



ISSF Participating Company Compliance

Audit Checklist

Version 2016/2

Asian Alliance International Company Ltd.

The following information is based on data provided by the company; it has been independently audited for completeness and accuracy
(Pursuant to stated ISSF guidelines):

Final Compliance Report (as of April 26, 2016 for activities in 2015)

General Audit Information

Please verify or complete the information in blue boxes.

Company Name	Asian Alliance International Company Ltd.
Affiliated Company Names	
Company Address	8/8 Moo 2, Rama 2 Road, Banbor, Muang, samutsakorn 74000 Thailand
Contact Information (Name, Phone, Email)	Khun Somsri +66 34-845575-91 somsri.m@asianalliance.co.th
Auditor Name(s)	Chris Spring, Erin Wilson, Phil Bratten, Patricia Bianchi, Jonah van Beijnen
Audit Start Date	January 15, 2016
Audit End Date	March 18, 2016
Time zone(s) for coordinating remote audit conference call	GMT+ 7, Bangkok
Language requirements for remote audit conference call	English

Compliance Snapshot		
Conservation Measure	Current	2014
1.1 RFMO Authorized Vessel Record	MINORr	OK
1.2 RFMO Participation	OK	OK
2.1 Product Traceability	OK	OK
2.2 Quarterly Data Submission to RFMO	MINOR	MINOR
3.1(a) Shark Finning Policy	OK	OK
3.1(b) Prohibition of Transactions with Shark Finning Vessels	MINOR	OK
3.1 (c) Prohibition of Transactions with Companies without a Public Policy	MINOR	OK
3.2 Large-scale Pelagic Driftnets	OK	OK
3.3(a) Full Retention of tunas	MINOR	OK
3.4 Skippers Best Practices	MINOR	OK
4.1 UVI-IMO	OK	MINOR
4.2 Purse Seine Unique Vessel Identifiers	OK	OK
4.3(a) Observer Coverage	OK	OK
4.4(a) Transshipment	OK	OK
5.1 IUU Fishing	OK	OK
5.2 IUU Product Response	MINOR	OK
6.1 Transaction Ban for LPS vessels not Actively Fishing for Tuna on Dec. 31, 2012	OK	OK
6.2(a) 2.a-d and 6.3(a) Requirements for Inclusion in Large-scale Purse Seine Vessels Fishing for Tropical Tunas	N/A	OK
7.1 Registration of Controlled Vessels	MINOR	OK
8.1 Exemption for Very Small Purse Seine Vessels	N/A	OK

Audit purpose	
Audit objective	The purpose of this audit is to validate participating company compliance with all ISSF conservation measures in place for the year of activity being audited.
Audit criteria	The PC compliance audits cover all conservation measures as defined in the ISSF Participating Company Compliance: Audit Policy Document and Standard Operating Procedures, Version 2015/1.
Audit outcomes	The auditing serves as an assessment of conformance by PCs. Any significant gaps in conformance and where corrective actions may be necessary will be specified. Timelines for remediation will be prescribed by MRAG in the audit report, however any sanctions or other actions will be at the discretion of ISSF. Depending on the nature of the non-conformance and the required corrective action, a follow up audit may be required.
Purpose of this document	All auditors will follow this checklist for conducting ISSF PC Compliance audits. The completed and approved copy of this checklist will serve as the audit report for each participating company.
Other relevant documentation	ISSF Participating Company Compliance: Audit Policy Document and Standard Operating Procedures, Version 2015/1

Conformance with ISSF Commitments	
Non-conformances	Non-conformances must be raised against specific ISSF conservation measures. The severity of the non-conformance – and in particular whether this jeopardizes the integrity of the ISSF program – determines which non-conformances are raised.
Grading	MRAG Americas defines audit findings as follows: <ul style="list-style-type: none"> · Conformance - the PC can provide evidence of compliance with a particular

	<p>conservation measure.</p> <ul style="list-style-type: none"> · Observations - the PC is currently in compliance but there is a high risk that non-conformance could occur inadvertently without implementing preventative actions. · Minor Non-conformance – the PC does not comply with a particular conservation measure, but this does not compromise the integrity of the ISSF initiatives. · Major Non-conformance – the PC does not comply with a particular conservation measure and this compromises the integrity of the ISSF initiatives.
MRAG Americas' procedures	<p>MRAG Americas' procedures for handling non-conformances for PCs are as follows:</p> <ul style="list-style-type: none"> · MRAG Americas substantiates conformance through documented evidence. · Where a company cannot provide documented evidence of conformance with a conservation measure, a non-conformance must be issued. · All non-conformances must be graded either major or minor. · In the case of a non-conformance, ISSF may require a Corrective Action Response (CAR). The corrective actions must be in place and evidence of addressing the condition must be supplied to MRAG or ISSF within an agreed timescale or a follow up audit may be required.
Corrective Action Responses (CARs)	<p>To rectify non-conformances, the PC may be given the opportunity to provide a CAR. The nature of the CAR is at the discretion of the PC. MRAG Americas does not advise on what specific corrective action the PC may take, but will assess whether the CAR is expected to address the non-conformance. MRAG Americas will also not provide advice with respect to any sanction that might be applied to a PC resulting from identified non-conformances. Such action will be at the discretion of the ISSF.</p>

