

To: Nicole Alba and Jeremy Woodrow, Alaska Seafood Marketing Institute

From: Sam Friedman, McKinley Research Group

Date: February 21, 2025 (Updated June 23)

Re: Comparative Seafood Tariff Rates Analysis

About two-thirds of Alaska's seafood production, by value, is exported, including products that are consumed in the importing country and products that are reprocessed by the importing country. This relationship to global markets leaves the Alaska seafood industry acutely vulnerable both to the direct consequences of new U.S. tariffs and, even more so, the indirect consequences of retaliatory actions by trading partners.

The following tables and analysis describe seafood tariff rates for products from the U.S. and from competing countries in four key Alaska seafood markets: the European Union (EU), Japan, the United Kingdom (UK), and China, as provided by ASMI's overseas marketing representatives.

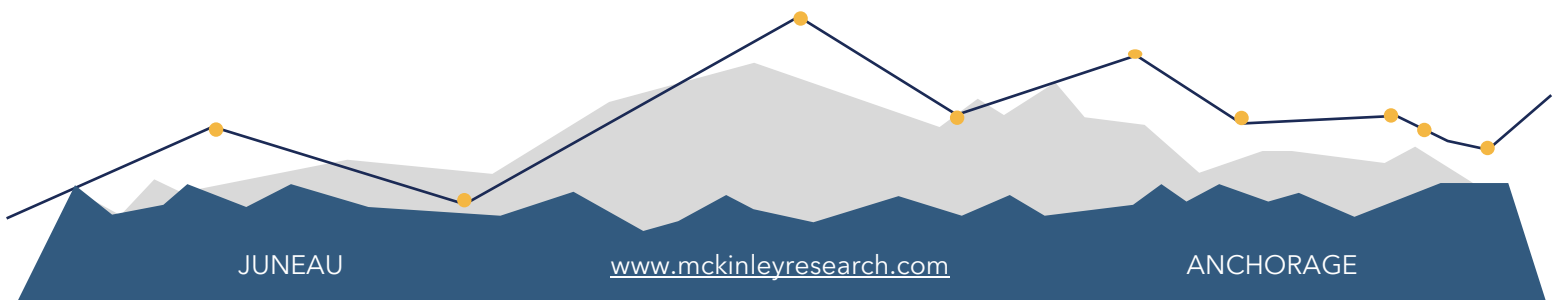
June 23 update: This update details new Chinese import tariffs on U.S. goods which increased significantly in April 2025, although the largest tariff increases are currently paused through August, 12 2025. The China section of this memo also contains additional information about how increased U.S. import tariffs apply to Alaska-origin seafood reprocessed in China and re-imported back into the U.S.

Import tariffs on U.S. seafood imposed by the European Union, Japan, and the United Kingdom have not changed since new U.S. import tariffs were announced in April 2025, although these tariff rates are the subject of ongoing negotiations.

Key Findings

While enormous complexity exists among tariff rates for various seafood products across the EU, Japan, and UK markets, two main themes emerged in our review of comparative tariff rates:

- None of the three markets restrict seafood imports from Russia (Alaska's biggest competitor) to the extent of the United States, which banned direct Russian imports in 2022 and indirect imports in 2024. Among the three markets, the UK's 35% punitive tariff on Russian imports is the most restrictive.
- U.S. seafood products generally face higher tariff rates than seafood from competing seafood producing countries (with the exception of Russia) in these three markets. The



discrepancy in tariff rates is due in part to trade agreements that do not include the United States and which allow for no- or low-tariff imports. These agreements include:

- Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP): 12 parties including Japan, Canada, Mexico, Chile, and the UK
- Economic Partnership Agreement: bilateral Japan-EU
- UK/EU Trade and Cooperation Agreement
- EU-Canada Comprehensive Economic and Trade Agreement (CETA)
- European Economic Area (EEA) Agreement, which incorporates Iceland, Liechtenstein, and Norway, along with the 27 EU nations, into a single European market

KEY MARKETS SUMMARY

Alaska exported more than \$1.7 billion in seafood products annually to the EU, Japan, China, and the UK collectively between 2020 and 2024, more than half of all Alaska seafood exports in this period, by value.

