

**ISSC 2023
Committee Report**

Committee Name : Patrol

Chairperson: Paul Golden

Date of Meeting: 2020-2022

**Recorder: Carmen
Rickel TPWD**

Approved By: ___/S/ Paul Golden_____

Printed Name: Paul Golden

Committee Members Present:

Paul Golden
(Chairperson)

Carter Witten

Michael Bott

Alex Manderson

Ben Stagg

Leslie Casterline

Andrew Johnson

Catherine Medellin

Aaron Wozniak

(FDA Delegate)

Marshall Kinsey

(FDA Advisor)

Joel Hansel

(EPA)

Charges

Charge 1: Provide consultation to the Executive Board regarding patrol matters.

Findings/Conclusions:

Recommendations: One recommendation was made by the Committee to the ISSC board based on charge 2.

Charge 2: Identify and advise the Executive Board regarding molluscan shellfish patrol issues that have the potential to impact the National Shellfish Sanitation Program.

Findings/Conclusions:

Texas Parks & Wildlife Department (TPWD) reported an issue with shucked oyster product from Mexico coming into the state from ports of entry in quantities that are unreasonable for personal use. To prosecute these cases, current law requires officers to show that the product entered commerce. TPWD has been able to show this in some cases, but many go undetected, putting the public and legitimate shellfish producers at significant risk. Additionally, states reported other increases in imports of unapproved product from unapproved sources, such as “blood clam” imports from El Salvador.

The Seafood Import Monitoring Program (SIMP), is a risk-based traceability program developed after the 2014 Presidential Task Force to combat Illegal Unreported, and Unregulated (IUU) Fishing and Seafood Fraud. NOAA/NMFS manages the SIMP, which establishes reporting and record keeping requirements for 13 species groups comprising over 1000 unique species. Two objectives of the SIMP are to reduce seafood fraud and reduce economic harm to the American fishing industry. For law enforcement purposes, the SIMP can alert agencies that particular products are being imported and provide traceability. Under a 2022 proposed rule by NOAA, the top 50 seafood imports were considered for inclusion under the SIMP based on risk related to IUU fishing and seafood fraud. Species under consideration included “mussels, oysters, and shellfish (class Bivalvia)”. These species eventually were not included in the SIMP under the proposed rule. The ISSC Patrol Committee believes that adding bivalve molluscan shellfish to the SIMP would increase public health and safety and reduce trafficking in unapproved product from unapproved sources, especially for coastal states that participate in Cooperative Enforcement Program with NOAA OLE. NOAA’s rule proposal is open for comment until March 28th 2023. The link for comment is <https://www.federalregister.gov/documents/2022/12/28/2022-27741/magnuson-stevens-fishery-conservation-and-management-act-seafood-import-monitoring-program>

Recommendations:

The Patrol Committee requests that the ISSC Executive Director compose a letter of support for the inclusion of all species of Bivalve Molluscan Shellfish into the Seafood Import Monitoring Program (SIMP) to NOAA prior to the March 28, 2023 deadline.