NMFS Webinar: Final Rule on Electronic Reporting of Trade Data

Speaker:	*Christopher Rogers, Assistant Director, Office of International Affairs and Seafood Inspection*
Date:	*September 1, 2016, 1:30 pm CT*

Coordinator:	Welcome and thank you for standing by. Today's call is being recorded. If you have any objections you may disconnect at this time.
	All participants will be in a listen only mode for the duration of the call. During the question and answer session if you would like to ask a question please press Star 1.
	I would now like to turn the call over to (Kerry Turner). You may begin.
(Kerry Turner):	Thank you. And welcome everyone. My name is (Kerry Turner). I'm a Communication Specialist here at NOAA Fisheries Office of International Affairs and Seafood Inspection.
	I'd like to welcome you to the second webinar on NOAA Fisheries' Final Rule for Electronic Reporting of Trade Data.
	As you may know the final rule was published last month, early last month. And this webinar is another opportunity for – that NOAA Fisheries has provided throughout this rulemaking process to engage interested stakeholders about the rule and its implications.
	So I know we probably have a lot of diverse people on the phone and that are interested in seafood in general. So if your head starts to spin at the information that you're receiving don't worry about it. At the end of presentation we will have a very robust question and answer session for you to ask your questions or request further information or clarification about a point within the presentation.
	We also have – we'll have personnel rather from the Customs and Border Protection Agency participating in the question and answer session so we are particularly appreciative of them for joining us on this call.
	Before I introduce our speaker a few housekeeping items. One, we know that everyone is on the online WebEx page. Just follow along there. However please do not submit any comments or questions through that. We can't see the comment window and it's just much easier if you submit your questions through the Conference Line Operator. And we'll give you instructions after the presentation on how to do that.

Also if you have any IT difficulty participating in this webinar we have posted a PDF for the presentation on the International Affairs and Seafood Inspection web page and that's at www.nmfs.noaa.gov/ia. In fact all of the information with regard to this rule and these discussions, transcripts and recordings will be posted on that web page in a few days. And again that was www.nmfs.noaa.gov/ia.

With that let's introduce our speaker. We're joined today on the phone by Chris Rogers, Assistant Director for the International Fisheries Division with our Office of International Affairs and Seafood Inspection.

And Chris will be taking you through the presentation. And once he's done with that he will turn it back over to me and we'll have the Conference Line Operator open it up for that question and answer portion that I mentioned.

With that Chris we'll turn it over to you.

Chris Rogers: Okay. And thank you for the introduction (Kerry). And welcome to all of the participants. I would say good morning or good afternoon depending on your location.

I'm going to step through a number of slides here. First, I'll give a quick overview of the presentation this afternoon, an introduction to the International Trade Data System, the concept of the single window, an overview of the three National Marine Fisheries Service Programs that have been integrated into ITDS by this final rulemaking, a description of the transition from the current entry processing to International Trade Data System entry processing, a review of the NMFS Final Rule and its implications for various actors in the supply chain, review the responsibilities for each of those actors under these new protocols.

And then at the end of the presentation there are some web resource links and personal contacts that will be part of the presentation that will be posted so you can either jot them down during this presentation or look to our web site that (Kerry) referenced for picking up those web sites and again we'll have the question and answer period afterwards.

So by way of introduction, why is the International Trade Data System now required by the National Marine Fisheries Service?

The U.S. imports about 90% of its consumable seafood at this point in time. Several of those products and/or products from certain nations may be subject to either Trade Monitoring Programs or even embargoes if there's a trade prohibition for a certain product from a certain country. Therefore we must monitor imports of those commodities.

The Customs Modernization Act of 1993 established the National Customs Automation Program, the Automated Commercial Environment/International Trade Data System. That's the project that Customs and Border Protection has been working on for a number of years. And it's coming to fruition at the end of this calendar year.

The Safe Port Act of 2006 mandated that any agency, any federal agency with a role in admissibility decisions on whether goods can be admitted into U.S. Commerce was mandated under the Safe Port Act to participate in ACE/ITDS as the single window.

And then finally an executive order issued by the Obama Administration in February of 2014 entitled *Streamlining the Export/Import Process* mandated completion of agency integration into the single window by December of 2016.

So that's the timeline that we were trying to meet. And with this final rule and its implementation date we will meet that timeline.

