

**DARK NETS, ILLICIT LABOR—
CONFRONTING CHINA'S IUU FISHING
AND SEAFOOD SUPPLY CHAIN**

HEARING
BEFORE THE
**CONGRESSIONAL-EXECUTIVE
COMMISSION ON CHINA**
ONE HUNDRED NINETEENTH CONGRESS
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DARK NETS, ILLICIT LABOR— CONFRONTING CHINA’S IUU FISHING AND SEAFOOD SUPPLY CHAIN

THURSDAY, APRIL 16, 2026

CONGRESSIONAL-EXECUTIVE
COMMISSION ON CHINA,
Washington, DC.

The hearing was held from 10:09 a.m. to 11:36 a.m., in Room 562, Dirksen Senate Office Building, Washington, DC, Senator Dan Sullivan, Chair, Congressional-Executive Commission on China, presiding.

Also present: Co-chair Chris Smith, Senators Kim and Whitehouse, and Representative Strong.

OPENING STATEMENT OF HON. DAN SULLIVAN, A SENATOR FROM ALASKA AND CHAIR, CONGRESSIONAL-EXECUTIVE COMMISSION ON CHINA

Chair SULLIVAN. The Commission will come to order. We are here today to examine illegal, unreported, unregulated fishing by the People’s Republic of China. What we’re dealing with is a state-backed system run by the Chinese Communist Party that combines illegal fishing, market manipulation, some of the worst environmental standards on oceans in the world, gray fleets that don’t abide by any international treaties, and forced labor, all in one supply chain. And it’s happening at scale—what we call IUU fishing. This system has real consequences for American workers, for law-abiding American fishermen—particularly in my state, the great state of Alaska—and for the integrity of the entire global seafood market. The PRC has built the world’s largest distant-water fishing fleet. These vessels do not simply compete, they overwhelm.

And as China always does, they cheat. They show up in other countries’ waters, hundreds if not thousands of these gray fleet vessels. They push into exclusive economic zones, where they’re not supposed to be. They ignore quotas and environmental standards. They transship and relabel the catch to hide its origin. And they use forced labor, slave labor. This is not fair competition. Alaska fishermen can’t compete against slave labor. It is a strategy of economic coercion that has direct consequences here at home, but also overseas.

My state I like to refer to as the superpower of seafood. We produce over 60 percent of the wild-caught seafood in the United States—commercial, subsistence, sport. In Alaska, we have some of the best-managed fisheries in the world. We certainly have chal-

allenges like bycatch, but our fishermen generally follow the law. They respect environmental standards. They manage sustainably. They are very focused on preserving resources for future generations. Alaska fishermen, American fishermen, should not be forced to compete against gray fleets from China that disregard rules, benefit from state subsidies, flood global markets with cheap products tied to illegal practices, all the while destroying fish stocks through trawling and other operations on the high seas.

Again, this is not fair competition. And it gets worse. There's credible evidence that parts of the PRC seafood supply chain involve forced labor, slave labor, including Uyghur labor and North Korean labor, in seafood processing. North Koreans and Indonesians, and others, are also being used on Chinese fishing boats in conditions that resemble slave labor. So when we talk about IUU fishing, we are not just talking about resource theft and environmental degradation. We are talking about a system in which illegal fishing, hidden sourcing, labor exploitation, market distortion, and horrendous environmental standards for sustainable ocean fisheries are all connected. This should concern all of us.

Then add Russia to this mix. Russian seafood can be processed in China, relabeled, and then pushed back into global markets. This undermines sanctions and further distorts prices. It should not be possible, but it is happening now as we speak. This is a serious problem, and it deserves serious attention. Fortunately, we are beginning to act. I weighed in extensively with the Trump administration to communicate how much Alaska fishermen need a comprehensive ban on Russian seafood imports into the United States to continue. Russia banned the importation of American seafood in 2014.

We have not been able to export one fish to Russia since 2014. You want to talk about an unlevel playing field? We were able to get a ban on Russian seafood into the United States. When they tried to launder their seafood through China, we clamped down on that as well. I was happy to see the Trump administration renew that ban just a few weeks ago to help maintain and strengthen Federal measures, ensure a level playing field against Russia, and promote Alaskan and American fishermen and coastal communities that support them.

Congress has also begun to respond. Two weeks ago, the Senate unanimously passed my Fighting Foreign Illegal Seafood Harvests Act, the FISH Act. This is an effort, a comprehensive effort that I've been working on for many years with my friend and colleague Senator Sheldon Whitehouse of Rhode Island, that recognizes the huge threat of IUU fishing, not just as an environmental issue, but as an economic issue, a labor issue, a national security issue. When Senator Whitehouse and I were at the Munich Security Conference—not this year but last year and the year before—the AFRICOM commander, the four-star Marine general in charge of U.S. AFRICOM, the combatant commander for AFRICOM, met with a bunch of Senators saying the number one national security issue he's dealing with right now is IUU fishing from China off the coast of Africa, if you can believe that.

This is an issue that combines national security, forced labor, human trafficking, environmental degradation, and sustainable

oceans, all wrapped up in one. Our FISH Act is the most comprehensive enforcement effort to combat IUU fishing in the history of Congress. And it passed in a unanimous way in the U.S. Senate. So we're hoping our House colleagues will get that one over the goal line soon, and I'm confident that we will. Congress also passed, and the President signed into law, a provision that I included in the NDAA last year, barring the Pentagon from selling or procuring any Chinese seafood imports into our commissaries or military dining facilities. Our servicemen and women and their families should not be eating communist fish. We should be eating freedom fish from Alaska and America, and we were able to start an important way in which to do that. I'm pretty darn sure Chinese military members are not eating great wild Alaskan salmon, so we shouldn't be eating their fish, especially given how it's harvested.

I've also been the leading advocate for elevating the role of seafood within the U.S. Department of Agriculture. I'm very honored to announce that just yesterday the Secretary of Agriculture, the Secretary of the Interior, the Secretary of Commerce, and the NEC Chairman Kevin Hassett and I announced the USDA Office of Seafood Policy—this is something I've been working on for 10 years and we finally did it—to enable the farmers of the sea, our great American fishermen, to have many of the same benefits that our farmers have from USDA and have the White House fully coordinate American seafood policy. In our press conference and roundtable yesterday with many American fishermen throughout the country, we talked a lot about the issues we are going to be focused on in this hearing. It's progress.

If illegal seafood can still be caught in one place, processed in another, relabeled, and sold in the United States, then we have significant gaps to close. If Withhold Release Orders from Customs are not brought robustly, if traceability remains incomplete, and if import controls are still too easy to circumvent, then bad actors will continue to exploit these weaknesses. That is why this hearing matters. We need to understand more fully where our enforcement tools are working, where they are falling short, and what more should be done.

I'm particularly interested in hearing from our experts today on the utility of tools like the Uyghur Forced Labor Prevention Act. That was a bill that Chairman Smith and Senator Rubio, now our Secretary of State, got passed into law, that banned the importation of products from China that use Uyghur forced labor. One of my questions today will be, if the Chinese are using forced labor for fisheries, why are we allowing any fish from China into the United States, not just the fish going to our commissaries and military dining facilities? Senator Merkley and I have introduced a bill to follow on that, the Uyghur Genocide Accountability and Sanctions Act, that reinforces some of these provisions. As it moves through the process, maybe there's more we can do with it. We're certainly open to suggestions from our witnesses.

At this time this is not a challenge the United States faces alone. Countries around the world are dealing with the same tactics—as I mentioned, African countries, Latin American countries. The same coercive patterns, the same gray fleets, Chinese fleets, that ravage the ocean, the same difficulty of enforcing rules against

these fleets that operate at scale and in the shadows. We need to work with our partners to improve enforcement capacity and increase the cost of this illegal IUU behavior. Though China's IUU fishing is a global and complex problem, at the end of the day the principle here is simple. If you are engaged in illegal fishing, if you are exploiting workers, if you are using slave labor, if you are hiding all of these things, then you should not have access to the American market, period. That should be the standard.

If we banned all Russian seafood, which we have, why shouldn't we also ban all Chinese seafood, which we should. This hearing is an opportunity to expose the Chinese IUU fishing system that impacts more than just sustainable and healthy oceans. It's a human trafficking racket. It is an opportunity to identify where our policies need to be stronger and make clear that the United States intends to defend lawful producers, uphold human rights, and enforce the laws—particularly [former Commission] chairman and Senator, now Secretary, Rubio.

[The prepared statement of Chair Sullivan appears in the Appendix.]

I want to thank our witnesses for helping bring transparency to what is designed to stay hidden. I want to introduce them, because we have an expert panel.

Ian Urbina is the founder and director of The Outlaw Ocean Project, a Washington, DC.-based nonprofit journalism organization that investigates human rights, environmental, and labor abuses across the world's oceans. Before launching the project, he spent nearly 17 years as a staff reporter for the *New York Times*. His work has earned numerous awards. His *New Yorker* articles and political articles were exceptional, and I've cited them many times in testimony. His awards include a Pulitzer Prize, two George Polk Awards, and an Emmy. This is journalism at its finest and most important.

Rear Admiral Scott Clendenin has served 33 years on active duty in the U.S. Coast Guard and retired as Assistant Commandant for Response Policy where he oversaw operational policy across seven mission areas. He spent 14 years at sea on six Coast Guard cutters, commanded four of them, and led international multi-mission patrols involving narcotics interdiction, fisheries enforcement, mass migration response, search and rescue, and disaster response. Ashore he held senior intelligence and policy roles supporting national operations and interagency efforts. He is a 1990 graduate of the U.S. Coast Guard Academy.

And finally, the Honorable Dean Pinkert, who is an international trade and human rights lawyer and consultant who serves as a special advisor to Corporate Accountability Lab. He spent 10 years as a commissioner at the International Trade Commission, including two as the vice chairman. He has testified before Congress and has written and spoken widely on trade policies, including U.S. efforts to prevent the importation of goods produced by forced laborers.

I want to welcome the witnesses. I want to hear from our Co-chairman—his opening statement. Then we look forward to the statements from our witnesses.

Mr. Chairman.

**STATEMENT OF HON. CHRIS SMITH, A REPRESENTATIVE
FROM NEW JERSEY AND CO-CHAIR, CONGRESSIONAL-
EXECUTIVE COMMISSION ON CHINA**

Co-chair SMITH. Thank you very much, Mr. Chairman, and thank you for your extraordinary leadership on the FISH Act. You know, I've been in Congress now 46 years. Very often, because of the filibuster and the unbelievable power one member has to stop a bill ... you were able to navigate, overcome just tremendous odds to get this piece of legislation passed by the Senate. It will pass in the House. I've already talked to the Chairman, that you have continually talked to—Bruce Westerman—who's a great chairman. He's all in. He's had his hearings himself.

But you did—and people have to know this—the nearly impossible. Because there would be a hold on this bill. I know the four or five people who would have done it. You navigated that just brilliantly, and I want to thank you for that. The bill will pass, I think people know, unanimously. And again, it's comprehensive. It is a historic, landmark piece of legislation to combat foreign, illegal, unreported, and unregulated—IUU—fishing. The Sullivan FISH Act will blacklist offenders from U.S. ports, bolster the U.S. Coast Guard's enforcement capabilities, and advance international and bilateral negotiations to achieve enforceable agreements. Again, we will just back your leadership in the House and get this over the finish line and signed by the President.

Let me also say too, your amendment that you got into the NDAA to ban the purchase of these products by our commissaries, the PXs, we had written the Biden administration—and that would be Marco Rubio and I—frequently saying, all of the agencies of government who buy fish, and were the biggest purchasers of fish in the world, how could we be doing that when it is being made with forced labor in violation of the Uyghur Act, as well as the Uyghur Human Rights Act? And we get crickets. You know, they didn't do a thing. You've now put it into law, and I can't say [enough] how grateful all of us are for your extraordinary leadership. It's just amazing, and it's going to make the difference.

And I do hope your constituents know, because in addition to being a fundamental human rights issue, it also is a great issue for your fishermen. I have many in my state of New Jersey. They can't compete against unfair trading of that kind, where you force people to be on these boats. And again, Ian, at great risk to his investigators—and I mean great risk, being on the boats themselves—were able to expose this. And yet we really—until your law, and it's going to be a law—we got nothing. You know, we got a lot of, Oh, wow, that's something. But nobody would say, let's really do something. And again, four years of the Biden administration, crickets. They wouldn't do it. And I can't tell you how upset I am with them.

At our Commission hearing in 2023, we did hear from Ian, who did a tremendous job. I like the way you [the Chair] said, you know, outstanding leadership on the journalistic side. You [the Chair] have shown us outstanding legislative leadership, Mr. Chairman, to get this legislation passed by the U.S. Senate. We did have a hearing. We called it "From Bait to Plate: How Forced Labor in China Taints America's Seafood Supply Chain." And across the board, whether it be calamari or whatever it might be,

we're talking about a highly tainted industry with forced labor. And you know, nobody does forced labor as horribly and as egregiously as Xi Jinping does. Of course, a whole industry now has been tainted. And again, Ian, you're the one who broke the story on all this.

You know, I want to thank you. I do have a long statement, but we do want to get to our witnesses. I ask, with unanimous consent, that it be made a part of the record. But I can't thank you enough, Mr. Chairman. I mean, this is leadership. I hope people realize how hard it is to get a human rights bill passed in the U.S. Senate, and you've achieved it. Thank you.

[The prepared statement of Co-chair Smith appears in the Appendix.]

Chair SULLIVAN. Thank you, Mr. Chairman. It was a team effort. Senator Whitehouse, I think, is going to show up here in a little bit. He was my partner on this.

Congressman, do you have an opening statement?

**STATEMENT OF HON. DALE STRONG,
A REPRESENTATIVE FROM ALABAMA**

Representative STRONG. Well, Mr. Chairman, it's an honor to be back again with each of you. Thank you all for being here today, our witnesses. This is a very distinguished group that is before this Commission. Think about this: China's illegal fishing practices and forced labor systems—totally unacceptable. Alabama's red snapper fishery is one of the most well managed and profitable in the Gulf, yet our local fishermen are forced to compete with cartel-backed poachers and subsidized foreign fleets that ignore conservation standards. And I think that that right there is working against America. I just commend both of you, especially because this wasn't an easy fight. But I think we're definitely going in the right direction.

In this opening statement, I just want to commend both of you for this. And we'll roll with questions later. I thank each of you for being here. And Ian, I thank you for your hard work. Not an easy lift that you went through, but I can tell you, the world saw it. There's no doubt. And I thank each of you for being here. Mr. Chairman, I yield back.

Chair SULLIVAN. Thank you.

We're going to begin, speaking of forced labor, with a very quick video. We will start with the testimony of our three distinguished witnesses, and then we'll wrap that up with the short video. Then we will have questions for the panel.

