



**ISSF Participating Company Compliance
Audit Checklist**
Version 2016/2

Atunes Y Lomos, S.L. (Atunlo)

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

Company Name	Atunes Y Lomos, S.L. (Atunlo)
Affiliated Company Names	
Company Address	Coruña 24, 1° A Aptdo. 5.273 36208 Vigo Spain
Contact Information (Name, Phone, Email)	Alberto Gros, CEO +34 986 203617 logistica3@copersl.com
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	Spain
Language requirements for remote audit conference call	Spanish/English

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

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.	Ok	<p>Company has a form for suppliers to complete that includes a information of RFMO registration.</p> <p>With all purchases Atunlo requests to the supplier the annex of the purchase signed and stamped that contains information of RFMO</p> <p>All vessels from traceback were listed on PVR</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	All vessels from traceback were listed on PVR	
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	OK	The company has a reasonable traceability system in place that allows product codes to	

				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.		be linked back to the vessel and vessel trip.	
CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
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.	Major	Sent one report in for audit request, but no evidence any RFMO data was sent to relevant RFMOs	Starting in Q1 for 2016, company needs to send RFMO data to relevant RFMOs in accordance to ISSF's timeline requirements and copy the following address for each submission: rfmodata@iss-foundation.org
3.1(a)	Shark-Finny Policy	Company establishes and publishes policy prohibiting shark finning.	All	Auditor reviews company website for published policy.	Ok	http://copersl.com/?page_id=8	

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.	Ok	<p>Company has a system to ensure no transaction with vessels that practice shark finning. With all purchases Atunlo requests to the supplier the annex of the purchase signed and stamped where suppliers confirm they have not been engaged in shark finning.</p> <p>All vessels from traceback are listed on PVR</p>	
CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
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 must have a public policy.	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 prohibition, auditor will review all publicly	Ok	With all purchases Atunlo requests to the supplier the annex of the purchase signed and stamped. New suppliers has to fill the questionnaire that includes a question whether or not the company has a public shark finning policy.	

				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.		Shark finning policy has been submitted for company suppliers. All vessels from traceback are listed on PVR	
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	No use of large-scale pelagic driftnets in RFMO data All vessels from traceback are listed on PVR	
				MRAG reviews RFMO compliance committee reports for any indication of vessels using large-scale pelagic driftnets.	Ok	No use of large-scale pelagic driftnets in Commission reports	
CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
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 caught in that set. If the vessel fishes in areas where full retention is mandatory, no further	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 regarding full retention of tunas.	OK	Company provided full tuna retention statements for some companies. In some cases company policies were submitted in others just a statement that the company commits with all ISSF CM including full tuna retention.	
					Minor	The vessel Agnes 1 listed	Submit evidence

		policy is needed. If RFMO does not require full retention, vessel must have documented and implemented policy in accordance with this conservation measure.				on PVR has red cross (non compliance) for full tuna retention. All vessels from traceback are listed on PVR	of full tuna retention policy for this vessel.
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 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.	Major	Several purse seine vessels that are not listed on PVR need further evidence of skipper training: Drago, IMO#7707073; Belouga, IMO#7360320; Ginno D, IMO#7383700; Juan Ramon Egana/Pont Saint Louis, IMO#8222422; Erroxape, IMO#7413816; Eileen, IMO#7201146; Cape Blanco, IMO#8886618; Barbara H, IMO#8886498; Ferrigno Boy, IMO#7940376; Hayabussa Maru 75, IMO#9234173; in addition to the several purse seiners listed without UVI/IMO#: VESSELS ZHEDIYU13127; ZHEDIYU12871; ANITAJAYA XII; ANEUKMEUTUAH; REDJEKIO7; MALAUGIS 01; WARNOW CHIEF AND RESTY B.T ARE NOT LISTED WITH AN IMO#, UVI, OR TUVI.	Company needs to submit evidence of all purse seine vessels that are not on the PVR.

						<p>The vessel Agnes 1 listed on PVR has red cross (non compliance) for skipper education .</p> <p>All vessels from traceback were listed on PVR</p>	Company needs to submit evidence for Agnes 1.
CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
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 whether the company system is adequate to ensure that non-PVR vessels meet this requirement.	<p>Ok</p> <p>Minor</p>	<p>Company has an adequate system to ensure all purchases come from vessels with IMO number if applicable. Company requests to the supplier the annex of the purchase signed and stamped that requires all suppliers to have UVI number. The new suppliers has to fill the questionnaire with questions that include IMO number.</p> <p>VESSELS ZHEDIYU13127; ZHEDIYU12871; ANITAJAYA XII; ANEUKMEUTUAH; REDJEKIO7; MALAUGIS 01; WARNOW CHIEF AND RESTY B.T ARE NOT LISTED WITH AN IMO#, UVI, OR TUVI.</p>	COMPANY NEEDS TO EXPLAIN LACK OF VESSEL IDENTIFIERS