What is the model of the single window?

ITDS is paperless, electronic. It's a single window. If you see this panel on the presentation and you'll see on the right side, excuse me, the left side the current flow of information involving paper. Even though the CBP entry process has been automated and electronic for a number of years with the Automated Commercial System and the Automated Broker Interface, a lot of the interactions between the trade and the Partner Government Agencies with their individual requirements have been in paper format with license, permits and certificates. That has slowed down the entry process and, you know, potentially release of goods by communicating between the trade and the partner agencies and customs in different directions and different media.

The single window vision on the right side of the diagram you see the trade interacting with ACE, the Automated Commercial Environment in an electronic fashion and also the Partner Government Agencies interacting with ACE in an electronic fashion.

So basically the Partner Government Agencies like ourselves, National Marine Fisheries Service, will have real time access to entry filings and the data that are provided in those entry filings. So we can review the data, evaluate it and make our admissibility decisions. So the single window will certainly streamline that process.

The benefits of the single window -- traders will have to submit the data once to one system. Interactions between the Partner Government Agencies will be automated, to enable real time decision making. Costs will be reduced for business and government. And the agencies will obtain the data more quickly

to identify where necessary unsafe, dangerous or prohibited shipments to exclude them from the U.S. market.

And the final rule for NMFS integration, N-M-F-S, the National Marine Fisheries Service, our integration with the International Trade Data System was issued on August 3rd of this year, 2016. It had the effective date of February, or excuse me, of September 20, 2016 so basically 20 days away from the go live date.

We will use the single window for collecting data at entry filing. The three existing paper-based programs will be converted, our three programs, the Highly Migratory Species Program, the Antarctic Marine Living Resources Program and the Tuna Tracking and Verification Program. You'll see the acronyms listed up there on the screen.

An Importer Permit is required and data will be collected via the message set and Document Imaging Systems of ACE, the Automated Commercial Environment.

The three programs that we are integrating into ITDS, Highly Migratory Species is basically tunas and swordfish. Antarctic Marine Living Resources is principally Antarctic toothfish known in the trade primarily as Chilean Sea Bass.

And then the NOAA Form 370 Tuna Tracking and Verification Program. This is for dolphin, under the Dolphin Protection Consumer Information Act, product labelling as dolphin safe. That is an import only program. The other two programs, Highly Migratory Species and Antarctic Marine Living Resources Programs also have requirements for data reporting at export because of our obligations to International Fisheries Management Commissions for those products.

These programs took approximately 35 harmonized tariff schedule codes in the Implementation Guides for National Marine Fisheries Service. Message set those tariff codes for each program are listed. There are about 700 harmonized tariff schedule codes for fisheries products. But this rulemaking only covers 35 codes which would be flagged in ACE/ITDS as of interest to National Marine Fisheries Service and requiring additional data for the entry filing.

These other codes at present do not require the International Trade Permit of this rulemaking nor the submission of any additional filing information, no message set. No digital image beyond what customs would already require in a normal entry filing or census with respect to an export filing.

I would make a note though that there is a separate rulemaking underway. We had issued a proposed rule. We're in the process of finalizing that rule. This

was in response to the Presidential Task Force on Combating Illegal Fishing and Seafood Fraud.

And that proposed rule had recommended additional products for monitoring so those would be in addition to the 35 tariff codes here.

But for the time being on February, excuse me, September 20th only those 35 codes are affected in the near term.

Again about those programs, tunas are covered under both, the HMS, the Highly Migratory Species Program and the NOAA Form 370 Programs. In the past where there where was an overlap in a particular product and product form, the trade would have to submit multiple documents to National Marine Fisheries Service. We have consolidated both the permitting requirement and the message set requirement so that there's no overlap, no duplication between the programs.

The requirements of both programs must be met but they don't have to be met independently as the message set has been set up to account for that.

Swordfish is covered under the Highly Migratory Species Program as well and as I said toothfish or Chilean Sea Bass under the Antarctic Marine Living Resources Program.

As a reflection on the past currently the paper documents were submitted post-release directly to National Marine Fisheries Service. Those documents attested to the circumstances and conditions of the harvest event. We would evaluate those forms. But again that would be done on a post-release basis.

We are frontloading the process now with the use of ACE/ITDS by having the message set and/or image files of the paper documents submitted at the point of entry filing.