It's good to see Senator Kim here as well. Do you want to say anything? Okay.

Why don't we begin? I've already introduced our witnesses, again, three distinguished witnesses. I want to begin with Ian Urbina, who's done such a great job on The Outlaw Ocean Project, and hear from him. You have five minutes for an opening statement, and if you wish to submit a longer written statement for the record, we will certainly accept that. Mr. Urbina.

**STATEMENT OF IAN URBINA,
DIRECTOR AND FOUNDER, THE OUTLAW OCEAN PROJECT**

Mr. URBINA. Thank you for that. I'll try to make the five-minute deadline. I'll read fast.

Chair SULLIVAN. That's all right, I didn't make my five-minute deadline. There's a lot to say here.

[Laughter.]

Mr. URBINA. Thank you, Chair Sullivan, Co-chair Smith, and the rest of the Commission for inviting me to speak. It's an honor to be back before you. Last time I was here was in 2023, when the Commission asked me to testify about an investigation by my news team, The Outlaw Ocean Project, into China's role in global seafood. That reporting focused on China's more than 6,500 industrial fishing vessels and its hundreds of processing plants. It documented debt bondage, passport confiscation, avoidable deaths, fatal beatings, trafficked workers, illegal fishing, and a state-coordinated program forcing thousands of workers from Xinjiang and North Korea into seafood processing plants.

Much of the product from those plants was bound for the U.S., including U.S. military bases and congressional cafeterias, in violation of the Uyghur Forced Labor Prevention Act (UFLPA) and the equivalent law tied to North Korean labor known as CAATSA. In the wake of that reporting, Congress, the executive branch, and a small handful of seafood companies took action. I'm here today to discuss our current investigation, which will be published in the coming weeks, and which examines the global aquaculture industry, including China's role in it. By way of context, seafood is the world's most heavily traded food commodity by value, and aquaculture, or fish farming, is the industry's fastest growing sector. As of 2022, more than half of all seafood worldwide was farmed, rather than caught at sea.

This growth has been driven in part by a marketing claim that fish farming is sustainable because it reduces pressure on wild fisheries. The problem is that, for much of the industry, that claim is false. Roughly two-thirds of global aquaculture depends on feed made from wild-caught fish, in the form of fishmeal and fish oil—think of seafood that people eat most—so salmon, shrimp, tilapia, sea bream. In other words, many farmed fish are fed the very wild fish the industry claims it's helping to spare. Not all aquaculture works this way. Roughly a third of global fish farming focuses on non-fed species, such as clams, oysters, and mussels. That form of aquaculture can indeed be sustainable.

But most fish farming depends on fed fish. And our investigation found that this segment of the industry prefers to begin the story of sustainability and ethical sourcing at the farm. If you start the story earlier, however, with the feed, a very different picture emerges. Our recent investigation, called "Food for Feed," did just that. Over the past two years we mapped and reported on roughly 1,400 fishmeal plants worldwide. We boarded and inspected ships supplying them. We traced the farms to which the feed goes. And we tracked the resulting seafood. Our goal was to document the hidden costs of fish farming.

In Russia's Far East, we found forced labor on ships, farms, and in factories. In Western Sahara, we revealed the industry helping

prop up Morocco's military occupation. In Gambia and Mauritania, we discovered fish that once fed local communities increasingly diverted into fishmeal factories for export, worsening food insecurity in countries including India and Peru, the industry was tied to at least 80 incidents of civil unrest, some quite violent, often labor strikes and community protests over polluted water and stench from factories cooking thousands of tons of decomposing fish. These are what economists call externalities, costs pushed onto distant countries and communities while wealthier consumers enjoy the luxury seafood produced as a result.

So what does any of this have to do with China? China is the largest producer, exporter, and consumer of seafood in the world. It's also the single biggest exporter of seafood to the United States. And it is rapidly expanding fish farming so it does not have to send so many vessels onto the high seas or into foreign waters. China now grows about four times as much fish as it catches, and huge quantities of that farmed seafood are exported, including to the United States. What's striking is where much of this expansion is happening—Xinjiang and Tibet.

Fish farming typically takes place, elsewhere in the world, along coasts, in near-shore cages or pens. But China is expanding it in mountainous and desert regions that are among the most landlocked places on Earth. Our investigation mapped the supply chains of more than 1,200 fish farms in Xinjiang and Tibet. We found seafood from these farms going to dozens of countries, including the U.S., and to companies supplying public institutions such as military bases, public schools, and congressional cafeterias.

Not only is that a violation of the UFLPA, but some of these farms in Xinjiang are certified as sustainable by U.S.-based programs such as Best Aquaculture Practices, which seems mystifying in light of the U.S. law. I do not need to remind this Commission that Tibet and Xinjiang are among the most repressive regions in China. In Tibet, the government has relocated roughly half a million people, leveling villages and monasteries for projects including hydroelectric dams and fish farms. In Xinjiang, more than a million people have been held in detention camps while the government has carried out large-scale land seizures, forced sterilizations, and criminal penalties for speaking native languages or practicing religious and cultural traditions.

That seafood from these regions is still reaching the United States shows how much work remains. American seafood producers, grocers, and food service companies such as Sysco continue to rely on certification schemes that claim to police sustainability and forced labor in places like China, where spot checks at factories, ships, or farms are effectively impossible. China is also a place where asking tough questions about Uyghurs, Tibetans, or human rights generally can get a company, civil society group, or journalists expelled. Yet the cost savings are so enticing that industry and certifiers and journalists continue to make that Faustian bargain.

Let's be clear: Repression in these regions is one of China's hidden costs. It is the externality that helps produce cheap seafood. It is part of China's competitive advantage and helps explain the trade surplus in this commodity. The UFLPA was enacted partly

to level that playing field. So were tools like the Global Magnitsky Act. Customs and Border Protection has used Withhold Release Orders to stop imports suspected of being tied to forced labor. Congress has pressed companies through letters and hearings like this one, and tightened purchasing rules for federally funded institutions. Congress has also, in rare cases, forced companies to do due diligence, putting the burden on industry, rather than on journalists or civil society groups, to prove that supply chains are free of illegal or unethical hidden costs. The bottom line then is this: The tools exist. The question now is whether they'll get used.

Thank you for your time.

[The prepared statement of Ian Urbina appears in the Appendix.]

Chair SULLIVAN. Thank you, Ian. I'm going to call an audible here and have Senator Whitehouse say a few opening lines before we turn to our other witnesses. Senator Whitehouse.

**STATEMENT OF HON. SHELDON WHITEHOUSE,
A SENATOR FROM RHODE ISLAND**

Senator WHITEHOUSE. Thank you, Chairman. I appreciate you allowing me to interrupt the proceedings with a statement. You and I have worked together on the FISH Act, which has recently passed the Senate by unanimous consent and which I believe has the support of the Trump administration, at least the Department of State, and which has cleared, in the past, all of its House obstacles at one time or another. So I think we're in a good place to get it across the finish line at last. It addresses the problem of the international pirate fleet, which exists in a shadowy world of shell corporations and false flags. It is a machine of exploitation, both of common resources like international fisheries, and of human beings. Many of the pirate fleet vessels qualify as slave ships by any rational definition of that term.

The Chinese fishing fleet has its own set of problems, the first of which is that it's not just a fishing fleet. If you have any doubts about that, go to the recent *New York Times* article that had an interactive display of the geolocation of the Chinese fishing fleet deployed in the Pacific, in the sort of South China Sea area. They were spread all over the place, and suddenly they all moved to create a strategic line across the sea. That was not ordinary fishing behavior. I went to an oceans conference in an island nation, and there was a Chinese fishing ship anchored, or just offshore—anchored or just holding position. It was not engaged in anything that looked like fishing behavior, but a lot of diplomats and people had come to that place for that conference, and I suspect that this vessel was trying to pick up whatever signals they could to find out what was going on among the people at that conference.

So they're not just fishing, and we should be aware of that. When they are fishing, they're also a danger because they behave horribly with respect to fisheries. We heard about this for quite a long time. Mr. Urbina, your work on this has been good. Thank you. But particularly it came in a meeting at the Munich Security Conference, where the four-star general in charge of AFRICOM, without provocation by me, said, One of the things we need to do to be more effective in my command is to provide resources to our coastal partner nations to help them better understand when somebody is fish-

ing illegally in their waters, who is fishing illegally in their waters, and maybe even give them some resources to go out and challenge the illegal fishing in their waters. Because the Chinese fishing fleet is going through other nations' economic zones and just shredding the fisheries.

When I used to travel in Asia with Senator McCain, pretty much everywhere we stopped that was a coastal nation, when we had our major meeting with the head of state and I asked about how things were going with the Chinese fishing fleet, their heads practically exploded. Everybody had a story about abuses, damage, violent behavior, threatening behavior by the Chinese fishing fleet. So we have an enormous amount of work to do. The recent High Seas Treaty I think is a help. It'd be great if we could join that. In the meantime, the FISH Act is going to be really important. What it does is encourage investigations and sanctions and blacklisting of the bad behavior in these fleets. In addition to thanking Senator Sullivan for his partnership on the FISH Act, I also want to thank him for bringing us together repeatedly with Deputy Secretary of State Landau, who has become a convert, having heard from Dan and me about this subject, and who I think is increasingly making it a State Department priority.

I'm delighted that these witnesses are here. For far too long the pirate fishing fleet and the Chinese fishing fleet have been allowed to do untold damage in not only international waters, but also in unenforced sovereign waters. The quicker we put an end to it, the better off we all will be. My Rhode Island fishermen and your Alaska fishermen will be well served when the international fisheries are less pressured by illegal fishing, leaving more for them to catch under law. Thank you.

Chair SULLIVAN. Great. Thank you, Senator Whitehouse. Thank you for your leadership and partnership on these issues.

We'll now return to our expert witnesses. Admiral, the floor is yours.

**STATEMENT OF SCOTT W. CLENDENIN, RADM,
USCG (RET.), OWNER, DOG ZEBRA SOLUTIONS LLC**

Admiral CLENDENIN. Well, distinguished members of the Commission, I greatly appreciate the invitation to testify on this mission, which is just a very deep passion of mine. A lot of my comments will affirm the excellent introduction of the Commission to this topic.

Illegal, unreported, and unregulated fishing, IUU fishing, is not just a conservation problem alone. It is a national security and food security issue that fuels global conflict. While other nations have large distant IUU fishing fleets, as has been said here, China has by far the largest, and has deployed it in a deliberate strategy to dominate the global seafood supply. Its distant-water fishing fleets operate in the waters of over 90 countries, often with state subsidies. IUU fishing fleets practice AIS manipulation and transshipments at sea to launder their illegal catch. They take critical fishing resources from countries in the Indo-Pacific, West Africa, and South America, where their fisheries are critical for their needed subsistence. They build dependencies and are responsible for

human rights abuse at sea through forced labor, as we've discussed here.

Admiral Paparo, Commander INDOPACOM, noted that 8 of the 10 worst IUU fishing violators in the world are state-owned enterprises of the PRC. And they are a real driver of conflict in his AOR. China also uses fishing fleets as maritime militia in gray zone operations, creating what amounts to regional conflict through the proxy of coast guards and fishing fleets. Between 2011 and 2024, the Indo-Pacific saw 156 conflicts tied to fishing competition, and fisheries-related conflicts have increased twentyfold since the 1970s. IUU fishing is a vector for other transnational crime, including narcotics smuggling.

Turning to the U.S. economy—the seafood sector, as has been discussed here, is worth over \$320 billion and employs 2.3 million Americans, yet 75 to 85 percent of the seafood consumed in America is imported, directly exposing us to IUU-tainted supply chains. As the President's recent EO on fisheries stated, this is unfair to our very well regulated fishing industry, just as was discussed here. Estimates suggest that up to one-third of wild-caught seafood consumed in the United States is linked to illegal fishing. This is the seafood on American dinner tables.

So what can be done? I recommended three strategic shifts that are detailed in my written testimony. I'll be very brief here to summarize them. First, we should reinvigorate American maritime governance to counter IUU fishing. As a start, this issue should be treated with the same seriousness as we treat narcotics smuggling and piracy. Congress's MSAFE Act is the best U.S. initiative to counter IUU fishing to date. However, their work needs to be elevated strategically in importance and fully funded. Despite years of effort, they have had minimal impact on the tide of IUU fishing globally.

Second, we need to protect America's maritime interests through alliances and trade. Regional fisheries management organizations have been forged through diplomatic compromise, where any member can block enforcement measures. That needs to evolve. We have proven that coordinated international operations, broad intelligence sharing, and collective diplomatic pressure can change IUU fleet behavior. U.S. trade negotiations are a critical instrument as well. All this needs to be consistently done at scale.

Third, we need to strengthen public-private partnerships, developing a whole-of-society effort. As an example, in collaboration with the seafood industry, we need to improve seafood traceability and import controls that require documented legal origin for seafood entering U.S. markets. As another example, Operation JADE SPEAR showed what is possible when law enforcement, Customs, Department of Defense, regulatory actions, and the financial sector are combined, and resulted in the delisting of IUU-linked companies from NASDAQ. However, that was but one operation. To be effective, these types of operations must be replicated at scale.

The opportunity before this Congress is to reframe our counter-IUU effort as the strategic national security and food security imperative that it is. I look forward to your questions.

[The prepared statement of Admiral Clendenin appears in the Appendix.]

Chair SULLIVAN. Thank you, Admiral.
Mr. Pinkert.

**STATEMENT OF HON. DEAN A. PINKERT,
SPECIAL ADVISOR, CORPORATE ACCOUNTABILITY LAB**

Mr. PINKERT. Thank you, Mr. Chairman. I thank the Commission for the opportunity to testify on one of the most urgent tasks in U.S. trade enforcement, enhancing efforts to address systematic use of forced labor in China's seafood industry. As you indicated, Mr. Chairman, I'm a special advisor to Corporate Accountability Lab, or CAL, a human rights non-profit organization in Chicago. CAL is active in petitioning U.S. Customs and Border Protection for forced labor import bans under Section 307 of the Tariff Act of 1930.

China is the world's largest seafood producer and exporter, as was indicated in prior testimony, supplying a substantial share of the fish and shellfish reaching American consumers. There is a documented state practice of using Uyghur and other minority group workers under coercive conditions in Chinese seafood production. Goods produced under these conditions enter U.S. commerce at a price advantage underwritten by human suffering.

Congress has assembled a flexible toolkit of legislation that can be used to address this problem, including Section 307, the Uyghur Forced Labor Prevention Act, or UFLPA, Section 1595a civil penalties, and Section 301 of the Trade Act of 1974. The issue is not an absence of statutory authority. It is the failure to use these tools at scale, in combination, and with the creativity the circumstances demand.