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
1.1	Tuna RFMO Authorized Vessel Record	All purchases must be from vessels listed on the authorized vessel record of the RFMO governing the ocean area in which the tuna was caught, at the time of the fishing trip, so long as the vessel is of a size subject to listing in the RFMO authorized vessel record. For any purchases from non-PVR vessels, maintain a system check and approve vessel listing.	All	Auditor reviews company system to ensure that purchases are from properly listed vessels. Traceability exercises, reviewing RFMO vessel records and checking ocean areas where vessels are fishing verifies the system.	Minor	<p>AAI stated that it does not engage in transactions with vessels that are not registered on the RFMO vessel record.</p> <p>Company checked all vessels against RFMO record and PVR.</p> <p>AAI sourced fish from Jih Yu No 212, but this fishing vessel is not registered with the WCPFC.</p> <p>Unable to find evidence of RFMO registration for the following vessels from the traceback Jhi Yu 212, Rasbawati 02</p> <p>Note Marshalls 203 name changed to Micronesia 102</p>	<p>By Q3 2016, AAI will contact the fishing vessel operator and ensure they have the FV registered with the WCPFC</p> <p>Provide evidence of RFMO registration or reasons for being exempt</p>
1.2	RFMO Participation	All purchases must be from vessels flagged to a member or cooperating non-member of RFMO relevant to fishing area.	All	Auditor reviews quarterly data sent by the company to the RFMO to check that all vessels meet this requirement.	OK	<p>All fishing vessels listed on the quarterly RFMO reports were flagged to member countries.</p> <p>Flag form traceback vessels member of relevant RFMO</p>	N/A

2.1	Product Traceability	Demonstrate ability to trace products from can code or sales invoice to vessel and trip.	All	Auditor will review recent mock recalls, if available, and select a sample of can codes or sales invoices by label and destination from which the company will conduct traceability exercises. If the company produces cans from loins, or sells loins as a finished good, these products must be included in the assessment.	OK	The company has a suitable traceability system in place that allows product codes to be traced back to the vessel and vessel trip.	N/A
2.2	Quarterly Data Submission to RFMO	Send information as described in the measure to RFMO scientific bodies for each quarter (Q1-Q3) by the end of the month following each quarter.	All	Auditor checks that information has been sent by companies to RFMO for all purchases.	Minor	<p>Company provided RFMO data however did not provide evidence that data was sent to relevant RFMOs.</p> <p>No evidence of information sent for the following vessels from traceback: Rasbawati 02, Fukuan 707, Fukuan 707, Erroxape, Marshalls 201, Melissa, Queen Mary, American Victory</p>	<p>Company needs to provide evidence of data submission o RFMOs.</p> <p>Provide evidence of data submission for these vessels</p>
3.1(a)	Shark-Finching Policy	Company establishes and publishes policy prohibiting shark finning.	All	Auditor reviews company website for published policy.	OK	http://asianseafoods.co.th/about/group?id=asian_alliance	N/A

3.1(b)	Prohibition of Transactions with Shark-Finching Vessels	Refrain from transactions with vessels that have shark finned within two years of the product purchase date (as found by RFMO or competent national authority)	All	Auditor reviews company system for ensuring no transactions with vessels that practice shark finning. The company system is verified by checking purchases against data gathered throughout the year of RFMO compliance reports, media sources, etc.	Minor	<p>AAI has a Shark Finning Policy that does not endorse the practice of shark finning.</p> <p>The presented Captain statements provide a declaration of no shark finning. However, there is no description of how the company verifies this.</p> <p>No evidence of shark finning was found on traceback vessels.</p>	Develop a system to verify no shark finning (e.g., review of compliance report).
3.1(c)	Prohibition of Transactions with Companies without a Public Policy Prohibiting Shark Finning	No transactions with companies that do not have a public policy prohibiting shark finning. If transactions involve flag states that absolutely prohibit shark finning no policy is required. If flag state allows 5% shark fin retention, the company	All	Auditor reviews company procedure for ensuring that all tuna purchases have come from a company that has a public policy prohibiting shark finning. For flag states that do have an absolute shark finning	Minor	AAI's Shark Finning Policy commits to purchasing from vessel-owned companies that have a published policy prohibiting shark finning on board its vessels.	AAI will obtain supporting documentation that these vessels have an anti-shark finning policies.