Key competitors to Alaska in these markets include Russia (whitefish/salmon/crab), Norway (whitefish/salmon/crab), Iceland (whitefish/salmon), Canada (whitefish/salmon), Chile (salmon), and China (reprocessed whitefish and salmon from Russia, Alaska, and other sources).

Table 1. Estimated Alaska Exports of Seafood Products to the EU, Japan, China, and UK, 2020-2024 Annual Average

Year	\$Millions	Metric Tons
European Union	\$617M	160,198
Japan	\$593M	153,585
China	\$521M	257,191
United Kingdom	\$50M	9,444
Total	\$1.78 Billion	580,418

Source: National Marine Fisheries Service, McKinley Research Group estimate of Alaska portion of U.S. exports

European Union

The EU has been the Alaska seafood industry's largest direct trading partner by value since 2022. Annual Alaska seafood exports to the trading bloc averaged more than 160,000 metric tons, valued at more than \$610 million, between 2020 and 2024.

(See table next page)

Table 2. Estimated Alaska Exports of Seafood Products to the EU, 2020-2024

Year	\$Millions	Metric Tons
2020	\$578M	170,315
2021	\$601M	151,018
2022	\$673M	154,196
2023	\$618M	159,096
2024	\$614M	166,368
Average	\$617M	160,198

Source: National Marine Fisheries Service, McKinley Research Group estimate of Alaska portion of U.S. exports

Tariff Rates

As seen in Table 4, most Alaska seafood products entering the EU are subject to the same tariffs as those from China and Russia, which are higher than the rates levied upon countries with EU trade agreements, including Iceland and Norway (members of the European Economic Area), Canada, and Chile.

The U.S., China, and Russia are all “third countries”: not member countries of the EU and without EU free trade agreements. However, Russian seafood imports are often subject to higher tariffs due to the following:

- a) Russia is excluded from preferential tariff rates offered to third countries for products that undergo further processing within the EU, such as breaded Alaska pollock fillets.
- b) Russia is excluded from the whitefish (pollock and cod) parts of the Autonomous Tariff Quota program, as described below. This exclusion includes Russian raw-material that was reprocessed in China or other third-party countries before entering the EU.

Autonomous Tariff Quota (ATQ) Program

The Autonomous Tariff Quota (ATQ) program is an important exception to EU tariff rates for some Alaska seafood products.

The program allows tariff-free imports up to certain volume quotas. The table below outlines current ATQ program volumes for Alaska seafood products. This program was created to allow greater access to products for which Europe is dependent on imports. Quotas are also influenced by trade agreements.

(see table next page)

Table 3. EU Autonomous Tariff Quota (ATQ) Program Volumes, 2025

Product	ATQ Limit (mt)
Alaska pollock fillet/whole	340,000
Headed and gutted cod	110,000
Alaska pollock surimi	60,000
Cod fillets	50,000
Pacific salmon	10,000
Whole frozen flatfish	7,500
Salted cod	2,000

Source: ASMI Europe program

(see table next page)

Table 4. EU Seafood Import Tariffs on Major Trade Partners, Products Ranked by Value of EU Imports from U.S., 2020-2023 Annual Average

HS Code	Imports from U.S.	Simple Description*	Alaska Seafood Product	Tariff Rate on Imports From:					
				U.S.**	Russia	China**	Norway	Canada	Chile
03047500	\$258 M	Alaska pollock fillets	Y	0-13.7%	13.7%	0-13.7%	0% - 0.9%	0%	0%
03031100	\$108 M	Sockeye salmon fillets	Y	0-2%	2%	0-2%	0%	0%	0%
03049410	\$88 M	Alaska pollock surimi	Y	0-14.2%	14.2%	0%-14.2%	0%	0%	0%
03047419	\$67 M	Hake fillets	N						
03063210	\$53 M	Live lobsters	N						
03049510	\$50 M	Other surimi	N						
03048100	\$22 M	Pacific salmon for processing	Y	0-2%	2%	0-2%	0%	0%	0%
016052190	\$22 M	Shrimp	N						
03036390	\$22 M	Pacific cod (H&G)	Y	0-12%	12%	0-12%	0%	0%	0%
03031200	\$22 M	Pacific salmon (H&G) ***	Y	0-2%	2%	0%-2%	0%	0%	0%
03039190	\$22 M	Fish livers, roe, and milt	N	0-10%	10%	0-10%	0%	0%	0%
03049490	\$15 M	Minced Alaska pollock	Y	0-7.5%	7.5%	0%-7.5%	0%	0%	0%
03072290	\$14 M	Scallops	N						
16041100	\$11 M	Canned salmon	Y	5.5%	5.5%	5.5%	0%	0%	0%
Other Products	\$107 M								
All Seafood Imports from U.S.	\$882 M								

