedures of a relevant regional fisheries management organization.<sup>13</sup>
- **Unregulated fishing** occurs in geographic areas or for specific species of fish for which there are no applicable conservation or management measures and when fishing activities are conducted in a manner inconsistent with a nation's responsibilities for the conservation of living marine resources under international law. Fishing activities are also unregulated when occurring in an area managed by a regional fisheries management organization and conducted by vessels without nationality, or by those flying a flag of a nation or fishing entity that is not party to the organization, in a manner inconsistent with the conservation measures of that organization.

IUU fishing encompasses many illicit activities that can occur both within a nation's exclusive economic zone as well as on the high seas. For example, these could include fishing without an appropriate license, above a nationally established quota, out of season, or in a prohibited area. Figure 1 below illustrates common types of IUU fishing.

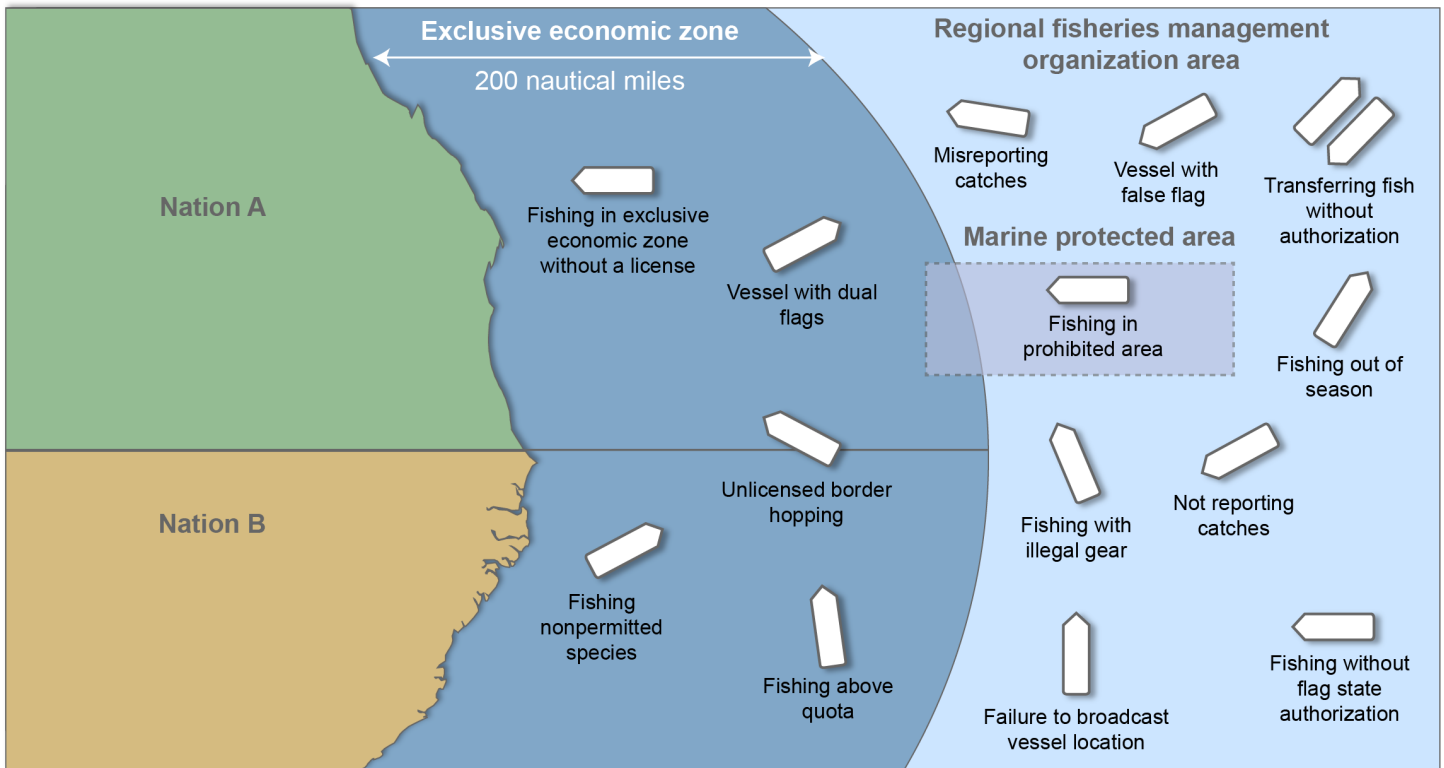
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<sup>11</sup>Applicable requirements for fishing vessels at sea and, thus, the kinds of fishing that are permissible, vary depending on the maritime zone. A nation's territorial waters generally extend from a nation's coastline up to 12 nautical miles away. Beyond and adjacent to the territorial sea, coastal nations generally have an exclusive economic zone up to 200 nautical miles from their coastlines. Beyond exclusive economic zones, the ocean is generally defined as "high seas" and is considered international waters.

<sup>12</sup>NOAA's description of IUU fishing is based on definitions from the *International Plan of Action to Prevent, Deter, and Eliminate Illegal, Unreported and Unregulated Fishing*, adopted at the 24th Session of the Committee on Fisheries in Rome on March 2, 2001. As noted previously, NMFS is a component of NOAA.

