



**ISSF ProActive Vessel Register:
Audit Policy Document
&
Standard Operating Procedures**

For

Purse Seine Vessels

March 2018 (Updated September 2018)

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Integrated Management of Natural Resources

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1 Introduction

The ProActive Vessel Register (PVR) of the International Seafood Sustainability Foundation (ISSF) is an innovative and effective way for owners of tuna fishing vessels to identify themselves as active participants in meaningful fishery sustainability efforts. The PVR provides validated information to tuna purchasers and interested stakeholders of the steps each vessel is taking in implementing a series of ISSF conservation measures designed to support responsible tuna fishing practices. The PVR provides information on individual vessel performance against a defined set of conservation measures.

This document describes the protocol for audits of purse seine vessels listed on the PVR to verify information on compliance with current ISSF conservation measures. Tuna fishing vessels with other gear types are covered by separate Audit Policy Documents.

The PVR vessel audits are organized in three levels to ensure the goals of auditing are achieved efficiently and effectively. Level 1 and 2 audits are carried out remotely and level 3 audits are done on-site. All vessels applying to be on the PVR undergo an initial Level 1 audit as part of the listing process. Vessels are also subject to quarterly level 1 audits of skipper best practices and observer coverage and annual level 1 audits to verify vessel attribute data remain current. Levels 2 audits are conducted on an appropriate sample of large-scale purse seine vessels to assist in verifying information provided to show conformance with ISSF conservation measures.

As of September 2018, more than 600 purse seine vessels participate in the PVR program, and this number is anticipated to increase over time as various stakeholders (processors, consumers, supermarkets, the environmental community, governments and RFMOs, etc.) continue to demand responsibly sourced tuna. Per the [PVR Terms and Conditions](#), ISSF covers all Level 1 & 2 auditing costs for large-scale purse seine vessels, while the vessel owner or external funder is responsible for covering costs associated with a red flag Level 3 audit.

For small-scale and very small-scale purse seine vessels, ISSF covers the costs of (i) the initial Level 1 audit necessary for listing of the vessel on the PVR, and (ii) the annual Level 1 audit required to ensure information remains up to date. ISSF does not cover the costs of Level 2 and Level 3 audits. These must be funded by the vessel owner or an external funder. Starting in September 2018, it is mandatory for each vessel on the PVR to be audited at Level 2 at least once every three (3) years. During the first twelve (12) months, vessel owners (or designated representatives) may volunteer their vessel (or fleets). Starting in month 13 (beginning of year 2) onwards, any vessels that have not already received a Level 2 audit will be randomly selected by MRAG Americas. At any time, if a vessel receives a red flag, it must complete an on-site Level 3 audit. Failure to cooperate with the auditor to complete a Level 2 audit when selected may result in a red flag and a mandatory Level 3 audit. New vessels that join in the first half of a 3-year cycle, must be audited during that cycle. New vessels joining in the second half of a 3-year cycle can either volunteer to be audited during that cycle and/or will be audited within the following 3-year cycle, but no later than within the first 18 months of that cycle.

For the purposes of this protocol, “fishing” means:

- (a) searching for, catching, taking or harvesting fish;
- (b) attempting to search for, catch, take or harvest fish;

- (c) engaging in any other activity which can reasonably be expected to result in the locating, catching, taking or harvesting of fish for any purpose;
- (d) placing, searching for or recovering fish aggregating devices or associated electronic equipment such as radio beacons; and any operations at sea directly in support of, or in preparation for, any activity described in subparagraphs (a) to (d), including transshipment.

2 Program implementation

2.1 Audit Strategy

There are three main components to the information to be audited:

- **Threshold Requirement for PVR Listing;**
- **Vessel Attribute Data** submitted as part of a vessel's initial listing on the PVR; and
- **Compliance with ISSF Conservation Measures** by the vessels listed on the PVR.

2.1.1 Threshold Requirement for PVR Listing

There are two main threshold requirements for Purse Seine vessels wishing to appear on the PVR.

- (1) Conservation Measure 7.2, requires that all **large-scale**¹ purse seine vessels are listed on the ISSF Record of Large-Scale Purse Seine Vessels (Record) as a prerequisite for listing on the PVR.
- (2) Conservation Measure 6.2(a) [details in Table 1] requires that the following information is entered in the Record for **all** vessels. Note that vessel information is subject to verification by government agencies, RFMO secretariats, and other relevant agencies.
 - (a) Name
 - (b) Flag
 - (c) IMO number
 - (d) RFMO vessel record number(s)
 - (e) National Registration Number
 - (f) Radio Call Sign
 - (g) Length overall (m)
 - (h) Fish carrying capacity (metric tons)
 - (i) Fish hold volume (m³)
 - (j) Year and month built
 - (k) Shipyard
 - (l) If applicable: Previous name(s) and flag(s); date(s) changed.

Table 1 describes the conditions a large-scale purse seine vessel must meet to be listed on the Record, what information/evidence is required from the vessel owner, and how the audit undertakes verification of that information.

In reviewing Table 1, note that the following rules apply with regards to capacity:

¹ Large-scale purse seine vessels are those with at least 335 m³ fish hold volume.

- If the proposed replacement of an older vessel by a new vessel under 6.2(a)2.d. is one-for-one and the fish hold volume (FHV) of the new vessel is less than the FHV of the older vessel, the remaining sunk or scrapped capacity may be used toward another replacement vessel at any time;
- If the proposed replacement under 6.2(a)2.d. involves a new vessel replacing more than one vessel currently on the Record, any remaining sunk or scrapped capacity may be used toward another replacement vessel at any time;
- The auditor will state in its determination letter the amount of remaining sunk or scrapped capacity;
- ISSF will not create or maintain a permanent "bank" or "credit" of excess capacity. The auditor's determination of remaining capacity will be considered the best evidence in reviewing any future application of that remaining capacity toward the inclusion of a new vessel on the PVR; and
- The burden will remain on the new vessel owner to provide the best evidence of sunk or scrapped capacity to the auditor.

Table 1 Requirements for Inclusion in Record of Large-Scale Purse Seine Vessels Fishing for Tropical Tunas, including ISSF Capacity Measures

Conservation Measure	Category	Text	Guidance - What is Required?	Means of Verification
6.2(a).2.a	Requirements for Inclusion in Record of Large-Scale Purse Seine Vessels Fishing for Tropical Tunas	The addition of a large-scale purse seine vessel that was actively fishing for tuna on or before December 31, 2012 but cannot have ceased fishing operations prior to January 1, 2010 and was not included in the Record initially.	Provide certification from government body that vessel was licensed to fish for tuna before December 31, 2012 or provide proof from ISSF PC that tuna was purchased from the vessel before December 31, 2012. Provide documentation to show that the vessel did not cease fishing operations prior to January 1, 2010.	ISSF reviews evidence provided by vessel owner to determine whether vessel is eligible to be listed in the ISSF Record.
6.2(a).2.b		The addition of a large-scale purse seine vessel that was under contract for construction on or before December 31, 2012 with construction completed by June 30, 2015. "Under contract for construction" means that there is evidence that a valid contractual obligation was in place for the construction of the vessel. "Construction completed" means that the vessel has been delivered and is ready to commence fishing operations.	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.	MRAG reviews evidence provided by vessel owner to determine whether vessel is eligible to be listed in the Record.
6.2(a).2.c		A change in the name, flag, or registration number of a vessel already on the Record.	Vessel provides update regarding name, flag or registration number.	ISSF reviews evidence provided by vessel owner to determine whether vessel is eligible to be listed in the Record.