Source: Trade Data Monitor and ASMI Europe program. Compiled by McKinley Research Group

*Simplified HS description for space and clarity. All top seafood imports are frozen products, unless specified. Non-fillet imports are generally headed and gutted but may include some whole frozen fish. **Tariff expressed as a range because of preferential rate of 0% available only for products intended for further processing in the EU.

***Excludes sockeye salmon.

Japan

Japan is a top market for Alaska seafood both in terms of total value and its role as a key consumer of Alaska seafood products, with limited market penetration in other countries such as pollock and salmon roe, Atka mackerel, and rockfish.

Direct U.S. exports of Alaska products averaged about \$600 million in recent years, however, the importance of Japan to the Alaska seafood industry is likely larger. Import data reported by Japan indicate total seafood imports from the United States annually averaged more than \$1 billion. Imports to Japan from the U.S. include non-Alaska seafood products such as Maine lobster, but Japan's imports also include a significant volume of Alaska products that are not represented in U.S. export figures.¹

Table 5. Estimated Alaska Exports of Seafood Products to Japan, 2020-2024

Year	\$Millions	Metric Tons
2020	\$519M	140,024
2021	\$638M	160,876
2022	\$667M	153,401
2023	\$619M	172,283
2024	\$522M	141,341
Average	\$593M	153,585

Source: National Marine Fisheries Service, McKinley Research Group estimate of Alaska portion of U.S. exports

TARIFF RATES

As seen in the table below, there is less variation in Japan's seafood tariff rates as compared to the European Union. U.S. tariff rates for key Alaska seafood products are the same as the general World Trade Organization rates, which are higher than the 0% tariffs levied on imports from countries with which Japan has trade agreements, including the EU, Chile and Canada.

Some of Japan's tariff rates are higher for imports from Russia because of sanctions on Russia for the 2022 invasion of Ukraine. However, Japan's sanctions are more limited than other G7 nations, and as a result most Alaska and Russian seafood continues to enter Japan with identical tariff rates.

¹ Some Alaska-origin seafood products exported from the U.S. make an intermediary stop in cold storage in South Korea and are therefore recorded in the U.S as exports to South Korea, but in Japan as imports from the U.S.

Japan's WTO/U.S. tariff rates are generally higher for value-added products, averaging 10% for fillets and smoked salmon and 3.5% for frozen whole or headed and gutted products. Pollock surimi and pollock roe (which together make up more than a third of Japan's seafood imports from the U.S. by value) are both taxed at 4.2% for the U.S. and competing countries.

NON-TARIFF BARRIERS

Japan imposes substantial limitations on imports of 18 fishery products through its import quota system, which limits the volume of imports from all trade partners. Products made with Alaska-origin species subject to the quota system include pollock, cod, cod roe, pollock roe, and herring. See Appendix A for a detailed explanation of how this program restricts seafood imports.

(see table next page)

Table 6. Japanese Seafood Import Tariffs on Major Trade Partners, Products Ranked by Value of Japanese Imports from U.S., 2020-2023 Average