The NOAA Form 370 Program as I said has been used. It's being used to screen Yellowfin Tuna imports from embargoed countries as well as to ensure that product labeled as dolphin safe, have the proper documentation or certification for that dolphin safe status.

Under ITDS, the shipments in these three product groups will require filing of the NMFS message set in ACE and supplemental documents through the Document Image System.

Responsibilities under this new regulation, the Importer of Record must obtain a Fisheries International Trade Permit and provide data or documents to the customs broker who will make the entry filing for that importer. We do recognize that some importers do their own entry filings. They will still have

to obtain the permit and provide the data documents to the system or they make the ACE entry filings.

When a customs broker is used that entry filer will submit the data and the documents via ACE and the Document Image System.

There is a role for software developers who will develop that message set for or the software to submit the message set to ACE and certify that message set software in the Customs and Border Protection certification environment for ACE before they move into the development environment.

So the – in the past the National Marine Fisheries Service has primarily dealt with what we call the Importer of Record, the fish dealers. But this rule has responsibilities conferred on the entry filer and the software developer as well.

So as I said the rule itself is effective September 20, 2016, 20 days from now. The Highly Migratory Species International Trade Permit and the Antarctic Marine Living Resources Dealer Permit, both permits under the legacy programs, would no longer be required. They'll be eliminated. They will be replaced by the National Marine Fisheries Service's International Fisheries Trade Permit. This is a consolidated permit. One permit would cover all commodities.

In the past importers of products covered under the NOAA Form 370 Tuna Tracking and Verification Program did not require a permit. But that permit requirements and the consolidated permit is extended to importers of those products as well as part of this rulemaking.

So a single International Fisheries Trade Permit will entitle the holder to conduct trade under any of the three current NMFS Trade Programs, HMS, AMLR and Tuna Tracking and Verification Program.

We've been in contact with a number of individuals and helping them to convert the HMS and AMLR Programs to the new Fisheries - International Fisheries Trade Permit.

Those who do hold those legacy permits, HMS and AMLR have hopefully received a letter by now with a special code to go into the National Permitting System. And obtain the International Fisheries Trade Permit by converting their existing permit.

New entrance to the process, importers and exporters who will deal with program – products covered under these programs, haven't had a permit in the past, will have to obtain one through the National Permit System. It's an online system available 24/7.

And it is a pay online through the U.S. Treasury Department, use of the pay.gov application. The current fee for processing the application is $30. That's a requirement for us to recover administrative costs for the program.

And update and renewal to the International Fisheries Trade Permit will be required annually.

So here's a screenshot of the permit site. And the first step for those who need a permit or wants to convert their existing permit is to register. If you have not previously registered with the National Permit System, you register and create a user account and password. That will send you login information via email.

And then you can use the Account Login Screen on the top right corner once you get your user name and password established.

So first step if you haven't used the system is to register; then the next step would be to use the login information and look for the information on the International Fisheries Trade Permit.

If you are a legacy permit holder as I said you would have received a letter with a special code. Use that code. Your information will be preloaded and you can update that information for issuing the International Fisheries Trade Permit. If you're a new user just go through the application process and enter your information as required in all the mandatory fields.

So just some notes, there have been some other developments in the course of the project through this rulemaking and integrated programs with ITDS for Atlantic Bluefin Tuna. The International Commission for the Conservation of Atlantic Tunas has just completed its implementation of an Electronic Bluefin Tuna Catch Documentation System. It went online on May 1, 2016 so earlier this year. Because of that system National Marine Fisheries Service has direct access to inbound shipments of Bluefin Tuna coming from abroad.

So the message set that normally would have been required would be reduced. Basically just the certificate number in the electronic system is all that's required in the message set. However there will be some Bluefin Tuna still in trade that has been in cold storage for some time perhaps and is accompanied by the paper document. So in those cases the full message set and the Document Imaging System requirements would pertain.

But just to note that if there is an electronic certificate then the message set is reduced to simply the certificate number in the ICCAT System. And the DIS requirements do not pertain.

Upon filing the eBCD number it can be two types of numbers. Just to be aware it's either a catch certificate Number or a Re-Export Certificate Number.

But again those would be the only data elements required if the fish is represented, has been recorded in the Electronic System run by the International Commission for the Conservation of Atlantic Tunas.