Conservation Measure	Category	Text	Guidance - What is Required?	Means of Verification
6.2(a).2.d	Requirements for Inclusion in Record of Large-Scale Purse Seine Vessels Fishing for Tropical Tunas.	<p>The addition of a new large-scale purse seine vessel that is built as a replacement for a vessel already on the Record that has sunk, has been scrapped or otherwise permanently transferred out of the tropical tuna fishery. The addition of the new vessel will be permitted only to the extent it replaces one or more older vessels on the ISSF Record and its fish hold volume is less than or equal to the fish hold volume of the older vessel(s) that were on the ISSF Record.</p> <p>The request for the addition of new vessels shall come either from the owner of the older vessel, or from a new owner designated by the owner of the older vessel.</p> <p>Vessels that do not provide verified proof of the existence of a fish hold are not eligible for use as replacement capacity under this subsection.</p> <p>In circumstances where the vessel owner does not provide proof of a fish hold volume (m3), an independent auditor will make a conservative calculation in accordance with then-current ISSF technical papers.</p>	<p>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 fish hold volume of the new vessel must be equal to (or less than) the aggregated fish hold volume of the vessels being replaced. If multiple new vessels are intended to replace one vessel, the combined fish hold volume of the new vessels must be equal to (or less than) the fish hold volume of the vessel being replaced.</p> <p>Replacement request can only come from owner of vessel being replaced, or from the new owner of the vessel (if designated by the old owner).</p> <p>Evidence of Fish Hold Volume (FHV) can comprise:</p> <ul style="list-style-type: none"> - certified vessel plans, with the name of the vessel, hull number, and name and contact information of the builder as well as of the authority(ies) having certified the plans; - national or RFMO fishing license/authorization, which states the name of the vessel, IMO number, FHV, and contains contact information for the licensing authority; 	MRAG reviews evidence provided by vessel owner to determine whether vessel is eligible to be listed in the Record.

Conservation Measure	Category	Text	Guidance - What is Required?	Means of Verification
			<ul style="list-style-type: none"> - certified survey by a member of the International Association of Classification Societies, which states the name of the vessel, IMO number, and contact information for the naval engineer. 	
6.2(a)3.		Vessels on the Record that are refurbished in such a way that their fish hold volume increases will be removed from the Record unless the aggregated replaced capacity is at least 1.0 times the capacity of the vessel before refurbishment.	If a vessel on the ISSF Record is to be refurbished, the new fish hold volume, as a result of refurbishment, must be equal to, or less than, the fish hold volume prior to refurbishment.	MRAG reviews evidence provided by vessel owner to determine whether vessel is eligible to be listed in the Record.
6.2(b)	Special arrangement – PNA	<p>Effective May 5, 2016, ISSF recognizes the commitment of the Parties to the Nauru Agreement (PNA) to the adoption of harvest control rules in the Western Central Pacific Fisheries Commission (WCPFC), their leadership in gaining Marine Stewardship Council (MSC) certification of the free-school skipjack fishery, and the robust monitoring, control and surveillance (MCS) measures that are in place to ensure compliance, such as 100% observer coverage and vessel monitoring systems (VMS).</p> <p>1. Exemptions for compliance with ISSF Conservation Measures 6.1 and 6.2(a) may be made for new large-scale purse seine vessels flagged to member</p>	<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> <ol style="list-style-type: none"> 1) Evidence of current registration on the WCPFC Record of Fishing Vessels; 2) Evidence of current participation in the Vessel Day Scheme (VDS) management system; 3) A statement from the vessel owner or operator that the vessel is only authorized to fish within the WCPFC Convention Area. 	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.

Conservation Measure	Category	Text	Guidance - What is Required?	Means of Verification
		<p>countries of the PNA that meet all of the following conditions:</p> <ul style="list-style-type: none"> i. The vessel is registered in the WCPFC record of authorized fishing vessels. ii. The vessel fishes within the purse seine Vessel Day Scheme (VDS) management system. iii. The vessel is not authorized to fish outside the WCPFC Convention Area. iv. The vessel is registered on the ISSF ProActive Vessel Register (PVR). <p>2. Large-scale purse seine vessels exempted under this measure will be listed on the ISSF Record of Large-Scale Purse Seine Vessels.</p>		
6.2(c)	Investment in Purse Seine Vessels Subject to the PNA Special Arrangement.	Effective May 5, 2016, processors, traders, importers, transporters and others involved in the seafood industry that are investors in any new vessels that meet all of the conditions in ISSF Conservation Measure 6.2(b) above, and are therefore exempted from compliance with ISSF Conservation Measures 6.1 and 6.2(a) above, shall buy out and scrap 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	<p>Vessel representative will be asked to provide:</p> <ol style="list-style-type: none"> 1) Evidence of ownership, such as a signed contract, supporting correspondence, deposit paid, plans, photos, etc. certificate from IACS member, IMO number or RFMO record.; 2) Evidence listing all owners, and which shows the percentage ownership by owner, such as 	MRAG reviews public records as well as evidence provided by vessel owner to determine whether vessel is eligible to be listed in the Record.

Conservation Measure	Category	Text	Guidance - What is Required?	Means of Verification
		<p>paragraph 2(d) of ISSF Conservation Measure 6.2(a).</p> <p>For the purposes of this measure, “new vessels” include vessels owned, partially or fully:</p> <p>(a) directly or indirectly (through intermediary entities) by any ISSF Participating Company or any member of the corporate group of which such Participating Company is a part, or</p> <p>(b) directly or indirectly by any individuals who are majority shareholders (or any equivalent form of ownership) of any ISSF Participating Company. Individuals shall include any natural person and his or her family members (including spouse, domestic partner, child, sibling, parent or grandparent, whether natural, adopted or by marriage).</p>	<p>certificate from government agency, certificate from shipyard, and/or correspondence and MOU with other owner(s);</p> <p>3) Statement by all owners as to whether they own any controlled vessels on the PVR;</p> <p>4) Evidence that existing capacity has been bought out and scrapped, along with Fish Hold Volume figures for said capacity; and</p> <p>5) Evidence that the Fish Hold Volume of the new vessel corresponding to the % ownership stake is less than or equal to that of older vessel that was on the ISSF Record.</p>	
6.2(d)	Investment in purse seine vessels not in compliance with ISSF Conservation Measure 6.1 and 6.2(a)	Effective January 1, 2017, processors, traders, importers, transporters, marketers and others involved in the seafood industry, that are investors in any new vessel that does not meet all of the conditions in ISSF Conservation Measures 6.1 and 6.2(a) shall buy out and scrap existing capacity of large-scale tuna purse seine vessel(s) that corresponds to the full capacity of the new vessel, in accordance with	<p>Vessel representative will be asked to provide:</p> <p>1) Evidence of ownership, such as a signed contract, supporting correspondence, deposit paid, plans, photos, etc., certificate from IACS member, IMO number or RFMO record;</p>	Auditor reviews public records as well as evidence provided by vessel owner to determine whether vessel is eligible to be listed on the Record. Auditor will review evidence the ISSF PC (and its affiliates) or the owner with a controlling interest, has bought out and scrapped existing capacity in accordance with paragraph 2(d) of ISSF Conservation Measure 6.2(a).