<sup>13</sup>Regional fisheries management organizations are treaty-based international bodies comprising nations that share an interest in managing and conserving fisheries in specific regions of the high seas. The U.S. belongs to nine such organizations where the U.S. is a coastal nation or has a fishing interest, according to State Department officials.

**Figure 1: Common Types of Illegal, Unreported, and Unregulated Fishing**



Source: GAO analysis of agency information. | GAO-23-105643

## U.S. Efforts to Combat IUU Fishing before Seafood Reaches Ports

The U.S. combats IUU fishing at different stages of the seafood supply chain, including efforts designed to detect and combat IUU fishing where it occurs. For example, as we reported in 2021, the U.S. conducts at-sea operations focused on strengthening other nations' capacity to manage their own fisheries and fleets. The U.S. also works with other nations through various multilateral agreements.<sup>14</sup> One such agreement is the Port State Measures Agreement—the first binding international agreement to specifically target IUU fishing, according to the United Nations Food and Agriculture Organization.<sup>15</sup> Among other provisions, the

<sup>14</sup>GAO-22-104234.

<sup>15</sup>The United Nations Food and Agriculture Organization approved the Agreement on Port State Measures to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated Fishing in 2009, and the agreement entered into force on June 5, 2016. Seventy-four nations, including the U.S., have become parties to the agreement.

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agreement seeks to block fishery products derived from IUU fishing from reaching markets by denying port access to vessels known to have engaged in such fishing.

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## U.S. Seafood Imports

Globally, the U.S. seafood import market is one of the largest and most diverse in terms of products, according to estimates from the United States International Trade Commission.<sup>16</sup> In 2020, shrimp, salmon, and tuna were the highest valued U.S. seafood imports, according to NMFS.<sup>17</sup> Among these, shrimp was the most valuable, accounting for 27 percent of the value of total edible U.S. seafood imports.<sup>18</sup> NMFS officials stated that the majority of U.S. seafood imports are fresh or frozen products; accordingly, they must be kept refrigerated or frozen during shipping and at port, including any time spent awaiting inspection.

According to our analysis of foreign trade data, 51 percent of U.S. seafood imports by weight in 2021 were from Asia. As shown in figure 2, China and India together provided 23 percent of the total imports by weight.<sup>19</sup>

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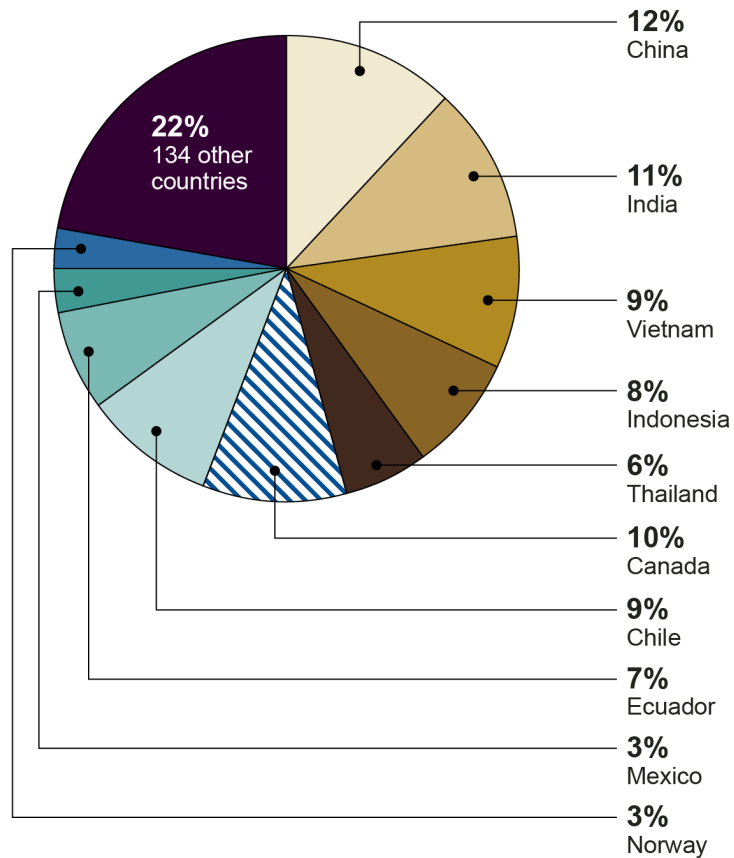
<sup>16</sup>United States International Trade Commission, *Seafood Obtained via Illegal, Unreported, and Unregulated Fishing*.

<sup>17</sup>U.S. Department of Commerce, National Marine Fisheries Service, *Fisheries of the United States, 2020*, NOAA Current Fishery Statistics No. 2020 (Silver Spring, MD: 2022).

<sup>18</sup>U.S. Department of Commerce, National Marine Fisheries Service, *Fisheries of the United States, 2020*.

