



## **ISSF Participating Company Compliance**

### **Audit Checklist**

Version 2016/2

## **Celebes Canning**

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 15 March 2017, for activities in 2016)**

## General Audit Information

Please verify or complete the information in blue boxes.

|  |   |
|--|---|
| Company Name   | Celebes   |
| Affiliated Company Names                                   | Celebes Canning Corporation   |
| Company Address  | Bo. Cabu, Tambler, General Santos City<br>9500 Philippines  |
| Contact Information<br>(Name, Phone, Email)                | Vivian Co<br><a href="mailto:vcsazon@celebescanning.com.p">vcsazon@celebescanning.com.p</a><br><br>Virginia Acain<br><a href="mailto:virginia_acainb@yahoo.com.ph">virginia_acainb@yahoo.com.ph</a> |
| Auditor Name(s)  | Chris Spring, Erin Wilson, Phil Bratten, Patricia Bianchi, Jonah van Beijnen  |
| Audit Start Date   | Week of 14 November, 2016   |
| Audit End Date   | <b>Preliminary audit results issued: Week of 30 January, 2017</b><br><b>Final audit results issued: Week of 13 March, 2017</b>  |
| Time zone(s) for coordinating remote audit conference call | Philippines   |
| Language requirements for remote audit conference call     | English   |

| Conservation Measure  | Current | 2015 Update | 2015  |
|---|---------|-------------|-------|
| 1.1 RFMO Authorized Vessel Record   | OK      | OK          | MINOR |
| 1.2 RFMO Participation  | OK      | OK          | OK    |
| 2.1 Product Traceability  | OK      | OK          | OBS   |
| 2.2 Quarterly Data Submission to RFMO   | OK      | MINOR       | MAJOR |
| 3.1(a) Shark Finning Policy   | OK      | OK          | OK    |
| 3.1(b) Prohibition of Transactions with Shark Finning Vessels                         | OK      | OK          | OK    |
| 3.1 (c) Prohibition of Transactions with Companies without a Public Policy            | OK      | OBS         | MINOR |
| 3.2 Large-scale Pelagic Driftnets   | OK      | OBS         | OBS   |
| 3.3 Full Retention of tunas   | OK      | MINOR       | MINOR |
| 3.4 Skippers Best Practices   | MAJOR   | OBS         | MINOR |
| 4.1 UVI-IMO   | OK      | OBS         | MAJOR |
| 4.2 Purse Seine Unique Vessel Identifiers   | OK      | OBS         | MINOR |
| 4.3 Observer Coverage   | OK      | OBS         | MINOR |
| 4.4 Transshipment   | OK      | OBS         | OBS   |
| 5.1 IUU Fishing   | OK      | OBS         | OBS   |
| 5.2 IUU Product Response  | OK      | MINOR       | MINOR |
| 6.1 Transaction Ban for LPS vessels not Actively Fishing for Tuna on Dec. 31, 2012    | MAJOR   | OBS         | OBS   |
| 6.2(a) 2.a-d and 6.3(a) Requirements for Inclusion in Large-scale Purse Seine Vessels | N/A     | N/A         | N/A   |
| 7.1 Registration of Controlled Vessels  | N/A     | OK          | MAJOR |
| 7.3 Purchases from PVR Vessels  | MAJOR   |             |       |
| 8.1 Exemption for Very Small Purse Seine Vessels                                      | N/A     | N/A         | N/A   |

| Audit purpose                       |  |
|-------------------------------------|--|
| <b>Audit objective</b>              | 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.   |
| <b>Audit criteria</b>               | The PC compliance audits cover all conservation measures as defined in the ISSF Participating Company Compliance: Audit Policy Document and Standard Operating Procedures, Version 2017/1.   |
| <b>Audit outcomes</b>               | 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. |
| <b>Purpose of this document</b>     | 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.   |
| <b>Other relevant documentation</b> | ISSF Participating Company Compliance: Audit Policy Document and Standard Operating Procedures, Version 2017/1.  |

| Conformance with ISSF Commitments |  |
|-----------------------------------|--|
| <b>Non-conformances</b>           | Non-conformances must be raised against specific ISSF conservation measures. The severity of the non-conformance – and whether this jeopardizes the integrity of the ISSF program – determines which non-conformances are raised.  |
| <b>Grading</b>                    | MRAG Americas defines audit findings as follows: <ul style="list-style-type: none"> <li>· Conformance (Ok) - the PC can provide evidence of compliance with a conservation measure</li> <li>· Observations - the PC is currently in compliance but there is a high risk that non-</li> </ul> |