Conservation Measure	Category	Text	Guidance - What is Required?	Means of Verification
		<p>Paragraph 2(d) of ISSF Conservation Measure 6.2(a).</p> <ol style="list-style-type: none"> 1. For the purposes of this measure, “new vessels” includes vessels owned, partially or fully: <ol style="list-style-type: none"> a. directly or indirectly (through intermediary entities) by any ISSF Participating Company, which shall mean the ISSA Member and its affiliates, including all commonly controlled business organizations; or b. directly or indirectly by any individuals who hold controlling interests directly or indirectly by any individuals who hold controlling interests in any ISSF Participating Company as defined in section (1) of this Conservation Measure. Individuals shall include any natural person and his or her family members (including spouse, domestic partner, child, sibling, parent or grandparent, whether natural, adopted or by marriage). 2. In auditing this measure, the only possible findings will be either “fully compliant” or “major non-conformance.” 3. For the purposes of this measure, large-scale purse seine vessels are those with at least 335 m³ fish hold volume. 	<ol style="list-style-type: none"> 2) Sales receipt for the capacity that has been bought out and scrapped, which clearly states Fish Hold Volume figures for said capacity; and 3) Evidence that the Fish Hold Volume of the new vessel(s) is less than or equal to that of the vessel(s) being scrapped. 	

Conservation Measure	Category	Text	Guidance - What is Required?	Means of Verification
6.2(e)	Purchases from Purse Seine Vessels in Fleets with Other Vessels Not in Compliance with ISSF Conservation Measures 6.1 and 6.2(a)	<p>Processors, traders, importers, transporters, marketers and others involved in the seafood industry shall refrain from transactions in skipjack, bigeye and yellowfin tuna caught by any and all large-scale purse seine vessels owned by business organizations or individuals that also own large-scale purse seine vessels not in compliance with ISSF Conservation Measures 6.1 and 6.2(a).</p> <p>For the purposes of this measure, “owned” means a registered or controlling (majority) interest in the vessels:</p> <p>(1) directly or indirectly (through intermediary entities) by any business organization or its affiliated business organizations, including commonly controlled organizations, or</p> <p>(2) directly or indirectly by any individuals, including individual ownership of any equity or investment interest in whatever form of any business organization operating, managing, controlling or receiving revenues from a vessel. Individuals shall include any natural person and his or her family members (including spouse, domestic partner, child, sibling, parent or grandparent, whether natural, adopted or by marriage).</p>	Vessel representative will be asked to provide a complete list of all owned large-scale purse seine vessels, including IMO numbers.	<p>Auditor reviews list of owned vessels and compares it to the PVR record.</p> <p>Auditor may review RFMO records, and other publicly available sources of information, to cross-reference ownership declarations.</p>

Conservation Measure	Category	Text	Guidance - What is Required?	Means of Verification
		<p>For the purposes of this measure, large-scale purse seine vessels are those with at least 335 m³ fish hold volume.</p> <p>This measure comes into effect January 1st, 2018.</p>		
7.2	Threshold Requirement for PVR Listing	<p>1. A large-scale purse seine vessel shall be in demonstrated compliance with, or otherwise exempted from, Section 6 – Capacity, and listed on the ISSF Record of Large-Scale Purse Seine Vessels (Record) in order to be listed on the ISSF PVR.</p> <p>2. All large-scale purse seine vessels owned by the same business organization shall be in demonstrated compliance with, or otherwise exempted from, Section 6 – Capacity, and listed on the Record in order to be listed on the ISSF PVR.</p> <p>3. If a large-scale purse seine vessel is not in demonstrated compliance as described in paragraph 1, any and all Large-Scale Purse Seine Vessels owned by the same business organization will not be eligible to be listed on the Record. If those vessels are already on the Record, they will be removed.</p> <p>4. If a vessel owner proposes to replace a vessel that is going to be scrapped under ISSF Conservation Measure 6.2(a)2.d, ISSF recognizes that there</p>	<p>Vessel representative shall provide a list of all company owned vessels.</p> <p>For the purposes of this measure, “owned” means a registered or controlling (majority) interest in the vessel(s).</p> <p>If vessel owner indicates that a vessel will be scrapped in order for a new vessel to be listed under 6.2(a)2.d, evidence will need to be provided to demonstrate vessel has in fact been scrapped. Such evidence will need to be time-stamped (i.e. include dates) and may include:</p> <ul style="list-style-type: none"> - Signed scrapping contract, with contact information of the scrapping company; - Photographs showing the scrapping process, with vessel name clearly visible; - Government evidence confirming the scrapping has been completed. 	<p>Auditor will review list of vessels and compare to LPS record.</p> <p>Auditor also reviews publicly available information to cross-check vessel list and determine ownership.</p>

Conservation Measure	Category	Text	Guidance - What is Required?	Means of Verification
		<p>can be a gap in time after a contract for scrapping the vessel is in place until the time that the vessel is scrapped. A vessel owner may produce an executed scrapping contract and demonstrate that the vessel is permanently retired from fishing activities to begin the auditor's review under 6.2(a)2.d. The following will apply in such circumstance:</p> <p>a. If the auditor determines that the new vessel will meet the requirements of the conservation measure once the old vessel is physically scrapped, the new vessel will be listed on the Record and PVR conditionally.</p> <p>b. Within 6 months from the date of the scrapping contract, the vessel owner must provide certification that the older vessel has actually been scrapped.</p> <p>c. In the event, that the required certification is not timely provided, the new vessel and all other large-scale purse seine vessels owned by the same business organization will be removed from the Record and the PVR, unless the owner can prove <i>force majeure</i> in the event of a delay.</p> <p>For the purposes of this measure, largescale purse seine vessels are those with at least 335 m³ fish hold volume.</p>	<p>This measure becomes effective as of January 1st, 2018.</p>	

2.1.2 Vessel Attribute Data

The information relating to Vessel Attribute Data pertains to **all** gear types. The basic attribute data of vessels listed on the PVR must be a true representation of the identity and description of the vessel and its activities, thereby enabling the tracing of vessel history of ownership and operation, flag status, RFMO membership etc. Vessel Attribute Data are verified to ensure that the vessel listed on the PVR is the vessel it purports to be.

Auditing of Vessel Attribute Data is principally through tracing and examination of official documentation. If needed, additional verification is undertaken as part of Level 3 on-site audits. Vessel Attribute Data are categorized and audited as is described in Table 22 below.