<sup>19</sup>National Marine Fisheries Service Office of Science and Technology, Foreign Trade Query, available at: <http://www.fisheries.noaa.gov/foss>, accessed October 5, 2022. At the time of our analysis, 2021 was the most recent full year for which data were available.

**Figure 2: Origins of Seafood Imported by the U.S. in 2021**



Source: GAO analysis of foreign trade data from the National Marine Fisheries Service (NMFS) Office of Science and Technology, Foreign Trade Query, available at: <http://www.fisheries.noaa.gov/foss>, accessed October 5, 2022. | GAO-23-105643

Note: Countries shown are the top 10 countries from which the U.S. imported seafood in 2021, ranked by the weight of the seafood. In addition to edible seafood, the data include inedible imported fishery products, such as fish meal; such products account for 6 percent of the weight of seafood imported by the U.S. in 2021. According to NMFS, the agency purchases foreign trade data from the Foreign Trade Division of the U.S. Census Bureau. The bureau receives the data from U.S. Customs and Border Protection, which receives the data from importers and exporters.

Imported goods enter the U.S. by sea, air, and land at more than 300 ports. NMFS officials told us that most seafood imported into the U.S. arrives at seaports in container vessels, but some high-value seafood arrives by air. The majority of seafood imports enter the U.S. through a small number of customs districts, each of which can comprise multiple ports. According to our analysis of foreign trade data, 10 customs districts received 84 percent of the weight of U.S. seafood imports in 2021, with

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the New York and Los Angeles districts together accounting for 40 percent of seafood imports.<sup>20</sup>

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## Agency Roles and Responsibilities in the Seafood Import Process

NOAA's mission includes conserving coastal and marine ecosystems and resources. NOAA addresses the importation of illegally harvested fish and fish products, which, as noted previously, is prohibited under several federal laws, including the Magnuson-Stevens Fishery Conservation and Management Act and the Lacey Act.<sup>21</sup> Within NOAA, NMFS leads federal efforts to combat IUU fishing and has responsibilities for certain seafood imports. NMFS' mission includes providing for productive and sustainable fisheries, safe sources of seafood, recovery and conservation of protected resources, and healthy ecosystems. Combating IUU fishing is one of NMFS' top priorities, according to its strategic plan.<sup>22</sup>

CBP's mission priorities include facilitating lawful international trade at the ports-of-entry for imports, including seafood, and protecting revenue. Accordingly, the agency's responsibilities include facilitating and enforcing the import process and collecting the duties, taxes, and fees assessed on products, including seafood. Additionally, CBP officials told us that the agency conducts enforcement efforts for trade violations, including assessing civil penalties and supporting criminal prosecutions. CBP collects import data and documentation from importers—including a description of the product, manufacturer information, and the country of origin—through its Automated Commercial Environment system. This system and other sources provide data that CBP and its partner agencies, including NMFS, can use to identify cargo for possible inspection by port officials.<sup>23</sup> CBP requires certain entry data and documents for all imported goods. Other agencies with regulatory

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<sup>20</sup>National Marine Fisheries Service Office of Science and Technology, Foreign Trade Query, available at: <http://www.fisheries.noaa.gov/foss>, accessed October 5, 2022. At the time of our analysis, 2021 was the most recent full year for which data were available.

<sup>21</sup>See 16 U.S.C. §§ 1857(1)(Q), 3372(a).

<sup>22</sup>U.S. Department of Commerce, National Marine Fisheries Service, *NOAA Fisheries Strategic Plan 2022-2025* (Silver Spring, MD: Dec. 2022).

<sup>23</sup>According to CBP officials, under CBP policy, agencies that require access to Automated Commercial Environment data to carry out their responsibilities must enter into a memorandum of understanding with CBP. According to CBP officials, the memorandum is to specify the data that the agency is authorized to receive and the ways that the data will be transmitted to the agency. Authorized staff of these agencies receive access to the specified data.

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responsibilities for imports may also specify data that importers or their customs brokers need to submit.<sup>24</sup>

Other agencies also have certain roles and responsibilities related to seafood imports, but officials from these agencies told us that their programs do not explicitly focus on combating IUU fishing or imports of seafood caught through IUU fishing. For example:

- The U.S. Fish and Wildlife Service monitors wildlife trade and works to prevent the illegal import or export of species regulated under international agreement and U.S. wildlife laws and regulations. Virtually all wildlife imports and exports must be declared to the Fish and Wildlife Service and cleared by the agency's wildlife officers.
- The Food and Drug Administration is responsible for ensuring that seafood products imported into the U.S. for consumption are safe, sanitary, wholesome, and honestly labeled.

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## NMFS and CBP Implement Trade Monitoring Programs, Targeting Efforts, and Inspections to Combat Imports of Seafood Caught through IUU Fishing

To combat imports of seafood caught through IUU fishing, NMFS and CBP implement trade monitoring programs, targeting efforts, and inspections. NMFS administers four trade monitoring programs that may help deter and identify imports of seafood caught through IUU fishing by requiring importers to submit specific data and documentation on seafood shipments arriving at U.S. ports of entry.<sup>25</sup> CBP and NMFS both have efforts to target imports of seafood potentially caught through IUU fishing—that is, to evaluate, monitor, and identify shipments that fit a pattern of interest or concern, such as importers with past trade violations, according to NMFS officials. Additionally, CBP and NMFS officials at ports conduct some physical inspections that may identify or deter imports of seafood caught through IUU fishing.