HS Code	Imports from U.S.	Simple Description*	Tariff Rate on Imports From:							
			U.S.	WTO	Russia	Norway	Iceland	EU	Chile	Canada
030494010	\$282M	Alaska pollock surimi	4.2%	4.2%	4.2%	4.2%	4.2%	4.2%	4.2%	4.2%
030391090	\$152M	Salmon roe	3.5%	3.5%	5.0%	3.5%	3.5%	0.0%	0.0%	0.0%
030391020	\$108M	Alaska pollock roe	4.2%	4.2%	4.2%	4.2%	4.2%	4.2%	4.2%	4.2%
030389299	\$78M	Atka mackerel (H&G)	3.5%	3.5%	3.5%	3.5%	3.5%	0-1.3%**	0-1.2%**	0-1.2%**
030489290	\$76M	Fish fillets	2.9%	2.9%	2.9%	2.9%	0.0%	0.0%	0.0%	0.0%
030389296	\$75M	Sablefish (H&G)	3.5%	3.5%	3.5%	3.5%	3.5%	0.0%	0.0%	0.0%
030311000	\$52M	Sockeye salmon (H&G)	3.5%	3.5%	5.0%	3.5%	3.5%	0.0%	0.0%	0.0%
030614020	\$39M	Snow crab (sections)	4.0%	4.0%	6.0%	4.0%	4.0%	0.0%	0.0%	0.0%
030483000	\$38M	Flatfish fillets	3.5%	3.5%	5.0%	3.5%	0.0%	0.0%	0.0%	0.0%
030475000	\$28M	Pollock fillets	10.0%	10.0%	10.0%	10.0%	10.0%	10.0%	10.0%	10.0%
030389295	\$23M	Rockfish (H&G)	3.5%	3.5%	3.5%	3.5%	3.5%	0.0%	0.0%	0.0%
Other Products	\$187M									
All Seafood Imports from U.S.	\$1,137M									

Source: Trade Data Monitor and ASMI Japan program. Compiled by McKinley Research Group

*Simplified HS description for space and clarity. All top seafood imports are frozen products. Non-fillet imports are generally headed and gutted but may include some whole frozen fish.

**Most "other" frozen H&G products in this heading (including Atka mackerel) have no tariff if imported from the EU or CPTPP countries, although a 1.2-1.3% tariff is imposed for Spanish mackerel.

United Kingdom

While significantly smaller than the EU and Japan, the United Kingdom (UK) is a significant market for Alaska seafood. Annual exports of Alaska seafood averaged \$50 million between 2020 and 2024. The UK is an especially important market for canned salmon, Alaska pollock fillets, and sockeye salmon fillets.

Table 7. Estimated Alaska Exports of Seafood Products to Japan, 2020-2024

Year	\$Millions	Metric Tons
2020	\$74M	13,259
2021	\$49M	9,365
2022	\$49M	9,171
2023	\$32M	6,575
2024	\$44M	8,853
Average	\$50M	9,444

Source: National Marine Fisheries Service, McKinley Research Group estimate of Alaska portion of U.S. exports

TARIFF RATES

As with the EU and Japan, the UK tariff rates for U.S. seafood imports are higher than for countries with free trade agreements, but lower than tariffs on Russian seafood imports. As seen in Table 9, the U.S. and China are both “third countries” with respect to the UK without preferential market access.

The UK has a 35% punitive tariff on seafood imports from Russia and Belarus, a more substantial sanction than that imposed by Japan or the EU following the 2022 invasion of Ukraine.

BREXIT AND TRADE AGREEMENTS

The UK left the European single market as part of Brexit in 2020, meaning shipments between the European continent and the UK now need to be logged and declared. However, no tariffs are imposed between the UK and the EU under the UK/EU Trade and Cooperation Agreement. See Appendix B for more information about Brexit.

The UK has several other trade agreements relevant to seafood imports. The following table from ASMI’s United Kingdom program, provides a useful reference.