Table 2: Vessel Attribute Data and Means of Verification

Specific Information	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
Vessel Identification (Vessel Name, Flag State, Current Owner, IMO/UVI Number, International Radio Call Sign and Skipper)	Provide accurate, current data to ISSF regarding vessel identity.	Level 1	Check vessel name, flag state, current owner, IMO/UVI, international radio call sign and captain	Initially by ISSF, then annually by MRAG
		Level 2	Comparison with updated IMO/UVI listing and RFMO authorized vessel record(s). Company tax records may be provided to show vessel ownership and the auditor may access company records on Sea-web. Physical licenses, documentation, ownership papers, letter from government agency, etc. showing rights to operate vessel under previously reported attributes should also be reviewed.	Sample Plan
		Level 3	Verification of the vessel attributes in on-site audit. The auditor looks for consistency between the previously attained information and the vessel itself.	

Specific Information	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
Vessel Characteristics (Location, Year Built, Size, etc.)	Provide accurate data to ISSF regarding vessel characteristics.	Level 1	Check location/year built/size: Supporting documentation could include contract documents, insurance records, vessel commissioning documentation, subsequent marine survey etc. submitted with application; RFMO authorized list; IMO/Fairplay information, IRCS verification if available, IACS certification, if available	Initially by ISSF, then annually by MRAG
		Level 2	Photographs of vessel used. Larger variations or inaccuracies can be validated through additional documentation (such as engineering reports)	Sample Plan
		Level 3	Marine or other compliance survey, photographs, and/or auditor vessel tour consistent with previously supplied Vessel Attribute Data	
Current Activity (Gear Type, RFMO Convention, Current Fishing Area, Current Ports of Landing)	Provide current, accurate data to ISSF regarding vessel activity.	Level 1	Must receive supporting documentation with application that aligns with basic (annually updated) IMO listing; verification through RFMO lists as well as IMO/Fairplay	Initially by ISSF, then annually by MRAG
		Level 2	Compare vessel landing records to information gained from national databases.	Sample Plan
		Level 3	Auditor compares documentation available on-site to documentation received as part of level 1 and 2 audits. This may include such things as port access records, logbooks, examination of fishing gear, etc.	
Vessel History (2 years prior to date of application)	Provide web links or documentation to ISSF that detail the vessel history for 2 years prior to the application date.	Level 1	Checks the supporting documentation submitted with application or vessel updates; must align with basic (annually updated) IMO listing; verification through RFMO lists as well as IMO/Fairplay	Initially by ISSF, then annually by MRAG

Specific Information	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
		Level 2	<p>Auditor checks IUU databases, IMO listings or other various web sites with vessel lists. Supporting documentation may also include:</p> <ul style="list-style-type: none"> • Past company tax records showing vessel ownership and company records on Sea-web. • Analysis of sample of historical catch and effort data – from RFMO database and/or national databases; depends on data access. <p>Web resources include:</p> <ul style="list-style-type: none"> • www.Equasis.org • www.parismou.org/inspection-search • www.tokyo-mou.org/organization/ • www.interpol.int/INTERPOL-expertise/Notices/Public-Purple-notice <p>Historical catch and effort data only to be used if available and if no other sources of information provide verification.</p>	Sample Plan
		Level 3	<p>Historical VMS records supplied by the Vessel. Forensic investigation of ownership and company records VMS data from official data center permitted by vessel company to be released to the auditor for limited analysis.</p>	
Electronic Monitoring System (EMS)	<p>Provide current, accurate data to ISSF regarding:</p> <ul style="list-style-type: none"> (i) what EMS system was installed on the vessel and when was it installed; (ii) which company ‘installed’ the system; (iii) which company ‘maintains’ the system; (iv) who collects the data, what kind of data is collected and who does it go to; and 	Level 1	<p>Vessel representative indicates whether EMS is installed on vessel (yes or no question). Name/identifier of EMS.</p>	
		Level 2	<p>Acceptable evidence which the auditor reviews can include the following:</p> <ul style="list-style-type: none"> - copy of installation contract - copy of maintenance contract - copy of data management contract - copy of EMS report for randomly selected month <p>Auditor asks whether system(s) was independently audited and meets best practices standards, as described</p>	

Specific Information	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
	(v) how often is the system operated?		in Restrepo et al. 2018 Minimum Standards for Electronic Monitoring Systems in Tropical Tuna Purse Seine Fisheries . Finally, auditor checks whether system is operated as a stand alone or in conjunction with human observers.	
		Level 3	N/A	

2.1.3 Compliance with Conservation Measures

All vessels listed on the PVR commit to independent auditing against the current ISSF conservation measures specifically measured on the PVR. The current version of these conservation measures is provided in Table 3 to Table 5 for large-scale, small-scale, and very small-scale purse seine vessels respectively. These tables provide the current list of items to be audited, guidance regarding what is required, and the means of verification that will be used by the auditor to assess conformance. ISSF Conservation Measures may be amended or added from time to time and voluntary categories may be introduced. The information audited will be based upon the data vessels submit, and/or data which are otherwise available to ISSF and MRAG Americas.

Table 3: ISSF Conservation Measures and Means of Verification (Large-Scale Purse Seine)

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
1.1	Tuna RFMO Authorized Vessel Record	Vessel must be 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 subject to listing in the RFMO authorized vessel record.	Level 1	Review RFMO record to see if vessel appears.	Initially by ISSF, then annually by MRAG
			Level 2	Review RFMO record against previously submitted vessel attributes to verify accuracy of information.	Sample Plan

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
			Level 3	Auditor verifies that physical attributes of the vessel are consistent with RFMO records.	
1.2	RFMO Participation	Vessel must be flagged to a member or cooperating non-member of RFMO.	Level 1	RFMO records of member countries, vessel lists, IMO lists, etc. are reviewed to ensure that the vessel is flagged to a member or cooperating non-member of RFMO.	Quarterly, or as reports are issued
			Level 2	Auditor confirms that RFMO reports are consistent with vessel attribute data previously submitted.	Sample Plan
			Level 3	Auditor confirms vessel flag on-site.	
3.1(b)	Prohibition of Transactions with Shark-Finching Vessels	No shark finning and no evidence of shark finning within 2 years prior to the date of application.	Level 1	N/A	N/A
			Level 2	Review of RFMO sites, media sources, etc. for any indication that vessel was found by RFMO or competent national authority to have shark finned within last two years.	Annually, or as notified
			Level 3	Auditor confirms no evidence of shark finning aboard vessel.	Sample Plan

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
3.1(c)	Prohibition of Transactions with Companies without a Public Policy Prohibiting Shark Finning	<p>Maintain a public² policy that prohibits shark finning for the vessel company. Submit copies of policy. If flag state absolutely prohibits shark finning, a documented policy is not necessary.</p> <p>Note: If a Non-Conformance (NC) is assigned to this measure, the vessel representative will have 60 days to remediate the situation. If the NC is not remediated during that timeframe, the vessel will receive a red X on the PVR and the red X will remain until the vessel remediates the NC.</p> <p>If the same vessel has the same NC during consecutive audit cycles, it will automatically receive a red X on the PVR, with no grace period, and the red X will remain until the vessel remediates the NC.</p>	Level 1	Review of company policy or evidence provided by vessel that flag state absolutely prohibits shark finning.	Initially by ISSF, then annually by MRAG
			Level 2	Review of company policy to assess whether it contains elements in accordance with ISSF best practices.	Sample Plan
			Level 3	Physical inspection of posted policies, vessel flag, etc.	Sample Plan
3.2	Large-Scale Pelagic Driftnets Prohibition	No use of large-scale pelagic driftnets.	Level 1	MRAG reviewer identifies driftnet vessels for further investigation of net size. Maximum net size is 2.5 km.	Quarterly, or as reports are issued
			Level 2	MRAG reviews RFMO compliance committee reports for any indication of vessels using large-scale pelagic driftnets.	
			Level 3	Auditor physically views gear type of vessel.	Sample Plan

² For the purposes of this measure a policy is “public” if it is published on the company’s website or is otherwise available to the general public.