|   |  |
|---|--|
|   | <p>conformance could occur inadvertently without implementing preventative actions</p> <ul style="list-style-type: none"> <li>· Minor Non-conformance – the PC does not comply with a conservation measure, but this does not compromise the integrity of the ISSF initiatives</li> <li>· Major Non-conformance – the PC does not comply with a conservation measure and this compromises the integrity of the ISSF initiatives</li> </ul>   |
| <b>MRAG Americas' procedures</b>          | <p>MRAG Americas' procedures for handling non-conformances for PCs are as follows:</p> <ul style="list-style-type: none"> <li>· MRAG Americas substantiates conformance through documented evidence.</li> <li>· Where a company cannot provide documented evidence of conformance with a conservation measure, a non-conformance must be issued.</li> <li>· All non-conformances must be graded either major or minor.</li> <li>· 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.</li> </ul> |
| <b>Corrective Action Responses (CARs)</b> | <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    | Celebes has a fish sourcing/purchasing policy that requires suppliers to submit a document proving they are a member of an RFMO. Shipments are validated by the Celebes' Fisheries Department upon arrival.<br><br>Traceability exercise purchases came from vessels either listed on PVR or registered on WCPFC. |                   |
| 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 purchases were from vessels flagged to RFMO member states.  |                   |
| 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 all product codes and produced volumes to be traced back to the vessel and vessel trip.   |                   |

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|--------|-----------------------------------|---|-----------|---|-----------------------|---|-------------------|
| 2.2    | Quarterly Data Submission to RFMO | <p>a. Send information for all round fish purchases (skipjack, albacore, yellowfin, bigeye) as described in the measure to RFMO scientific bodies for each quarter by the last day of the following calendar quarter.</p> <p>b. <a href="#">As described by ISSF</a>, for each quarter, Participating Companies are required to report (no later than the last day of the following calendar quarter) if they have no purchase of round fish (in total or from a typical RFMO region).</p> <p>c. A Participating Company that only purchases loins and finished goods from other ISSF participating companies is exempt from sending RFMO data. However, company must affirm so quarterly via an unprompted email to <a href="mailto:rftodata@iss-foundation.org">rftodata@iss-foundation.org</a></p> | All       | <p>Auditor checks that information has been sent by companies to RFMO for all purchases.</p> <p>Auditor checks if PC has sent quarterly report to MRAG indicating no purchase of round fish. Auditor notes that this requirement did not come into effect until October 2016, therefore if company failed to report no purchases of round fish, this should be noted as an observation.</p> <p>Auditor checks that email has been sent to <a href="mailto:rftodata@iss-foundation.org">rftodata@iss-foundation.org</a> indicating that company only purchases loins and/or finished goods from other ISSF Participating Companies. Here again, requirement came into effect in Oct 2016, thus if company did not send the emails, it should be noted as an observation.</p> | <p>Ok</p> <p>Obs.</p> | <p>Company provided evidence that RFMO reports for Q2 and Q3 of 2016 were submitted on time to RFMO authorities.</p> <p>However, Q4 2015 and Q1 2016 were submitted late. This is noted as an observation rather than a minor, because company has demonstrated progress throughout the audit period, and has been in compliance over the most recent quarters.</p> |                   |
| 3.1(a) | Shark-Fin角度 Policy                | Company establishes and publishes policy prohibiting shark finning.   | All       | Auditor reviews company website for published policy.   | Ok                    | Company provided public policy prohibiting shark finning. Company does not have a website, but policy is posted in company's office, and each supplier is   |                   |