Table 8. Summary of United Kingdom Trade Agreements Most Relevant to Seafood

Key Country(s) Affected	Market Access Summary	Trade Agreement or Measure	Other Nations Included
Canada	Tariff Free	UK-Canada Trade Continuity Agreement	
China	No preferential access		
EU 27	Tariff Free	UK/EU Trade and Cooperation Agreement	All 27 EU Members
Faroe Islands	Some preferential tariffs and quotas	UK-Faroe Islands free trade agreement (FTA)	
Greenland	No preferential access		
India and Indonesia	Reduced tariffs	Developing Countries Trading Scheme (DCTS)	65 developing countries, varying levels of access
Japan, Chile, Peru, Mexico*	Reduced tariffs	Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP)	Singapore, New Zealand, Malaysia, Brunei, Australia
Norway and Iceland	Extensive preferential tariffs and quotas	UK-Norway, Iceland, and Liechtenstein free trade agreement	Liechtenstein
Russia	No preferential access plus punitive tariffs of additional 35%	Additional duties on goods originating in Russia and Belarus	Belarus
Seychelles	Tariff Free	ESA-UK economic partnership agreement (EPA)	Madagascar, Mauritius, Zimbabwe, potentially Zambia
Turkey	Tariff Free	UK-Turkey trade agreement	
USA	No preferential access		
Vietnam	A few tariffs	UK-Vietnam Free Trade Agreement	

Source: ASMI United Kingdom program.

*Pending Mexico ratification of UK ascension.

(see table, next page)

Table 9. United Kingdom Seafood Import Tariffs on Major Trade Partners, Products Ranked by Value of UK Imports from U.S., 2020-2023 Average

HS Code	Imports from U.S.	Simple Description*	Alaska Seafood Product	Tariff Rate on Imports From:							
				U.S./China	Russia	Faroe Islands	Greenland	Iceland**	Norway**	Canada	EU
16041100	\$69 M	Canned salmon	Y	4%	39%	0%	4%	4%	4%	0%	0%
03047500	\$26 M	Alaska pollock fillets	Y	12%	47%	12%	12%	0%	0%	0%	0%
03048100	\$21 M	Pacific salmon fillets	Y	2%	37%	0%	2%	2%	2%	0%	0%
03049490	\$6 M	Alaska pollock surimi	Y	6%	41%	6%	6%	2%	2%	0%	0%
03072290	\$6 M	Scallops	N								
03031100	\$3 M	H&G sockeye salmon	Y	2%	37%	2%	2%	2%	2%	0%	0%
03063210	\$2 M	Live lobsters	N								
03031200	\$2 M	H&G Pacific salmon ***	Y	2%	37%	2%	2%	2%	2%	0%	0%
03047190	\$2 M	Cod fillets	Y	6%	41%	0%	6%	0%	1%	0%	0%
Other Products	\$15 M										
All Seafood Imports From U.S.	\$151 M										

Source: Trade Data Monitor and ASMI United Kingdom program. Compiled by McKinley Research Group

*Simplified HS description for space and clarity. All top seafood imports are frozen products. Non-fillet imports are generally headed and gutted but may include some whole frozen fish.

**Denotes countries with which the UK has significant tariff rate quotes (TRQs), which allow for imports of a certain volume of product with no tariff.

***Excludes sockeye salmon.

China

China was the third largest export market for Alaska seafood by value and by far the largest by volume from 2020-2024. China is a global center for seafood reprocessing. The country primarily imports frozen, headed, and gutted fish from Alaska for processing into fillets that are consumed in the U.S., Europe, Japan, and other markets. Products imported for the reprocessing and re-export market have historically not been subject to tariffs. China is an important consumer of some low-volume, high-value Alaska seafood products, including geoducks and sea cucumbers. As the largest seafood consumer in the world, China has the potential to become a larger final market for Alaska seafood, but tariffs are a significant barrier.

Table 10. Estimated Alaska Exports of Seafood Products to China, 2020-2024

Year	\$Millions	Metric Tons
2020	\$521M	257,191
2021	\$557M	247,752
2022	\$604M	246,324
2023	\$571M	244,872
2024	\$562M	252,792
Average	\$563M	249,786

Source: National Marine Fisheries Service, McKinley Research Group estimate of Alaska portion of U.S. exports

TARIFF RATES

Prior to the U.S.-China trade conflict that began in 2018, U.S. seafood imports were subject to higher tariffs than countries with free-trade agreements with China – most notably Chile and Iceland. U.S. seafood imports faced similar tariffs as other top seafood producers that lack free trade agreements, including Russia and Norway.

China's import tariffs on U.S. goods have increased significantly over several rounds since 2018. Current Chinese tariffs on U.S. seafood imports are as high as 57% (with some exclusions described below), compared to 2%-7% on competing products from Russia and Norway.

