



FISHERIES AGENCY

MINISTRY OF AGRICULTURE, FORESTRY AND FISHERIES, GOVERNMENT OF JAPAN

1-2-1, Kasumigaseki, Chiyoda-ku, Tokyo 100-8907, Japan

January 10, 2022

Comments from the Fisheries Agency of Japan on the Notice of Comment Request for Information Collection under the Marine Mammal Protection Act (OBM Control No.0648-0651)

The Fisheries Agency of Japan (FAJ) welcomes the opportunity to comment on the information collection under the Marine Mammal Protection Act (MMPA).

In order to avoid that the information collection based on MMPA would impose an excessive burden on the business operators involved in seafood trade to the United States, FAJ would like to provide our comments on the form of "Certification of Admissibility" as follows.

1. In regard to the information on "Vessel Name (s) and Number (s)" requested in the proposed form, in some cases in Japan, some fishing vessels catch a fish species in the same fishing area, then the catches by such vessels are landed at a local landing port and shipped together. In such cases filling the vessel names and numbers in the form at the time of export could require an excessive burden. We think this information is not essential, as the purpose of the certificate is to confirm that the fish and fish product imported to the United States are not originated from the prohibited fish species or fishery. We therefore, from the perspective of minimize the public's reporting burden, would like to request for deletion of "Vessel Name (s) and Number (s)".
2. Some exporting nations may have multiple "Export Fishery" even if they are the same type of fishery. For this reason, we would like to request to assign a serial number to each fishery on LOFF, and to add a new column in the form of Certification of Admissibility for entering the serial number.
3. To clarify that the Certificate of Admissibility is required to be prepared for each shipment, we would like to suggest adding "For each shipment," to the description of the form as follows;

"For fish or fish products for which a certificate of admissibility is required, a shipment of fish or fish products in any form from a nation subject to an import restriction, offered for entry to the United States, is eligible for entry only when accompanied by this completed and certified form attached to the invoice and/or

shipping documents. For each shipment, an authorized official or agent of the exporting nation must complete the information below”

Sincerely,

川島哲哉

KAWASHIMA Tetsuya

Director

Fisheries Products Trade office,

Fisheries Agency of Japan