



Southern Shrimp Alliance

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April 23, 2026

Senator Dan Sullivan (R-AK)
Chairman,
Congressional-Executive Commission on
China

Representative Christopher H. Smith (R-NJ)
Co-Chair,
Congressional-Executive Commission on
China

**Re: Congressional-Executive Commission on China Hearing, April 16, 2026:
“Dark Nets, Illicit Labor – Confronting China’s IUU Fishing and Seafood
Supply Chain”**

Dear Chairman Sullivan and Co-Chair Smith:

On behalf of the Southern Shrimp Alliance (SSA), we provide this written statement in regards to the Congressional-Executive Commission on China’s (CECC) April 16, 2026 hearing, “*Dark Nets, Illicit Labor – Confronting China’s IUU Fishing and Seafood Supply Chain.*” As an initial matter, SSA applauds the CECC for investigating China’s practices with respect to illegal, unreported, and unregulated (IUU) fishing and forced labor in its seafood supply chain. China’s repeated, egregious, and intolerable violations of baseline international norms must be emphatically rejected by the laws and policies of the United States.

SSA strongly supports our government’s efforts to address forced labor in China’s seafood supply chains and has repeatedly petitioned federal agencies to take action. For example, in January 2020, SSA requested that the Bureau of International Labor Affairs (ILAB) of the U.S. Department of Labor identify fish harvested from Chinese distant water fishing vessels as a good produced through forced labor,¹ with ILAB subsequently issuing the *2020 List of Goods Produced by Child Labor or Forced Labor* to include this product.² Further, in January 2024, SSA requested that the Forced Labor Enforcement Task Force (FLETF) recognize how

¹ See Southern Shrimp Alliance, “Comments on Child Labor, Forced Labor, and Forced or Indentured Child Labor in the Production of Goods in Foreign Countries and Efforts by Certain Foreign Countries to Eliminate the Worst Forms of Child Labor (Docket No. DOL-2019-0005)” (Jan. 13, 2020), <https://shrimpalliance.com/wp-content/uploads/2020/01/SSA-Comments-on-ILAB-Reports-Narrative-Only.pdf>.

² See U.S. Department of Labor, Bureau of International Labor Affairs, “2020 List of Goods Produced by Child Labor or Forced Labor” at 33, https://shrimpalliance.com/wp-content/uploads/2020/10/2020_TVPRAListOnlineFinal.pdf.

forced labor programs imposed by the Chinese government on their Uyghur population were utilized by the seafood processing industry.³ SSA specifically asked that eight Chinese companies be added to the entity list maintained under the *Uyghur Forced Labor Prevention Act* (UFLPA) (Public Law 117-78).⁴ Subsequently, in the summer of 2024, the FLETF designated seafood as a high-priority sector for enforcement under the UFLPA and added one of the eight companies – Shandong Meijia – to the UFLPA’s entity list.⁵

The other seven Chinese seafood companies identified by SSA based on the reporting of The Outlaw Ocean Project have not been added to the UFLPA’s entity list. Moreover, in December 2024, SSA additionally requested that the FLETF add Rongcheng Sanyue Foodstuff Co., Ltd., an exporter of “Argentinian” red shrimp to the United States, to the UFLPA’s entity list noting that the company was already listed on the U.S. Food and Drug Administration’s (FDA) Import Alert 99-32 for refusing to allow FDA inspectors access to their facilities.⁶ SSA’s request for the inclusion of Rongcheng Sanyue on the UFLPA’s entity list followed prior requests to U.S. Customs and Border Protection that the labor practices of seafood processors located in Shandong Province that were actively shipping “Argentinian” red shrimp to the U.S. market, including Rongcheng Sanyue and another company, Qingdao Yize Food Co., Ltd., be investigated.⁷

Consistent with these requests, SSA believes that there is strong evidence supporting the addition of many more Chinese seafood companies on the UFLPA’s entity list and recommends that the CECC formally inquire after why the FLETF, to date, has failed to address any of these companies beyond Shandong Meijia since June of 2024. “Argentinian” red shrimp continues to be shipped to the U.S. market from Chinese seafood processing plants, with new containers arriving at U.S. ports weekly. This bizarre supply chain – shrimp landed in the waters of the Atlantic Ocean by Argentinian trawlers, then shipped across the Pacific Ocean for minimal

³ See Southern Shrimp Alliance Letter to R. Silvers, Chair, Forced Labor Enforcement Task Force (Jan. 29, 2024), <https://shrimpalliance.com/wp-content/uploads/2024/01/SSA-Petition-UFLPA-Entity-List-cc-Jan-29-2024.pdf>.

⁴ See *id.* The eight Chinese seafood companies were: (1) Yantai Sanko; (2) Shandong Meijia; (3) the Chisan Group; (4) Qingdao Tianyuan; (5) Weihai Wendeng Xinghe Food; (6) the Rongsense Group; (7) Yantai Longwin Food; and (8) Qingdao Lian Yang Aquatic Products. See *id.* at 4.

⁵ See U.S. Department of Homeland Security, Office of Strategy, Policy, and Plans, “2024 Updates to the Strategy to Prevent the Importation of Goods Mined, Produced, or Manufactured with Forced Labor in the People’s Republic of China,” Report to Congress (July 9, 2024) (reporting that Shandong Meijia was added to the UFLPA’s entity list in June 2024), <https://shrimpalliance.com/wp-content/uploads/2024/07/2024-Updates-to-the-Strategy-to-Prevent-the-Importation-of-Goods-Mined-Produced-or-Manufactured-with-Forced-Labor-in-the-Peoples-Republic-of-China.pdf>.