		must have a public policy. .		prohibition, auditor will review all publicly available material to ensure no shark finning has taken place. Traceability exercises by transaction or can code to PVR vessels or proof of compliance verifies the system.		However there is no description on how they implement this. Purse seiners Fong Seong 666 & 696 are on the PVR, but Shark finning is listed as pending confirmation Unable to find evidence of public shark finning for Erroxape, and Rasbawati 02 vessels from traceback	
3.2	Large-Scale Pelagic Driftnets Prohibition	No transactions in vessels using large-scale pelagic driftnets.	All	Auditor reviews quarterly report by gear type, and identifies any use of large-scale driftnets. This is done by first identifying vessels using gill nets, then following up on the size of the net. Maximum net size is 2.5 km.	OK	RFMO reports indicate that AAI only sources fish from purse seiners.	N/A
				MRAG reviews RFMO compliance committee reports for any indication of vessels using large-scale pelagic driftnets.	OK	RFMO reports show no evidence of large-scale pelagic driftnets.	N/A
3.3	Full Retention of Tunas	All purse seine caught tuna (skipjack, yellowfin and bigeye) retained onboard, except those unfit for human consumption as defined, or when in the final set of a trip, there is insufficient well space to accommodate all fish	All Purse Seine	Verify that the company sources tuna from vessels that practice full retention of tunas. Auditor checks PVR. For vessels not listed on the PVR, company provides evidence of vessel policy or RFMO requirement	Minor	Effective Q3 2015, all fishing vessels from which Asian Alliance sources fish are on the PVR and full retention is documented. The following vessels from traceback is not	Provide evidence of full tuna retention policy for these vessels

		caught in that set. If the vessel fishes in areas where full retention is mandatory, no further policy is needed. If RFMO does not require full retention, vessel must have documented and implemented policy in accordance with this conservation measure.		regarding full retention of tunas.		registered on PVR and not registered in WCPFC: Rasbawati 02 and Erroxape. Unable to find evidence of full tuna retention policy	
3.4	Skipper Best Practices	Unless exempt per Conservation Measure 8.1, skipper[1] has attended an ISSF Skippers Workshop in person, has viewed the Skippers Workshop video online, or has reviewed the Skippers Guidebook. The workshop video is located at this link . The online guidebook is located at www.issfguidebooks.org .	All Purse Seine	Verify that the company has purchased tuna only from vessels with skippers that have completed ISSF best practices education. Auditor checks PVR and ISSF has a list of individuals who have attended Skippers Workshops or have certified that they read the online Skippers Guidebook or viewed the online Skippers Workshop video; or the PC may provide evidence of skipper review of guidebook, video, including list of skippers, method of review and dates of completion.	OK Minor	Effective Q3 2015 all fishing vessels from which Asian Alliance sources fish are on the PVR and skipper training is confirmed. Fong Seong 666 & 696 are on the PVR, but Skipper Education is shown as pending verification. The following vessels from traceback is not registered on PVR Rasbawati 02 and Erroxape. Unable to find evidence of skipper training	N/A AAI will obtain supporting documentation showing completion of Skipper Training for these vessels.
4.1	Unique Vessel Identifiers - IMO	All purchases must be from vessels with an IMO UVI number if the vessel is capable of being registered by IMO.	All	Auditor reviews company system to ensure vessel purchases meet this criteria. A sample of non-PVR purchases will be reviewed to assess	OK	Company checks all vessel IMOs and UVIs against the PVR database and through the Captain statements. If the vessel is ineligible due to size, the vessel	N/A

