



January 20, 2015

Carrie Selberg
1315 East-West Highway
Silver Spring, Maryland 20910

**RE: Recommendations of the Presidential Task Force on Combatting Illegal,
Unreported and Unregulated Fishing and Seafood Fraud**

Docket No. NOAA-NMFS-2014-0090

Dear Ms. Selberg:

On December 18, 2014, the U.S. Department of Commerce National Oceanic and Atmospheric Administration (NOAA) published in the *Federal Register* a notice and request for comments on recommendations resulting from the work of the interagency task force. We appreciate the opportunity to comment on this important topic.

The Food Marketing Institute (FMI) proudly advocates on behalf of the food retail industry. FMI's U.S. members operate nearly 40,000 retail food stores and 25,000 pharmacies, representing a combined annual sales volume of almost \$770 billion. Through programs in public affairs, food safety, research, education and industry relations, FMI offers resources and provides valuable benefits to more than 1,225 food retail and wholesale member companies in the United States and around the world. FMI membership covers the spectrum of diverse venues where food is sold, including single owner grocery stores, large multi-store supermarket chains and mixed retail stores. For more information, visit www.fmi.org and for information regarding the FMI foundation, visit www.fmifoundation.org.

The food retail industry is concerned about the issue of illegal fishing and seafood fraud. The industry takes steps to purchase seafood from known and trusted suppliers and to provide product information to consumers. Consumers want to know more about the food they are consuming and retailers are going to great lengths to provide them additional details.

We commend the task force for developing fifteen recommendations to combat illegal, unreported and unregulated fishing and seafood fraud. All fifteen recommendations are valid and have merit.

We support recommendation #13 with increased partnerships. We believe that increased communication and awareness of illegal, unreported, and unregulated fishing will help retailers manage their supply chains and be more aware of problems should they arise.

Several of the recommendations center around traceability programs or have a foundation in traceability. The task force and the government agencies should work with food industry groups already working on traceability so that key learnings can be utilized and redundancies eliminated. One such group is the Global Food Traceability Center (GFTC) run by the Institute of Food Technologists. In the food industry, it is very important that traceability systems be interoperable so that supply chain partners and users at the end of the supply chain (retail and foodservice) can share data. If separate systems are developed for seafood that are different than the rest of the food industry, then costs will be added because multiple systems will be needed to access the traceability information and run the system.

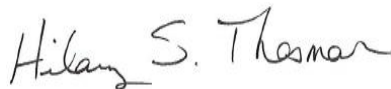
We strongly encourage NOAA and your partners to explore existing traceability solutions, standards and theories already in place and in development in the food industry before developing a new solution for seafood. In addition, we request that the recordkeeping requirements for traceability systems fall on the responsible parties in the supply chain allowing information to be shared when necessary. Retailers should not be responsible for records for the entire supply chain.

We commend NOAA and your partner agencies for proceeding with this effort. It is important to protect our marine environments and preserve seafood species for generations to come. FMI members are committed to seafood sustainability, food safety and regulatory compliance. Our members are also committed to providing safe, wholesome and properly labeled products to consumers. We look forward to working with the respective agencies as these recommendations are implemented.

Sincerely,

Handwritten signature of Stephanie K. Barnes in cursive script.

Stephanie K. Barnes
Regulatory Counsel

Handwritten signature of Hilary S. Thesmar in cursive script.

Hilary S. Thesmar, PhD, RD
Vice President, Food Safety Programs