⁶ See Southern Shrimp Alliance Letter to R. Silvers, Chair, Forced Labor Enforcement Task Force (Dec. 30, 2024), <https://shrimpalliance.com/wp-content/uploads/2024/12/Petition-for-Rongcheng-Sanyue-Foodstuff-Co.-Ltd.s-Inclusion-on-UFLPA-Entity-List-FINAL.pdf>, and U.S. Food and Drug Administration, Import Alert 99-32 “Detention Without Physical Examination of Human and Animal Food Products from Foreign Establishments Refusing FDA Inspection,” https://www.accessdata.fda.gov/cms_ia/importalert_521.html.

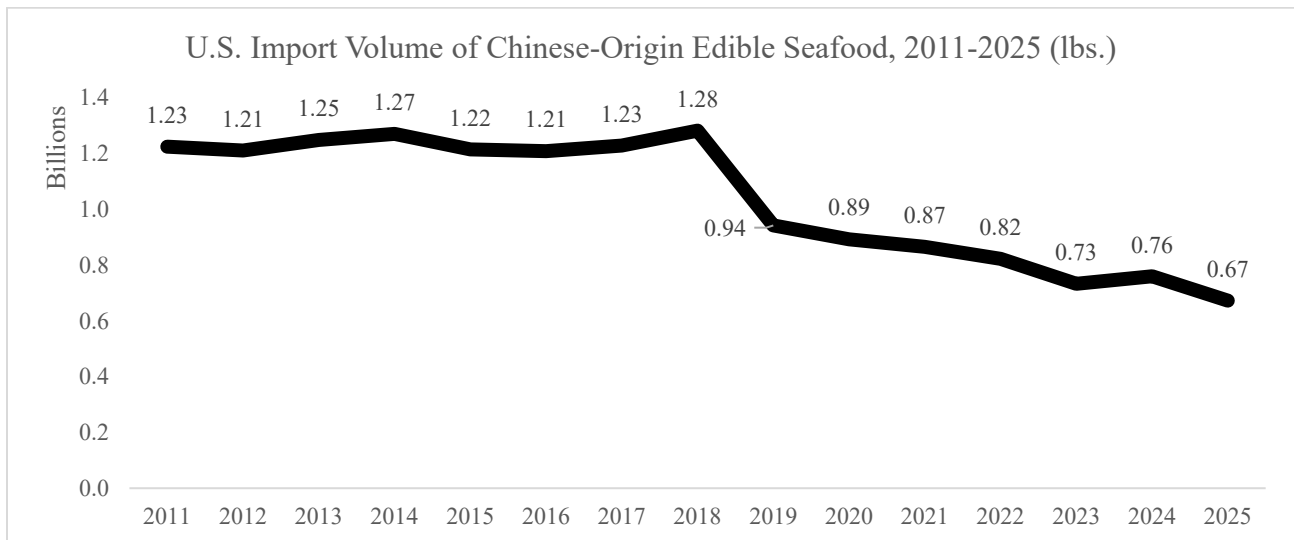
⁷ See Southern Shrimp Alliance, “Southern Shrimp Alliance Petitions for Argentine Red Shrimp Processed Through Uyghur Labor to Be Banned” (Oct. 23, 2023), <https://shrimpalliance.com/southern-shrimp-alliance-petitions-for-argentine-red-shrimp-processed-through-uyghur-labor-to-be-banned/>.

processing and packaging prior to being shipped back across the Pacific Ocean to end up on American grocery shelves – is premised on the abuse of labor in China’s seafood supply chains and should not be tolerated.

While the FLETF should take swift action to include Chinese seafood companies tied to Uyghur forced labor programs on the UFLPA entity list, the CECC’s hearing posed a broader, foundational question: should the United States permit imports of Chinese seafood – both Chinese-origin and Chinese-processed – at all? To this question, SSA believes that the answer is a resounding no. SSA has long agreed with the views expressed by a former U.S. Immigration and Customs Enforcement official, Ken Kennedy, tasked with addressing forced labor overseas:

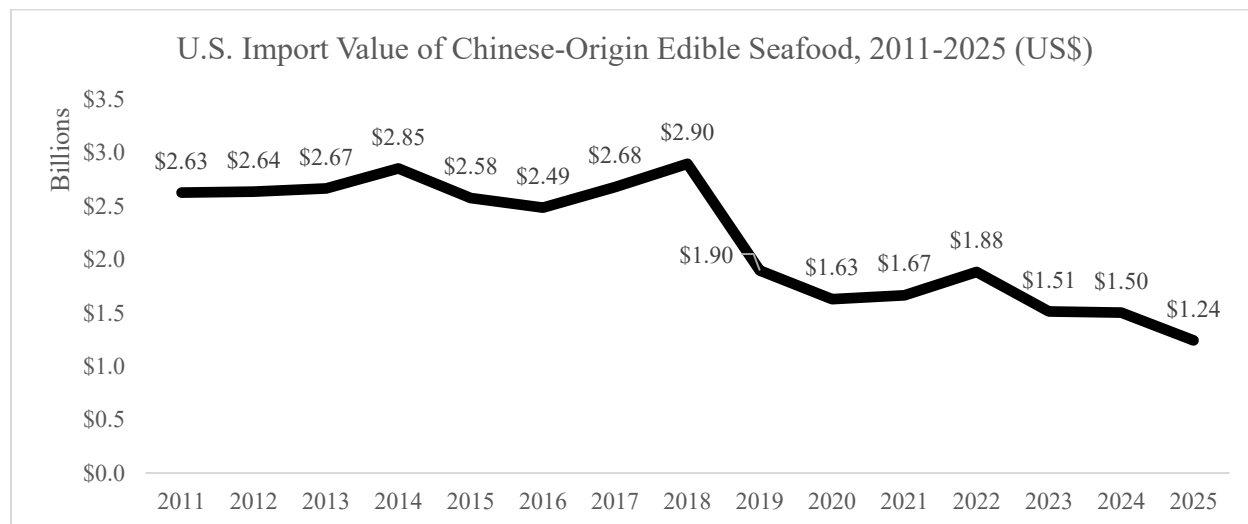
Kenneth Kennedy, a former manager of the anti-forced-labor program at Immigration and Customs Enforcement, said that the U.S. government should block seafood imports from China until American companies can demonstrate that their supply chains are free of abuse. “The U.S. is awash with criminally tainted seafood,” he said.⁸

Import data indicate that the U.S. market is already taking steps to adjust to reduced access to Chinese seafood supply chains. Last year, the United States imported 672.8 million pounds of Chinese-origin edible seafood, valued at a little over \$1.2 billion.⁹ While significant, these figures are well below U.S. import levels a decade ago. As recently as 2018, the U.S. imported nearly 1.3 billion pounds of Chinese-origin edible seafood worth roughly \$2.9 billion. The tables below show the decline in Chinese-origin seafood imports over the last fifteen years:



⁸ Ian Urbina, “The Crimes Behind the Seafood You Eat,” *The New Yorker* (Oct. 9, 2023), <https://www.newyorker.com/magazine/2023/10/16/the-crimes-behind-the-seafood-you-eat>.

⁹ U.S. import data for edible seafood obtained from the U.S. International Trade Commission’s (USITC) *Dataweb* based on the following Harmonized Tariff Schedule of the United States (HTSUS) codes: 03; 1603; 1604; and 1605.



Thus, although the presence of Chinese seafood in the United States remains significant, the market’s dependence on seafood from this particular foreign supply chain has been substantially diminished.

The experience of the American shrimp industry demonstrates that the United States can pivot away from Chinese seafood supply chains without adversely impacting the availability of product in this market. Specifically, SSA was initially formed to address the surge in volume of Chinese shrimp imports at the beginning of this century. In 1999, the United States imported roughly 19 million pounds of frozen, non-breaded shrimp from China.¹⁰ By 2003, that total had grown to over 170 million pounds, with China becoming the second largest supplier of this shrimp to the United States behind only Thailand.

SSA pursued antidumping duties on Chinese shrimp, resulting in the implementation of an antidumping duty order in February 2025 that imposed antidumping duties of 112.81 percent on most exporters.¹¹ Following trade relief, imports of Chinese frozen, non-breaded shrimp have never come close to 2003 levels and have largely disappeared from the market – last year, the United States imported less than 350,000 pounds of this shrimp from China. At the same time, the availability of frozen, non-breaded shrimp has not been adversely impacted by the removal of Chinese-origin product from the market.

While Chinese-origin frozen, non-breaded shrimp imports peaked in 2003 but largely left the market in 2025, the trend for all frozen, non-breaded shrimp imports is very different. Specifically, in 2003, the United States imported just over 1 billion pounds of frozen, non-

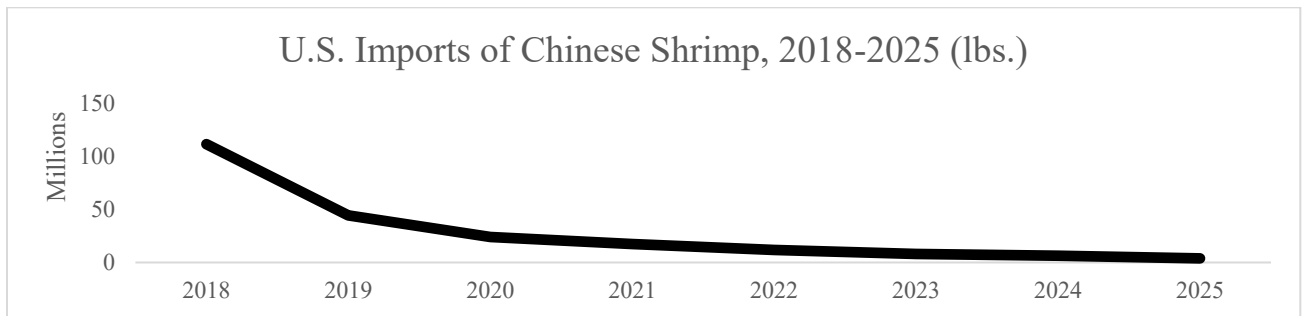
¹⁰ U.S. import data for frozen, non-breaded shrimp obtained from the USITC’s *Dataweb* based on the following HTSUS codes: 030613; 030617; 030623; 030636; 1605201010; 1605201030; 1605201050; 1605211030; 1605211050; 1605291010; and 1605291040.