Section 307 prohibits the importation of goods produced in whole or in part by forced labor. And the UFLPA creates a rebuttable presumption that any goods mined, produced, or manufactured in the Xinjiang Uyghur Autonomous Region or by entities on the UFLPA entity list are made with forced labor and are therefore inadmissible. These are powerful tools, but their effectiveness depends on, first, the U.S. Government's ability to trace goods from point of harvest through processing to the port of entry; two, the Forced Labor Enforcement Task Force's, or FLETF's, ability to maintain a timely cadence of placing companies on the entity list; and three, the willingness of CBP to move, under Section 307, directly when the UFLPA itself does not satisfy enforcement objectives. And I believe, Senator Sullivan, that this addresses the point that you made in your opening statement that sometimes we've got to move over to general enforcement rather than just the UFLPA.

Chinese seafood supply chains are deliberately opaque. Fish caught in distant waters can be transshipped through intermediary ports, relabeled, commingled with locally sourced product, and re-exported to the United States. This can render conventional documentation-based compliance less than fully effective. CBP should therefore require positive traceability documentation, vessel-level catch certificates, processing facility records, and chain of custody statements for high-risk seafood species and sourcing regions. Importers who cannot provide this documentation should simply not be permitted U.S. Customs entry of their merchandise.

Now I mentioned very briefly about the entity list. I just want to underscore that the UFLPA entity list should be expanded and the FLETF should devote particular attention in this regard to Chinese seafood processors, cold chain logistics firms, and fishing fleet operators. It's also very important that Section 1595a authorizes civil penalties for importations made contrary to law. Forced labor importations in violation of Section 307 fit precisely into this authorization, yet penalties are rarely imposed in the forced labor context, and their deterrent potential has largely gone unrealized.

A robust Section 1595a enforcement program would provide two benefits that detentions alone cannot. First, penalties impose a financial cost on importers who have not self-policed their supply chains and thereby create a direct economic incentive for upstream due diligence. Second, penalty provisions can generate evidence through CBP's demand for importer documentation and the importer's responses, documentation revealing supply chain structures otherwise hidden from regulators. And I hope, by the way, that we get to talk about the new regulations in China that seek to impose penalties on just that very kind of investigatory activity that's so important.

Perhaps the most sophisticated challenge in this space is the practice of supply chain bifurcation—companies maintaining nominally compliant product lines for export to the United States while continuing to use state-imposed forced labor in lines destined for other markets or sold domestically. Compliance, in other words, is purely performative. Section 301 authorizes the U.S. Trade Representative (USTR) to investigate and respond to foreign acts, policies, or practices that are unreasonable or discriminatory and that burden or restrict U.S. commerce. A foreign government policy that induces companies to simulate compliance while preserving state-imposed forced labor in non-U.S.-destined production is exactly the kind of state-implicated anticompetitive practice that Section 301 was designed to address. In short, it's harmful to U.S. producers.

In conclusion, we have the legal tools to address forced labor in seafood supply chains, including where, as in China, it is an instrument of state policy. The myriad laws in this space are mutually reinforcing. When deployed with strategic coordination and resolve, they can impose meaningful costs on companies that seek to benefit from this egregious human rights violation. Thank you, and I look forward to your questions.

[The prepared statement of Dean Pinkert appears in the Appendix.]

Chair SULLIVAN. Thank you, Mr. Pinkert. I want to thank all the witnesses again. Excellent testimony. Before we turn to questions we have a short video that will be indicative of some of the forced labor issues that we wanted to show at this hearing. It puts a human face on modern slavery in the Chinese fishing fleet.

(Video presentation begins.)

Mr. SAHRUDIN. (Translated.) Conditions onboard were very poor. The captain was harsh. I worked hard day and night without any break days, and I was treated badly by the captain. Even I often got punched. I was even whipped using a mainline, the gear to pull the fish. Even worse, every time I got extra duty to guard behind

the steering wheel, I was often stabbed with needles. And the food was not suitable to consume—it was like food fed to the ducks.

My friends have the same fate as me. They were often stabbed with needles and slapped. At one point, the workers got united and demanded to go home because the bad treatment was frequent. The area that was punctured by a needle left a wound and got infected to the point of pus coming out and even swelling. I found it difficult just to walk.

We united to demand the captain to send us home. Then the captain didn't allow me to go home, nor my colleagues. In the end the workers, including me, agreed to go on strike, demanding to be sent home. From there I asked the captain again for permission to be sent back to Indonesia. Eventually, the captain allowed me to go home, one month later.

(Video presentation ends.)

Chair SULLIVAN. Again, just an example of what our witnesses testified to, and some of the basic elements of the huge problem that we are facing here.

I want to begin—Mr. Pinkert, I want to get your sense—it was very effective testimony—on the authorities that we have. And I'm wondering, from your perspective, we've banned the importation of Russian seafood—that's through Executive order. As I mentioned in my opening statement, the Trump administration recently reauthorized that Executive order. I've been working on this issue for many, many years. We finally got it done. We had a lot of American importers who were relying on Russian seafood who were fighting this measure. They said this is going to hurt them. And what it actually ended up doing, when it finally went into effect, is it had a positive impact on American fishermen, because they said, Well, I can't afford to not source my fish from Russia. And when I had discussions with these guys, I said, Well, sure you can. There's a great source. It's called American seafood from American fishermen.

The Chinese and Russians are famous not just for their abusive practices, but for dumping seafood into our markets. Really, really drove down the price. So the benefit of banning the importation of Russian seafood—they tried to launder it through China and we nailed that down—was that the importers in America started to say, Well, I guess I should get it from the Alaskans, who are catching freedom fish sustainably. So it's actually really benefited our fishermen across the country. So I have two questions related to that experience. One, just a warning, right? If you're an American importer of a lot of Chinese seafood and you're watching this hearing, I would start kind of looking at new supply chains because I think your days are numbered. Because the goal here is to ban the importation of Chinese seafood under the laws that you currently say exist in the authority.

But I think our CBP officials are getting better at the issue of traceability because of all the good work they've done on implementing the ban on Russian seafood, and then the laundered Russian seafood through China. They're getting quite good. But my question to you is, Do you think—under current law, all the laws that you mentioned—should we be looking to implement a ban, not just the bill that I got passed in the NDAA, which is banning the

importation of Chinese seafood for military commissaries and military dining facilities, but a comprehensive ban on Chinese seafood?

Do you think that, given current practices, given what you know, given what others have testified to and have provided evidence of, whether it's the Section 307, the UFLPA, Section 301, is there enough evidence and authority for a comprehensive ban on Chinese seafood into the United States under current law? Do you think we meet that standard? And do you think that CBP is gaining the ability—I know the traceability issues are challenging—but do you think the CBP is gaining the ability to implement such a ban, since they are currently doing it with Russia, and they're doing it quite effectively? And maybe I'll pose that to you first, but I think I can pose that question to all the witnesses.

Mr. PINKERT. Thank you, Senator, for that question. I would start by saying I agree with you that the capabilities have improved dramatically just in the past two years, two and a half years, when I've been watching it very, very carefully. Having said that, I think that the answer, and I kind of touched on your question in the testimony, the more aggressive use of Withhold Release Orders by CBP, including regional Withhold Release Orders, I think would go a long way toward addressing the concerns that you're expressing. I think that it's one thing to say we have the Uyghur Forced Labor Prevention Act, and that has very specific triggers, and there's a rebuttable presumption, as you know, under the UFLPA. But more generally, can we use the Section 307 process to do regional Withhold Release Orders in a way that doesn't hinge specifically on the use of Uyghur forced labor?

Chair SULLIVAN. Okay. Good.

Admiral, do you have a view on this?

Admiral CLENDENIN. Yes, sir. I think, more strategically—I was a co-chair in the early days of the MSAFE with my NOAA and State Department colleagues—every time we had public comment, traceability was one of the number one issues and suggestions that came up. I think—

Chair SULLIVAN. As a way to not take action, or what?

Admiral CLENDENIN. No. Traceability had to be pursued and had to be implemented and had to be part of our customs procedures. Our interagency partners at that point were not very aggressive with that, as far as seafood, and now it looks like they are forming around that.

Chair SULLIVAN. I think they're getting much better, right?

Admiral CLENDENIN. They're getting much better.

Chair SULLIVAN. The ban on Russian seafood has been comprehensive and not always easy to enforce, but I think they're actually doing a really good job.

Admiral CLENDENIN. Yes, sir. And it does take resources, obviously, to make sure they have those, and it requires consistency across the board. So I think if you read public opinion right now, there's still room to improve there, but I think we're moving in the right direction with that. I think we've done a good job on the southern border. I think as we look at the importation of things like this into the Nation, there's some things that we can do to do better on that front.

Chair SULLIVAN. So let me ask, Mr. Urbina, your testimony—you have expertise. How do you think we are doing? I want to have, in some ways, a followup on the great work you’ve done previously on the forced labor on ships and processing facilities. And then, to your testimony today, if there is a rebuttable presumption under the UFLPA on forced labor in certain parts of China, and you are going to publish something here very soon that shows there’s enormous amounts of aquaculture going on in this part of China—which, as your testimony reveals, kind of makes no sense, right? You’re not near an ocean. They’re doing it probably because of the labor costs of using slave labor.

So do you think that that’s going to highlight again the potential to ban any aquaculture from China, given how much they produce in the Xinjiang province and other areas? And then if you want to comment with an update on where you think we have been from your previous excellent reporting, and what the law, from your perspective, demands that we do, given that there is a lot of slave labor, forced labor, going on in the seafood supply chain directly from China?

Mr. URBINA. I think, on your first question about a China-wide ban, I don’t have an answer, but I do have a restatement of the question, in the sense that the UFLPA is a fairly circumscribed and effective tool. But there’s also law that clearly says products tied to forced labor in general should not be coming into the U.S. And yet we have a place that produces a lot of products where that law is unenforceable because it’s so opaque and impenetrable. To me, that’s the simplification of the point you’re making. If we have a law but we can’t enforce it vis-à-vis any products coming from one certain place because it’s a black box, we can’t do real audits, we can’t check on the truthfulness of papers coming from that place, then there needs to be some strong action to fix that so that we can ensure the forced labor law that’s in general is enforceable.

How you do that is your job, but I think it needs to be much wider. I do think the genius in UFLPA is the element of rebuttable presumption, which shifts the burden off of the likes of us, and even you, and puts it back on those who are making money from this Faustian bargain. And says if you want to do business there, you need to prove that it is legal. We don’t have to prove that it’s illegal. So to me, that’s a formula for moving forward.

To your second question, how are things going—you know, Dean has the best view. He’s down in the weeds and watching these cases. My kind of high-altitude, removed view of how things are going in the last couple of years is there was a lot of action from you folks in Congress, thankfully. And executive departments sat up and took notice. There was a lot less action from within the industry in terms of solving [this]. And many of the key players we identified as relying on North Korean or Uyghur labor changed their name and kept their address, and suddenly they were not on the list anymore.

This sort of gimmickry is a very simple solution to get around the tools we have. And we did document that happening right after the reporting. But I do agree with you that Customs and Border and other agencies began figuring out how they need to take this more seriously, and try to staff up to enforce those tools better.

Chair SULLIVAN. Mr. Chairman.

Co-chair SMITH. Thank you very much, Mr. Chairman.

Let me just ask a couple of questions. In 1992, Frank Wolf, Scott Flipse—our chief of staff who's behind me here—and I visited China. We went to Beijing Prison No. 1, where Tiananmen Square activists had been—unfortunately, about 40 of them were still there, incarcerated under slave-like conditions. And we were there in large part to focus on forced labor. The fact that the Laogai was producing unbelievably large numbers of products that were at all of our stores, K-mart, you name the place, you would find it. If you traced it back, you would all of a sudden say, Oh my God, it was made by an activist or religious freedom prisoner, prisoner of conscience. And totally against Smoot-Hawley, totally against our laws.

And Clinton pushed this idea, because I held a whole series of hearings on it—a whole series of hearings, that we had an MOU with China. So I looked at it carefully, asked a lot of hard questions, met with our people in the Beijing embassy, who were part of the enforcement. And they were like the Maytag repairman. Remember that old commercial? They have no work to do because they just had no work to do. It was so flawed as an agreement. We would tell them when we suspected something, and then they would investigate and get back to us within about 60 days. We had trouble getting visas for people to go and investigate.

So we actually had proof. We got socks, jelly shoes. Scott actually put some of those socks in his back pocket. We went to Customs, and they put an import ban on anything coming out of that, because we had actionable information. But other than that, the MOU was an absolute farce. The whole idea of proof of origin, and trying to determine that, has been a vexing problem. And rebuttable presumption has helped, to a large extent, but not fully, to at least shift that paradigm in our favor, and in the favor of exploited workforces.

We've had hearings in this Commission, as the Chairman knows, where we focused on the fact that the so-called investigators for our big corporations were denied access when they went. They come back and they say, See, it's all good—we got a certification. So we asked the hard questions. In one case they interviewed people who told them, with the communist minders sitting right there, the secret police, you know, What is going on? You think you're going to say they don't have bargaining rights—but there's not any kind of protection for workers. So my point is that origin, the exploitation of the workforce, we kid ourselves if we think, absent the FISH Act and the Uyghur Forced Labor Prevention Act, very aggressively implemented, will ever stop Xi Jinping from dumping all of these slave-made goods on our shores.

So I would ask you again, it's been a problem. The MOU was—and they would come up, they being the Clinton leaders, Assistant Secretary for Human Rights and Democracy and Labor and others—and say, We've got this MOU. And I said, Doesn't work. Quit using that as a false defense for your lack of due diligence to try to stop this. And I think we're now dealing with it. And when the Chairman's bill becomes law, and I do believe it will become law, it will be the biggest game changer on this issue ever. The Uyghur

Forced Labor Prevention Act is important. It had problems with *de minimis*, you know, numbers, although that's been reduced. They were gaming that big time, they being the Chinese Communist Party. And there's always a problem of suggesting it's coming from somewhere else.

I would point out that the video we just watched and the lawsuit against Bumble Bee is being undertaken pursuant to my law, the Trafficking Victims Protection Act, which awaits fuller implementation even as we meet, but at least—and the judge—Judge Bashant, has denied Bumble Bee's motion to dismiss. And that was good. She's a district judge. And hopefully that will proceed. I mean, exploiting people in plain sight. So certification procedures, we've got to do a better job on that. The law will be there, I think, on the fish.

There's also the issue of farmed fish, and concerns about how healthy farmed fish are. I did not know until you just said it that there's four times the number of farmed fish as they catch. I mean, that's a frightening statistic because it breeds sickness and a lot of other things that are underappreciated by so many. So I would ask you maybe to elaborate on that. We've got tools. We need more tools. And I can't say enough—and I hope the people in Alaska, the people of New Jersey, the people in Rhode Island, and all the other places where fish are so important, realize—that this historic bill, soon to become law, by the Chairman, is the game changer.