I would note that the Pacific Bluefin Tuna and Southern Bluefin Tuna have independent systems under different commissions. They are still paper-based so the provision for the reduced message set applies only to Atlantic Bluefin Tuna.

A recap of the final rule we're transitioning from paper-based reporting directly to NMFS to electronic reporting for import and export filings through the ACE single window. We'll utilize the Partner Government Agency message set for National Marine Fisheries Service to collect data from the text documents for the covered species.

And we'll use that data to make our decisions for the shipment release. And we will utilize the Customs and Border Protection Data Image System to collect any international forms. And we'll eliminate the collection of all paper forms so the paper forms themselves can be retained by the importers. The image files will be submitted to National Marine Fisheries Service through DIS.

We will be using interoperable web services to automate system to system communications between ourselves and Customs and Border Protection. And we'll be using a secure file transfer protocol to receive the CBP data collected on all of the National Marine Fisheries products. It's necessary to use secure processes because the data are business confidential and will be kept as such both by CBP and National Marine Fisheries Service.

The rule itself requires a permit so we can identify and do outreach and education for the importers and exporters. But we're consolidating permits and using an electronic system to facilitate timely permit acquisition and automated permit validation.

So once again the effective date of implementation of the rule is September 20th. So as of that date any entry filings for the 35 harmonized tariff codes must be made electronically through ACE and will require the validation of the fisheries, the International Fisheries Trade Permit as well as the message set and in certain cases document images.

And here's some resources on the Fisheries Service web site for International Affairs with some information not only about these webinars and these transcripts and guidelines for Implementation and Compliance Guide for the rule.

The Fisheries Permit site, you can see the complete rulemaking, proposed rule comments received on the proposed rule, the final rule and responses to comments on the docket at regulations.gov.

And then the specific information for the message sets required for imports and exports on the CBP web sites. And then finally some information about the Compliance Guide which we have mailed out to all the folks that we could identify through prior year entry filings for these commodities. We're not saying that we have identified everybody who's affected by this rule but we did our best job to glean from the CBP entry filings and export filings, those who are involved in the trade of the commodities that are covered by the rule.

But if you haven't received a direct mailing of the Compliance Guide it is posted on our web site.

So we've had two webinars August 18th as well as today, September 1st. The transcripts of both webinars will be posted on the web site.

So that takes us through the presentation. I know it was fast, a lot of information. But we'll have plenty of time for follow-up with questions and answers.

(Kerry Turner):   Thanks, great. Thanks Chris. As you mentioned lots of information. And I mentioned earlier that NOAA Fisheries has offered – provided a series of opportunities one of which are these webinars for you to ask your questions about this rule.

So we want to get into that question and answer portion of this call. And Operator can you give us instructions on how to get into the queue to ask a question please?

Coordinator: Absolutely. If you would like to ask a question please press Star 1 from your phone and record your first and your last name clearly when prompted. Once more if you would like to ask a question please press Star 1 from your phone and record your first and your last name clearly when prompted.

One moment as we wait for any questions; our first question comes from (Leroy Bervin). Your line is open.

(Leroy Bervin):   Thank you. One point I would like to clarify if I may is, are there any tuna or tuna products which do not require the certificate via the permit?

Chris Rogers: The Tuna Tracking and Verification Program does cover a number of species of tuna. We do have on the TTVP web site a list of the tariff codes. That is also listed in the NMFS Implementation Guide.

So certain what we might call minor species of tuna may not be covered under those programs. It really depends on how they are entered under certain tariff codes.

But any tuna that's labeled dolphin safe, any processed tuna that is labeled dolphin safe would be covered under the program.

(Leroy Bervin): Right.

Chris Rogers: But as I said Frigate Tunas, certain other minor species, some might call them tunas like Bonito. Depends on which tariff code they are entered. Certainly an entry filer is supposed to use the proper tariff code for that commodity.

But the best advice I can give you is go to the Compliance Guide under that program and look at the specific tariff codes which pertain to the certificates and the message set.

(Leroy Bervin): This is on the NOAA web site.

Chris Rogers: It's on the NOAA web site. It's also on the CBP web site where the CATAIR, the Customs and Trade Automated Interface Requirements are listed. There's a tab there for the PGA, so-called PGA; the Partner Government Agency requirements. You click on that and you can down a list of agencies. The National Marine Fisheries Service is there.