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
3.3	Full Retention of Tunas	<p>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 policy is needed. If RFMO does not require full retention, vessel must have documented and implemented policy in accordance with this conservation measure.</p> <p>Note: If a Non-Conformance (NC) is assigned to this measure, the vessel representative will have 60 days to remediate the situation. If the NC is not remediated during that timeframe, the vessel will receive a red X on the PVR and the red X will remain until the vessel remediates the NC.</p> <p>If the same vessel has the same NC during consecutive audit cycles, it will automatically receive a red X on the PVR, with no grace period, and the red X will remain until the vessel remediates the NC.</p>	Level 1	<p>Auditor checks RFMO areas where vessel fishes. In RFMOs or flag states where full retention of tunas is mandatory, no further action necessary. If RFMO does not require full retention, auditor checks for vessel policy.</p>	Initially by ISSF, then annually by MRAG
				MRAG reviews RFMO committee meetings, compliance reports, etc. to inform level 2 and 3 audit sampling.	Quarterly
			Level 2	<p>Auditor reviews areas where vessel fishes and/or vessel policy to ensure that it complies with the conservation measure. If RFMO does not require full retention, auditor checks for vessel policy.</p>	Sample Plan
Level 3	<p>Auditor interviews vessel personnel for comprehension of full retention policy.</p>				
3.4	Skipper Best Practices	<p>Skipper³ 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</p>	Level 1	<p>The auditor checks the PVR and ISSF list of individuals who have attended Skippers Workshops or have certified that they read the online</p>	Initially by ISSF, then annually by MRAG

³ The intent of this conservation measure is that the person or persons trained are those in leadership roles onboard the vessel directing the fishing operations.

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
		<p>located at this link. The online guidebook is located at www.issfguidebooks.org.</p> <p>Note: If a Non-Conformance (NC) is assigned to this measure, the vessel representative will have 60 days to remediate the situation. If the NC is not remediated during that timeframe, the vessel will receive a red X on the PVR and the red X will remain until the vessel remediates the NC.</p> <p>If the same vessel has the same NC during consecutive audit cycles, it will automatically receive a red X on the PVR, with no grace period, and the red X will remain until the vessel remediates the NC.</p>		<p>Skippers Guidebook or viewed the online Skippers Workshop video; or the vessel may provide evidence of skipper review of guidebook, video, including list of skippers, method of review and dates of completion.</p> <p>Current skipper name is requested, and auditor checks against ISSF list of skippers trained.</p>	Quarterly
			Level 2	Auditor checks current skipper and evidence that the skipper has attended a workshop, read online guidebook or viewed online video.	Sample Plan
			Level 3	Auditor identifies current skipper via crew interviews and compares to list of skippers who have attended workshops, read online guidebook or viewed online video. Auditor interviews skipper, if available, to test comprehension of best practices.	
3.5	Using Non-Entangling FADs	Processors, traders, importers, transporters, marketers and others involved in the seafood industry shall conduct transactions only with those purse seine vessels whose owners have a	Level 1	Auditor reviews whether RFMO/flag-state has an in-effect mandatory requirement for NE FADs,	Annually

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
		<p>public policy regarding the use of only non-entangling FADs. The policy should refer to the ISSF Guide for Non-Entangling FADs and shall apply to all new FAD deployments, regardless of the type of vessel that deploys the FADs.</p> <p>For the purposes of this measure a policy is “public” if it is published on the company’s website or is otherwise available to the general public.</p> <p>For purposes of this measure, non-entangling FADs should meet the minimum specifications in the ISSF Guide for Non-Entangling FADs. Vessel owners shall not deploy FADs that meet the description of "highest entanglement" contained in the ISSF Guide.</p> <p>If RFMO/flag state where vessel(s) operate has an in-effect mandatory requirement for NE FADs, which equals or surpasses the ISSF guidelines for NE FADs, then vessel owner is not required to have an individual public policy.</p> <p>If the vessel is a member of a fleet association that has a public policy on NE FADs, which equals or surpasses the ISSF guidelines for NE FADs, the individual vessel must have a policy implementing the fleet association policy.</p>	<p>Level 2</p>	<p>which equals or surpasses ISSF guidelines for NE FADs, or whether policy has been provided for the vessel.</p> <p>If above RFMO/flag-state measure does not exist, then auditor reviews whether vessel has public policy on NE FADs, which references the ISSF Guide on NE FADs or mandates FAD construction in a way that equals or surpasses the ISSF guidelines.</p> <p>If the vessel is a member of a fleet association that has a public policy on NE FADs, the Auditor reviews whether the fleet association policy equals or surpasses ISSF guidelines for NE FADs and whether the individual vessel has public policy implementing the fleet association policy.</p> <p>Finally, auditor reviews date on which policy was published.</p> <p>Same as Level 1.</p>	<p>Sample Plan</p>

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
			Level 3	Same as Level 1.	Sample Plan
4.1	Unique Vessel Identifiers - IMO	Vessel must obtain an IMO UVI number.	Level 1	Review IMO record to see if vessel appears.	Initially by ISSF, then annually by MRAG
			Level 2	Review IMO record against previously submitted vessel attributes to verify accuracy of the information.	Sample Plan
			Level 3	Auditor verifies that physical attributes of the vessel are consistent with IMO record.	
4.3(a)	Observer Coverage	Vessel has 100% observer coverage (human or electronic) unless exempt or prevented by force majeure conditions in a particular region. 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 the data for at least three years from the end of the trip. At a minimum, data to be made available upon request are those fields required by the flag state for vessel logbooks.	Level 1	Vessel representative provides details of agreement with observer provider (human or electronic) for 100% coverage. If RFMO requires 100% observer coverage, no further evidence is required. MRAG reviews RFMO committee meetings, compliance reports, etc. to inform level 2 sample plan.	Initially by ISSF
				Auditor requests company name of observer provider. If observer provider has changed, treat as initial audit.	Quarterly by MRAG

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
			Level 2	<p>Vessel representative provides details of agreement with observer provider (human or electronic) for 100% coverage. If RFMO requires 100% observer coverage, no further evidence is required. MRAG reviews RFMO committee meetings, compliance reports, etc. to inform level 2 sample plan.</p> <p>Vessel logs may be reviewed to confirm observer presence on all trips. Check to see if vessel owner offered data to flag state and RFMO and if not accepted by the flag state or RFMO, if the vessel owner is retaining the data.</p>	Sample Plan
			Level 3	<p>Auditor checks for presence of observer or meets with observer provider if possible. Vessel logs may be reviewed to confirm observer presence on all trips. Check to see if vessel owner offered data to flag state and RFMO and if not accepted by the flag state or RFMO, if the vessel owner is retaining the data.</p>	Sample Plan