Because, as you pointed out, Admiral, there's concerns that the AFRICOM general pointed out as well—the commander—that we're dealing with a nefarious fleet for other reasons too, not only the way they're exploiting workers and undercutting anything that even comes close to free and fair trade, and completely violative of the Trafficking Victims Protection Act. But this law will make all the difference in the world.

Ian, if you want to—and, again, I can't thank you enough for what you have done. I mean, when we met before *The New Yorker* article came out, you briefed our whole staff about how important it was, and we coincided our hearing to try to amplify the message of what you and your investigators have done. Again, you're the great journalist, and [Chair Sullivan], you're the great lawmaker who made all the difference on this issue. And I can't thank you enough.

Ian.

Mr. URBINA. Thank you. I would just touch on the TVPA and its importance, and also the importance of what's happening with that Bumble Bee case. It's a bit in the weeds, but the judge rejected the argument by the company in that case that the company was not liable for what happened to that guy that you saw because of the sort of shell-game nature of how globalized product handoff happens now, that that company couldn't possibly know what was going on on the ship and therefore that company shouldn't be held responsible for it. This is the sort of fundamental playbook maneuver of modern litigation when it comes to these cases, and it's problematic beyond seafood.

And the judge in that case said, You know, you were certified and participant in a shared program, and therefore you're clearly connected with what was coming off of that ship and what was

going on on the ship. Therefore, I'm not going to allow that argument to fly. This is important precedent and should be watched very closely to see if that holds, because it will be the first big step toward, A, making TVPA, your legislation, more enforceable, and connecting the entities that are really getting wealthy off of the forced labor that's way down the supply chain, and ensuring that these supply chains have accountability and responsibility all the way up to the ones who really care the most, which are the branded, profiting institutions. So I would only say that the law is very important, but the way it's being gamed in the courts is also really important. And that case could be a boon for better enforcement going forward.

Co-chair SMITH. Thank you.

Chair SULLIVAN. Senator Kim.

Senator KIM. Yes, thank you, Senator. Thank you, Congressman, for your leadership on this.

I only have a couple minutes here before I have to run for votes, but I wanted to ask Mr. Urbina—I wanted to start with you. I mean, what you talked about in terms of the growth of the aquaculture industry in Xinjiang and in Tibet. I mean, it's very alarming. And I wanted to just get a little bit more sense from you just what you see as motivating this. I mean, is it driven primarily by just the low cost of the forced labor, or are there other political considerations, or other things of that nature?

Mr. URBINA. It's a great question. It's not driven by a desire to cash in on forced labor. It's driven by a larger state-building agenda by the Chinese government. Very wise. Very Chinese. It's one part—look, there are 68,000 fish farms on the east coast of China. There are 1,200 in western landlocked Tibet and Xinjiang. So it's a small percentage. It's also the fastest growing. It's a half billion dollars of export coming out of that region. And in the last two years, it's grown by 16 percent, more than anywhere else in the country. So while it's small, it's cutting edge. It's the tip of the spear. And it has a lot to do with two big motivations. One is, China needs to settle that inland west. It's a restive, challenging population, to put it diplomatically. And China wants to consolidate it, to control it, so pushing more and more industry in there—hydroelectric, solar, tomatoes, cotton, fish farms—is one way to settle it. That's part of the big agenda. The other agenda is China put 30 percent of its aquaculture along its—well, 30 percent of its eastern coast is taken up by aquaculture. Extremely polluting and extremely overfished. So those waters have plummeted. So they need to figure out how to decrease the pressure—of what their industry is doing on their own coasts. How? Move inland. Where? Move to depopulated inland. Where's that? Far west.

Third, there's a great PR story of Chinese state-led ingenuity that it's eager to push—Look at what we've done with solar, look at what we're doing on climate. All commendable and impressive, but also part of the China PR program to show that Xinjiang isn't a human rights story, it's an innovation story, it's an engineering story. Growing fish in the desert is a great engineering story, right? And so they're pushing that on social media. These are the big reasons they're pushing inland.

Senator KIM. And you're testifying here saying that some of the seafood is reaching the United States, you know, reaching public institutions. Where is the biggest enforcement failure here? Is it the importer due diligence? Is it customs screenings? And what is it that we can do better to try to verify—you know, to be able to push back on this and be able to have credible ways for certification bodies to be able to verify the labor and sustainability claims from that region?

Mr. URBINA. Sorry to do this to Dean again, but the nuts and bolts of how UFLPA works, how Withhold Release Orders work, are super important here. Oftentimes it's how slow it is, the bar of evidentiary standard for getting a company added. These are some of the biggest reasons that those two tools alone aren't more effective. I think that's one place. Funding, staff levels, how the law is being interpreted, and how recent the testimony has to be, what level of proof is required for forced labor. UFLPA, luckily, you don't need that. If you're from Xinjiang, it's proven. But for other places, on ships, very tough. These are the things that are boring, but also super consequential in how effective it can be.

I think the biggest issues are the ones that I focus on, which are putting the responsibility less on your shoulders, and less on Customs and Border, and the executive, and putting it back more on industry due diligence and having them prove that it's not happening. They're the ones that are making the money off of it. They should also have the burden. They also are in command of their own supply chains. We have to fight and, you know, go out to sea and do all sorts of crazy things to figure out their supply chains. They're sitting on the data. And if they wanted to police their own supply chains, if they were forced to, they could. But right now, they don't have to.

And China makes it especially easy, because they can throw up their hands and say, Well, it's certified by Best Aquaculture Practices or whomever. So we think that's pretty good. But if you ask them, does anyone actually—what does that mean? They say, Well, you should ask them, and we do the best we can in China. Those are the places where I think the biggest fixes have to happen. And putting pressure on industry to fix that and requiring them to do so is probably the biggest thing that you folks could do.

Senator KIM. Well, thanks for shining a light on this. And for the three of you, just the incredibly important information that we have. I hope we can take real action here to be able to step up and stop some of the most nefarious aspects of this and be able to get things better for our fishermen in New Jersey and elsewhere. So thanks so much for putting this together. Thank you.

Chair SULLIVAN. Thank you, Senator Kim.

I'm going to go to round two here. We do have a vote, so we're going to keep this kind of quick, but I want to begin. Admiral, your testimony—I wanted to ask two questions. You testified that MSAFE created a framework but is under resourced and underutilized. Where do you think the principal breakdown in that is with regard to MSAFE funding, interagency coordination, operational capacity?

And then, related to that—we're hoping to get my FISH Act over the goal line here soon, and that does have a big role for our great

men and women in the Coast Guard. I chair the Coast Guard Subcommittee in the Commerce Committee. What kind of specific resources do you think we need to make the Coast Guard more efficient at meeting IUU fishing interdiction goals? You may have seen in the Working Families Tax Cuts Act last year, we made the biggest investment in the Coast Guard in American history, \$25 billion. Huge. Twenty-two new cutters, 16 new icebreakers, 40 new H-60 helos. I mean, we are investing massively in the Coast Guard. Are there other Coast Guard-related priorities that can help on the IUU fishing front? So two questions for you.

Admiral CLENDENIN. Well, thank you very much for those questions, Senator. They're very important. On the MSAFE, again, it's a very laudable effort. It's the only of its kind and it brings together departments and agencies in a very unique way. We've talked about the complexity, and it's outside the Coast Guard wheelhouse, but of customs enforcement and traceability. You look at a JADE SPEAR-type investigation, it involved many departments and agencies. And that requires very, very detailed and intricate work between the departments and agencies.

As I compare the MSAFE to other work that I've done at the national level, when I think about some of the efforts I had at the National Security Council, and we were working on a strategy in Central America that was routinely briefed at the cabinet level, and then I also had the opportunity to work transnational organized crime in the strategic division that was also briefed at the cabinet level, I look at an incredible opportunity here. With your FISH Act, with the MSAFE that's already established, with the president's EO that addresses having to get after importation of IUU fishing, it connects us to both the executive branch and the legislative branch, and resources can be brought to the table.

The one thing I would say is, when we work in the MSAFE, we can't just be cataloging everything that we're already doing. Those efforts have to focus on what needs to be done, and that sometimes involves changing what agencies are doing, changing their emphasis, and funding additional lines of effort, and that's hard work. So having to routinely report to Congress and the executive branch on how to get ahead, using the MSAFE and all these, this is the time to do it. I think this is the time to rejuvenate all the efforts against IUU.

Chair SULLIVAN. Great.

I'm going to ask a final question of Mr. Pinkert and Mr. Urbina. They're related, but you might have different angles on it. But it's essentially, if we wanted to have measurable—either from Congress or the executive branch—results in this area in the next 12 months, where would you focus the efforts? Tougher import enforcement? Stronger procurement bans? Pressure on certifiers? Exposure of brands using these supply chains and slave labor? Entity list designations? Hopefully, my bill is going to have the sanctions list component to it when it becomes law. A Section 301 investigation?

Where would you—and maybe it's not one to just prioritize, but to get action and, to be honest, to get publicity on the importance of this—which all of you have done a really good job at, what would you think in the next 12 months the most effective, impactful

action is that we, either in Congress or the executive branch, could take? We've been working with USTR. They're looking at a 301 investigation. I think they're already undertaking part of the investigation aspect. So I think we're pushing on an open door with this administration on a lot of this. But I'm just curious, from your expertise, where would you prioritize efforts? Why don't we start with you, Mr. Pinkert.

Mr. PINKERT. Thank you. I would note that the Seafood Competitiveness Executive Order specifically talked about using Section 301. I would just add that, of course, this bifurcation of supply chains issue is a really, really critical aspect of that. And they should really be looking into that. As far as other things, you mentioned the entity list. And I think we need to kind of set the scene for the difficulties that have occurred in the last year or so with the entity list, and the fact that there's just not much movement in that area. This is an interagency group, seven agencies, and some observer agencies as well, and it's chaired by the DHS. And there's been a lot of turnover among staff. There's been a lot of turnover among the political appointees that are charged with keeping this program going and keeping it robust. And quite frankly, we don't know what the priority is in terms of having robust additions to the entity list. So I think that—you know, Ian talked a lot about the problem of labor transfers within China. And in fact, one of his former colleagues, Daniel Murphy, has also written quite a bit about that. In order to really address labor transfers, we have to get the entity list up and moving, and moving forward.

And then finally, civil penalties. That's a totally—I don't want to say totally neglected, but mostly neglected, area of authority. You've got to make companies pay. Ian talked about the TVPA and the venture liability under the TVPA. These companies are in a venture making money off of forced labor, in many instances. And we need to make them accountable, not just in terms of shaming but also financial penalties. Thank you.

Chair SULLIVAN. Great.

Mr. Urbina, I'll give you the last word, and then I'm going to turn it over to Chairman Smith to wrap up the hearing. I am being called by the cloakroom to get down and vote, but I want to hear your final answer. You have a lot of views on this, I'm sure, and I want to hear them.

Mr. URBINA. I'll be very brief. I think what Dean said is 100 percent correct. It's a sort of bottom-up strategy. I think a top-down strategy would be—the civil penalties point is akin—focusing on the certification industry, and also on the largest single corporate players, be they grocers or seafood companies, that the U.S. Government relies on to provide its seafood in lots of different places. And figuring out to what degree those players alone, through purchasing policy, can be pressured to change how well they police their supply chains by way of demands from you folks. If you want access to this market, then you've got to change your approach to verifying to us that you're not tied to these regions. I think that will affect the marketplace globally and have trickle-down effects that are more efficient than legislation sometimes.

Chair SULLIVAN. Great.

Well, listen, I want to thank the witnesses. I'm going to turn it over to Chairman Smith here. Excellent testimony. As we wrap up, if other members of the Commission have additional questions, they will submit them for the record. If you can try to get answers back to those other members in the next two weeks, we'll leave the hearing record open. But again, I want to thank the outstanding witnesses, all three of you. The importance of this hearing—I think it's gaining steam in the executive branch and in Congress, in a bipartisan way. I think that's really positive. Your work, all three of you, has been exceptional, and we really appreciate it.

Mr. Chairman, I'm going to turn it over to you. Thank you, sir. We will be in touch.

Co-chair SMITH. Thank you. I want to thank Chairman Sullivan. Yes, to underscore, we have a vote now over on the House side, so I'm going to have to leave momentarily.

I want to thank you for your testimony, for your guidance, your wisdom, counsel, breakthrough work. But just to underscore how historic and how difficult it is to get anything passed of this caliber, I've had the Forced Organ Harvesting Act pass 406 to 1 in the House. It has passed in the last Congress, passed in this one. I can't get it passed in the Senate. I mean, it's an abomination what Xi Jinping is doing to the Uyghurs, to the Falun Gong, and to others. You know, tens of thousands of young people, average age 28, having their organs ripped out—you know, killed.

My first hearing on forced organ harvesting was 30 years ago in 1996. I had a doctor who actually testified as to exactly what they were doing. It was low-level exploitation and human rights abuse then in terms of numbers, but now it's industrial size. And I can't get the bill out of the Senate. So I want you to know how important and precedent-setting it is for the Chairman to have gotten his bill—the FISH Act—passed in the Senate. It was a brilliant maneuver on his part. He got it. And it will pass in the House, I guarantee it. So I just—you know, I hope people realize that. Otherwise, we'd have another great bill sitting and languishing in committee that never moves. But now we have a really good, solid, actionable piece of legislation that he has authored.

I know that there are some 30 entity list proposals that have not gone forward. I'm not sure if any of them deal with seafood. Maybe, Mr. Pinkert, you might know. Part of the answer just a moment ago was that there's been a lot of change of personnel and the like, but we need to get a more laser-like focus on doing just that. And implementation, implementation, implementation. And when this bill becomes law, and the FISH Act similarly, implementation, implementation, implementation.

I have to run—but I can't thank you enough. I mean, you have done breakthrough work, all three of you. And the Chairman has done, I think, the biggest heavy lift imaginable to get the FISH Act passed in the U.S. Senate. I do have a vote, so I'm going to have to leave. The hearing is adjourned, and I thank you.

[Whereupon, at 11:36 a.m., the hearing ended.]

A P P E N D I X

PREPARED STATEMENTS

PREPARED STATEMENT OF IAN URBINA

THE OUTLAW OCEAN PROJECT INVESTIGATION: CHINA'S FORCED LABOR IN THE AQUACULTURE INDUSTRY

Thank you, Chair Sullivan and Co-chair Smith, and the rest of the Commission, for inviting me to speak. It's an honor to be back before you.

The last time I was here was in 2023, when the Commission asked me to testify about an investigation by my news team, The Outlaw Ocean Project, into China's role in global seafood. That reporting focused on China's more than 6,500 industrial fishing vessels and its hundreds of processing plants. It documented debt bondage, passport confiscation, avoidable deaths, fatal beatings, trafficked workers, illegal fishing, and a state-coordinated program forcing thousands of workers from Xinjiang and North Korea into seafood processing factories. Much of the product from those factories was bound for the United States, including American military bases and congressional cafeterias, in violation of the Uyghur Forced Labor Prevention Act and the Countering America's Adversaries Through Sanctions Act. In the wake of that reporting, Congress, the executive branch, and a small handful of seafood companies took action.