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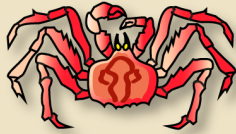

<sup>24</sup>According to CBP, customs brokers assist importers and exporters in meeting federal requirements governing imports and exports. The brokers, who are licensed and regulated by CBP, submit information and appropriate payments to CBP on behalf of their clients and charge a fee for this service, according to CBP.

<sup>25</sup>NMFS officials told us that one of its four trade monitoring programs—the Tuna Tracking and Verification Program—may also help deter and identify domestic processing of tuna caught through IUU fishing. According to agency officials, the program (1) conducts spot checks by randomly purchasing tuna products labeled as dolphin-safe from retail stores and tracing the tuna's origins and (2) conducts audits at U.S. canneries to determine how the canneries track the dolphin-safe status of products as they move through processing.

## NMFS Trade Monitoring Programs May Help Deter and Identify Seafood Imports Caught through IUU Fishing

NMFS has four trade monitoring programs that require documentation and include reviews that NMFS officials told us help deter and identify imports of seafood caught through IUU fishing. These are the Antarctic Marine Living Resource Program, the Highly Migratory Species International Trade Program, the Seafood Import Monitoring Program, and the Tuna Tracking and Verification Program. Each program has certain requirements, set forth in NOAA regulations, for filing certain information about specific marine species, for example, those more vulnerable to IUU fishing or that may be caught through fishing practices that can harm other species. Some species are subject to the requirements of multiple programs.<sup>26</sup> See figure 3 for a summary of the species covered and the documentation reviews that NMFS conducts under each program.

**Figure 3: Species and Documentation Reviews under the National Marine Fisheries Services' Trade Monitoring Programs**

	<b>Antarctic Marine Living Resources Program</b> 	<b>Highly Migratory Species International Trade Program</b> 	<b>Seafood Import Monitoring Program<sup>a</sup></b> 	<b>Tuna Tracking and Verification Program<sup>b</sup></b> 
<b>Species or species groups covered</b>	Fresh and frozen Patagonian toothfish (also known as Chilean sea bass) and Antarctic krill	Fresh and frozen bluefin tunas (Atlantic, Pacific, and Southern), shark fins, and swordfish  Frozen bigeye tuna	Fresh, frozen, and processed abalone, Atlantic blue crab, Atlantic cod, dolphinfish (also known as mahi mahi), grouper, Pacific cod, red king crab, red snapper, sea cucumber, sharks, shrimp, swordfish, and tunas (albacore, bigeye, bluefin, skipjack, and yellowfin)	Frozen and processed tunas (albacore, bigeye, blackfin, bluefin, longtail, skipjack, and yellowfin)
<b>NMFS review of import documentation</b>	For all shipments of frozen toothfish, prior to entering commerce  For all krill and fresh toothfish shipments, after entering commerce	For all shipments, after entering commerce	Only for selected shipments, after entering commerce	For all shipments, after entering commerce

Sources: GAO analysis of program documents and information from National Marine Fisheries Service (NMFS) officials; GAO (illustrations). | GAO-23-105643

<sup>a</sup>On December 28, 2022, NMFS issued a proposed rule to expand the Seafood Import Monitoring Program. 87 Fed. Reg. 79,836 (Dec. 28, 2022). The proposed rule would, among other things, (1) expand the currently listed red snapper and tuna to larger species groups; and (2) add cuttlefish and squid, eels, octopus, queen conch, and Caribbean spiny lobster to the program.

<sup>b</sup>This program is also known as the Dolphin-safe Program.

<sup>26</sup>See 50 C.F.R. pt. 216, subpt. H; pt. 300, subpts. G, M, Q; pt. 635.

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**Documentation requirements.** Information required under the trade monitoring programs varies by program but may include where the harvest took place, the weight of the seafood being imported, fishing permit or license numbers, the vessel's flag country, harvesting gear type, and dates of harvest.<sup>27</sup> In general, importers or their customs brokers must submit information on incoming shipments into CBP's Automated Commercial Environment system at the time of importation.

NMFS officials told us that the trade monitoring programs' extensive documentation requirements can deter imports of seafood caught through IUU fishing. According to agency officials, importers or customs brokers knowingly attempting to import seafood caught using IUU fishing would not be able to do so without deliberate misrepresentation or falsification of required documentation. Additionally, an official told us that the program's documentation requirements help ensure that importers have awareness of their own supply chains.

**Documentation reviews by NMFS staff.** According to agency officials, NMFS reviews documentation for a selection of shipments under the Seafood Import Monitoring Program and for all shipments under the agency's other three trade monitoring programs to ensure compliance with program requirements.<sup>28</sup> NMFS generally reviews shipments after they enter commerce.<sup>29</sup>

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<sup>27</sup>NMFS' seafood import and export tool allows users to identify which trade monitoring program or programs that a particular species and product fall under and, therefore, which requirements such species and product are subject to. For the tool, see <http://www.fisheries.noaa.gov/seafood-import-export-tool>.