China imposed 30% retaliatory tariffs as part of the first phase of the trade conflict in 2018 and 2019. In March 2025, China announced an additional 10% in tariffs in retaliation for new U.S. tariffs on goods imported from China under the International Emergency Economic Powers Act. In April 2025, China added more than 100% in additional tariffs in response to U.S. tariff increases. However, these additional tariffs were lowered to 10% under a 90-day pause announced in May 2025. This pause is set to expire on August 12, 2025, and is the subject of ongoing negotiations.

Table 11. Timeline of Imposition of Recent “Punitive” Chinese Tariffs Imposed on Imports of U.S. Seafood

Date Imposed	Over multiple rounds 2018-219	March 2025	April 2025
Explanation	Retaliation for U.S. “Section 301” tariffs (unfair trade practices)	Retaliation for U.S. International Emergency Economic Powers Act tariff (aka “fentanyl tariff”)	Retaliation for U.S. retaliatory tariffs based on reducing the U.S. trade deficit
Tax Percentage	30%	10%	10%, increases to 125% on August 12
Exemptions and Exclusions	Does not apply to re-export/reprocessing; case-by case exemptions for domestic market imports	Does not apply to re-export/reprocessing	Does not apply to re-export/reprocessing

Source: ASMI China program

EXCEPTIONS AND EXCLUSIONS

China has historically not imposed tariffs on seafood imports for the reprocessing and re-export sector and, as of June 2025, continues to not apply tariffs to these products.

Exclusions to the 30% import tariffs imposed before 2025 are available for seafood imports intended for the domestic Chinese market. Industry interviews indicate exclusions are most often granted to importers with established business patterns that pre-date the tariff increases. Decisions about exclusions are made on a shipment-by-shipment basis.

There are no exclusions for the 20% in additional tariffs China imposed in 2025 beyond the exemptions on products intended for the reprocessing and re-export market.

Table 12. China Seafood Import Tariffs on Major Trade Partners, Products Ranked by Value of Chinese Imports from U.S., 2020-2023 Average

HS Code	Imports from U.S.	Simple Description*	Alaska Seafood Product	Tariff Rate on Imports From:			
				U.S.**	Russia	Norway	Chile
03033900	\$184 M	H&G flatfish	Y	27-57%	7%	7%	0%
03031200	\$168 M	H&G Pacific salmon***	Y	27-57%	7%	7%	0%
23012010	\$161 M	Fish meal	Y	22-52%	2%	2%	0%
03063290	\$134 M	Live lobsters	N				
03079190	\$107 M	Fresh/live mollusks****	Y	27-57%	7%	7%	0%
03038990	\$104 M	Nonspecified H&G	Y	25-55%	5%	5%	0%
03074310	\$97 M	Squid (named species)	N				
03036300	\$83 M	H&G cod	Y	25-55%	5%	5%	0%
03063190	\$76 M	Live rock lobster/crayfish	N				
03063399	\$70 M	Live crab	Y	27-57%	7%	7%	0%
03036700	\$44 M	H&G Alaska pollock	Y	25-55%	5%	5%	0%
03031100	\$27 M	H&G sockeye salmon	Y	27-57%	7%	7%	0%
03049400	\$25 M	Alaska pollock surimi	Y	27-57%	7%	7%	0%
03074390	\$22 M	Other squid	N				
03061490	\$18 M	Frozen crab	Y	25-55%	5%	5%	0%
03035100	\$15 M	Frozen herring	Y	25-55%	5%	5%	0%
03047500	\$13 M	Alaska pollock fillets	Y	27-57%	7%	7%	0%
03063610	\$11 M	Shrimp	N				
03039100	\$10 M	Fish livers, roes, & milt	Y	27-57%	7%	7%	0%
03049500	\$5 M	Non-pollock whitefish meat	Y	27-57%	7%	7%	0%
03033110	\$4 M	H&G Greenland halibut	Y	25-55%	5%	5%	0%
16056100	\$4 M	Sea cucumbers	Y	25-55%	5%	5%	0%
All Other Products	\$22 M						
All Seafood Imports from U.S.		\$1,405 M					

Source: Trade Data Monitor and ASMI China program. Compiled by McKinley Research Group

*Simplified HS description for space and clarity. Most top seafood imports are frozen products. Non-fillet imports are generally headed and gutted (H&G) but may include some whole frozen fish.