¹¹ *See Certain Frozen Warmwater Shrimp from the People’s Republic of China*, 70 Fed. Reg. 5,149 (Dep’t Commerce Feb. 1, 2005) (Notice of Amended Determination of Sales at Less Than Fair Value and Antidumping Duty Order).

breaded shrimp from all sources. Last year, total U.S. imports of this shrimp increased to 1.6 billion pounds.

The antidumping duties on Chinese frozen, non-breaded shrimp are not the only issue that has limited China’s access to the U.S. shrimp market. After the FDA increased testing of imported Chinese-origin shrimp in 2006 and 2007 for veterinary drug residues, the agency’s repeated findings of banned antibiotics resulted in the imposition of an Import Alert that required Chinese exporters to demonstrate that they had taken affirmative steps to eliminate harmful veterinary drugs from their supply chain in order to avoid having their products detained without physical examination.¹² The FDA further revised this Import Alert to encompass shrimp that was “aquacultured outside of China or Hong Kong SAR but processed within China or Hong Kong SAR.”¹³ Separately, following a February 2020 request from SSA,¹⁴ the U.S. Department of State suspended China’s certification under Section 609 of Public Law 101-162 (November 21, 1989), resulting in the prohibition of all Chinese wild-caught shrimp from the U.S. market.¹⁵ Thus, although China’s shipments to the United States of shrimp in other product forms beyond frozen, non-breaded shrimp remained significant for a much longer period of time – particularly with respect to breaded shrimp – these products have also been receding from the U.S. market.

As recently as 2018, China exported nearly 112 million pounds of shrimp products to the United States but last year, this country imported less than 4 million pounds of shrimp from China.¹⁶ Again, the availability of these products has not been adversely impacted by China’s withdrawal from the market. The United States imported over 1.5 billion pounds of all shrimp products from throughout the world in 2018; last year, we imported over 1.7 billion pounds. The charts below illustrate the very different trends for these imports.



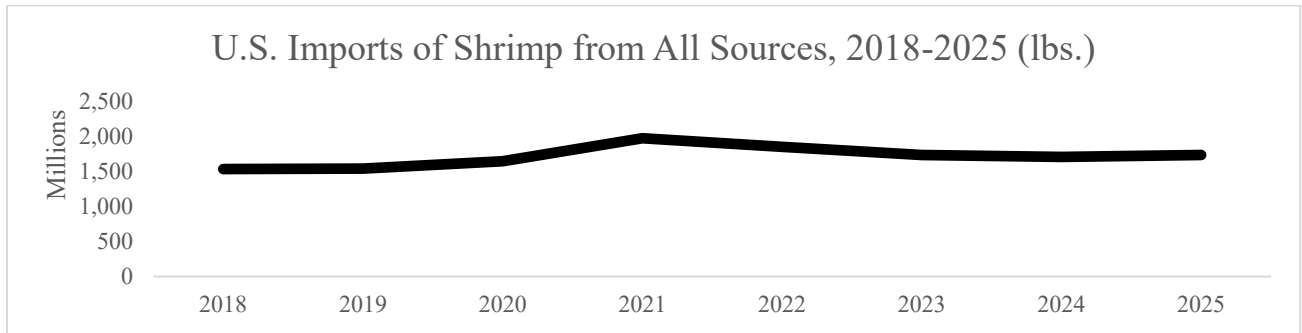
¹² See U.S. Food and Drug Administration, Import Alert 16-131 “Detention Without Physical Examination of Aquacultured, Shrimp, Dace, and Eel from China and Hong Kong SAR – Presence of New Animal Drugs and/or Unsafe Food Additives,” https://www.accessdata.fda.gov/cms_ia/importalert_33.html.

¹³ *Id.*

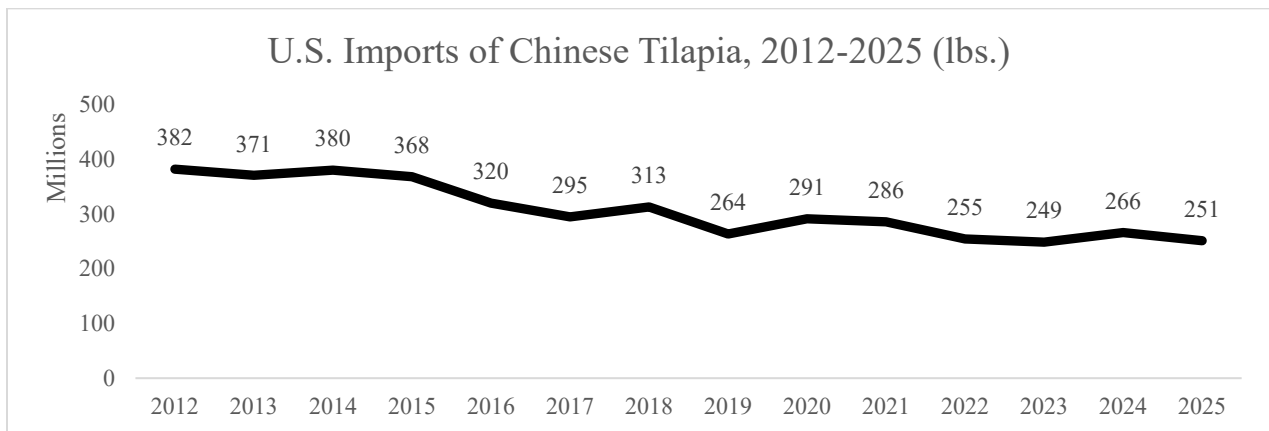
¹⁴ See Southern Shrimp Alliance, “Certification of Chinese Shrimp Trawling Industry Under Section 609” (Feb. 13, 2020), <https://shrimpalliance.com/wp-content/uploads/2020/03/Section-609-Paper-February.pdf>.