I'm here today to discuss our current investigation, which will be published in the coming weeks and examines the global aquaculture industry, including China's role in it.

By way of context: seafood is the world's most heavily traded food commodity by value, and aquaculture, or fish farming, is the industry's fastest-growing sector. As of 2022, more than half of all seafood worldwide was farmed rather than caught at sea.

This growth has been driven in part by a marketing claim: that fish farming is sustainable because it reduces pressure on wild fisheries. The problem is that for much of the industry, that claim is false. Roughly two-thirds of global aquaculture depends on feed made from wild-caught fish, in the form of fishmeal and fish oil. Think of the seafood people eat most: salmon, shrimp, tilapia, and sea bream. In other words, many farmed fish are fed the very wild fish the industry claims it is helping to spare.

Not all aquaculture works this way. Roughly a third of global fish farming focuses on non-fed species such as clams, oysters, and mussels. That form of aquaculture can indeed be sustainable.

But most fish farming depends on feed fish. And our investigation found that this segment of the industry prefers to begin the story of sustainability and ethical sourcing at the farm. If you start the story earlier, with the feed, a very different picture emerges.

Our recent investigation, called "Food for Feed," did just that. Over the past two years, we mapped and reported on roughly 1,400 fishmeal plants worldwide, boarded and inspected ships supplying them, traced the farms to which the feed goes, and tracked the resulting seafood to document the hidden costs.

In Russia's Far East, we documented forced labor on ships, farms, and in factories. In Western Sahara, we found the industry helping prop up Morocco's military occupation. In Gambia and Mauritania we found fish that once fed local communities increasingly diverted into fishmeal factories for export, worsening food insecurity. In countries including India and Peru, the industry was tied to at least 80 incidents of civil unrest, some violent, often labor strikes and community protests over polluted water or the stench from factories cooking thousands of tons of decomposing fish. In Senegal, fishmeal has pushed local fishers out of work, so that many are selling or repurposing their boats to flee to Europe, usually by making the roughly 930-mile journey to Spain's Canary Islands, a route that claimed more than 3,000 lives in 2025.

These are what economists call externalities: costs pushed onto distant countries and communities, while wealthier consumers enjoy the luxury seafood produced as a result.

So what does this have to do with China? China is the largest producer, exporter, and consumer of seafood in the world. It is also the single biggest exporter of seafood to the United States. And it is rapidly expanding fish farming, so it does not have to send as many vessels onto the high seas or into foreign waters. China now grows about four times as much fish as it catches, and huge quantities of that farmed seafood are exported, including to the United States.

What is striking is where much of this expansion is happening: Xinjiang and Tibet. Fish farming typically takes place along coasts, in near-shore cages or pens. But China is expanding it in mountainous and desert regions that are among the most landlocked places on Earth.

Our investigation mapped the supply chains of more than 1,200 fish farms in Xinjiang and Tibet. We found seafood from these farms going to a dozen countries, including the United States, and to companies supplying public institutions such as military bases, public schools, and congressional cafeterias. Not only is that a violation of the Uyghur Forced Labor Prevention Act, but some of these farms in Xinjiang are certified as sustainable by U.S.-based programs such as Best Aquaculture Practices, which seems mystifying in light of U.S. law.

I do not need to remind this Commission that Tibet and Xinjiang are among the most repressive regions in China. In Tibet, the government has relocated roughly half a million people, leveling villages and monasteries for projects including hydroelectric dams and fish farms. According to a 2024 Human Rights Watch report, this effort has relied on coercive tactics including repeated home visits, threats of prosecution, and warnings that utilities could be cut off for those who refused to move. In response to such policies, at least 169 Tibetans have set themselves on fire, often on camera, outside police stations, monasteries, or public squares. In Xinjiang, more than a million people have been held in detention camps, while the government has carried out large-scale land seizures, forced sterilizations, and criminal penalties for speaking native languages or practicing religious and cultural traditions.

That seafood from these regions is still reaching the United States shows how much work remains. American seafood producers, grocers, and food-service companies such as Sysco continue to rely on certification schemes that claim to police sustainability and forced labor in places like China, where spot checks at factories, ships, or farms are effectively impossible. China is also a place where asking tough questions about Uyghurs, Tibetans, or human rights generally, can get a company, civil society group, or journalist expelled. Yet the cost savings are so enticing that industry and certifiers continue to make that Faustian bargain.

Let's be clear: repression in these regions is one of China's hidden costs. It is the externality that helps produce cheap seafood. It is part of China's competitive advantage and helps explain the trade surplus in this commodity.

The UFLPA was enacted partly to level that playing field. So were tools like the Global Magnitsky Act. Customs and Border Protection has used Withhold Release Orders to stop imports suspected of being tied to forced labor. Congress has pressed companies through letters and hearings like this one, tightened purchasing rules for federally funded institutions, and, in rare cases, forced companies to do due diligence, putting the burden on industry, rather than journalists or civil society, to prove that supply chains are free of illegal or unethical hidden costs.

Bottom line: The tools exist. The question now is whether they'll get used.

Thank you for your time today.

PREPARED STATEMENT OF REAR ADMIRAL (RET.) SCOTT W. CLENDENIN,
UNITED STATES COAST GUARD *

*Strategic Advisor to the report *The Geopolitics of the Ocean—Why Healthy Seas Are Vital to America's National Security* (World Wildlife Fund, 2025)

I. Opening Statement

Distinguished Members of the Commission: thank you for the opportunity to testify. My name is Scott Clendenin. I am a retired Rear Admiral from the United States Coast Guard, where I last served as Assistant Commandant for Response Policy. I am here in my personal capacity today, but also as a Senior Advisor to the recently published World Wildlife Fund's and International Conservation Caucus Foundation's report *The Geopolitics of the Ocean: Why Healthy Seas Are Vital to America's National Security*. It brings together data, analysis, and first-hand perspectives from five former senior national security officials—including two U.S. Ambassadors, a former Acting National Oceanic and Atmospheric Administration (NOAA) Administrator, and the 26th Commandant of the U.S. Coast Guard—all of whom have served the Nation in high-level leadership positions for decades.

It is important to note up front that my opinions and views expressed in my testimony are my own and in no way reflect the official position of the U.S. Government, U.S. Coast Guard, the World Wildlife Fund, or any other organizations.

I want to be direct with this congressional commission—Illegal, Unreported, and Unregulated (IUU) Fishing is much more than a fisheries management or conservation problem. IUU Fishing is a national security crisis that fuels conflict and transnational organized crime; it finances cartels; enables arms and drug smuggling; is intertwined with human trafficking and forced labor; undermines the sovereignty of our allies while directly defrauding American consumers, and creates an unfair playing field for U.S. domestic fishermen who have to compete with illegally caught fish on the market.

The principal driver of IUU Fishing is the People's Republic of China (PRC). Beijing has for decades conceived of and deployed a strategy to access, lay claim to, and dominate the global supply of seafood in order to exercise power around the world, including through gray-zone operations where its global fishing fleet is leveraged as a maritime militia. Beijing has used policy incentives, economic subsidies, and political encouragement for its distant-water fishing fleet to fan out over the world to further the PRC's natural resources and geopolitical interests. As Admiral Samuel Paparo, Commander, U.S. Indo-Pacific Command, has stated: "Eight of the 10 world's worst IUU fishing violators are state-owned enterprises of the People's Republic of China ... it has the potential to be a real driver of conflict." In short, our nation's action on IUU Fishing could determine whether we experience peace or conflict, security or instability, prosperity or economic challenges.

To that end, I am here to reaffirm that America is a maritime nation and that the ocean underpins our economic strength, our food supply chains, our strategic influence, and our homeland security. I am also here to urge our Nation's elected officials to treat the governance of the ocean—and the enforcement against those who prey upon it—with the same strategic imperative that we bring to piracy, narcotics smuggling, energy security, rare earth minerals, and strategic competition with our adversaries.

II. IUU Fishing Is a National Security Challenge

Let me begin with the scope of the problem. Under my tenure in the U.S. Coast Guard, we declared IUU Fishing to be the world's top maritime security challenge—surpassing piracy. The financial losses from IUU Fishing are estimated at 16 to 36 billion dollars annually. Estimates indicate that potentially up to one third of wild-caught seafood consumed in the United States is linked to illegal fishing. That is seafood on American dinner tables, in American restaurants, and in American grocery stores—caught illegally, often by forced labor, processed in opaque supply chains, and sold at a price advantage over the American fishermen who play by the rules. President Trump in his recent Executive orders on *Restoring American Seafood Competitiveness and Unleashing American Commercial Fishing in the Pacific* addressed this issue of fundamental fairness for our American fishermen. I agree with this assessment, and we need to meet this moment because this issue goes beyond economic unfairness to our domestic industry—it is a direct subsidy to criminal networks.

Many sources and initiatives document how IUU Fishing is a driver of conflict and deeply intertwined with the most dangerous transnational threats America faces. For example:

- In the Indo-Pacific: China's distant-water fishing fleets dominate the maritime domain. Between 2011 to 2024, the region experienced 156 conflict events in the Pacific Islands in what amounts to regional conflict through the proxy of coast guards and fishing fleets. Now the tuna stocks are shifting eastward due to warming waters, a trend likely to spark escalated conflicts.
- There are strong indications that distant-water fishing fleets are involved in drug smuggling and other transnational crimes in our hemisphere. In 2018 two Chinese nationals were convicted in U.S. Federal District Court of narcotics smuggling following a U.S. Coast Guard Cutter interdiction of their fishing vessel with 900 kilos of cocaine on the high seas in the Eastern Pacific.
- In 2023, the U.S. Navy seized over 2,000 AK-47 assault rifles from a Yemeni-crewed fishing vessel in the Gulf, demonstrating how traditional fishing craft are used to arm Iranian-funded proxies. These same types of fishing vessels are smuggling other illicit cargoes across Middle East waterways, serving to destabilize the region.
- Drug cartels—including Mexico's Gulf Cartel, a designated foreign terrorist organization—use fishing vessels to conduct drug and migrant smuggling operations along our southern maritime border. They also harvest red snapper and other commercially valuable species from U.S. waters, violating American sovereignty, stealing our natural resources, and exporting them back to the U.S. market for millions of dollars in cartel revenue.
- In the Gulf of California, the Sinaloa Cartel and Cartel Jalisco Nueva Generación (CJNG) have systematically taken over the fishing industry—from individual fishermen, to cooperatives, to processing plants, and to exporters. The entire seafood value chains in some Mexican coastal communities are now under criminal control.
- And finally, **on the global level**, nearly two-thirds of countries assessed have documented cases of forced labor, child labor, or other human rights violations in their seafood supply chains. The International Labour Organization conservatively estimates that more than 128,000 fishermen are trapped in conditions of forced labor worldwide, and the Pew Charitable Trust estimates that over 100,000 fishermen die each year on the sea, and that is likely an underestimate.

These examples highlight the types of public and semi-private networks we are allowing to profit when we fail to enforce traceability, transparency, and the rule of law across global seafood supply chains. It is through this lens that the strategic imperative for our maritime nation becomes crystal clear: how we, our allies, and partner nations meet the challenges posed by IUU Fishing contributes to countering PRC's increased geopolitical and economic influence through natural resource extraction.

III. Geopolitical Competition and the Seafood Battleground

Building on this, the Committee should understand that IUU Fishing is not merely a conflict and crime problem—it is an instrument of geopolitical competition.

The PRC has built vast distant-water fishing fleets that operate with state subsidies, with support vessels for refueling and at-sea processing, and with what can be described as deliberate strategic intent. These fleets operate in the waters of up to 93 countries. In some regions, as many as two-thirds of foreign fishing vessels operate with disregard for international and coastal state laws. Predatory practices such as AIS manipulation, shell company licensing, bribery, and transshipment at sea to launder illegal catch are widely documented across West Africa, South America, and the Western Pacific.

This is not fishing. This is economic coercion. These fleets are the maritime equivalent of the debt-trap infrastructure investments we have rightly flagged as threats, one example being China's controlling interest in Sri Lanka's Hambantota port. These predatory practices are designed to secure strategic resource access, spread corruption, build dependencies, and extend influence over nations whose maritime economies are their primary national asset.

The consequences are already playing out in regions of direct U.S. strategic interest:

- In the Indo-Pacific, as noted above, Admiral Paparo, Commander of U.S. Indo-Pacific Command, has warned that competition over fisheries has the potential to be a real driver of conflict. Research has found that the presence of foreign

fishing vessels contributed to 45 percent of fisheries-related conflict events in the Pacific Island region. Small island nations—precisely the nations that we desire influence with—are being outcompeted and destabilized.

- In the Arctic, as ice recedes, pollock stocks are shifting from American Exclusive Economic Zone (EEZ) waters to those of Russia and other nations. The Alaskan pollock fishery is worth nearly \$2 billion annually and supports approximately 30,000 American jobs. Foreign vessels—primarily fishing for this stock—are already crowding the U.S.-Russian maritime border, and the PRC continues to explore the Arctic, declaring itself as a near-Arctic nation. Moreover, overhead surveillance and communications are at best difficult in the Arctic due to the physics of satellite orbits, so maritime presence and enforcement patrols are critical to preserve our sovereign interests. This need for persistent presence in the challenging Arctic operational environment is in part why the efforts of Congress to fund Polar Security Cutters (PSCs) and Arctic Security Cutters (ASCs) for the United States Coast Guard is so important to protecting U.S. interests in that region of increasing geostrategic importance.
- In South America, Argentina has militarily engaged Chinese fishing fleets after discovering hundreds of vessels fishing illegally in its waters. Chinese distant-water fishing fleets have lined the edges of exclusive economic zones around uniquely biodiverse ecosystems like the Galapagos Islands.
- Globally, fisheries-related conflict events have increased 20-fold since the 1970s. One in four militarized conflicts between democracies during the cold war were over access to fisheries resources.

This is the strategic context in which IUU Fishing must be understood. As the United States has learned in the rare earth minerals context, it is not in America's interest to allow geostrategic competitors, like the PRC, to dominate access to critical natural resources. Seafood is no different.

IV. The Economic Stakes for America

Let me also speak to the economic dimension, since both national security and commerce concerns vis-à-vis the PRC are in your purview as a Commission.