And you can see our Compliance Guide which basically indicates the tariff codes that are applicable under each of the three programs. And then the construct of the message set for each of those programs.

(Leroy Bervin): Right. Now again still with tuna, are there any exemptions that are based on geographic location of origin as distinct from purely on species?

Chris Rogers: No, there are not. No geographic origin exemptions.

(Leroy Bervin): Thank you.

Chris Rogers: The contrary is true though. Where we do have an error listed on the National Marine Fisheries Service web site where we do have embargoes on Yellowfin Tuna from certain countries because of the dolphin mortality concerns and their fishing practices.

Coordinator: Thank you. Our next question comes from (Emily Davis). Your line is open.

(Emily Davis): Hi. Yes. Is this now true that we will not be able to import swordfish especially fresh swordfish if the ICCAT document is not provided at time of shipment?

Chris Rogers:	Yes. It is true under this rule. That was always the case that the ICCAT document was required to accompany the shipment. But the way we were implementing the program in the past was the importer would obtain the document from the shipment once released and provide that to National Marine Fisheries Service. We are moving that compliance check upfront in the entry filing process by requiring certain information from the document and the message set and an image of the document.
	So the importer would retain the paper document. And the information would be transmitted during the point of entry filing to National Marine Fisheries Service through the CBP system.
(Emily Davis):	And also is it true? Because I believe the entire seafood industry has been made aware of the problems in Brazil and the Brazilian government is down to 45 people in their Fisheries Department. And they haven't been able to provide ICCAT for a month sometimes after the shipment and…
Chris Rogers:	Well Brazil is the contracting party to the International Commission for the Conservation of Atlantic Tuna. So they have subscribed to the program just like the United States.
	I'm not arguing with you that they may have problems in implementing the program particularly under their current governmental situation. But they shouldn't be exporting swordfish if they cannot provide the documents upfront.
(Emily Davis):	Okay. I also had a question on sea bass.
Chris Rogers:	Okay.
(Emily Davis):	Right now we do an enormous amount of work and providing again after the – after – prior to an entry and then paying $200 for getting individual Sea Bass Permits per shipment.
	Are we still going to be doing that or and submitting just the approval document from NOAA or…?
Chris Rogers:	(Again) that's a situation very similar to what I described for the Atlantic Bluefin Tuna. You are continuing to do that upfront through the -what we call the Pre-approval Certificate.
	But because of that there is a reduced message set in part – in terms of entry filing. All you need to provide in the message set is that Pre-approval Certificate Number.
(Emily Davis):	Okay.

Chris Rogers:	You will continue with the pre-approval process for frozen toothfish shipments. For fresh toothfish shipments the message set would pertain. And again that's described in the Implementation Guide.
(Emily Davis):	Okay. And then I hate to be jumping around but back to swordfish. We are providing half – monthly, bimonthly swordfish documentation right now to NOAA. Will that continue as well?
Chris Rogers:	Yes. That will continue. That's not part of the entry processing requirement and therefore we're not collecting that information through ACE/ITDS. But that is required for us as a contracting party to the International Commission to have semiannual reports on swordfish imports and exports. So we do need to continue to collect that information. But it is not necessary to collect that particular information upfront at the point of entry.
(Emily Davis):	Okay. We'll still do the reporting but it will be bimonthly as always, okay.
Chris Rogers:	That's correct.
(Emily Davis):	Thank you.
Chris Rogers:	Thank you.
Coordinator:	Thank you. Our next question comes from (Doreen Alberga). Your line is open.
(Doreen Alberga):	Oh yes. Hi. Good afternoon.
Man:	Yes. This is (unintelligible) partner. My question is – business partner by the way. My question is I was looking at the tariff numbers in both. And all of them are frozen. Is this concerning also the fresh tuna?
Chris Rogers:	That depends on the program. For the Tuna Tracking and Verification Program that pertains only to frozen or processed tuna products so frozen whole fish and (unintelligible), frozen tuna loins, process products in terms of cans and pouches. However the other programs overlap to some extent. The Highly Migratory Species Program does have documentation requirements for Bluefin Tuna and Bigeye Tuna. And it doesn't matter in those programs whether it's fresh or frozen. But for the Tuna Tracking and Verification Program fresh products are exempt. It's only frozen and process products that are included.