**Tariffs on U.S. imports are presented as a range. Shipments that qualify for exemptions are subject to the tariff at the lower-end of the range, while those that do not receive exemptions are subject to the maximum. See narrative for more information.

***Excludes sockeye salmon

****This HS code includes geoducks (an Alaska product), as well as significant non-Alaska mollusks such as abalone.

U.S. Imports on U.S.-Origin Seafood Reprocessed in China

This document mainly addresses import tariffs imposed by foreign countries, which influence the costs and competitiveness of Alaska seafood in foreign markets. Import tariffs imposed by the U.S. are also relevant to the cost and competitiveness of Alaska seafood when these tariffs apply to Alaska-origin seafood reprocessed in China and re-imported back into the United States.

As noted above, Chinese import tariffs continue to exempt Alaska seafood for reprocessing and re-export, as of June 2025. U.S. import tariffs were previously not been applied to Alaska seafood processed in China.

However, the new U.S. import tariffs do not exempt U.S. origin seafood processed in China and reimported into the United States. Most directly, U.S. imports of seafood from China are subject to the 20% tariff imposed under the International Emergency Economic Powers Act in January and February. There are currently no exceptions to this tariff for Alaska seafood. In addition, retaliatory tariffs announced with the goal of reducing the U.S. trade deficit currently add an additional 10% tariff on imports from China, a tariff that is currently scheduled to balloon to 125% on August 12, 2025 if an agreement is not reached. Importers are able to reduce the effective rate of this particular tariff by applying the tariff rate only to the value added by Chinese processors (subtracting out the value of the U.S.-origin raw material). Finally, tariff exclusions for some reprocessed Alaska origin seafood products including flatfish fillets are scheduled to expire in August 2025, which would add another 25% tariff for these products.

Table 13. Summary of U.S. Import Tariffs Applicable to U.S.-Origin Seafood Reprocessed in China and Re-Exported to the U.S.

Name of Tariff	Most Favored Nation Tariff Rate	IEEPA "Fentanyl Tariff"	Reciprocal Tariff	Section 301 Tariff
Type of Tariff	Base rate charged to most countries	Invoked using the International Emergency Economic Powers Act	Based on goal of reducing trade deficits	Invoked in 2018. Based on presidential authority to respond to unfair trade practices
Tax Percentage	Varies by Product	20%	10%, increases to 125% on August 12	25%
Exemptions and Exclusions	N/A	None	Tariff only applies to value added part of Alaska seafood processed in China.	Most Alaska products not included. An exemption for some affected products including flatfish fillets was recently extended and expires August 31.

Source: At-sea Processors Association

Appendix A: Japanese Import Quotas

ASMI Overseas Marketing Representative Akiko Yakata provided the following summary of Japan's Import Quota System.

The Japanese Import Quota (IQ) system for seafood products is a trade management measure established under the "Import Trade Control Order". This system sets import limits for specific seafood products to complement domestic resource management efforts.

- Purpose: The system aims "to support domestic resource management by controlling the import volume of certain seafood products." (*However, this purpose has largely become symbolic. Due to vulnerabilities in resource management, delays in reforms, and factors like climate change, the volume of seafood caught in Japanese coastal waters continues to decline significantly. As a result, this system is widely considered "nonsense" by many within the industry.)
- Applicable Products: Currently, 18 fishery products (categories) are subject to import quotas, including horse mackerel, sardines, (pacific) mackerel, **pollock, cod, cod roe and pollock roe**, squid, dried squid, **herring**, kelp, kelp preparations, scallops, dried seaweed (nori), unsweetened seasoned seaweed (nori), seaweed preparations, dried green laver (Ulva), and yellowtail & Pacific saury & scallop adductor muscles & and dried sardines, and yellowtail & Pacific saury & scallop adductor muscles & and dried sardines from South Korea.
- Import Approval: Importers must obtain an import quota allocation and an import approval certificate from the Ministry of Economy, Trade and Industry (METI) before importing these products.
- Application Process:
 - 1.) Import Announcements: METI issues annual import announcements for each product, detailing import limits, application periods, and eligibility criteria. Importers should review these announcements to understand the specific requirements.
 - 2.) Application Submission: Applications must be submitted within the specified period, and late submissions or those from ineligible applicants will not be accepted.