The U.S. blue economy—encompassing fisheries, maritime trade, shipbuilding, coastal tourism, and marine technology—is a powerful engine of American prosperity. The U.S. seafood sector alone is worth over \$320 billion and employs approximately 2.3 million Americans. The United States holds the second-largest marine territory in the world; however, 75 to 85 percent of seafood consumed in America is imported. That import dependence creates direct exposure to the very IUU Fishing-tainted, criminally controlled, and geopolitically manipulated supply chains I have just described. The scale of potential economic loss is significant: global estimates suggest over \$3 trillion in fisheries and aquaculture value is at risk over the next decade due to inadequate governance and overfishing.

The return on investment for getting this right is extraordinary. Every dollar invested in sustainable ocean resource management yields five dollars in return—through food security, economic stability, reduced enforcement costs, and preserved marine assets. Conversely, failing to act risks ceding strategic resources to competitors, empowering criminal networks, and undermining American global maritime influence.

V. The Maritime Safety Enforcement Act and What More Is Needed

I would like to personally thank Congress for your leadership on this issue. The Maritime Security and Fisheries Enforcement Act—MSAFE—is a laudable initiative. It authorizes a whole-of-government approach for orchestrating and coordinating the efforts of 21 departments and agencies to combat IUU Fishing, and it requires periodic progress update reports to Congress.

But while it creates a framework for progress, candor requires that I also note for this Committee that the working group initiatives established under MSAFE have received little dedicated funding outside of internal agency reprogramming and modest budget increases, and their collective authority and expertise remain significantly underutilized. We all know that interagency coordination without the commensurate fiscal resourcing is not a strategy—it is principally an exercise in paperwork. Moreover, in my experience in government, if strategic joint and interagency initiatives in our government are not periodically reinvigorated by both Congress and the executive branch, they will naturally be relegated, or migrate, to bureaucratic channels at lower echelons of our government's departments and agencies.

Regional Fisheries Management Organizations (RFMOs) have strengthened monitoring, control, and surveillance, expanded IUU Fishing vessel lists, and helped to improve transparency. However, their governing rules, forged around a model of

consensus, often allow a single nation to block enforcement, including the authority to board, inspect, and sanction vessels; hence, they cannot obtain agreements on what could be the most effective treaty enforcement measures.

The U.S. Coast Guard has entered into diplomatic maritime agreements that enable combined operations with partner nations to counter IUU fisheries, and the service routinely conducts patrols focused in part on countering IUU fisheries. Congress has authorized the largest, and very needed, acquisition effort in the history of the service, including the Fast Response Cutters (FRCs) and Offshore Patrol Cutters (OPCs) that are critical to operations that counter IUU Fishing. However, it is critical to note that the actions of the U.S. Coast Guard at sea alone are insufficient to stem the tide of IUU Fishing.

To this end I recommend that your commission consider three strategic shifts:

1. Reinvigorate American Maritime Governance Leadership

Maritime governance should be elevated in our Nation's core security directives—National Security Directives, congressional strategic mandates, and our National Maritime Strategies. Coupling the elevation in importance, adequate resourcing mechanisms must enable enhanced domestic maritime governance and position the United States as a global leader on this front. The National Security Council plays an important role to develop and coordinate our IUU Fishing strategic efforts to ensure they embody a whole-of-government approach, especially when they team with Congress and the Office of Management and Budget resourcing those efforts. Resources to implement this strategy will allow America to protect, manage, enforce, and deter threats to our national maritime resources and to our international seafood supply chains and by extension our national security.

2. Protect America's Maritime Interests Through Alliances and Trade

In regions of strategic importance—the Indo-Pacific, Latin America, the Caribbean, and the Arctic—the United States must deepen collaboration with partners on maritime domain awareness, capacity-building for fisheries enforcement, fisheries management, and coalition efforts to counter IUU Fishing. Critically, this does not require new funding lines or programs. Resources from the State Department's Narcotics and Law Enforcement (INL) program and the Defense Security Cooperation (DSC) Fund can be authorized for this purpose—because IUU Fishing is, at its core, both a national security imperative and a transnational organized crime criminal challenge.

Experience in recent years shows that maritime presence, transparent documentation of violations, and coordinated diplomatic messaging can change IUU Fishing fleet behavior. More powerfully, when multiple nations act together—sharing evidence and issuing *démarches*—states with IUU Fishing-linked fleets often adjust their actions. This approach has proven effective in West Africa, the Eastern Pacific, and the South China Sea.

Regional Fisheries Management Organizations need to find a way to evolve or mature from diplomatic coordination bodies into more intentional actors supporting fisheries treaty enforcement and compliance coordination mechanisms, enabling the levying of consequences for violations of international fisheries agreements and non-adherence to accepted standards for rules-based order at sea. I recognize, given the diplomatic realities that they face, that this is easier said than done; however, in the face of shared national security concerns throughout history, the international community has agreed to powerful enforcement regimes—for piracy, the slave trade, and narcotics trafficking—a similar approach is needed to address IUU Fishing and the associated crimes.

Finally, we must lead international coalitions to ensure global seafood traceability, transparency in foreign access and trade agreements, and import controls/market access requirements for catch information that can document legal origin. These tools exist and have been exercised at times. What is missing is the political emphasis to deploy them consistently. This hearing is an indication that this is about to change, and I commend you for it. Traceability is optimized when paired with data-driven fisheries management. The U.S. has the best-managed fisheries in the world.

Our Regional Fisheries Management Councils balance the interests of fishermen, seafood markets, marine biologists, and politicians, creating a regulatory framework that levels the playing field for all. Sharing our technical expertise, governance process, and enforcement regime with partner nations to improve fisheries data collection and management would help to address the root causes of IUU Fishing: ungoverned fishing of too few fish in the ocean in an unsustainable manner.

3. Strengthen Public-Private Partnerships in a Whole-of-Society Effort

Even with all the international efforts I have enumerated, IUU Fishing persists at scale. We cannot only interdict or regulate our way out of this challenge, and the solutions lie beyond the actions of any single government or entity. The reality is that a whole-of-society response with broad partnership is needed to address IUU Fishing that aligns market forces, industry, technology, diplomacy, maritime enforcement, regulation, and civil society.

If major importers of seafood—including the United States, Japan, Australia, and the European Union—collectively sanctioned companies engaged in IUU Fishing activity, the financial incentive for IUU Fishing would be dramatically reduced.

U.S. departments and agencies are collectively increasing efforts to improve seafood traceability to prevent importation. There have been episodic successes through innovative interagency law enforcement and customs investigations. As an example, Operation JADE SPEAR, a U.S. interagency effort, demonstrated the power of combining law enforcement investigation, customs enforcement, and coordinated financial actions that resulted in the delisting of IUU Fishing-linked companies from the NASDAQ Stock Exchange. Interpol has also established a program to coordinate international investigations into IUU Fishing criminal networks and activity. These enforcement efforts need to be replicated and conducted at a much larger scale.

Industry also has a critical role to play in eliminating IUU Fishing from their supply chains. A unified and impactful commitment to traceability is needed to transform global seafood supply chains. A good example is the “dolphin safe tuna” movement in the 1990s, which increased the awareness of industry, government, and the public about the deaths of dolphins that occurred during tuna fishing and developed fishing practices to prevent that from happening. Companies are exploring how a similar industry-wide effort could be used to illuminate and prevent IUU Fishing from unwittingly existing in their supply chain.

Non-Governmental Organizations (NGOs) serve as underutilized force multipliers in this mission set that could be better leveraged by government and international organizations through increased communication and engagement with the NGO community. Often NGOs do not require U.S. Government funding or support because they operate on philanthropic donations. They desire better partnership with U.S. departments and agencies to ensure that their efforts are complementary and not redundant to U.S. efforts to counter IUU Fishing activity.

The MSAFE Act has helped to better coordinate the IUU Fishing capacity-building efforts of U.S. departments and agencies; however, U.S. capacity-building efforts should now be better synchronized across agencies, allies, NGOs, and international organizations who are involved in similar capacity-building efforts. To build the requisite capacity to counter IUU Fishing activity, partner nations need coordinated support in law and policy frameworks, maritime domain awareness, intelligence sharing, enforcement, customs, and traceability.

Emerging technologies in industry are critical as well—including low-cost uncrewed aerial systems (UAS), lower cost patrol vessels, commercial satellite data, and AI analytics—which have served to dramatically reduce the cost of monitoring EEZs for developing nations. Creating sustained offshore presence and awareness in a nation’s territorial seas, whether through patrols, shiprider agreements, UAS surveillance or multinational operations, remains the essential objective.

Emerging UAS capability technologies provide the ability for developing nations to overcome the financial barrier-to-entry for effective maritime security by replacing very costly traditional manned maritime patrol aircraft programs with much lower cost and lower risk UAS systems. These systems can now remain airborne for over a day and cover a nation’s territorial seas and EEZ and provide the ability to share ubiquitous surveillance data enhanced by AI capabilities to operators and analysts ashore to document IUU Fishing incursions and activities in and around their waters. Moreover, industry now also offers mission enablers such as Starlink with lower cost communication and good bandwidth, which enables most nations to afford access to IUU Fishing monitoring information and intelligence at sea.

It is important to note that nations do not always need to board IUU Fishing vessels to be effective. UAS or boat crew photos and documentation that enable detailed diplomatic démarches to be sent to the offending flag state of the IUU Fishing fleets can be just as compelling as a seizure at sea with the same desired effect—compelling a modification of behavior and conformance to accepted maritime rules-based order.

Similarly, least developed countries often do not have sufficient maritime law enforcement vessels to operate hundreds of miles offshore for lengthy periods of time. Recent innovative and lower cost approaches to at-sea maritime law enforcement that have been used by NGOs in Central America can be adopted for use in

Oceania, Africa, and South America as well. Traditional navy and coast guard ships and patrol boats are very expensive to acquire and operate, but unlike complicated and risky high-speed interdictions of go-fast drug trafficking vessels, often at night, least developed countries do not need fast interdiction platforms to counter IUU Fishing vessels and activity in and around their waters. Instead, effective enforcement operations can be accomplished with used offshore supply vessels, which can be repurposed to serve as a mother ship or a floating station—with plenty of fuel, endurance over 30 days, berthing for multiple boarding teams, and 2–4 interceptor boats and crews. This “wolf pack” operational approach can be operated at a fraction of the cost of operating typical offshore navy or patrol vessels.

Combating IUU Fishing will require these types of innovative approaches and a departure from our traditional U.S. regional engagement business models to maintain affordable at-sea persistent presence to catch IUU Fishing violators in the act.

The private sector—including NGOs and industry partners—can serve as critical force multipliers for U.S. Government capacity-building efforts. Expanded collaboration and explicit authorization for these partnerships would yield significant returns.

VI. Closing

Members of the Commission: Our ocean fisheries resources have historically been treated as a conservation issue, separate from geopolitics and national security. That approach has not been effective. The threats I have described today—from IUU Fishing tied to cartels and arms smuggling, to state-subsidized distant-water fleets advancing China’s influence in our own hemisphere—are not future threat or national security risks. They are present and growing.

The health and sustainability of our ocean resources, our Nation’s enforcement of the laws that govern it, our efforts to partner with allies on maritime governance, and our efforts to build the capacity of nations to combat IUU Fishing in and around their waters are inseparable from American maritime strength. The opportunity before this Congress is to reframe ocean governance as the strategic imperative it is—and to fund, staff, and direct the agencies toward whole-of-society partnerships that can meet this challenge.

I am grateful for the Commission’s time and attention to this matter, and I look forward to your questions.

PREPARED STATEMENT OF HON. DEAN A. PINKERT

USING U.S. TRADE LAW TO COMBAT FORCED LABOR
IN THE CHINESE SEAFOOD INDUSTRY

Thank you for the opportunity to testify before this distinguished Commission on one of the most urgent tasks in U.S. trade enforcement—enhancing efforts to address systematic use of forced labor in China’s seafood industry. My name is Dean Pinkert. I’m a former commissioner of the U.S. International Trade Commission, serving as a commissioner from 2007 to 2017, and as Vice-Chairman of that body from 2014 to 2016. I am currently Special Advisor to Corporate Accountability Lab (CAL), a human rights nonprofit organization in Chicago. CAL is active in petitioning U.S. Customs and Border Protection (CBP) for forced labor import bans under Section 307 of the Tariff Act of 1930. In addition, CAL participates in the Tariff Act Advocates Group, the Coalition Against Forced Labor in Trade, and the Illegal, Unreported, and Unregulated (IUU) Fishing & Labor Rights Coalition, and co-chairs the Uyghur Forced Labor Prevention Act (UFLPA) Implementation Working Group.

China is the world’s largest seafood producer and exporter, supplying a substantial share of the fish and shellfish reaching American consumers. There is a documented state practice of using Uyghur and other minority-group workers, under coercive conditions, in Chinese seafood production. Goods produced under these conditions enter U.S. commerce at a price advantage underwritten by human suffering.

Congress has assembled a flexible toolkit of legislation that can be used to address this problem—including Section 307, the UFLPA, Section 1595a civil penalties, and Section 301 of the Trade Act of 1974. The issue is not an absence of statutory authority; it is the failure to use these tools at scale, in combination, and with the creativity the circumstances demand.

STRENGTHENING TRACEABILITY AND TRANSSHIPMENT ENFORCEMENT
UNDER SECTION 307 AND THE UFLPA

Section 307 prohibits the importation of goods produced in whole or in part by forced labor, and the UFLPA creates a rebuttable presumption that any goods mined, produced, or manufactured in the Xinjiang Uyghur Autonomous Region—or by entities on the UFLPA Entity List—are made with forced labor and are therefore inadmissible. These are powerful tools. But their effectiveness depends on the U.S. Government’s ability to trace goods from point of harvest through processing to the port of entry; the Forced Labor Enforcement Task Force’s (FLETF’s) ability to maintain a timely cadence of placing companies on the Entity List; and the willingness of CBP to move under Section 307 directly when the UFLPA itself does not satisfy enforcement objectives.

Chinese seafood supply chains are deliberately opaque. Fish caught in distant waters can be transshipped through intermediary ports, relabeled, commingled with locally sourced product, and re-exported to the United States. This can render conventional documentation-based compliance less than fully effective. CBP should therefore require positive traceability documentation—vessel-level catch certificates, processing facility records, and chain-of-custody attestations—for high-risk seafood species and sourcing regions. Importers who cannot provide this documentation should not be permitted U.S. customs entry of their merchandise.

An existing Federal program provides infrastructure for the traceability regime that the forced labor problem in this sector demands. The Seafood Import Monitoring Program (SIMP), administered by NOAA under 50 C.F.R. Part 300, Subpart Q, already requires collection and/or reporting of vessel-level harvest data, species identification, and chain-of-custody records for 13 high-risk species. CBP should treat SIMP documentation as a necessary—though not always sufficient—predicate for admissibility, and NOAA should expand SIMP’s species coverage to close the gaps that bad actors currently exploit by routing tainted product through non-covered species and supply chains.¹ SIMP can also be improved by including additional data elements to address labor abuse risks, requiring pre-entry notification of SIMP data, enhancing data verification and enforcement activity, and formalizing interagency coordination and data sharing.

