



ONE HUNDRED NINETEENTH CONGRESS
SENATOR DAN SULLIVAN, CHAIR
REPRESENTATIVE CHRISTOPHER H. SMITH, COCHAIR

July 28, 2025

Honorable Marco Rubio
Secretary
Department of State

Honorable Pete Hegseth
Secretary
Department of Defense

Honorable Kristi Noem
Secretary
Department of Homeland Security

Honorable Brooke Rollins
Secretary
Department of Agriculture

Honorable Howard Lutnick
Secretary
Department of Commerce

Honorable Russ Vought
Director
Office of Management and Budget

Dear Secretaries Rubio, Hegseth, Noem, Rollins, Lutnick, and Director Vought:

We write to urge action to end the importation of seafood that is fished, farmed, or processed using forced labor, and to establish robust procedures to ensure that U.S. federal agencies do not procure such products. These measures enjoy broad bipartisan support in Congress and align squarely with *Executive Order 14276, Restoring American Seafood Competitiveness*, which calls for strengthening domestic seafood supply chains, increasing traceability, and eliminating unfair and unethical foreign competition.

Extensive investigations by *The Outlaw Ocean Project* have documented the staggering scale and human rights abuses associated with China's illegal, unreported, and unregulated (IUU) fishing. These include the use of forced labor aboard distant-water vessels and in Chinese processing facilities that exploit Uyghur and North Korean workers. China's seafood sector not only artificially depresses global prices and disadvantages law-abiding American fishers, but it also perpetuates egregious labor abuses that violate U.S. law and international norms.

Seafood imports processed using Uyghur or North Korean labor, in particular, ties American consumers to China's ongoing genocide in the Xinjiang Uyghur Autonomous Region and to North Korea's weapons development programs. If such seafood enters the U.S. federal supply chain, American service members and federal employees become unwitting supporters of adversarial regimes that abuse human rights and undermine international stability.

The importation of goods produced with Uyghur or North Korean labor is expressly prohibited under the Uyghur Forced Labor Prevention Act (UFLPA) (22 U.S.C. §6901 note) and the Countering America's Adversaries Through Sanctions Act (CAATSA) (22 U.S.C. §9241a), respectively. These statutes are enforced under Section 307 of the Tariff Act of 1930 (19 U.S.C. §1307), which bans imports produced wholly or in part with forced labor.

Congress has repeatedly called on the Department of Homeland Security (DHS) and the National Oceanic and Atmospheric Administration (NOAA) to enhance scrutiny of China's seafood supply chain through targeted trade enforcement. Nonetheless, seafood from Shandong and Liaoning provinces likely continue to enter the U.S. market despite credible allegations of the use of forced labor.

To its credit, the DHS-led Forced Labor Enforcement Task Force (FLETf) has designated seafood as a "high-priority" sector under the UFLPA and placed Shandong Meijia Group (also known as Rizhao Meijia Group) on the UFLPA Entity List, blocking imports from the company due to the use of forced Uyghur labor. In March 2025, DHS issued a Withhold Release Order (WRO) against the *Zhen Fa 7*, a Chinese-flagged fishing vessel, based on credible evidence of forced labor including debt bondage and abusive onboard conditions.

While these actions are commendable and reflect the Administration's stated goal of building resilient, transparent, and ethical seafood supply chains, serious gaps remain. The volume and scope of Chinese seafood entering the U.S. market remain opaque, and the extent of federal detentions or pending enforcement actions is unclear. Moreover, there is no evidence of enforcement against imports linked to North Korean labor, despite the rebuttable presumption of inadmissibility under Section 321(b) of CAATSA and international bans under U.N. Security Council Resolution 2397 and U.N. General Assembly Resolution 78/218.

These gaps undermine both U.S. law and Executive Order 14276's vision for a competitive, trusted, and fully traceable seafood supply chain. They also risk entrenching supply chain dependence on foreign entities that violate fundamental labor rights and threaten global security. To get at this issue, in the FY2026 National Defense Authorization Act, the Senate Armed Services Committee approved a specific Department of Defense prohibition on the procurement and commissary sales of seafood originated or processed in China.

To address these concerns, we respectfully seek to work with you to implement the following actions:

1. **Issue binding guidance for all federal procurement agencies and contractors** clarifying obligations to comply with UFLPA, CAATSA, and recent Withhold Release Orders and to give preference to verifiably domestic or U.S.-allied sources of seafood.
2. **Support pending Congressional action to prohibit the procurement** and commissary sales by the Department of Defense of fish imported from China.
3. **Establish and publish a consolidated blacklist** of vessels engaged in IUU fishing and Chinese facilities implicated in forced labor, aligning this list with UFLPA Entity List, CAATSA enforcement, and WROs.
4. **Expedite pending UFLPA Entity List designations** under DHS review, particularly those seafood processing companies with direct links to Uyghur transfer labor.
5. **Enhance transparency in the UFLPA Statistics Dashboard** by including sector-specific, line-item data for seafood and other high-priority sectors of enforcement.
6. **Publicly disclose all seafood import detentions and denials** issued by CBP under CAATSA.

7. **Impose targeted financial sanctions** under Section 6 of the Uyghur Human Rights Policy Act (Pub. L. 116-145) on entities complicit in forced labor within the seafood supply chain.
8. **Strengthen enforcement cooperation with key Indo-Pacific allies**, including South Korea, Japan, Canada, and Mexico, to improve data sharing and align blacklists, enforcement actions, and port controls.

We request a briefing from Commerce, State, and the Department of Homeland Security discussing progress on the relevant issues raised in this letter and how the “seafood trade strategy” required by E.O. 14276 will be implemented by the Administration.

We look forward to working with you on these important issues.

A handwritten signature in blue ink that reads "Dan Sullivan". The signature is fluid and cursive, with a long horizontal stroke at the end.

Senator Dan Sullivan
Chairman
Congressional-Executive Commission on China

A handwritten signature in blue ink that reads "Chris Smith". The signature is cursive and stylized, with a prominent "C" and "S".

Representative Christopher Smith
Cochairman
Congressional-Executive Commission on China