So you need to compare. In making an entry for a tuna product, compare the requirements across the Highly Migratory Species Program in terms of the message set required and the Tuna Tracking and Verification Program because there is some overlap.

Man: All right, thank you. My next question is regarding, I was looking also at the tariffs. And I also see that this concern frozen salmon. I was unaware that salmon was considered a migratory species. But are we talking about wild salmon or farm grazed salmon?

Chris Rogers: Well this particular rulemaking does not affect salmon. Were you looking at the tariff codes on the Tuna Tracking and Verification Program web site or from the Compliance Guide that we posted on Customs and Border Protection web site?

Woman: (Unintelligible) Fisheries product.

Man: So it does not – we do not have to be concerned about salmon.

Chris Rogers: Well let me explain. The Tuna Tracking and Verification Program uses the NOAA Form 370. That NOAA Form 370 had two purposes or does have two purposes. One is with respect to dolphin safe labelling of tuna products. The other with respect to embargoes from countries that use large scale drift nets on the high seas, there is a ban on use of large scale drift nets on the high seas under United Nations Agreement. And the United States has implemented that through the High Seas Driftnet Enforcement Act.

If a country has been identified as using high seas drift nets certain products are embargoed from that country.

So that's where that list was posted because salmon would be some of the products captured via large scale drift nets used on the high seas. However at this point in time there are no countries identified as large – using large scale driftnets.

So that list of tariff codes does pertain only in the case where we do identify a country and we have to start screening products from that country because of their driftnet use. We would notify importers and exporters of that condition in the event we identify a country and notify you of the effective date.

But at the moment there are no countries identified. And therefore that list of additional products including salmon that would be subject to import monitoring does not pertain.

Man: Right, thank you so much.

Coordinator:	As a reminder if you would like to ask a question please press Star 1 from your phone and record your first and your last name clearly when prompted. Our next question comes from (Ordair Lee). Your line is open.
(Ordair Lee):	Hi. Just our question is on the Form 370 where after entry within ten days we have to submit it to National Marine. Do we still need to submit that every 10th day or by the electronic that's not required anymore?
Chris Rogers:	No. The submission post-release directly to NMFS is eliminated by this rulemaking. So we're just – we're changing the requirements under all three of these programs from the post-release submission of paper documents to National Marine Fisheries Service to an upfront at the point of entry filing a submission through the electronic message set and the Document Image System. So yes, the rule eliminates the post-release requirement to submit the documents to National Marine Fisheries Service.
(Ordair Lee):	Oh okay. And just like before they ask about the monthly reports, those ones we still have to submit every – I mean we submit every month reports for frozen tuna.
Chris Rogers:	That's correct. Those are independent of the Entry Monitoring Program.
(Ordair Lee):	Okay. So when we submit the reports we also submit the ((unintelligible)) Form. So we still – (using) that report and that submission. We still have to do both things at the time. Correct?
Chris Rogers:	Well did make an allowance. If you go to the Compliance Guide for those entities that are supplying information through the monthly reports…
(Ordair Lee):	Yes.
Chris Rogers:	…there is a reduced requirement at the point of entry. So the fact that we are receiving certain information through a separate pathway allows for a reduced message set, reduced document image requirement for those particular products, for those entities that are reporting. So the details are in the Implementation Guide. But if you find them to be confusing do give us a call and we'll walk you through it.
(Ordair Lee):	Oh okay. All right, thank you.
(Kerry Turner):	Before we get to our next question I just would like to note that we do have personnel from Customs on the phone with us. (Dina) is your line open?
Coordinator:	(Dina)'s line is open.

(David):	Yes, can you hear us?
(Dina):	Can you hear us?
(Kerry Turner):	Okay, great. Thank you. We just would like to acknowledge that we do have Customs personnel on the phone for any forthcoming questions.
	So and (Dina) or (David) feel free to drop in in terms if any of the answers forthcoming.
	(Monet) can you give us the next question?
Coordinator:	Thank you. Our next question comes from (Paulette Colba). Your line is open.
(Paulette Colba):	Thank you. I'm commenting from a freight forwarder perspective and I have an export question.
	In AES there are two data elements required, a description of the product and the three letter codes for which of the two programs the cargo is under.
	Separately independently from that do exporters have to send other information directly into ACE using a PGA message set or Document Imaging System?
Chris Rogers:	No. The import requirements are different from the export requirements. And in large measure the export situation we've already worked with the exporter because in fact we're validating the export document so we don't need to have those documents submitted again.
	So you go to the web sites that we specified here in the PowerPoint presentation and that will have the detail.
	So the export situation is much reduced in terms of the data elements as you noted. In some cases we will make use of the Document Imaging System for certain things.
	But if it's a document that we have already validated for you there's no reason for us to require that to be submitted again. It's already been submitted to us.
	So I would again advise you go to the web site for AESTIR, the Automated Export System Information requirements. Look at the formats required for National Marine Fisheries Service. That will tell you what you need to do on the export side.
	If you do have any questions you can get back to us. Our information is posted for you to contact us.