¹⁵ See Annual Certification of Shrimp-Harvesting Nations, 85 Fed. Reg. 24,074 (Dep’t State Apr. 30, 2020) (Notice of Annual Certification).

¹⁶ U.S. import data for all shrimp products obtained from the USITC’s *Dataweb* based on the following HTSUS codes: 030613; 030616; 030617; 030623; 030626; 030627; 030635; 030636; 030639; 030695; 160520; 160521; and 160529.

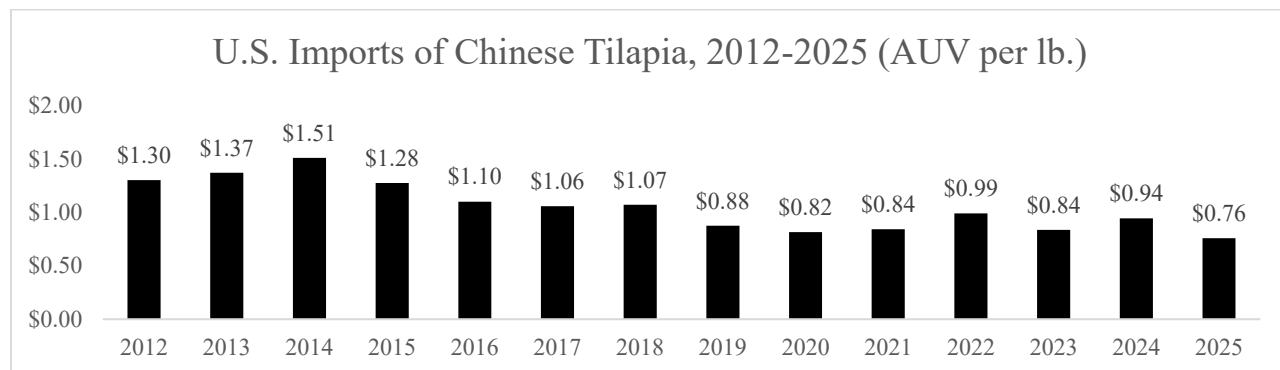


Had the domestic shrimp industry not taken aggressive action to combat Chinese shrimp imports, SSA believes that there is strong evidence that reliance on Chinese seafood supply chains would have substantially undermined demand for *all* shrimp in the U.S. market. The example of American consumption patterns with respect to tilapia is instructive on this point. China has long dominated the supply of tilapia to the U.S. market and, as recently as 2018, accounted for over three-quarters of the total volume of imports of this fish into the United States.¹⁷ The below chart shows the deterioration of U.S. imports of Chinese tilapia over the last fourteen years.



While the volume of Chinese tilapia imports has declined substantially over this timeframe, China remains the dominant supplier of this seafood to the United States, accounting for over 62 percent of all such imports in 2025. The average unit values (AUVs) of tilapia imports from China versus sources outside of China likely explain why alternative sources have been unable to more significantly increase their presence in the U.S. market. Last year, Chinese tilapia imports carried an AUV of \$0.76 per pound, while tilapia imports from all other sources had an AUV of \$2.37 per pound. Incredibly, as shown in the chart below, Chinese tilapia imports have been withdrawing from the market at the same time as they are becoming significantly cheaper to obtain.

¹⁷ U.S. import data for tilapia obtained from the USITC’s *Dataweb* based on the following HTSUS codes: 030271; 030323; 0303890040; 030431; 0304490112; 0304510125; 0304590030; and 030461.



These import data – demonstrating reduced volumes and prices for Chinese tilapia – indicate that American demand for this seafood product is declining. Although U.S. seafood importers have successfully prevented the FDA from increasing oversight of this aquacultured product and this particular seafood supply chain has largely avoided additional scrutiny from federal agencies (tilapia is not, for example, subject to NOAA Fisheries’ Seafood Import Monitoring Program¹⁸ and has no meaningful traceability requirements imposed on it), the consequence of this laissez-faire approach is American consumers turning away from a low-quality product that may only maintain a market presence through incredibly low, non-market prices.

Beyond shrimp and tilapia, the Chinese seafood industry supplies a wide variety of seafood products to the United States, including carp, caviar, clams, cod, crab, crayfish, eel, haddock, halibut, mackerel, octopus, oysters, pollock, sardines, salmon, scallops, sole, squid, and tuna. However, many of the Chinese seafood companies exporting to the United States have never been inspected by the FDA but nevertheless have been granted unfettered access to the U.S. market. Based on entry line data reported by the FDA for carp, clams, crayfish, eel, halibut, mackerel, sardines, and tuna, the table below identifies **106** Chinese companies that exported seafood to the United States thus far during fiscal year 2026 (October 1, 2025 through April 23, 2026) for which the FDA includes no firm profile on the agency’s website¹⁹ or, alternatively, reports has never been subject to an FDA inspection.