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|--------|--|--|-----------|--|-------|---|-------------------|
|        |  |  |           |  |       | sent a copy of the policy.  |                   |
| 3.1(b) | Prohibition of Transactions with Shark-Finishing 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 outlined that most vessels were listed on PVR, and have a green check under the shark finning CM.</p> <p>For non PVR vessels operating in Philippines EEZ, company indicated that they must be registered with the Bureau of Fisheries and Aquatic Resources [BFAR] and Maritime Industry Authority [Marina]. Philippine Fisheries require that all Philippine registered fishing vessels not engage in shark finning. Copies of official government fishing certificates were provided as evidence.</p> |                   |
| 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 available material to ensure no | Ok    | Company provided evidence of Government policies prohibiting shark finning, and which applies to all Philippines flagged fishing vessels. Company also provided certified captains' statements, stamped by the government, and showing vessel fishing authorizations.   |                   |

| CM  | Category                                  | Category Guidance  | Gear Type       | Means of Verification   | Grade | Evidence   | Corrective Action |
|-----|---|--|-----------------|---|-------|--|-------------------|
|     |   |  |                 | shark finning has taken place. Traceability exercises by transaction or can code to PVR vessels or proof of compliance verifies the system.   |       |  |                   |
| 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 evidence of large-scale pelagic driftnet use in quarterly RFMO reports.                   |                   |
|     |   |  |                 | MRAG reviews RFMO compliance committee reports for any indication of vessels using large-scale pelagic driftnets.   | OK    | No evidence of large-scale pelagic driftnet use in RFMO CC reports.                          |                   |
| 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    | Vessels are either listed on PVR or registered on WCPFC, which requires full tuna retention. |                   |

| CM  | Category                        | Category Guidance   | Gear Type       | Means of Verification   | Grade | Evidence  | Corrective Action |
|-----|---------------------------------|---|-----------------|---|-------|---|-------------------|
|     |                                 | policy is needed. If RFMO does not require full retention, vessel must have documented and implemented policy in accordance with this conservation measure.   |                 |   |       |   |                   |
| 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 <a href="#">link</a> . The online guidebook is located at <a href="http://www.issfguidebooks.org">www.issfguidebooks.org</a> . | 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 | <p>Most vessels are listed on the PVR.</p> <p>However, company sourced from several purse seine vessels not registered on the PVR, and which could not provide evidence of skipper training.</p> <p>In February 2017, company indicated that it would stop sourcing from these vessels unless they joined the PVR, and received a green check for skipper training.</p> |                   |
| 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 criterion. A sample of non-PVR purchases will be reviewed to assess whether the company system is adequate to   | Ok    | Celebes has a fish sourcing/ purchasing policy that requires suppliers to submit a document with IMO number where relevant. Fish supplies are then validated by the Fisheries Department upon arrival.  |                   |

| CM  | Category                              | Category Guidance  | Gear Type       | Means of Verification  | Grade | Evidence  | Corrective Action |
|-----|---------------------------------------|--|-----------------|--|-------|---|-------------------|
|     |                                       |  |                 | ensure that non-PVR vessels meet this requirement.   | Obs.  | A vessel the company sourced from has a GT of 128, and it therefore qualifies for an IMO number. However, at time of sourcing it only had a TUVI. Company indicated that Philippines Authority does not request IMOs for this class vessel. Copies of proper fishing permits were provided for the vessel. // Company understands that vessel qualifies for IMO, and that even though this is not required by the Government, it will ask supplier to apply for and obtain an IMO number. |                   |
| 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 <a href="http://www.tuna-org.org/GlobalTVR.htm">http://www.tuna-org.org/GlobalTVR.htm</a> or ISSF <a href="http://issf-foundation.org/download-monitor-demo/download-info/uvi-and-imo-number-instructions/">http://issf-foundation.org/download-monitor-demo/download-info/uvi-and-imo-number-instructions/</a> unless exempt per Conservation Measure 8.1. | All Purse Seine | Auditor reviews company method to ensure that all vessel purchases meet this criterion. 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    | TUVI was provided for all PS vessels that did not already have an IMO.  |                   |

| CM     | Category                                  | Category Guidance  | Gear Type         | Means of Verification   | Grade | Evidence   | Corrective Action |
|--------|---|--|-------------------|---|-------|--|-------------------|
| 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 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. | 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 agreement with observer provider (human or electronic) for 100% coverage. If RFMO requires 100% observer coverage, no further evidence is required. | Ok    | All large purse seiners are registered on PVR or the WCPFC fishing vessel register, which requires 100% observer coverage for large scale purse seiners. |                   |
| 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 nontarget) 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  | Large Purse Seine | The auditor will review evidence that the vessel meets the requirements for this exemption.   | N/A   |  |                   |