						All vessels from traceback were listed on PVR and have IMO	
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-im o-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	Company has a system to ensure all purchases come from vessels with IMO number. Company requests to the supplier the annex of the purchase signed and stamped that requires all suppliers to have UVI number. The new suppliers have to fill the questionnaire with questions that include having an IMO UVI number.	
					Minor	Vessels: ZHEDIYU13127; ZHEDIYU12871; ANITAJAYA XII; ANEUKMEUTUAH; REDJEK107; MALAUGIS 01; WARNOW CHIEF and RESTY B.T are not listed with an IMO #, UVI or TUVI All vessels from traceback were listed on PVR	Please explain why these vessels do not have a unique vessel identifier
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	Large Purse Seine	Auditor assesses company system for observer coverage of controlled vessels, company data submission to RFMOs and RFMO committee	Minor	Company requests to the supplier the annex of the purchase signed and stamped that vessels comply with 100 % observer coverage. New suppliers also have	Please clarify if and how this information is verified

		the flag state authorities and, if appropriate, to the RFMO, in the format required by the flag state (and RFMO). In case the 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.		meetings and compliance reports, etc. For non-PVR vessel purchases, the PC provides details of agreement with observer provider (human or electronic) for 100% coverage. If RFMO requires 100% observer coverage, no further evidence is required.		to complete a questionnaire. It is not clear how they verify this. Vessel from PVR Agnes 1 has a no conformity on this CM. No evidence of observer coverage was found for non PVR vessels. All vessels from traceback were listed on PVR	Company needs to submit evidence of 100% obs coverage for all non PVR vessels and vessel Agnes 1 that has no conformity in this CM
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	Large Purse Seine	The auditor will review evidence that the vessel meets the requirements	N/A	N/A	

		vessels that operate only within New Zealand waters targeting free school skipjack during the summer season		for this exemption.			
CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
4.4(a)	Transshipments	No transactions in tuna where transportation included transshipment, except when exempt per Conservation Measure 4.4 (b)(i) or Conservation Measure 8.1.	All Purse Seine	Auditor reviews data submission for relevant RFMO, transshipment documents and RFMO compliance committee and commission reports to verify that tuna purchased has not undergone unauthorized transshipment.	Ok	To be addressed in remediation period CC reports indicate no unauthorized transshipments	
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	
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	No vessels in company data are on IUU lists All vessels from traceback were listed on PVR	
				The auditor reviews the company purchasing system to prevent IUU fish. This will also be assessed during	Obs	Company requests to the supplier the annex of the purchase signed and stamped that state no transaction with	Please clarify if and how system verifies IUU statement (e.g, by reviewing RFMO

				traceability exercises to verify that products do not originate from IUU vessels and by reviewing compliance committee reports, commission reports, etc.		companies with vessels involved listed in RFMO IUU list. New suppliers also have to complete a questionnaire which include question about IUU internal policy. It is not clear whether the company verifies this information against RFMO IUU vessels list	blacklists)
CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
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.	Ok	Company has a documented procedure to identify risk and withdrawal product if there is a non conformity. See documented procedure attached (PLAN DE CONTROL DE SEGURIDAD DE MATERIAS PRIMAS)	
				Company initiates market withdrawal of IUU products.		N/A	
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	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	Obs	JUAN RAMON EGAÑA, IMO# 8222422, is listed on the LPS record as 'PONT SAINT LOUIS'; HAYABUSA MARU 75, IMO# 9234173, is listed as 'TAIYO WAAB'; All vessels from traceback were listed on PVR	Please verify the correct name and IMO for these vessels

		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).		Record, the company must provide evidence in accordance with Conservation Measure 6.2(a) as described below.			
6.2(a).2.a	Requirements for Inclusion in Record of Large-Scale Purse Seine Vessels Fishing For Tropical Tunas	Provide certification from government body that vessel was licensed to fish for tuna before December 31, 2012.	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	
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	Large Purse Seine	MRAG reviews evidence provided by company to determine whether vessel is eligible to be listed in the ISSF Record.		N/A	

		government agency.					
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	
6.2(a).2.d	Requirements for Inclusion in Record of Large-Scale Purse Seine Vessels Fishing For Tropical Tunas	If vessel replacement is 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).	Large Purse Seine	MRAG reviews evidence provided by vessel owner to determine whether vessel is eligible to be listed in the ISSF Record.		N/A	
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	

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.	OK	Company has no controlled vessels	
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	