There are six allocation categories for the IQ system:

- 1) Performance-Based Allocation (Trading Company Allocation): Allocations are granted to entities with a stable import track record of the specific IQ items. Distribution is based on the previous year's import performance, with a penalty for failing to utilize at least 80% of the allocated quota, resulting in loss of eligibility.
- 2) Additional Performance-Based Allocation (Trading Company Allocation A2): This method applies to entities that have utilized a certain percentage of their current or previous year's first-come, first-served allocation, or a certain percentage of their current year's trading company allocation.
- 3) First-Come, First-Served Allocation: Designed for new entrants with prior import customs clearance experience in food products. Entities must utilize at least 80% of their allocation to maintain eligibility, with penalties for non-compliance.
- 4) Demand-Based Allocation: This method ensures a stable supply of raw materials to processors. Allocations are made to entities that place orders based on the needs of processing industry members, as indicated by the Director-General of the Fisheries Agency.
- 5) Fishermen's Allocation: Aimed at securing import opportunities for Japanese fishing vessels operating in foreign Exclusive Economic Zones (EEZs). Allocations are granted to entities that place orders through fisheries organizations recognized by the Director-General of the Fisheries Agency.
- 6) Overseas Fisheries Development Allocation: This method supports sustainable overseas fisheries resource development. Allocations are provided to entities recognized by the Director-General of the Fisheries Agency for collaborating with foreign fisheries management organizations to ensure a stable supply to Japan.

Compliance: Importers granted quotas are required to submit monthly import clearance performance reports. Failure to submit these reports may result in ineligibility for future allocations.

Appendix B: Brexit UK/EU Trade

ASMI Overseas Marketing Representative Alexa Tonkovich provided the following summary of UK EU trade policies under Brexit.

EU countries remain the largest supply base for UK imports of seafood. When the UK left the EU, the Trade and Cooperation Agreement reached ensured that there are no import or export duties payable on goods of UK or EU origin traded between the territories. However, the EU and the UK are in separate customs unions which means customs procedures (such as the logging of import and export declarations) are necessary, even if no tariffs are payable.

This, along with health certificates now being required, has made a more level playing field in terms of the bureaucracy involved in shipping to the UK and is resulting in the British market increasingly sourcing from third countries (outside the EU). In addition, Rules of Origin apply and processing of third country fish in the EU may result in a tariff being payable on import into the UK. An increase in freight costs for EU companies post-Brexit has also contributed to the trend. For illustration: UK imports of Chapter 03 products peaked in 2019 at 167,000 metric tons. Preliminary figures for 2024 indicate EU imports into the UK of around 30,000 metric tons.

The UK was party to around 70 trade agreements while a member of the EU. Continuity agreements have formed a bridge to enable arrangements to continue and are in place until such time as a new agreement is completed. As of December 2024, the UK has 39 active free trade agreements covering 102 countries and territories. Five of these are 'new' trade agreements, such as with Australia and New Zealand. The UK and Canada have a continuity agreement. Negotiations on a new trade agreement were suspended in January 2024 over concessions sought by Canada on hormone-free beef.

Trading with Northern Ireland brings a further level of complexity post-Brexit. If product is shipped into Northern Ireland for onward freight to the Republic of Ireland traders must use the Northern Ireland Tariff that is based on EU tariffs. If goods will remain in Northern Ireland the regular UK tariff schedule applies.

Appendix C: More Resources

Tariffs are complex and subject to change. While the tables in this memo provide some broad background as of February 2025, primary sources for each market below provide better up-to-the-moment information.

- European Union: <https://trade.ec.europa.eu/access-to-markets/en/home>
- Japan: <https://www.kanzei.or.jp/statistical/tariff/top/index/e>
- United Kingdom: https://www.trade-tariff.service.gov.uk/find_commodity
- China: <https://online.customs.gov.cn/ociswebserver/pages/jckspsl/index.html>