| CM        | Category   | Category Guidance  | Gear Type         | Means of Verification  | Grade | Evidence | Corrective Action |
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|           |  | through the ISSF website.  |                   |  |       |          |                   |
| 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   |          |                   |
| 4.3(c)    | Observer Coverage – Grace Period for Electronic Monitoring Systems for Certain Large-Scale Purse Seine Vessels | <p>ISSF has defined for its Conservation Measures that large-scale purse seine vessels are those with at least 335 m<sup>3</sup> fish hold volume. However, certain vessels who meet this definition are not considered large-scale in certain RFMOs and therefore are unable to obtain human observers for each fishing trip to meet the requirements of ISSF Conservation Measure 4.3(a). Owners of large-scale purse seine vessels who fit in this category may seek to install an electronic monitoring system (if proven to be effective) in lieu of human observers. In such an event, the following provisions apply:</p> <p>1. The vessel owner must</p> | Large Purse Seine | <p>The auditor will review evidence that vessel(s) meets the requirements of this grace period.</p> <p>Evidence can include a successful Level 2 audit of the vessel(s), but if that is not available, the vessel(s) is subject to the following:</p> <p>Auditor requests the name and IMO of the vessel(s), the name of the provider, EM system type, and installation date.</p> <p>Auditor might also request copy of executed services agreement, which clearly states the name and contact information of the provider, copy of receipt for the installation date, and evidence of</p> | N/A   |          |                   |

| CM     | Category       | Category Guidance   | Gear Type             | Means of Verification   | Grade | Evidence  | Corrective Action |
|--------|----------------|---|-----------------------|---|-------|---|-------------------|
|        |                | <p>identify each vessel involved and provide satisfactory evidence of an executed agreement with a service provider to install an electronic monitoring system on each vessel.</p> <p>2. Once such evidence has been determined to be satisfactory, the vessel will be deemed to follow this measure for a period of six (6) months, which will allow appropriate time for installation of and training on the electronic monitoring system.</p> <p>3. The vessel owner must provide satisfactory proof that the equipment has been installed and is operating within that period; if such proof is not provided within grace period, the vessel will return to a non-compliant status with ISSF Conservation Measure 4.3(a).</p> |                       | <p>crew/staff training in operating the EM system.</p> <p>If needed, auditor reviews services agreement with EM provider and physical inspection of EM system aboard vessel to verify that it contains stated attributes.</p> |       |   |                   |
| 4.4(a) | Transshipments | No transactions in tuna where transportation included transshipment, except when exempt per Conservation Measure 4.4  | All<br>Purse<br>Seine | Auditor reviews data submission for relevant RFMO, transshipment documents and RFMO compliance committee  | Ok    | Company provided transshipments coordinates, which qualifies these transactions for the |                   |

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|-----------|---|--|-------------------|---|-------|---|-------------------|
|           |   | (b)(i) or Conservation Measure 8.1.  |                   | and commission reports to verify that tuna purchased has not undergone unauthorized transshipment.  |       | exemption under CM 4.4(b)(i).   |                   |
| 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.  | Ok    | The company has shown significant proof that it has been granted exemption by the PNG authorities.  |                   |
| 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 evidence of IUU fishing on quarterly RFMO reports.   |                   |
|           |   |  |                   | 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    | Company has a sustainability manual to ensure no purchase of IUU fish. The fishing company must provide the company with documentation such as license or operator number issued by the regulatory agency.<br><br>The fish supplies must be validated by the Fisheries Department upon arrival<br>The catch certificate must be validated by the Bureau |                   |

| CM          | Category  | Category Guidance  | Gear Type         | Means of Verification   | Grade | Evidence  | Corrective Action |
|-------------|---|--|-------------------|---|-------|---|-------------------|
|             |   |  |                   |   |       | of Fisheries and Aquatic Resources or an equivalent validating agency of another country.   |                   |
| 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 provided a copy of recall policy which includes recall for IUU fish.  |                   |
|             |   |  |                   | 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 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. | Major | Company sourced product from a large-scale purse seiner not listed on ISSF Record of Large-Scale Purse Seine Vessels.<br><br>In Feb 2017, company informed vessel owner of need to join the PVR, and has stopped purchases until the vessel is properly registered. |                   |
| 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   | Large Purse Seine | ISSF reviews evidence provided by vessel owner to determine whether vessel is eligible  | N/A   |   |                   |