Manufacturer Name	FEI #	Product(s)	FDA Inspection
999Dandong Tianyue Aquatic Processing Co, Ltd.	3043657458	Clams	No Record
Anhui Luan Hongyuan Foodstuffs Co., Ltd.	3013608084	Crayfish	No Record
Dalian FuHua Foodstuffs Co., Ltd	3043523212 ²⁰	Clams	None
Dalian Hongxu Food Co., Ltd.	3043970014	Halibut	No Record
Dalian Meihe Foodstuff Co.	3009821558 ²¹	Halibut	None

¹⁸ NOAA Fisheries, “Seafood Import Monitoring Program,” <https://www.fisheries.noaa.gov/international/international-affairs/seafood-import-monitoring-program>.

¹⁹ See <https://datadashboard.fda.gov/oii/fd/fser.htm>.

²⁰ See <https://datadashboard.fda.gov/oii/firmprofile.htm?FEIs=2000012170&/identity/2000012170>.

²¹ See <https://datadashboard.fda.gov/oii/firmprofile.htm?FEIs=3009821558&/identity/3009821558>.

Dalian Taiyang Aquatic Products Co., Ltd.	3013267319 ²²	Halibut	None
Dalian Zhuohong Marine Product Co., Ltd	3014199615 ²³	Clams	None
Dingyixin International Trading (Shanghai) Co., Ltd.	3038155194	Crayfish	No Record
Donggang Cold Steamed Aquatic Food Co., Ltd	3038291284 ²⁴	Clams	None
Donggang Dongfu Food Co., Ltd	3042462581	Clams	No Record
Donggang Yihao Cold-Chain Logistics Co., Ltd	3030570932	Clams	No Record
Donggang Yixing Food Co., Ltd	3031464655 ²⁵	Clams	None
Foshan City Shunde Hongyuan Food Co., Ltd	3030118928	Carp	No Record
Foshan Lianya Xiezou Trading Company	3030378163	Mackerel	No Record
Foshan Runlin Trading Co., Ltd	3027405367 ²⁶	Clams	None
Fujian Haide Food Co Ltd	3031602770; 3032915876	Eel	No Record
Fujian Hanxiang Food Co., Ltd.	3017192254	Eel	No Record
Fujian Huanong Food Co., Ltd.	3011785700 ²⁷	Eel	None
Fujian Lins Hengfa Intl	3021381329 ²⁸	Clams	None
Fujian Ming Xing Frozen Food Co., Ltd.	3009294711	Mackerel	No Record
Fujian Ruiyun Foods Co., Ltd	3013406908 ²⁹	Clams, Eel	None
Fujian Shenglinmark Trade Co. Ltd.	3013704957 ³⁰	Carp, Clams, Eel	None
Fujian Xinfengteng Industrial Development Co., Ltd.	3021910834	Clams	No Record
Fuq Ing Huaxin Food Co., Ltd.	3009104107 ³¹	Eel	None
Fuqing Hongyi Food Co., Ltd	3033628153; 3034735925	Eel	No Record

²² See <https://datadashboard.fda.gov/oii/firmprofile.htm?FEIs=3013267319&/identity/3013267319>.

²³ See <https://datadashboard.fda.gov/oii/firmprofile.htm?FEIs=3014199615&/identity/3014199615>.

²⁴ See <https://datadashboard.fda.gov/oii/firmprofile.htm?FEIs=3038291284&/identity/3038291284>.

²⁵ See <https://datadashboard.fda.gov/oii/firmprofile.htm?FEIs=3031464655&/identity/3031464655>.

²⁶ See <https://datadashboard.fda.gov/oii/firmprofile.htm?FEIs=3027405367&/identity/3027405367>.

²⁷ See <https://datadashboard.fda.gov/oii/firmprofile.htm?FEIs=3011785700&/identity/3011785700>.

²⁸ See <https://datadashboard.fda.gov/oii/firmprofile.htm?FEIs=3021381329&/identity/3021381329>.

²⁹ See <https://datadashboard.fda.gov/oii/firmprofile.htm?FEIs=3013406908&/identity/3013406908>.

³⁰ See <https://datadashboard.fda.gov/oii/firmprofile.htm?FEIs=3013704957&/identity/3013704957>.

³¹ See <https://datadashboard.fda.gov/oii/firmprofile.htm?FEIs=3009104107&/identity/3009104107>.

Fuqing Hurong United Products Co., Ltd.	3038460617	Eel	No Record
Fuqing Huironghe Supply Chain MA	3032594868	Eel	No Record
Fuqing Quanfang Trading Co Ltd	3042544109	Eel	No Record
Fuzhou Haiyao Aquatic Products Co., Ltd.	3040506686	Clams, Eel	No Record
Guangzhou New Hengda Import and Export Trading Co	3029666979 ³²	Clams	None
Hai Jing Food Co Ltd	3030240785	Mackerel	No Record
Hainan Qinfu Foods Co.	3009989606 ³³	Eel	None
Hebei Sister Ma Food Co., Ltd.	3017102595	Carp	No Record
Hongchen Sea Food Co., Ltd., Zhoushan	3030574794	Eel	No Record
Honghu New Hungte Aquatic Company Limited	3015406172	Crayfish	No Record
Honghu Wanhong Aquatic Product and Food Co Ltd	3013518982; 3042500293	Crayfish	No Record
Hongsheng Food Co., Ltd**	3043167585 ³⁴	Eel	None
Ho’s BBY Food (Guangdong) Co., Ltd	3030667705	Carp	No Record
Huashan Technology Co., Ltd.	3013934208; 3035370411	Crayfish	No Record
Hubei Boao Food Co.	3017598030	Carp	No Record
Hubei Boao Food Stock Co., Ltd.	3015673149; 3018681445	Carp	No Record
Hubei Canhu Food Co., Ltd.	3024656668	Crayfish	No Record
Hubei Pinglin Leishan Natural Food Co. Ltd	3018144306 ³⁵	Clams, Eel	None
Hubei Qifou Food Technology Co., Ltd.	3021907354	Crayfish	No Record
Hubei Yuntaifang Foods Co.,	3023862210	Eel	No Record
Huludao Ronghai Food Co., Ltd	3031726188	Clams	No Record
Huoshan Yuanjin Foodstuffs Co., Ltd.	3022999353	Crayfish	No Record
Jiangsu Ocean Gift Ocean Sci-Tech	3014305368	Mackerel	No Record
Jiangsu Weiquan Food Co., Ltd.	3027403576	Crayfish	No Record
Jiangxi Huchen Ecological Technology Co., Ltd	3015556883 ³⁶	Eel	None
Jiangxi Province Fu Rui Ke Yu Fo	3038206957	Eel	No Record
Jiangxi Wan Cun Quan Food Co., Ltd	3014949549	Eel	No Record