Congress should examine any reluctance on the part of CBP to use Section 307 to issue sector-wide Withhold Release Orders covering Chinese seafood processed in facilities that have received state-transferred labor, without requiring individualized proof of coercion at each facility. The need for this is highlighted by the fact that CBP appears to regard a Withhold Release Order as a necessary predicate for imposing civil penalties on U.S. imports of these products.

EXPANDING THE UFLPA ENTITY LIST

The UFLPA Entity List should be expanded, and the FLETF should devote particular attention in this regard to Chinese seafood processors, cold-chain logistics firms, and fishing fleet operators.

Listing has asymmetric value, meaning its value greatly exceeds its cost, by shifting the burden of proof to importers, creating immediate commercial pressure on listed entities, and signaling to the broader industry that participation in supply chains tainted by Chinese government-mandated forced labor carries legal and reputational consequence. The FLETF should set an explicit timetable for seafood-sector designations and report to Congress on the evidentiary gaps, if any, that they believe have delayed action.

CIVIL PENALTIES UNDER 19 U.S.C. § 1595a

Section 1595a authorizes civil penalties for importations made contrary to law.² Forced labor importations in violation of Section 307 fit precisely into this authorization. Yet penalties are rarely imposed in the forced labor context, and their deterrent potential has largely gone unrealized.

A robust Section 1595a enforcement program would provide two benefits that detentions alone cannot. First, penalties impose a financial cost on importers who have not self-policed their supply chains and thereby create a direct economic incentive for upstream due diligence. Second, penalty proceedings can generate evidence—

¹A recently published meta-analysis shows that seafood mislabeling is rampant in the U.S. market, with species substitution being the predominant issue, <https://www.sciencedirect.com/science/article/pii/S0956713524008272>.

² 19 U.S.C. § 1595a(c).

through CBP's demand for importer documentation and the importer's response—revealing supply chain structures otherwise hidden from regulators.

The ultimate efficacy of such a program will depend in large part on how well it is understood by the relevant actors. CBP should therefore publicize its enforcement actions and, if possible, provide industry and civil society with a penalty matrix that helps them to help the government in its efforts to combat forced labor.

USING SECTION 301 TO TARGET SUPPLY CHAIN BIFURCATION

Perhaps the most sophisticated challenge in this space is the practice of supply chain bifurcation: companies maintaining nominally compliant product lines for export to the United States while continuing to use state-imposed forced labor in lines destined for other markets or sold domestically. Compliance, in other words, is purely performative, staged only for CBP's benefit.

Section 301 authorizes the U.S. Trade Representative (USTR) to investigate and respond to foreign acts, policies, or practices that are unreasonable or discriminatory and burden or restrict U.S. commerce. A foreign government policy that induces companies to simulate compliance while preserving state-imposed forced labor in non-U.S.-destined production is exactly the kind of state-implicated anticompetitive practice that Section 301 was designed to address; it enables the use of forced labor to achieve economies of scale that work to the disadvantage of U.S. producers. USTR must not turn a blind eye to the geographic sorting of tainted from untainted shipments.

The U.S. Government's goal should be that companies disengage entirely from state-imposed forced labor rather than allowing it to tilt the commercial playing field against U.S. companies.

CONCLUSION

We have the legal tools to address forced labor in seafood supply chains, including where, as in China, it is an instrument of state policy. The myriad laws in this space are mutually reinforcing; when deployed with strategic coordination and resolve, they can impose meaningful costs on companies that seek to benefit from this egregious human rights violation.

Congress should (1) urge the Administration both to mandate that seafood traceability documentation be provided to CBP and to enhance SIMP to address forced labor risk in the seafood sector, (2) work with the FLETF to accelerate UFLPA Entity List designations in the sector, (3) provide oversight to press CBP in the direction of an active and effective Section 1595a civil penalty program, and (4) explore with the USTR the possibility of a Section 301 investigation into supply chain bifurcation. Each of these steps is plainly within existing legal authority.

I look forward to the Commission's questions.

PREPARED STATEMENT OF HON. DAN SULLIVAN

We are here today to examine illegal, unreported, and unregulated fishing by the People's Republic of China. What we're dealing with is a state-backed system—run by the Chinese Communist Party—that combines illegal fishing, market manipulation, and forced labor, all in one supply chain. And it's happening at scale.

This system has real consequences for American workers, for law-abiding producers, and for the integrity of the global seafood market. The PRC has built the world's largest distant-water fishing fleet. These vessels do not simply compete. They overwhelm. They cheat. They show up in other countries' waters. They push into exclusive economic zones. They ignore quotas. They transship and relabel the catch to hide its origin.

That is not fair competition. It is a strategy of economic coercion that has direct consequences here at home.

Alaska is a seafood superpower. We produce over 60 percent of the wild-caught seafood in the United States. In Alaska, we have some of the best-managed fisheries in the world. Our fishermen follow the law. They respect quotas. They manage sustainably. They preserve these resources for future generations.

Alaska fishermen should not be forced to compete against fleets that disregard those rules, that benefit from state subsidies, and flood global markets with cheap products tied to illegal practices. That is not fair competition.

And it gets worse. There is credible evidence that parts of the PRC seafood supply chain involve forced labor, including Uyghur labor and North Korean labor in seafood processing. North Koreans and Indonesians and others are also being used on Chinese fishing boats in conditions that resemble slave labor.

So when we talk about illegal, unreported, and unregulated fishing, we are not just talking about resource theft. We are talking about a system in which illegal fishing, hidden sourcing, labor exploitation, and market distortion are all connected. That should concern all of us.

Then add Russia to this mix. Russian seafood can be processed in China, re-labeled, and then pushed back into global markets. This undermines sanctions and further distorts prices. It should not be possible, but it is happening right now, as we speak. This is a serious problem, and it deserves serious attention.

I weighed in extensively with the Trump administration to communicate how much Alaska needs the comprehensive ban on Russian seafood imports to the United States to continue. I was happy to see the Trump administration renew that ban just a few weeks ago to help maintain and strengthen Federal measures that ensure fair trade and protect Alaska's fishermen and coastal communities.

Congress has also begun to respond. The Senate unanimously passed my Fighting Foreign Illegal Seafood Harvests (FISH) Act in April. This is an effort I worked on for years with my friend Senator Whitehouse, who will join us later in the hearing. The bill recognizes that IUU fishing is not simply an environmental issue. It is also an economic issue, a labor issue, and a national security issue. It will strengthen enforcement, improve coordination, and ensure that the United States treats these activities with the seriousness they require.

Congress also passed, and the President signed into law, a provision I included in the NDAA last year barring the Pentagon from selling or procuring Chinese seafood imports in commissaries or serving them in military dining facilities. Our servicemen and women should be eating freedom fish from the United States, not communist fish harvested using slave labor.

I have also been a leading advocate for elevating the role of seafood within the U.S. Department of Agriculture. We've made meaningful progress already. In the FY2026 appropriations, Congress provided funding for a Seafood Liaison at USDA. Today, USDA announced the creation of a new USDA Office of Seafood. This office is a key component for integrating seafood into USDA programs, under the direction of the Seafood Liaison, to coordinate seafood policies and programs to provide support for our seafood industry, like U.S. farmers have. But we need to do more.

If illegal seafood can still be caught in one place, processed in another, relabeled, and sold into the United States, then we still have significant gaps to close. If Withhold Release Orders from Customs are not being enforced robustly, if traceability remains incomplete, and if import controls are still too easy to circumvent, then bad actors will continue to exploit those weaknesses.

That is why this hearing matters. We need to understand where our enforcement tools are working, where they are falling short, and what more should be done. I'm particularly interested in hearing our experts testify on the utility of tools like the Uyghur Forced Labor Prevention Act. Senator Merkley and I have introduced the follow-on to that bill, UGASA (the Uyghur Genocide Accountability and Sanctions Act) that reinforces some of these provisions. As it moves through the process, maybe there is more we can do with it. We're open to suggestions.

At the same time, this is not a challenge the United States faces alone. Countries around the world are dealing with the same tactics, the same coercive pressure, and the same difficulty in enforcing rules against distant-water fleets that operate at scale and in the shadows, so we need to work with partners to improve enforcement capacity and increase the cost of this behavior.

Though China's IUU fishing is a global and complex problem, at the end of the day, the principle here is simple: If you are engaged in illegal fishing, if you are exploiting workers, if you are hiding both—then you should not have access to the American market. Period. That's the standard.

This hearing is an opportunity to expose the Chinese IUU fishing system. It is an opportunity to identify where our policies need to be stronger and make clear that the United States intends to defend lawful producers, uphold human rights, and enforce the rules.

I want to thank our witnesses for helping bring transparency to what is designed to stay hidden. I look forward to their testimony.

PREPARED STATEMENT OF HON. CHRIS SMITH

I want to recognize my Co-chair, Senator Sullivan, for his leadership on this issue and his long record of fighting to protect the American seafood industry and American fishermen. His FISH Act just passed in the Senate and I will be working with my House colleagues to get it passed in the House. His amendment in last year's NDAA prohibiting Pentagon commissaries from serving Chinese seafood to our men and women in uniform was also a giant step forward. This is exactly the kind of serious leadership required to address the challenge of Chinese IUU fishing.

From the earliest days of seafaring, the oceans have been governed not only by currents and commerce, but by rules—rules that distinguish lawful navigation from piracy, fair trade from exploitation, and order from lawlessness.

Today we are confronted with a disturbing modern version of that lawlessness: a system of dark fleets, opaque supply chains, illegal fishing, and coerced labor that threatens not only American workers but also human rights, the rule of law, and our national security.

Credible reporting and investigative findings have exposed deeply troubling practices within China's distant-water fishing fleet and seafood processing industry. These include widespread illegal, unreported, and unregulated fishing—known as IUU fishing—as well as serious human rights abuses, including forced labor.

As our Commission heard in 2023 during the hearing I chaired titled “From Bait to Plate: How Forced Labor in China Taints America's Seafood Supply Chain,” a significant portion of China's distant-water fleet has been linked to labor exploitation, illegal incursions into the sovereign waters of other nations, and exploitation of workers.

The abuse does not end at sea. On land, there are grave concerns about the use of forced labor—including Uyghur and North Korean labor—in seafood processing facilities tied to global supply chains. Products processed under these conditions can make their way into international markets, including the United States, raising urgent legal, moral, and national security concerns.

We are joined again today by Mr. Ian Urbina, founder of The Outlaw Ocean Project, whose reporting has helped expose these abuses to the world. His work, and the work of others, has made one thing unmistakably clear: This is not a series of isolated incidents. It is a pattern. And it demands a response equal to its scale and seriousness.

Ian's testimony at our 2023 hearing told of North Korean laborers in Chinese seafood processing facilities whose products entered the U.S. market.

We have also recently learned that North Koreans are also being employed on Chinese flagged tuna longliners, with evidence of forced labor that included debt bondage, physical and verbal abuse, and excessive overtime. That is not just labor abuse. It is a sanctions evasion issue, a human rights issue, and a national security issue.

With Senator Merkley and Senator Sullivan, I have called on the Departments of State and Homeland Security to coordinate and act swiftly to address forced labor in China's seafood industry. We raised a particularly alarming possibility: that seafood consumed in the United States could be indirectly funding North Korea's nuclear and ballistic missile programs.

Our message was simple. The United States must not allow its consumers, its taxpayers, or its government procurement systems to become unwitting participants in forced labor or sanctions evasion. That means stronger enforcement to stop tainted seafood at the border, and it means ensuring that no Federal procurement system—including military bases, school meal programs, or other government facilities—relies on products linked to forced labor.

Because let's be clear: China's illegal fishing practices and the use of forced labor in its seafood supply chain are not merely unethical—they are in clear violation of U.S. law, including the Uyghur Forced Labor Prevention Act (which I led with Senators Rubio and Merkley and Representative McGovern) and the Countering America's Adversaries Through Sanctions Act.

We know the administration has said that addressing IUU fishing is a priority. We know Customs and Border Protection has issued Withhold Release Orders on Chinese vessels and barred products from at least one Chinese seafood processor.

We know CBP has the authority to act. What we need to know now is whether that authority is being used with the urgency and rigor this crisis demands.

After our 2023 hearing, Chinese seafood was added to CBP's priority enforcement list. Companies and retailers took notice—Lotte stores in South Korea and McDonald's promised to stop importing Chinese seafood.

We hope today's hearing produces that same kind of impact—but more important—we hope it leads to sustained action.

This hearing is about protecting American jobs and protecting national security as well. China's distant-water fishing fleet does not operate in a vacuum. These vessels often advance the Chinese Communist Party's objectives: asserting maritime claims, projecting presence in disputed waters, distorting markets, and exploiting vulnerable workers in service of larger geopolitical ambitions.

So this is about more than seafood. It is about whether the United States will tolerate a system that rewards coercion, harms American fishermen, weakens sanctions enforcement, creates food insecurity in Africa, and erodes the integrity of global commerce.

That is why we are here today, and that is why this hearing matters.

SUBMISSIONS FOR THE RECORD

QUESTIONS FOR ADMIRAL CLENDENIN FROM CHAIR SULLIVAN

Question. What specific resources do you believe are needed to make the U.S. Coast Guard more effective in meeting Illegal, Unreported, and Unregulated (IUU) fishing interdiction goals?

Answer. The views expressed in this response are my own and do not represent the official position of the U.S. Government or the U.S. Coast Guard.

Over the past 4 years, Congress has provided the Coast Guard with additional resources dedicated to counter-IUU fishing. These funds have been applied toward additional positions and the establishment of an IUU Center of Excellence in Hawaii. My understanding is that these investments have significantly strengthened the Service's ability to combat IUU fishing. As Congress revisits the IUU challenge with renewed interest and focus—and given that these resources were allocated several years ago—this is an appropriate time for the Coast Guard to reassess its level of both capabilities and capacity employed in this mission area, and more specifically to report whether the resources provided in 2020 remain adequate today for a mission that has, and continues to, expand in both geographic scope and strategic importance.

As noted in my testimony, persistent at-sea presence remains the single most important factor in the Coast Guard's ability to counter IUU fishing, and therefore the Offshore Patrol Cutter (OPC) acquisition program is essential. In addition to providing the global reach and capacity required to respond to IUU incursions, to support partner nations, and to increase persistent presence on the high seas, OPCs are urgently needed to replace the aging Medium Endurance Cutter fleet, which is operating decades beyond its intended service life. These legacy cutters face increasing maintenance challenges resulting in reduced operational availability (days on patrol at sea), limiting the Service's ability to sustain patrols in contested or remote regions. The OPCs will be the backbone of the Coast Guard's at-sea capacity and will be the workhorses supporting the Service's efforts to stem IUU fishing.