| CM          | Category   | Category Guidance   | Gear Type         | Means of Verification   | Grade | Evidence | Corrective Action |
|-------------|--|---|-------------------|---|-------|----------|-------------------|
|             |  | 31, 2012.   |                   | to be listed in the ISSF Record.  |       |          |                   |
| 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, skipper's 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   |          |                   |
| 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   | Large Purse Seine | MRAG reviews evidence provided by vessel owner to determine whether vessel is eligible to be listed in the ISSF         | N/A   |          |                   |

| CM       | Category   | Category Guidance   | Gear Type         | Means of Verification   | Grade | Evidence | Corrective Action |
|----------|--|---|-------------------|---|-------|----------|-------------------|
|          |  | 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).   |                   | 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   |          |                   |
| 6.2(b)   | Requirements for Inclusion in Record of Large-Scale Purse Seine Vessels Fishing for Tropical Tunas | <p>If a vessel is to be exempt from Conservation Measures 6.1 and 6.2(a), MRAG will review records to establish that the vessel is, in fact, flagged to a PNA member country, and vessel representative will be asked to provide:</p> <p>1) Evidence of current registration on the WCPFC Record of</p> | Large Purse Seine | MRAG reviews online records to verify flag, and evidence provided by vessel owner to determine whether vessel is eligible to be listed in the Record. | N/A   |          |                   |

| CM     | Category   | Category Guidance  | Gear Type         | Means of Verification  | Grade | Evidence | Corrective Action |
|--------|--|--|-------------------|--|-------|----------|-------------------|
|        |  | <p>Fishing Vessels;</p> <p>2) Evidence of current participation in the Vessel Day Scheme (VDS) management system;</p> <p>A statement from the vessel owner or operator that the vessel only fishes within the WCPFC Convention Area.</p>   |                   |  |       |          |                   |
| 6.2(c) | Requirements for Inclusion in Record of Large-Scale Purse Seine Vessels Fishing for Tropical Tunas | <p>If ownership into a new vessel is to be approved, auditor will need to see evidence that owner has bought out and scrapped existing capacity up to the percent of capacity of the new vessel that corresponds to their ownership interest in the new vessel, in accordance with paragraph 2(d) of ISSF Conservation Measure 6.2(a).</p> <p>This can include:</p> <p>1) Sales receipt for the capacity that has been bought out and scrapped, which clearly states Fish Hold Volume figures for said capacity; and</p> <p>2) Evidence that the Fish Hold Volume of the new vessel corresponding to the % ownership stake</p> | Large Purse Seine | MRAG reviews public records as well as evidence provided by vessel owner to determine whether vessel is eligible to be listed in the Record. | N/A   |          |                   |

| CM  | Category                           | Category Guidance  | Gear Type         | Means of Verification  | Grade | Evidence  | Corrective Action |
|-----|------------------------------------|--|-------------------|--|-------|---|-------------------|
|     |                                    | is (i) less than or equal to that of older vessel that was on the ISSF Record, or (ii) than 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). |                   |  |       |   |                   |
| 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.                 | N/A   | No controlled vessels.  |                   |
| 7.3 | Purchases from PVR Vessels         | For fishing trips beginning on or after January 1, 2016, source 100% of skipjack, yellowfin and bigeye tuna caught by large-scale purse seine vessels from vessels registered in the PVR.  | Large Purse Seine | Auditor isolates skipjack, yellowfin and bigeye tuna caught by large-scale purse seiners within the quarterly RFMO data submission and compares trip dates | Major | Company sourced from a large-scale purse seiner not listed on PVR.<br><br>In Feb 2017, company informed vessel owner of need to join the PVR, and |                   |

| CM  | Category                                     | Category Guidance   | Gear Type         | Means of Verification  | Grade | Evidence   | Corrective Action |
|-----|--|---|-------------------|--|-------|--|-------------------|
|     |  |   |                   | and purchase data to PVR listing dates. Supporting documentation may be requested to verify the accuracy of trip dates.    |       | has stopped purchases until the vessel is properly registered.<br><br>All other LPS purchases were from vessels listed on the PVR. |                   |
| 8.1 | Exemption for Very Small Purse Seine Vessels | Very small purse seine vessels are exempted from the following ISSF Conservation Measures:<br>3.4 Skipper Best Practices<br>4.2 Purse Seine Unique Vessel Identifiers<br>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   |  |                   |