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
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.	Level 1	Basic information regarding vessel activity will be requested and maintained on file.	Initially by ISSF, then annually by MRAG
			Level 2	Vessel logbooks, VMS data, etc. will be requested to verify the applicability of the exemption	As required
			Level 3	Vessel logbooks will be reviewed, and crew interviews conducted to verify the applicability of the exemption.	
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	Level 1	Basic information regarding vessel activity will be requested and maintained on file.	Initially by ISSF, then annually by MRAG
			Level 2	Vessel logbooks, VMS data, etc. will be requested to demonstrate the applicability of the exemption.	As required
			Level 3	Vessel logbooks will be reviewed, and crew interviews conducted to verify the applicability of the exemption.	

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
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 m³ 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 as a means 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> <ol style="list-style-type: none"> 1. The vessel owner must 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. 2. Once such evidence has been determined to be satisfactory, the vessel will be deemed to be in compliance with this measure for a period of six (6) months, which will allow appropriate time for installation of and training on the electronic monitoring system. 3. The vessel owner must provide satisfactory proof that the equipment has been installed and is operating within that time period; in the event that such proof is not provided within grace period, the vessel will return to a non-compliant status with ISSF Conservation Measure 4.3(a). 	Level 1	Auditor requests name of the provider, EM system type, and installation date.	Initially by ISSF and then annually by MRAG
			Level 2	Auditor requests copy of executed services agreement, which clearly states the name and contact information of the provider, copy of receipt for the installation date, evidence of crew/staff training in operating the EM system, the EM system type, expected length of the agreement, and IMO number or registration of the vessel(s).	Sample Plan
			Level 3	Review of executed services agreement with EM provider in line with Level 2 guidance, and physical inspection of EM system aboard vessel to verify that it contains stated attributes.	Sample Plan

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
5.1	Illegal, Unreported and Unregulated (IUU) Fishing	Vessel does not appear on RFMO IUU vessel list.	Level 1	RFMO lists are reviewed at the time of application, then checked annually for updates.	Initially by ISSF, then annual review of RFMO IUU lists by MRAG.
				Auditor reviews RFMO compliance committee reports, commission reports, etc. to confirm vessel is not present on such lists.	Quarterly review by MRAG of compliance committee, commission reports, etc.
6.1	Transaction Ban for Large-Scale Purse-Seine Vessels not Actively Fishing for Tuna as of December 31, 2012	Vessel must be listed on the ISSF Record of Large-Scale Purse Seine Vessels. If the vessel is not listed on this record, or capacity of the vessel listed on the record is inaccurate, the vessel company or owner shall provide evidence of the vessel attributes. Any updates to the record must be made in accordance with 6.2(a).	Level 1	Auditor checks Record of Large-Scale Purse Seine Vessels for presence of vessel being audited.	Initially by ISSF, then annually by MRAG
			Level 2	Auditor reviews ISSF Record of Large-Scale Purse Seine Vessels and compares the information to most recently submitted vessel attributes.	Sample Plan
			Level 3	Auditor confirms vessel attributes and activity on-site via physical inspection of vessel and interview with crew.	Sample Plan

Table 4 ISSF Conservation Measures and Means of Verification (Small-Scale Purse Seine⁴)

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
1.1	Tuna RFMO Authorized Vessel Record.	Vessel must be 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 subject to listing in the RFMO authorized vessel record.	Level 1	Review RFMO record to see if vessel appears.	Initially by ISSF, then annually by MRAG
			Level 2	Review RFMO record against previously submitted vessel attributes to verify accuracy of information.	
			Level 3	Auditor verifies that physical attributes of the vessel are consistent with RFMO records.	
1.2	RFMO Participation.	Vessel must be flagged to a member or cooperating non-member of RFMO.	Level 1	RFMO records of member countries, vessel lists, IMO lists, etc. are reviewed to ensure that the vessel is flagged to a member or cooperating non-member of RFMO.	Quarterly, or as reports are issued
			Level 2	MRAG confirms that RFMO reports are consistent with vessel attribute data previously submitted.	
			Level 3	Auditor confirms vessel flag on-site.	

⁴ Small-scale purse seine vessels are defined as those with less than 335 m³ fish hold volume, but 30 GT or greater. In cases where information is not available to determine the exact volume of the fish hold, conservative estimates will be made..

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
3.1(b)	Prohibition of Transactions with Shark-Finching Vessels Prohibition of	No shark finning and no evidence of shark finning within 2 years prior to the date of application.	Level 1	N/A	N/A
			Level 2	Review of RFMO sites, media sources, etc. for any indication that vessel was found by RFMO or competent national authority to have shark finned within last two years.	Annually, or as notified
			Level 3	Auditor confirms no evidence of shark finning aboard vessel.	Sample Plan
3.1(c)	Prohibition of Transactions with Companies without a Public Policy Prohibiting Shark Finning	<p>Maintain an anti-shark finning policy for the vessel. Submit copies of policy, photos, etc. upon request. If flag state absolutely prohibits shark finning, a documented policy is not necessary.</p> <p>Note: If a Non-Conformance (NC) is assigned to this measure, the vessel representative will have 60 days to remediate the situation. If the NC is not remediated during that timeframe, the vessel will receive a red X on the PVR and the red X will remain until the vessel remediates the NC.</p> <p>If the same vessel has the same NC during consecutive audit cycles, it will automatically receive a red X on the PVR, with no grace period, and the red X will remain until the vessel remediates the NC.</p>	Level 1	Review of company policy or evidence provided by vessel that flag state absolutely prohibits shark finning.	Initially by ISSF, then annually by MRAG
			Level 2	Review of company policy to assess whether it contains elements in accordance with ISSF best practices.	Sample Plan
			Level 3	Physical inspection of posted policies, vessel flag, etc.	