				whether the company system is adequate to ensure that non-PVR vessels meet this requirement.		must obtain a UVI from ISSF. All fishing vessels from which Asian Alliance sourced fish were purse seiners and all had IMO numbers.	
4.2	Purse Seine Unique Vessel Identifiers	All purse seine vessels with which the company transacts in tuna, and which are not able to receive an IMO UVI number, must have a TUVI issued by CLAV http://www.tuna-org.org/GlobalTVR.htm or ISSF http://iss-foundation.org/download-monitor-demo/download-info/uvi-and-imo-number-instructions/ unless exempt per Conservation Measure 8.1.	All Purse Seine	Auditor reviews company method to ensure that all vessel purchases meet this criteria. A sample of non-PVR purchases will be reviewed to assess whether the company system is adequate to ensure that non-PVR vessels also meet this requirement.	OK OK	Company checks that all Captain statements include an IMO and/or UVI number. All fishing vessels from which Asian Alliance sourced fish were purse seiners and all had IMO numbers. All vessels from traceback have IMO or pole and line	
4.3(a)	Observer Coverage	Evidence of 100% observer coverage (human or electronic) unless exempt or prevented by force majeure. The data collected by the observer must be made available to the flag state authorities and, if appropriate, to the RFMO, in the format required by the flag state (and RFMO). In case the	Large Purse Seine	Auditor assesses company system for observer coverage of controlled vessels, company data submission to RFMOs and RFMO committee meetings and compliance reports, etc. For non-PVR vessel purchases, the PC provides details of	OK	Company stated that it will not engage in transactions with vessels that are not registered with the RFMO vessel record. Auditor reviewed large scale purse seiners in the RFMO reports. They were all on the PVR and Observer	N/A

		flag state (or RFMO) does not accept the data, the vessel owner must store data for at least three years from the end of the trip. At a minimum, data to be made available are those fields required by the flag state for vessel logbooks.		agreement with observer provider (human or electronic) for 100% coverage. If RFMO requires 100% observer coverage, no further evidence is required.		coverage was checked. Traceback	
4.3(b)	Observer Coverage Exemption - WCPO Region	Exemptions may be made for large-scale purse seine vessels in the Western and Central Pacific Ocean fishing in latitudes higher than 20°N/S in cases where the catch (retained and discarded; target and non-target) is adequately sampled and reported to the RFMO. Such exemptions shall be based on a detailed report that will be reviewed and approved by the ISSF Board and announced publicly through the ISSF website.	Large Purse Seine	The auditor will review evidence that the vessel meets the requirements for this exemption.		N/A	N/A
4.3(b)(i)	Observer Coverage Exemption – New Zealand Flag Purse Seine Vessels	An exemption is granted for tuna caught by New Zealand flag purse seine vessels that operate only within New Zealand waters targeting free school skipjack during the summer season	Large Purse Seine	The auditor will review evidence that the vessel meets the requirements for this exemption.		N/A	N/A
4.4(a)	Transshipments	No transactions in tuna where transportation included transshipment, except when exempt per	All Purse Seine	Auditor reviews data submission for relevant RFMO, transshipment documents and RFMO	OK	Reviewed a sample of transshipments and Asian Alliance provided documents supporting	N/A

		Conservation Measure 4.4 (b)(i) or Conservation Measure 8.1.		compliance committee and commission reports to verify that tuna purchased has not undergone unauthorized transshipment.		the transshipment as recorded on the quarterly RFMO Reports.	
4.4(b)(i)	Transshipment Exemption – Papua New Guinea	No transactions in vessels that transship unless they have been granted an exemption under this clause (fishing only in the archipelagic waters of PNG; and that are based in PNG and are associated with processing facilities in PNG).	Large Purse Seine	During the traceability exercise, the auditor reviews any instance of transshipment to assess whether the exemption applies.		N/A	N/A
5.1	Illegal, Unreported and Unregulated (IUU) Fishing	No transactions with vessels on any tuna RFMO IUU vessel list.	All	Auditor checks quarterly data sent by the company to the RFMO for the presence of IUU listed vessels.	OK	Reviewed the WCPFC IUU vessel list and confirmed that none of the IUU vessels were reported in AAI's RFMO reports.	N/A
				The auditor reviews the company purchasing system to prevent IUU fish. This will also be assessed during traceability exercises to verify that products do not originate from IUU vessels and by reviewing compliance committee reports, commission reports, etc.	OK	As included in a letter from the company "Company has a policy not to purchase RM(fish) from IUU fishing vessel in compliance with Thailand DOF law and ISSF/EU regulation. Company verify or check EU fishing vessels approved list from web site; http://ec.europa.eu/fisheries/cfp/illegal_fishing/info/index_en.htm https://webgate.ec.eu	N/A