As IUU fishing activity expands into the Arctic and higher latitudes, the Arctic Security Cutter (ASC), currently under construction, will provide indispensable capability and capacity. Conventional non-icebreaking-capable cutters cannot safely operate in or near ice, and communications and overhead imagery are more challenging in the Arctic due to satellite-orbit geometry. The planned fleet of 11 Arctic Security Cutters will provide the persistent presence required to deter and respond to incursions into U.S. northern waters. Until the ASC fleet is fully operational, the interim high-latitude capabilities provided by USCGC STORIS, which was placed into service in August 2025, will remain critical.

The modularization program currently being prototyped on STORIS—and directed by the Executive Order on Restoring America's Maritime Dominance—is particularly important for the IUU mission, especially in the Arctic. Modern containerized modularity enables rapid augmentation of capabilities such as additional berthing, enhanced communications, expanded intelligence capabilities, and embarked scientific modules.

Both the ASC and Polar Security Cutter (PSC) classes will be designed to embark these modular capabilities, allowing each patrol to be tailored to mission requirements.

Last, Unmanned Aerial Systems (UAS) capabilities will be essential to the IUU mission in a variety of ways. UAS will soon be embarked on most Coast Guard cutters, providing organic surveillance capability that will greatly enhance maritime domain awareness for the IUU mission. In addition, UAS aerial patrols for counter-IUU fisheries missions in the Arctic limit risk to manned aircraft and their embarked crews given the harsh operational conditions found in the northern latitudes. Continued support for the Coast Guard's UAS program will be essential and may present an area that would benefit from increased resourcing.

Thank you for your leadership on this critically important IUU fishing mission, which is vital to U.S. national security, regional stability, and global food security.

Question. Are there other Coast Guard-related priorities that can help on the IUU fishing front?

Answer. The views expressed in this response are my own and do not represent the official position of the U.S. Government or the U.S. Coast Guard.

In 2020, the 26th Commandant, Admiral Schultz, in the Service's IUU Fishing Strategic Outlook, identified combating IUU fishing as the top operational concern for the majority of America's maritime partner-nation Coast Guards and Navies. Schultz noted, "The Coast Guard's IUU Fishing Strategic Outlook outlines the Service's efforts to combat the scourge of IUU fishing over the next decade. We are committed to working with our allies and like-minded partners to strengthen the international fisheries enforcement regime and counter this pervasive threat. As a recognized world leader in maritime safety, security and environmental stewardship, the Coast Guard has a responsibility to help build a coalition of partners willing to identify and address IUU fishing bad actors and model responsible global maritime behavior." Since publishing this Strategic Outlook, co-chairing the MSAFE IUU Committee, and expanding the Service's global engagement, the Coast Guard has become an international leader in counter-IUU maritime governance and operations. However, as noted in my testimony, the Coast Guard cannot address this challenge alone. A whole-of-society approach that integrates the work of Federal departments and agencies, industry, nongovernmental organizations (NGOs), and civil society is required.

To support this, IUU fishing should be elevated within national security priorities to a level comparable to narcotics trafficking and piracy. The MSAFE interagency effort should receive increased visibility, provide regular updates to Congress and the executive branch, and have its efforts incorporated into periodic, focused National Security Council-level discussions.

The Coast Guard, along with other departments and agencies, conducts extensive international capacity-building related to counter-IUU fishing, including law-enforcement instruction, fisheries education, legal and policy development, and broader capacity-building initiatives. A persistent challenge is ensuring that these efforts are coordinated not only across U.S. agencies, but also with foreign partners and nongovernmental organizations, to ensure they are additive and complementary rather than redundant. Additionally, these activities must be more closely aligned with operational objectives and measurable outcomes. Departments and agencies often report activities rather than results and impact, frequently providing only anecdotal examples. A system of macrolevel indicators—developed jointly with intelligence and NGO communities—would allow the United States to assess whether global IUU fishing trends are improving.

Improved intelligence collaboration is also essential. The U.S. Government shares information and intelligence with partners and NGOs through collaborative IT platforms and through Information Fusion Centers to improve awareness of vessels engaged in IUU fishing activities. While this effort is important, these mechanisms often remain cumbersome due to information-sharing policy constraints that prevent broader collaboration. Analytic products from NGOs—such as Global Fishing Watch—can exceed both the quality and timeliness of information available from the U.S. Government. The advantage of the IUU fishing mission is that classified information is not essential to produce quality targeting data. Crowd-sourced efforts to enrich unclassified, commercially available overhead data—enhanced with artificial intelligence—can provide timely information on IUU fishing fleets and fully inform priority patrol areas globally. Greater collaboration in unclassified, publicly releasable platforms would allow U.S. agencies, foreign partners, and NGOs to fully collaborate using the same data, enabling timely shared tactical information without releasability barriers. This would significantly enhance operational awareness for all partner nation patrols.

Coast Guard efforts must also be integrated into broader joint and interagency initiatives outside the Service's traditional mission areas. While the Coast Guard provides the persistent presence, boarding capability, and intelligence support needed to challenge IUU fishing at sea, it does not have the lead role in traceability, import inspections, or supply chain enforcement. The Coast Guard supports these efforts through intelligence and the Coast Guard Investigative Service, but as noted in my testimony, effective international traceability and inspection regimes—implemented in close partnership with industry—are essential. Reducing the market for IUU-tainted seafood imports would diminish the economic incentives that drive IUU fishing globally. Without this effort, it will be difficult to counter global IUU fishing effectively through at-sea enforcement alone.

The Coast Guard's efforts need to be fully integrated into a broader unified, coordinated, whole-of-society approach—bringing together joint and interagency resources, foreign partners, NGOs, and civil society. This approach would significantly strengthen national efforts to counter IUU fishing. This synergy can be achieved through regular, structured engagement of the MSAFE Committee and its working groups by congressional and executive branch leadership, including periodic discussion and progress monitoring at the National Security Council level.

Thank you for your leadership in addressing the IUU fishing challenge, which is vital to U.S. national security, regional stability, and global food security.

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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
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**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://shrimppalliance.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://shrimppalliance.com/wp-content/uploads/2020/10/2020_TVPR_List_Online_Final.pdf.

“Dark Nets, Illicit Labor – Confronting China’s IUU Fishing and Seafood Supply Chain”

April 23, 2026

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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/>.

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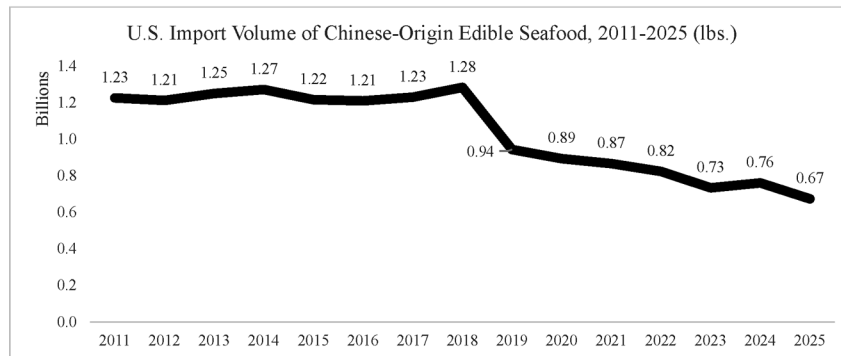
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processing and packaging prior to being shipped back across the Pacific Ocean to end up on American grocery shelves – is premised on the abuse of labor in China’s seafood supply chains and should not be tolerated.

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:

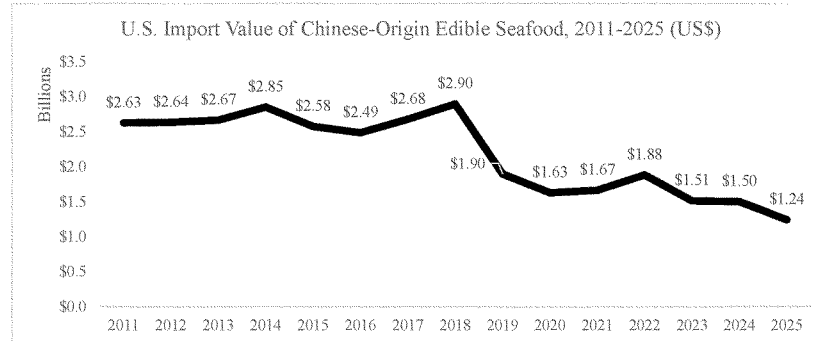
Kenneth Kennedy, a former manager of the anti-forced-labor program at Immigration and Customs Enforcement, said that the U.S. government should block seafood imports from China until American companies can demonstrate that their supply chains are free of abuse. “The U.S. is awash with criminally tainted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

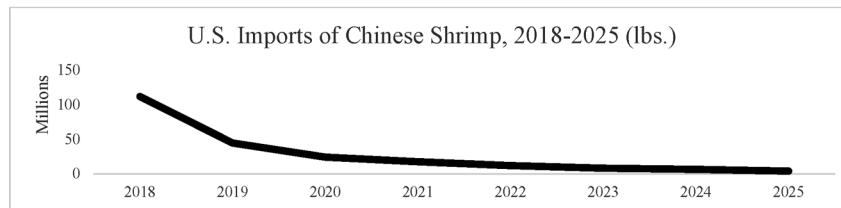
¹⁰ U.S. import data for frozen, non-breaded shrimp obtained from the USITC’s *Dataweb* based on the following HTSUS codes: 030613; 030617; 030623; 030636; 1605201010; 1605201030; 1605201050; 1605211030; 1605211050; 1605291010; and 1605291040.

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.



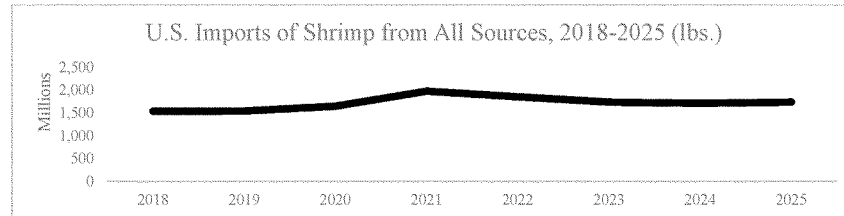
¹² See U.S. Food and Drug Administration, Import Alert 16-131 “Detention Without Physical Examination of Aquacultured, Shrimp, Dace, and Eel from China and Hong Kong SAR – Presence of New Animal Drugs and/or Unsafe Food Additives,” https://www.accessdata.fda.gov/cms_ia/importalert_33.html.

¹³ *Id.*

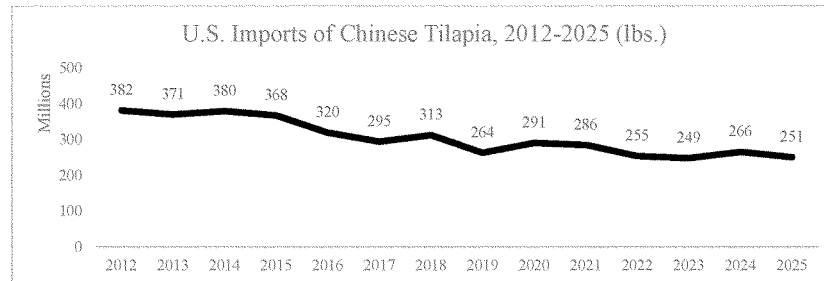
¹⁴ See Southern Shrimp Alliance, “Certification of Chinese Shrimp Trawling Industry Under Section 609” (Feb. 13, 2020), <https://shrimpalliance.com/wp-content/uploads/2020/03/Section-609-Paper-February.pdf>.

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.

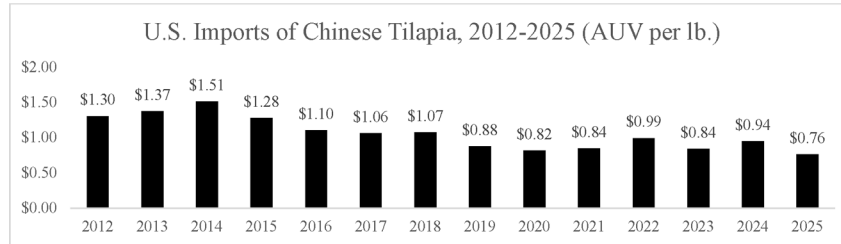


Had the domestic shrimp industry not taken aggressive action to combat Chinese shrimp imports, SSA believes that there is strong evidence that reliance on Chinese seafood supply chains would have substantially undermined demand for *all* shrimp in the U.S. market. The example of American consumption 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
Fuqing 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>.

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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 Weiwan 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>.

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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 Yinxianchen 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>.

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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>.

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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
Zhongsan 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.



**United States House of Representatives
Congressional-Executive Commission on China**

"Truth in Testimony" Disclosure Form

In accordance with Rule XI, clause 2(g) of the Rules of the House of Representatives, witnesses are asked to disclose the following information. Please complete this form and attach it to your written testimony and it may be made publicly available in electronic format.

1. Date of Hearing:
2. Hearing Title:
3. Your Name:
4. Organization, organizations, or government entity you are representing:
5. Position title:
6. Are you an active registrant under the Foreign Agents Registration Act (FARA)?
_____ Yes _____ No

False Statement Certification:

Knowingly providing material false information to this commission, or knowingly concealing material information from this commission, is a crime (18 U.S.C. 1001). This form may be made part of the hearing record.

Witness Signature

Date

Witness Biographies

Ian Urbina, Director and Founder, The Outlaw Ocean Project

Ian Urbina is the founder and director of The Outlaw Ocean Project, a Washington, DC-based nonprofit journalism organization that investigates human rights, environmental, and labor abuses across the world's oceans. Before launching the project, he spent nearly 17 years as a staff reporter for the *New York Times*. His work has earned numerous honors, including a Pulitzer Prize, two George Polk Awards, and an Emmy.

Rear Admiral Scott W. Clendenin, USCG (Ret.), Owner, Dog Zebra Solutions LLC

Rear Admiral Scott Clendenin served 33 years on active duty in the U.S. Coast Guard and retired as Assistant Commandant for Response Policy, where he oversaw operational policy across seven mission areas. He spent 14 years at sea on six Coast Guard cutters, commanded four of them, and led international multi-mission patrols involving narcotics interdiction, fisheries enforcement, mass-migration response, search and rescue, and disaster response. Ashore, he held senior intelligence and policy roles supporting national operations and interagency efforts. He is a 1990 graduate of the U.S. Coast Guard Academy.

Hon. Dean A. Pinkert, Special Advisor, Corporate Accountability Lab

The Honorable Dean A. Pinkert is an international trade and human rights consultant who serves as special advisor to Corporate Accountability Lab. He spent 10 years as a commissioner at the U.S. International Trade Commission, including 2 years as Vice Chairman. He has testified before Congress and has written and spoken widely on trade policy, including U.S. efforts to prevent the importation of goods produced with forced labor.