<sup>28</sup>In addition, CBP officials said that upon request from NOAA's Office of Law Enforcement, CBP's Regulatory Audit Directorate assists the Seafood Import Monitoring Program with audits of seafood importers.

<sup>29</sup>Frozen toothfish—also known as Chilean sea bass—subject to the Antarctic Marine Living Resources Program are the only seafood imports for which NMFS reviews all documentation prior to the shipments' entry to commerce. NMFS officials said that while pre-entry review is practical for frozen toothfish, which require pre-entry approval, it is impractical for the other programs due in part to their sheer volume of products and more detailed reviews. For example, NMFS officials noted that the Antarctic Marine Living Resources Program covers about 1 percent of seafood products entering the U.S., whereas the Seafood Import Monitoring Program covers about 45 percent of U.S. seafood imports. NMFS officials also cited other factors, including that the number of vessels harvesting Antarctic toothfish is limited, the product is all coming from the same ocean area, and frozen toothfish are shipped by container, so NMFS receives 4 to 6 weeks advance notice of a shipment destined for the U.S.



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NMFS officials said that these reviews are the most efficient method of identifying seafood imports that may have been caught through IUU fishing. Officials told us that these reviews provide an overview of the import process as a whole and that routine and organized document review provides a means to identify seafood potentially caught through IUU fishing among the immense volume of total seafood imports. This overview can help NMFS identify shipments that may be of concern based on missing or inconsistent information, such as vessel permit dates that do not match harvest dates, or other indicators of potential violations. Officials told us that these reviews can inform future investigations and may result in penalties or other consequences for noncompliant importers or brokers.

Officials noted that when they find something concerning, it is not always an indication of IUU fishing or fraud. Instead, it is more typically an issue of the importer unintentionally failing to meet the documentation and reporting requirements or an inconsistency in the information reported.

If NMFS officials identify an issue that is of a more serious nature, or that remains unresolved after outreach, they refer the issue to NOAA's Office of Law Enforcement. Such referrals are relatively uncommon, however, according to NMFS officials. For example, according to a 2021 NMFS report, the majority of documentation reviews under the Seafood Import Monitoring Program do not identify noncompliance; of the 40 percent that did so during the program's first 2 years of implementation, only a small number were significant enough to be referred for enforcement action.<sup>30</sup> NMFS officials said that enforcement actions may include informal outreach or education to support future compliance, written warnings, summary settlements with penalties, referral for civil administrative enforcement, or referral to the Department of Justice for criminal prosecution.

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## CBP and NMFS Manage Various Efforts to Target Imports of Seafood Potentially Caught through IUU Fishing

At both the headquarters and port levels, CBP and NMFS work to target imports of seafood potentially caught through IUU fishing. Officials told us that CBP's primary effort for targeting such imports is its Commercial Targeting and Analysis Center (CTAC), an interagency coordination center that combats a broad array of illegal imports beyond seafood. Comprising 12 partner agencies, including NMFS, CTAC develops and

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<sup>30</sup>U.S. Department of Commerce, National Marine Fisheries Service, *Report on the Implementation of the U.S. Seafood Import Monitoring Program* (Silver Spring, MD: 2021).

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implements procedures that help target seafood imports caught through IUU fishing.

Officials told us that partner agencies bring intelligence to CTAC, which can then facilitate further discussion and analysis and establish import alerts in CBP's data systems to help target shipments that meet specified criteria. Once a target is identified, CTAC coordinates with individual ports to hold and inspect the shipment. For example, CBP officials told us that CBP and NMFS developed alerts for shipments of tuna imported from a specific country due to a suspicion of concealed IUU fishing. This joint effort found that almost all tuna imported from that country violated import requirements, such as correct labeling, under the Seafood Import Monitoring Program. Among other actions in response, CBP took actions to recover nearly \$600,000 in underpaid tariffs.

Besides CTAC, CBP officials told us that other CBP entities can contribute to targeting efforts in the following ways:<sup>31</sup>

- **Intelligence Division:** can generate intelligence reports on IUU fishing and provide those to CBP or partner agencies for use in targeting shipments.
- **Strategic Enforcement Branch:** works with CBP and partner agencies to provide intelligence and analysis of anomalies in supply chains and prior shipments, investigate trade violations, target shipments, and take enforcement actions. The branch also provides related training to CBP port officials.
- **National Threat Analysis Centers (Miami):** can develop initial national-level targeting efforts for seafood imports and create alerts in CBP's systems for targeted shipments.
- **Agricultural and Prepared Products Center for Excellence and Expertise:** can look for patterns in violations that may indicate a systemic problem with an industry or importer, and help other CBP entities develop targeting plans.