³² See <https://datadashboard.fda.gov/oii/firmprofile.htm?FEIs=3029666979&/identity/3029666979>.

³³ See <https://datadashboard.fda.gov/oii/firmprofile.htm?FEIs=3007972736&/identity/3007972736>.

³⁴ See <https://datadashboard.fda.gov/oii/firmprofile.htm?FEIs=3002727116&/identity/3002727116>.

³⁵ See <https://datadashboard.fda.gov/oii/firmprofile.htm?FEIs=3018144306&/identity/3018144306>.

³⁶ See <https://datadashboard.fda.gov/oii/firmprofile.htm?FEIs=3015556883&/identity/3015556883>.

Jingzhou Baiyang Food Co., Ltd	3038251189	Crayfish	No Record
Jinsheng Aquatic Product Co., Ltd. Ningde Fujian	3038140043 ³⁷	Eel	None
Lian Cheng Fishery (Xiamen) Co.	3040977830	Tuna	No Record
Lianjiang Country Laojiaji Food Co., Ltd.	3029246956	Eel	No Record
Lianjiang County Laojiaji Food C	3029038341	Clams	No Record
Longfei Aquaculture Hatchery	3041124930	Mackerel	No Record
Nanjing Yinxiangchen International Trade Co Ltd	3038990429	Crayfish	No Record
Ningbo Xinzhiyuan Food Co., Ltd.	3008822372	Tuna	No Record
Ningde Caishi Aquatic Products Co., Ltd.	3029338457	Clams	No Record
Ningde Wanxing Food Co., Ltd.	3017911474 ³⁸	Eel	None
Ningde Xingguang Food Co., Ltd.	3019861045	Mackerel	No Record
Omeca (Liaoning) Food Co Ltd	3031717892	Clams	No Record
Qingdao Biwan Marine Products Co Ltd	3002471054 ³⁹	Mackerel	None
Qingdao Yihexing Foods	3011917120 ⁴⁰	Mackerel	None
Rizhao Huasheng Aquatic Foodstuff Co., Ltd	3039084275	Mackerel	No Record
Rizhao Meijia Aquatic Foodstuff Co., Ltd.	3010219795	Mackerel	No Record
Rizhao Mingbang Food Co Ltd	3013348512	Mackerel	No Record
Rizhao Rongjin Aquatic Products Co., Ltd.	3009086557 ⁴¹	Clams	None
Rizhao Xinghe Foodstuff Co., Ltd.	3009886076 ⁴²	Eel	None
Rongcheng Hehui Foods Co., Ltd.	3014294483 ⁴³	Sardines, Tuna	None
Rongcheng Hengsheng Aquatic Product Co., Ltd.	3038374645	Eel	No Record
Rongcheng Shengrong Aquatic Foods Co., Ltd.	3014355198	Mackerel	No Record

³⁷ See <https://datadashboard.fda.gov/oii/firmprofile.htm?FEIs=3038140043&/identity/3038140043>.

³⁸ See <https://datadashboard.fda.gov/oii/firmprofile.htm?FEIs=3017911474&/identity/3017911474>.

³⁹ See <https://datadashboard.fda.gov/oii/firmprofile.htm?FEIs=3002471054&/identity/3002471054>.

⁴⁰ See <https://datadashboard.fda.gov/oii/firmprofile.htm?FEIs=3005234533&/identity/3005234533>.

⁴¹ See <https://datadashboard.fda.gov/oii/firmprofile.htm?FEIs=3009086557&/identity/3009086557>.

⁴² See <https://datadashboard.fda.gov/oii/firmprofile.htm?FEIs=3009886076&/identity/3009886076>.

⁴³ See <https://datadashboard.fda.gov/oii/firmprofile.htm?FEIs=3014294483&/identity/3014294483>.