(Paulette Colba):	Thank you.
Coordinator:	Thank you. There are no current questions in queue.
(Kerry Turner):	Okay. (Monet), can you give us the instructions for those that are interested in asking questions? Again we welcome the opportunity both from NOAA Fisheries and also from Customs to answer any questions that you may have at this time about the final rule, it's implications.
	As mentioned the effective date of implementation for this rule is September 20th coming up in just a few…
Chris Rogers:	Twenty days.
(Kerry Turner):	…20 days. (David) or (Dina) do you have anything you would like to say at this time?
(David):	No. We're good. I mean don't have anything. Just waiting for questions.
(Kerry Turner);	Okay.
Coordinator:	Thank you. As a reminder you can ask a question by pressing Star 1 from your phone and recording your first and your last name clearly when prompted. Again that is Star 1 from your phone. And please press – and please record your first and your last name clearly when prompted.
	Our next question comes from (Leroy Bervin). Your line is open.
(Leroy Bervin):	I just tried going to the Fisheries Permits noaa.gov/npspub address. And when I go there my company's antivirus software tells me that this is a threat due to a Trojan. And will not let me connect.
Chris Rogers:	Well I will let our Office of Chief Information Officer, the Office of the Chief Information Officer Tech Support Group know about that and see what they can do about it.
	Sometimes there are problems with recognizing certificates. But sound like you got a pretty specific message about a virus associated with this web site.
(Leroy Bervin):	Yes.
Chris Rogers:	We'll look into that.
(Leroy Bervin):	Thank you.
Coordinator:	Thank you. Our next question comes from (Emily Davis). Your line is open.

(Emily Davis):	I realize that when we get our IFTP Permit, that's going to be one number that goes on all documents, goes on the Antarctic Marine Living Resource Application and also goes on the ICCAT Swordfish Reporting. Is it going to be one number?
Chris Rogers:	That's correct. It's one number. It's good for all three programs. So and the message set where its required under any of the three programs to submit he IFTP number, that will be the same number for any of those commodities.
(Emily Davis):	Okay. And I also realize that you had answered a question about Atlantic Bluefin Tuna Reporting that we won't have to go every ten days and do that.
	But are we going to have to go and make sure that the electronic filings are correct?
Chris Rogers:	Well we will be looking at the electronic filings as they are made and including the image files of the document.
	So if there's any discrepancies or concerns, missing data, ambiguous data that we need to follow-up on we will contact the Importer of Record directly. That's one of the reasons we are having this permit requirement. So we know how to contact the individuals that are making the entries.
(Emily Davis):	So we no longer have to as a co-signee go in and sign it.
Chris Rogers:	Do you mean go in – are you talking about the biweekly report or the document itself, the catch document?
(Emily Davis):	The catch document itself.
Chris Rogers:	Well you will be scanning the image file. So yes, you could sign that document and scan it. But at that point you can keep the document.
(Emily Davis):	But will we still have to submit the biweekly report by, you know, manually?
Chris Rogers:	Yes. The biweekly reports will still be sent directly to National Marine Fisheries Service.
(Emily Davis):	Okay.
Chris Rogers:	As you do now.
(Emily Davis):	Okay. Thank you.
Woman:	(Unintelligible). It's just (unintelligible).