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<sup>31</sup>In addition, an official from the Department of Homeland Security's Immigration and Customs Enforcement—a CTAC partner agency—told us that this agency's Homeland Security and Investigations directorate makes significant contributions to CTAC. Homeland Security and Investigations conducts investigations of IUU fishing to support national and international prosecutions and provide evidence to guide future policy and management of fisheries.

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- **National Targeting Center:** develops targeting policy and is responsible for certain data tools that CBP and its partner agencies use to access and analyze data on imports.

NMFS and CBP officials at the port level may also initiate efforts to target imports of seafood potentially caught through IUU fishing. Specifically, NMFS and CBP officials operating at the two ports we selected told us that they can initiate targeting based on local intelligence and work with partner agencies and national-level CBP groups, including CTAC, to further develop or share information. For example, CBP officers we interviewed at one port told us that they generate intelligence that is used locally and shared nationally with CBP through CTAC. Once shared with CTAC, this local intelligence helps inform future targeting efforts at the national level, according to those officers.

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### CBP and NMFS Port Officials Jointly Inspect Some Seafood Imports

NMFS and CBP jointly conduct physical inspections of some seafood imports upon arrival at U.S. ports to potentially identify seafood caught through IUU fishing. NMFS and CBP officials told us that, in general, NMFS officials in ports and at headquarters identify shipments for inspection based on targeting efforts, although some inspections may be random. Once a shipment is identified for inspection, NMFS officials request that CBP hold the shipment at the port.<sup>32</sup> NMFS and CBP officials then open the shipping containers; visually examine the shipment, and compare it with the entry information supplied by the importer.

In some cases, NMFS' Marine Forensic Laboratory can analyze a sample from a shipment to verify the species and may also be able to determine its geographic origin and whether a product was wild caught or farm raised. For example, in a 2021 case that NMFS ultimately referred to the Department of Justice for criminal prosecution, lab results determined that three shipping containers of shrimp were misrepresented as farm raised when they were actually wild caught, according to NMFS officials. According to NMFS officials, this misrepresentation was a violation of U.S. import prohibitions under the Department of State's Section 609

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<sup>32</sup>According to NMFS officials, NMFS does not have the authority to hold shipments.

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program, which is designed to protect sea turtles in foreign shrimp fisheries.<sup>33</sup>

The number of inspections is low relative to the volume of such imports, according to NMFS officials. While NMFS does not track the number of inspections, officials told us that in November 2021, NMFS conducted approximately 14 import inspections—12 at seaports and two through truck inspections at border crossings—and that this represented a typical number of inspections.<sup>34</sup> NMFS officials identified several reasons for the limited number of inspections:

- The benefit of inspecting a particular seafood shipment must be balanced against the risk of impeding the flow of thousands of other unrelated shipments, especially in busy ports.
- NMFS has limited capacity to conduct import inspections; there are 22 NMFS law enforcement officers who conduct these efforts in the more than 300 ports.
- There is no advance schedule for when seafood imports will arrive by land.

Officials said that, while it is difficult and uncommon for inspections alone to identify seafood imports caught with IUU fishing, inspections may lead to further investigation of the documentation that can identify such imports. In addition, inspections can serve as deterrents because they can result in monetary penalties and rejection of high-value goods.

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<sup>33</sup>Under this program, shrimp harvested with commercial fishing technology that may adversely affect sea turtles cannot be imported into the U.S., except that the import ban does not apply if the President and Congress certify that the government of the harvesting nation has adopted certain protective measures. See Pub. L. No. 101-162, § 609, 103 Stat. 1037 (1989) (16 U.S.C. § 1537 note).

<sup>34</sup>NMFS officials told us that a number of factors complicate their ability to quantify the number of shipments inspected, including inspections of cargo containers that may involve multiple shipments. Additionally, officials told us that while the agency did not currently track the number of inspections, an upcoming update to NMFS' case tracking system may better facilitate tracking inspections in the future.

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## CBP and NMFS Share Information through Several Mechanisms, but NMFS Officials Report Difficulties Obtaining Information from CBP

CBP and NMFS share information through several mechanisms—CBP data systems, direct interaction between officials at ports, and an interagency coordination center—but NMFS officials cited difficulties in efficiently obtaining information from CBP to help combat imports of seafood caught through IUU fishing.

**Data systems.** CBP’s data systems, including the Automated Commercial Environment, hold information submitted by importers or customs brokers about their incoming shipments, including seafood. CBP grants NMFS and other partner agencies access to selected data from these systems, as well as to accompanying analysis tools.<sup>35</sup> One such tool is the Government Client Manifest Capability, which was created in 2019.<sup>36</sup> It provides NMFS and other partner agencies with the ability to query real-time information on imports to support agencies’ efforts to target illegal imports, including seafood potentially caught through IUU fishing.

However, NMFS officials told us that this tool has not provided users with the necessary search capabilities to effectively target imports of seafood potentially caught through IUU fishing. Instead, the officials told us that they have had to use less efficient alternative methods that they have developed to retrieve data they need using this tool. NMFS officials told us that these alternative methods are cumbersome and time consuming and do not always work because of system limitations.