Rongcheng Yin Hai Aquatic Co., Ltd	3015192886; ⁴⁴ 3004564587 ⁴⁵	Eel	None
Rudong Zhangxiong Trade Co., Ltd	3041850852 ⁴⁶	Clams	None
Ruzhou Xiangru Food Factory	3037278617	Clams, Crayfish	No Record
Saneheld (FuQing) Food Co., Ltd	3022378106; ⁴⁷ 3038592086	Eel	None
Shandong JY Foods Group Co	3034226447	Clams	No Record
Shandong Whale Import & Export Co., Ltd.	3031165230	Eel	No Record
Shanghai Fulinnangang International Trading Co., Ltd.	3033036716; 3041371493	Crayfish	No Record
Shanghai Panmaoquan Technology Co., Ltd.	3029812947	Crayfish	No Record
Shanghai Senming Industry Trade Ltd.	3009823329	Eel	No Record
Shunde Baoli Food Co., Ltd.	3004270757 ⁴⁸	Eel	None
Sonsea Foods Co.	3009992116	Crayfish	No Record
Sunny Success International Inc.	3013640072	Sardines	No Record
Taihong Foodstuff Co., Ltd	3008418640	Clams	No Record
Taishan Gongrong Food Co., Ltd.	3009944201	Eel	No Record
Taishan Lvsheng Food	3009892955 ⁴⁹	Eel	None
Taizhou Tianhe Aquatic Products Co., Ltd.	3013313158	Crayfish	No Record
Weifang Yanda Food Co., Ltd.	3020704408	Carp	No Record
Wendeng Haifu Aquatic Product Foodstuff Co., Ltd.	3017938062	Mackerel	No Record
Wuyishan Hande Food Co., Ltd.	3015112446 ⁵⁰	Eel	None
Xiantao Eel Road Import and Export Co Ltd	3042899771	Eel	No Record
Xinchengweizhiyuan Food Technology (Jiangsu) Co., Ltd.	3031156428	Mackerel	No Record
Xinxing Aquatic Products Processing Factory	3019974323 ⁵¹	Carp	None
Xiping Opeck Food Co., Ltd.	3005270895 ⁵²	Crayfish	None

⁴⁴ See <https://datadashboard.fda.gov/oii/firmprofile.htm?FEIs=3015192886&/identity/3015192886>.

⁴⁵ See <https://datadashboard.fda.gov/oii/firmprofile.htm?FEIs=3004564587&/identity/3004564587>.

⁴⁶ See <https://datadashboard.fda.gov/oii/firmprofile.htm?FEIs=3014434259&/identity/3014434259>.

⁴⁷ See <https://datadashboard.fda.gov/oii/firmprofile.htm?FEIs=3022378106&/identity/3022378106>.

⁴⁸ See <https://datadashboard.fda.gov/oii/firmprofile.htm?FEIs=3004270757&/identity/3004270757>.

⁴⁹ See <https://datadashboard.fda.gov/oii/firmprofile.htm?FEIs=3009892955&/identity/3009892955>.

⁵⁰ See <https://datadashboard.fda.gov/oii/firmprofile.htm?FEIs=3015112446&/identity/3015112446>.

⁵¹ See <https://datadashboard.fda.gov/oii/firmprofile.htm?FEIs=3010169388&/identity/3010169388>.

⁵² See <https://datadashboard.fda.gov/oii/firmprofile.htm?FEIs=3005270895&/identity/3005270895>.

Yantai Dafeng Foods Co., Ltd	3038510152	Mackerel	No Record
Yantai Haiyu Foodstuffs Co Ltd	3038429283	Mackerel	No Record
Yantai Sanko Fisheries Co., Ltd.	3013055570	Halibut	No Record
Yantai Yuze Foodstuffs Co Ltd	3040774526	Mackerel	No Record
Yingkou Zetai Food Co., Ltd	3034392693	Clams	No Record
Zhangzhou Hanlong Food Co., Ltd	3030014297; ⁵³ 3019012836	Eel	None
Zhaoqing Chung Yip Aquatic Product Co Ltd	3042275896	Carp	No Record
Zhejiang Tianhe Aquatic Products	3015482173 ⁵⁴	Crayfish	None
Zhongshan Dai Sing Frozen Food Company Ltd.	3005193274; ⁵⁵ 3033460021	Carp	None

Incredibly, the 106 Chinese entities listed above are currently exporting seafood to the U.S. market without having been subject to *any* visit to their facilities by the FDA. These companies are permitted to sell into the U.S. market at the same time as the FDA currently identifies sixty Chinese exporters on Import Alert 99-32 as refusing to grant the federal agency access to their facilities.⁵⁶ Thus, although there is a significant documented history of Chinese suppliers to the United States refusing to allow inspection by U.S. government authorities, the federal government continues to afford Chinese seafood exporters open access to our market. This permissive approach has resulted in the U.S. seafood market becoming inundated with “criminally tainted seafood” from China. A change in tack is overdue.

For all of these reasons, SSA strongly supports the views expressed by Chairman Sullivan last week and believes that the United States should take steps to prohibit imports of both Chinese-origin and Chinese-processed seafood, similar to what has been done to remove Russian seafood from this market.

Sincerely,



Blake Price
Director

⁵³ See <https://datadashboard.fda.gov/oii/firmprofile.htm?FEIs=3030014297&/identity/3030014297>.

⁵⁴ See <https://datadashboard.fda.gov/oii/firmprofile.htm?FEIs=3009052455&/identity/3009052455>.

⁵⁵ See <https://datadashboard.fda.gov/oii/firmprofile.htm?FEIs=3005193274&/identity/3005193274>.

⁵⁶ See U.S. Food and Drug Administration, Import Alert 99-32 “Detention Without Physical Examination of Human and Animal Food Products from Foreign Establishments Refusing FDA Inspection,” https://www.accessdata.fda.gov/cms_ia/importalert_521.html.