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
3.2	Large-Scale Pelagic Driftnets Prohibition	No use of large-scale pelagic driftnets.	Level 1	RFMO quarterly report lists gear type. Reviewer identifies driftnet vessels for further investigation of net size. Maximum net size is 2.5 km.	Quarterly, or as reports are issued
			Level 2	MRAG reviews RFMO compliance committee reports for any indication of vessels using large-scale pelagic driftnets.	Quarterly, or as reports are issued
			Level 3	Auditor physically views gear type of vessel.	Sample Plan
3.3	Full Retention of Tunas	<p>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 policy is needed. If RFMO does not require full retention, vessel must have documented and implemented policy in accordance with this conservation measure.</p> <p>Note: If a Non-Conformance (NC) is assigned to this measure, the vessel representative will have 60 days to remediate the situation. If the NC is not remediated during that timeframe, the vessel will receive a red X on the PVR and the red X will remain until the vessel remediates the NC.</p>	Level 1	<p>Auditor checks RFMO areas where vessel fishes. In RFMOs where full retention of tunas is mandatory, no further action necessary. If RFMO does not require full retention, auditor checks for vessel policy.</p> <p>MRAG reviews RFMO committee meetings, compliance reports, etc. to inform level 2 and 3 audit sampling.</p>	Initially by ISSF, then annually by MRAG
			Level 2	Auditor reviews areas where vessel fishes and/or vessel policy to ensure that	Sample Plan
			Level 1	MRAG reviews RFMO areas where vessel fishes. In RFMOs where full retention of tunas is mandatory, no further action necessary. If RFMO does not require full retention, auditor checks for vessel policy.	Quarterly

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
		If the same vessel has the same NC during consecutive audit cycles, it will automatically receive a red X on the PVR, with no grace period, and the red X will remain until the vessel remediates the NC.		it complies with the conservation measure.	
			Level 3	Auditor interviews vessel personnel for comprehension of full retention policy.	
3.4	Skipper Best Practices	<p>Skipper⁵ 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.</p> <p>Note: If a Non-Conformance (NC) is assigned to this measure, the vessel representative will have 60 days to remediate the situation. If the NC is not remediated during that timeframe, the vessel will receive a red X on the PVR and the red X will remain until the vessel remediates the NC.</p> <p>If the same vessel has the same NC during consecutive audit cycles, it will automatically receive a red X on the PVR, with no grace period, and the red X will remain until the vessel remediates the NC.</p>	Level 1	The auditor checks the 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 vessel may provide evidence of skipper review of guidebook, video, including list of skippers, method of review and dates of completion.	Initially by ISSF, then annually by MRAG
				Current skipper name is requested, and auditor checks against ISSF list of skippers trained.	Quarterly
			Level 2	Auditor checks current skipper and evidence that the skipper has attended a workshop, read online guidebook or viewed online video.	Sample Plan

⁵ The intent of this conservation measure is that the person or persons trained are those in leadership roles onboard the vessel directing the fishing operations.

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
			Level 3	Auditor identifies current skipper via crew interviews and compares to list of skippers who have attended workshops, read online guidebook or viewed online video. Auditor interviews skipper, if available, to test comprehension of best practices.	Sample Plan
3.5	Using Non-Entangling FADs	<p>Processors, traders, importers, transporters, marketers and others involved in the seafood industry shall conduct transactions only with those purse seine vessels whose owners have a public policy regarding the use of only non-entangling FADs. The policy should refer to the ISSF Guide for Non-Entangling FADs and shall apply to all new FAD deployments, regardless of the type of vessel that deploys the FADs.</p> <p>For the purposes of this measure a policy is “public” if it is published on the company’s website or is otherwise available to the general public.</p> <p>For purposes of this measure, non-entangling FADs should meet the minimum specifications in the ISSF Guide for Non-Entangling FADs. Vessel owners shall not deploy FADs that meet the description of "highest entanglement" contained in the ISSF Guide.</p> <p>If RFMO/flag state where vessel(s) operate has an in-effect mandatory requirement for NE FADs,</p>	Level 1	<p>Auditor reviews whether RFMO/flag-state has an in-effect mandatory requirement for NE FADs, which equals or surpasses ISSF guidelines for NE FADs, or whether policy has been provided for the vessel.</p> <p>If above RFMO/flag-state measure does not exist, then auditor reviews whether vessel has public policy on NE FADs, which references the ISSF Guide on NE FADs or mandates FAD construction in a way that equals or surpasses the ISSF guidelines.</p> <p>If the vessel is a member of a fleet association that has a public policy on NE FADs, the Auditor reviews</p>	Annually

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
		<p>which equals or surpasses the ISSF guidelines for NE FADs, then no vessel owner is not required to have an individual public policy.</p> <p>If the vessel is a member of a fleet association that has a public policy on NE FADs, which equals or surpasses the ISSF guidelines for NE FADs, the individual vessel must have a policy implementing the fleet association policy.</p>		<p>whether the fleet association policy equals or surpasses ISSF guidelines for NE FADs and whether the individual vessel has public policy implementing the fleet association policy.</p> <p>Finally, auditor reviews date on which policy was published.</p>	
			Level 2	Same as Level 1.	Sample Plan
			Level 3	Same as Level 1.	Sample Plan
4.1	Unique Vessel Identifiers - IMO	<p>Vessel must obtain an IMO UVI number unless ineligible due to IMO requirements or due to other reasons stated by IMO.</p> <p>NOTE: The IHS Maritime & Trade (IHSM&T), which manages IMO identification numbers, has expanded the range of vessels that are potentially eligible to obtain an IMO number to include small-scale vessels of less than 100 GT down to a size limit of 12 meters in length overall (LOA) that are authorized to fish outside waters under national jurisdiction. Vessels that are now eligible to obtain an IMO UVI number under this change must apply for and/or have received an IMO number by December 31, 2017.</p> <p>Vessels that fish only in waters under national jurisdiction that provide a national certificate of</p>	Level 1	Review IMO record to see if vessel appears.	Initially by ISSF, then annually by MRAG
			Level 2	Review IMO record against previously submitted vessel attributes to verify accuracy of the information.	Sample Plan
			Level 3	Auditor verifies that physical attributes of the vessel are consistent with IMO record.	

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
		operation will be considered compliant under this section.			
4.2	Purse Seine Unique Vessel Identifiers	If IMO requirements do not provide for a particular vessel to receive an IMO UVI for reasons other than vessel size, the vessel shall obtain a TUVI from the Consolidated List of Authorized Vessels (CLAV) or a UVI from ISSF. If IMO requirements do not provide for a particular vessel to receive an IMO UVI due to vessel size, such vessels do not need to obtain a TUVI from the CLAV or a UVI from ISSF.	Level 1	Review Tuna.org website for CLAV TUVI or ISSF UVI record or vessel submits evidence of UVI.	Initially by ISSF, then annually by MRAG
			Level 2	Review UVI record against previously submitted vessel attributes to verify accuracy of the information. Check ocean areas currently fishing.	Sample Plan
			Level 3	Auditor verifies that physical attributes of the vessel are consistent with UVI record.	
5.1	Illegal, Unreported and Unregulated (IUU) Fishing	Vessel does not appear on RFMO IUU vessel list.	Level 1	RFMO lists are reviewed at the time of application, then checked annually for updates.	Initially by ISSF, then annual review of RFMO IUU lists by MRAG
				Auditor reviews RFMO compliance committee reports, commission reports, etc. to confirm vessel is not present on such lists.	Quarterly review by MRAG of compliance committee, commission reports, etc.

Table 5 ISSF Conservation Measures and Means of Verification (Very Small Purse Seine Vessels⁶)

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
1.1	Tuna RFMO Authorized Vessel Record	Vessel must be 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 subject to listing in the RFMO authorized vessel record.	Level 1	Review RFMO record to see if vessel appears.	Initially by ISSF, then annually by MRAG
			Level 2	Review RFMO record against previously submitted vessel attributes to verify accuracy of information.	
			Level 3	Auditor verifies that physical attributes of the vessel are consistent with RFMO records.	
1.2	RFMO Participation	Vessel must be flagged to a member or cooperating non-member of RFMO.	Level 1	RFMO records of member countries, vessel lists, IMO lists, etc. are reviewed to ensure that the vessel is flagged to a member or cooperating non-member of RFMO.	Quarterly, or as reports are issued
			Level 2	MRAG confirms that RFMO reports are consistent with vessel attribute data previously submitted.	
			Level 3	Auditor confirms vessel flag on-site.	