According to NMFS officials, NMFS previously had the search capabilities they needed using a CBP tool called the Automated Targeting System-Import Cargo. This tool is used within CBP to identify a broad range of threats. However, CBP officials told us that the agency reviewed the data available to partner government agencies after a system update and determined that CBP needed to provide stronger controls around these agencies’ access to sensitive information. As a result, CBP told us they created the Government Client Manifest Capability tool to properly control access to the data.. However, until recently, this tool had a technical

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<sup>35</sup>The information that CBP shares with NMFS is specified in an interagency memorandum of understanding dated 2019.

<sup>36</sup>CBP officials told us that the full name of this system is Automated Targeting System-Government Client Manifest Capability because it is an application of the larger Automated Targeting System. For the purposes of this report, we refer to it as the Government Client Manifest Capability.

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limitation that has limited agencies' search capabilities, according to CBP officials.

Officials at CBP told us that they recently remedied this search limitation and that the expanded search capabilities have been tested by one partner agency. These officials told us that they notified NMFS and other agencies of the remedy at an interagency meeting in late March 2023.

**Direct interaction between officials.** CBP and NMFS officials operating at individual ports also share information through direct interaction with one another. For example, NMFS officials at one port described an example of working directly with CBP managers at that port to get information about inbound shipments of imported fresh seafood suspected of being caught through IUU fishing. Because they were able to receive this information in a timely manner, NMFS officials were able to investigate the shipments before they cleared customs. Additionally, these NMFS officials told us that they are members of a regional port working group where they share information with CBP colleagues about ongoing cases of interest, planned operations, and incoming intelligence. These officials told us that gathering intelligence can be challenging but cited examples of local information sharing that provided information that helped them interdict shipments of seafood potentially caught through IUU fishing.

**Interagency coordination center.** As discussed earlier, CBP's interagency Commercial Targeting and Analysis Center (CTAC) is a mechanism to help partner agencies, including NMFS, coordinate to combat violations of U.S. import laws. CBP officials told us that the center holds weekly meetings in which partner agencies share information about concerns, ongoing operations, and relevant intelligence. NMFS officials told us that CTAC is the primary means through which NMFS shares information on seafood imports with CBP and other agencies with authority over aspects of seafood imports, such as the U.S. Fish and Wildlife Service and Food and Drug Administration.

Officials from CBP and NMFS told us that CBP directs partner agencies to request desired information through CTAC, rather than directly from CBP officials in ports, if CTAC has initiated enforcement efforts, is already generating related intelligence, or is investigating or targeting the shipment of interest. Specifically, these officials told us that in these situations, if NMFS officials in a port need information on a specific shipment, have questions about intelligence, or want to place a hold on a shipment to inspect it, they should reach out to NMFS headquarters,

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which will reach out to CBP at CTAC to obtain this information. CTAC will provide the information to CBP's Office of Field Operations, which will provide it to NMFS headquarters to share with NMFS port-level officials. Further, CBP officials noted that, in these situations, it is critical for NMFS to also communicate the results of any of its examinations or follow-up activities back to CTAC to ensure targeting data is continually refined.

However, NMFS officials at the headquarters and port levels have expressed concern about the length of time it takes to obtain information through this process. NMFS officials told us that if they want to inspect an incoming shipment, they need sufficient advance notice to coordinate with CBP and to identify officials to conduct the inspection prior to the shipment entering commerce. Consequently, NMFS officials at headquarters and at ports stressed the importance of obtaining timely information to support targeting efforts and said that requesting information through CTAC, in some cases, complicates the process of requesting information. NMFS port officials said that going through CTAC for information was sometimes inefficient and that requesting information through CTAC could take as long as a week.

NMFS officials at ports and at headquarters told us that some information requests are more efficiently addressed by sharing information directly between CBP and NMFS officials operating at ports, rather than making such requests through CTAC, as it currently operates. According to NMFS officials, consultation with CBP counterparts at the port level is important because the import process is complex, and details provided for some imports in CBP's data systems may be subject to interpretation. Additionally, these officials told us that direct consultation with CBP officials at ports allows NMFS officials to benefit from expertise that CBP personnel may have regarding aspects of the import process or conditions at a particular port.

CBP told us that making information requests through CTAC, rather than through officials at the port level, is important to ensure that officials in CBP headquarters are aware of actions such as requesting information or holds on shipments and how such requests may affect ongoing CBP operations, such as jeopardizing or duplicating them. Additionally, these officials told us that requiring partner agencies to make requests through CTAC can prevent duplication of effort between ports or conflicts among other CBP offices.

The information-sharing process through CTAC, as it currently operates, is not fully consistent with CTAC's stated mission, as specified in the

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interagency memorandum of understanding. This memorandum establishes how partner government agencies participate in CTAC. CTAC's mission includes maximizing cooperation among participating agencies and facilitating information sharing to combat import violations, including imports of seafood caught through IUU fishing. Nevertheless NMFS officials told us that CBP's current process may not always provide the information they need in a timely fashion. They said that the amount of time it takes to receive information could undermine time-sensitive efforts to target, investigate, or identify imports of concern. Unless CTAC officials work with NMFS to ensure that it has timely access to information through CTAC on seafood imports that may have been caught with IUU fishing, both NMFS and CBP may be missing opportunities to combat such fishing and associated import violations.