Coordinator:	Thank you. And once more I would like to remind all participants that you can press Star 1 from your phone to ask a question.
	Our next question comes from (Roger Clark). Your line is open.
(Roger Clark):	Yes. On the NOAA 370 Form we do have the Documentation Form itself and we have the Captain Certificates which accompany this.
	My understanding is the data off the form will be transmitted through the Customs ACS System but the Captain Certificate will be transmitted via DIS. The question is will you be reviewing these documentations prior to release back to Custom and Border Protection for release of the cargo?
Chris Rogers:	We may. We will establish screening and targeting criteria, obviously not in all instances. We do have a large number of entries of tuna that are subject to the program.
	So yes, we will have access through the Document Image System in real time as the entries are filed to that documentation. And we will have a screening and targeting criteria set up. Some of them will be reviewed pre-release. Some of them will be reviewed post-release.
(Roger Clark):	What time limitation would you suggest that it held if we do not get a response back or release? And what is the contact procedure for contacting NOAA should there be an issue that we have no way of knowing whether there was an issue with the documentation not going through proper or you're just still in the process of reviewing it?
Chris Rogers:	We'll work a messaging system out with CBP on the timeframe for release. Basically it will process the – if the message set has been received. The International Fisheries Trade Permit validates as part of that message set. The message set indicates that the (unintelligible) (statement) in this case has been submitted. An image file has been received and has been associated with that entry filing.
	You'll get a may proceed message. It would only be in the case where we elect to take a look at it in real time and have some questions or concerns that we would notify CBP and ask them to put a hold on that shipment, prevent the release until we have satisfied our concerns which may include contacting the importer to clarify something.
	So you would be contacted. It normally would be transparent to the entry filer, to the Importer of Record as long as the information supplied is complete. The entry will process. You'll get a may proceed. The cargo would be eligible for release. It would only be in a situation where we step in to act. And in those cases we would notify CBP as well as the Importer of Record and the entry filer that we are taking that action.

(Roger Clark):   Thank you.

Coordinator: Thank you. At this time we don't have any questions in queue.

(Kerry Turner):   Thank you. We'll give another minute or so for anyone again that wants to ask a question from either ourselves at the NOAA Fisheries or customs in reference to the implementation of this rule. And again the effective date of the implementation is September 20th of 2016.

As seen on the screen information regarding that can be found at the – regarding this rule and all the other links can be found at the National Marine Fisheries Service web site. That's at the top, www.nmfs.noaa.gov/ia.

And Operator will you give instructions for any questions and answers one more time?

Coordinator: Yes. Please press Star 1 from your phone if you would like to ask a question. Then record your first and your last name clearly when prompted. Again that is Star 1 from your phone to ask a question and record your first and your last name clearly when prompted; one moment as we wait for any additional questions.

(Kerry Turner):   Okay. Chris, (Dina) or (David) if you have anything, any last minute thing to say to this group before we close this session, I'm – please. You're welcome to do so.

Chris Rogers: Great. Well I appreciate the questions that folks have asked this afternoon. I hope the presentation was informative. As was noted several times September 20th is an important date. We would encourage folks to try to make the electronic entries. The system is open. Electronic entries can be made prior to September 20th. It's not mandatory. It's voluntary. But it can be very instructive and helping you prepare for what will become mandatory as of September 20th.

So encourage you to try. If you do encounter any problems you can contact your client rep at CBP or National Marine Fisheries Service contacts. And we'll help you through the process.

(Kerry Turner):   (David) or (Dina).

(David):   No. We're pretty – we're good. We had some – we have stuff that we're going to be posting in the appendix queue. We were just waiting for Dale Jones to return to answer some questions before we post it. So they can be in the lookout for the updated version of the appendix queue which is going to show the – can you help me out (Dina)?

(Dina):	I'm sorry. It's going to show the new International Fisheries Trade Permit Number that we have accommodated for.
Chris Rogers:	Okay.
(David):	Yes.
Chris Rogers:	Thank you much.
(David):	Yes. Thank you.
Chris Rogers:	And Dale will be back on Tuesday morning so hopefully we'll get that done by Tuesday afternoon.
(Dina):	Yes.
(David):	Absolutely. Thank you.
(Kerry Turner):	Okay. And again both links that they're referring to is up on the screen right now.
	Okay, so thank you everyone for joining us. As Chris mentioned we hope that it was informative to you. And if you have any questions feel free to give – send a message to Chris Rogers or Dale Jones. And they'd be happy to respond.
	You have a wonderful day or evening.
Chris Rogers:	Thank you.
Coordinator:	Thank you for your participation in today's conference. All participants may disconnect at this time.

<p style="text-align:center">END</p>