						opa.eu/sanco/traces/output/non_eu_listsPerCountry_en.htm Company verify or check IUU fishing vessels approved list website; http://iuu-vessels.org/iuu/iuu/search	
5.2	Illegal, Unreported and Unregulated (IUU) Product Response	No IUU purchases. If IUU found, company must withdraw these products from the marketplace.	All	Auditor reviews company recall procedure for presence of IUU policy, then reviews company purchases and compares to RFMO IUU lists.	Minor	See above procedure which company uses to identify IUU. However there is no evidence of what the company does if fish is found to come from IUU vessels.	Develop a system to withdraw products if IUU is detected.
				Company initiates market withdrawal of IUU products.	OK	No recalls due to IUU have occurred.	
6.1	Transaction Ban for Large-Scale Purse-Seine Vessels not Actively Fishing for Tuna as of December 31, 2012	Demonstrate that all purchases from large-scale purse seine vessels are from vessels actively fishing for tuna as of December 31, 2012 and listed on the ISSF Record of Large-Scale Purse Seine Vessels (Record). If a vessel is not listed on the Record, the company shall provide evidence of the vessel attributes in accordance with Conservation Measure 6.2 (a). Any updates to the Record must be made in accordance with 6.2(a).	Large Purse Seine	The auditor reviews a list of company purchases from large-scale purse seine vessels to assess whether the source vessels are listed on the ISSF Record of Large-Scale Purse Seine Vessels. If source vessels do not appear in the Record, the company must provide evidence in accordance with Conservation Measure 6.2(a) as described below.	OK	Reviewed large scale purse seiners reported on the RFMO report and all were found listed on the ISSF large scale purse seiner database.	N/A
6.2(a).2.a	Requirements for Inclusion in Record of Large-Scale Purse	Provide certification from government body that	Large Purse	ISSF reviews evidence provided by vessel	N/A	N/A	N/A

	Seine Vessels Fishing For Tropical Tunas	vessel was licensed to fish for tuna before December 31, 2012.	Seine	owner to determine whether vessel is eligible to be listed in the ISSF Record.			
CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
6.2(a).2.b	Requirements for Inclusion in Record of Large-Scale Purse Seine Vessels Fishing For Tropical Tunas	To demonstrate that the vessel was contracted for construction before 12/31/12, the vessel representative may provide such evidence as a signed contract, supporting correspondence, deposit paid, plans, photos, etc., certificate from IACS member, IMO number or RFMO record. To demonstrate that construction was completed before 6/30/15, the vessel may provide such evidence as completion of sea trial, certificate from shipyard, sale of fish, skippers log, observer report, etc., certificate from government agency.	Large Purse Seine	MRAG reviews evidence provided by company to determine whether vessel is eligible to be listed in the ISSF Record.	N/A	N/A	N/A
6.2(a).2.c	Requirements for Inclusion in Record of Large-Scale Purse Seine Vessels Fishing For Tropical Tunas	Vessel provides update regarding name, flag or registration number.	Large Purse Seine	ISSF reviews evidence provided by vessel owner to determine whether vessel is eligible to be listed in the ISSF Record.	N/A	N/A	N/A
6.2(a).2.d	Requirements for Inclusion in	If vessel replacement is	Large	MRAG reviews evidence	N/A	N/A	N/A

	Record of Large-Scale Purse Seine Vessels Fishing For Tropical Tunas	one to one, the well volume of the new vessel must be less than or equal to the well volume of the vessel being removed. If a new vessel is intended to replace multiple vessels listed in the ISSF Record, the aggregated replaced capacity of more than one vessel already on the ISSF Record must be at least 1.2 times the new capacity (aggregated replaced capacity/1.2 = permitted new capacity).	Purse Seine	provided by vessel owner to determine whether vessel is eligible to be listed in the ISSF Record.			
6.2(a).3	Requirements for Inclusion in Record of Large-Scale Purse Seine Vessels Fishing For Tropical Tunas	If a vessel on the ISSF Record is to be refurbished, the new fish hold volume must show that the aggregated replaced capacity is at least 1.2 times the capacity of the vessel before refurbishment ((original vessel capacity + replaced capacity)/1.2 = refurbished capacity).	Large Purse Seine	MRAG reviews evidence provided by company to determine whether vessel is eligible to be listed in the ISSF Record.	N/A	N/A	N/A
7.1	Registration of Controlled Vessels	Register all controlled purse seine vessels on the PVR.	All Purse Seine	Auditor will obtain list of controlled vessels from company and compare to PVR. Information may also come from industry and media sources.	Minor	From list of vessels provided by the company, the following were NOT on the PVR: Dhonis, Eastern Star, Taumoana, Jin Yu 812, Fair Winner 707, Cape Horn, Taiyo Maru	Review definition of controlled vessels or provide evidence that vessel has been added to PVR or has begun the application process.

8.1	Exemption for Very Small Purse Seine Vessels	Very small purse seine vessels are exempted from the following ISSF Conservation Measures: 3.4 Skipper Best Practices 4.2 Purse Seine Unique Vessel Identifiers 4.4(a) Transshipment	Small Purse Seine	The company can demonstrate that the vessel is less than 30 GT by providing fishing licenses, vessel surveys, photos, etc.	N/A	N/A	None
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