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## Conclusions

NMFS and CBP both undertake efforts to identify and target for investigation imports of seafood potentially caught through IUU fishing. To support these efforts, the agencies share information through mechanisms, including CBP-managed data and analysis tools and a CBP interagency coordination center, CTAC. However, NMFS officials told us that they experienced difficulties obtaining timely information through CTAC. Such information could help them better identify and target seafood imports for investigation. CBP officials emphasized that coordinating requests for information or holds on shipments through CTAC is important to ensure that officials in CBP headquarters are aware of such requests and how such requests may affect ongoing CBP operations. However, it is important for CBP to balance its need for awareness of information requests with providing timely information to NMFS, as one of its partner agencies. Until CBP works with NMFS to improve the timeliness of its information sharing with NMFS, both NMFS and CBP may miss opportunities to combat imports of seafood caught through IUU fishing.

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## Recommendation for Executive Action

We are making the following recommendation to CBP:

The Commissioner of CBP should direct relevant officials to work with NMFS to ensure that NMFS has timely access to information it needs to combat imports of seafood caught through IUU fishing. (Recommendation 1)

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## Agency Comments

We provided a draft of this report to the Departments of Commerce and Homeland Security for review and comment. The Department of Commerce told us that they had no comments on the draft report. The Department of Homeland Security provided technical comments, which



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we incorporated as appropriate, and written comments reproduced in appendix I. The Department of Homeland Security concurred with our recommendation and said they will take action to address it.

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We are sending copies of this report to the appropriate congressional committees, the Secretary of Commerce, the Secretary of Homeland Security, and other interested parties. In addition, the report will be available at no charge on the GAO website at <https://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-3841 or [johnsoncd1@gao.gov](mailto:johnsoncd1@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix II.

A handwritten signature in black ink, appearing to read "Cardell Johnson", with a large, stylized flourish at the end.

Cardell D. Johnson  
Director, Natural Resources and Environment

# Appendix I: Comments from the Department of Homeland Security

U.S. Department of Homeland Security  
Washington, DC 20528



**Homeland  
Security**

April 28, 2023

Cardell D. Johnson  
Director, Natural Resources and Environment  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Re: Management Response to Draft Report GAO-23-105643, "COMBATING ILLEGAL FISHING: Better Information Sharing Could Enhance U.S. Efforts to Target Seafood Imports for Investigation"

Dear Mr. Johnson:

Thank you for the opportunity to comment on this draft report. The U.S. Department of Homeland Security (DHS or the Department) appreciates the U.S. Government Accountability Office's (GAO) work in planning and conducting its review and issuing this report.

DHS leadership is pleased to note GAO's recognition that U.S. Customs and Border Protection (CBP) and the National Oceanic and Atmospheric Administration (NOAA), National Marine Fisheries Service (NMFS) work to combat imports of seafood caught through illegal, unreported, and unregulated (IUU) fishing, and that CBP and NMFS share information with each other in several ways, including through CBP's Commercial Targeting and Analysis Center (CTAC). CBP remains committed to collaborative information-sharing efforts that help maximize opportunities to combat imports of seafood caught through IUU fishing.

The draft report contained one recommendation for CBP with which the Department concurs. Enclosed find our detailed response to the recommendation. DHS previously submitted technical comments addressing several accuracy, contextual, and other issues under a separate cover for GAO's consideration.

Again, thank you for the opportunity to review and comment on this draft report. Please feel free to contact me if you have any questions. We look forward to working with you again in the future.

Sincerely,

JIM H CRUMPACKER  Digitally signed by JIM H  
CRUMPACKER  
Date: 2023.04.28 16:10:09 -04'00'

JIM H. CRUMPACKER, CIA, CFE  
Director  
Departmental GAO-OIG Liaison Office

Enclosure

**Enclosure: Management Response to Recommendation  
Contained in GAO-23-105643**

GAO recommended that the Commissioner of CBP:

**Recommendation 1:** Direct relevant officials to work with NMFS to ensure NMFS has timely access to information it needs to combat imports of seafood caught through IUU fishing.

**Response:** Concur. CBP's Office of Trade, CTAC will create a schedule of data that can be shared with NMFS, as well as a proposed timeline on the frequency of sharing this data. The CTAC will also elicit feedback from NMFS to ensure that the data sharing arrangement supports interagency IUU fishing enforcement efforts. Estimated Completion Date: September 29, 2023.

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# Appendix II: GAO Contact and Staff Acknowledgments

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## GAO Contact

Cardell D. Johnson, (202) 512-3841 or [johnsoncd1@gao.gov](mailto:johnsoncd1@gao.gov)

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## Staff Acknowledgments

In addition to the contact named above, Elizabeth Erdmann (Assistant Director), Emily Norman (Analyst in Charge), Krista Breen Anderson, Cathleen Carr, Patricia Moye, Cynthia Norris, and Dan C. Royer made key contributions to this report.

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