⁶ “Very small purse seine vessels” are defined those vessels of a size less than 30 GT.

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
3.1(b)	Prohibition of Transactions with Shark-Finishing Vessels	No shark finning and no evidence of shark finning within 2 years prior to the date of application.	Level 1	N/A	N/A
			Level 2	Review of RFMO sites, media sources, etc. for any indication that vessel was found by RFMO or competent national authority to have shark finned within last two years.	Annually, or as notified
			Level 3	Auditor confirms no evidence of shark finning aboard vessel.	Sample Plan
3.1(c)	Prohibition of Transactions with Companies without a Public Policy Prohibiting Shark Finning	<p>Maintain an anti-shark finning policy for the vessel. Submit copies of policy, photos, etc. upon request. If flag state absolutely prohibits shark finning, a documented policy is not necessary.</p> <p>Note: If a Non-Conformance (NC) is assigned to this measure, the vessel representative will have 60 days to remediate the situation. If the NC is not remediated during that timeframe, the vessel will receive a red X on the PVR and the red X will remain until the vessel remediates the NC.</p> <p>If the same vessel has the same NC during consecutive audit cycles, it will automatically receive a red X on the PVR, with no grace period, and the red X will remain until the vessel remediates the NC.</p>	Level 1	Review of company policy or evidence provided by vessel that flag state absolutely prohibits shark finning.	Initially by ISSF, then annually by MRAG
			Level 2	Review of company policy to assess whether it contains elements in accordance with ISSF best practices.	Sample Plan
			Level 3	Physical inspection of posted policies, vessel flag, etc.	

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
3.2	Large-Scale Pelagic Driftnets Prohibition	No use of large-scale pelagic driftnets.	Level 1	RFMO quarterly report lists gear type. Reviewer identifies driftnet vessels for further investigation of net size. Maximum net size is 2.5 km.	Quarterly, or as reports are issued
			Level 2	MRAG reviews RFMO compliance committee reports for any indication of vessels using large-scale pelagic driftnets.	Quarterly, or as reports are issued
			Level 3	Auditor physically views gear type of vessel.	Sample Plan
3.3	Full Retention of Tunas	<p>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 policy is needed. If RFMO does not require full retention, vessel must have documented and implemented policy in accordance with this conservation measure.</p> <p>Note: If a Non-Conformance (NC) is assigned to this measure, the vessel representative will have 60 days to remediate the situation. If the NC is not remediated during that timeframe, the</p>	Level 1	<p>Auditor checks RFMO areas where vessel fishes. In RFMOs where full retention of tunas is mandatory, no further action necessary. If RFMO does not require full retention, auditor checks for vessel policy.</p> <p>MRAG reviews RFMO committee meetings, compliance reports, etc. to inform level 2 and 3 audit sampling.</p>	Initially by ISSF, then annually by MRAG
					Quarterly

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
		<p>vessel will receive a red X on the PVR and the red X will remain until the vessel remediates the NC.</p> <p>If the same vessel has the same NC during consecutive audit cycles, it will automatically receive a red X on the PVR, with no grace period, and the red X will remain until the vessel remediates the NC.</p>	<p>Level 2</p> <p>Level 3</p>	<p>Auditor reviews areas where vessel fishes and/or vessel policy to ensure that it complies with the conservation measure.</p> <p>Auditor interviews vessel personnel for comprehension of full retention policy.</p>	Sample Plan
3.5	Using Non-Entangling FADs	<p>Processors, traders, importers, transporters, marketers and others involved in the seafood industry shall conduct transactions only with those purse seine vessels whose owners have a public policy regarding the use of only non-entangling FADs. The policy should refer to the ISSF Guide for Non-Entangling FADs and shall apply to all new FAD deployments, regardless of the type of vessel that deploys the FADs.</p> <p>For the purposes of this measure a policy is “public” if it is published on the company’s website or is otherwise available to the general public.</p> <p>For purposes of this measure, non-entangling FADs should meet the minimum specifications in the ISSF Guide for Non-Entangling FADs. Vessel owners shall not deploy FADs that meet the description of "highest entanglement" contained in the ISSF Guide.</p> <p>If RFMO/flag state where vessel(s) operate has an in effect mandatory requirement for NE FADs, which equals or surpasses the ISSF guidelines for</p>	Level 1	<p>Auditor reviews whether RFMO/flag-state has an in effect mandatory requirement for NE FADs, which equals or surpasses ISSF guidelines for NE FADs, or whether policy has been provided for the vessel.</p> <p>If above RFMO/flag-state measure does not exist, then auditor reviews whether vessel has public policy on NE FADs, which references the ISSF Guide on NE FADs or mandates FAD construction in a way that equals or surpasses the ISSF guidelines.</p> <p>If the vessel is a member of a fleet association that has a public policy on NE FADs, the Auditor reviews whether the fleet</p>	Annually

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
		<p>NE FADs, then no vessel owner is not required to have an individual public policy.</p> <p>If the vessel is a member of a fleet association that has a public policy on NE FADs, which equals or surpasses the ISSF guidelines for NE FADs, the individual vessel must have a policy implementing the fleet association policy.</p>		<p>association policy equals or surpasses ISSF guidelines for NE FADs and whether the individual vessel has public policy implementing the fleet association policy.</p> <p>Finally, auditor reviews date on which policy was published.</p>	
			Level 2	Same as Level 1.	Sample Plan
			Level 3	Same as Level 1.	Sample Plan
4.1	Unique Vessel Identifiers - IMO	<p>Vessel must obtain an IMO UVI number unless ineligible due to IMO requirements or due to other reasons stated by IMO.</p> <p>NOTE: The IHS Maritime & Trade (IHSM&T), which manages IMO identification numbers, has expanded the range of vessels that are potentially eligible to obtain an IMO number to include small-scale vessels of less than 100 GT down to a size limit of 12 meters in length overall (LOA) that are authorized to fish outside waters under national jurisdiction. Vessels that are now eligible to obtain an IMO UVI number under this change must apply for and/or have received an IMO number by December 31, 2017.</p> <p>Vessels that fish only in waters under national jurisdiction that provide a national certificate of operation will be considered compliant under this section.</p>	Level 1	Review IMO record to see if vessel appears.	Initially by ISSF, then annually by MRAG
			Level 2	Review IMO record against previously submitted vessel attributes to verify accuracy of the information.	Sample Plan
			Level 3	Auditor verifies that physical attributes of the vessel are consistent with IMO record.	Sample Plan

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
5.1	Illegal, Unreported and Unregulated (IUU) Fishing	Vessel does not appear on RFMO IUU vessel list.	Level 1	RFMO lists are reviewed at the time of application, then checked annually for updates.	Initially by ISSF, then annual review of RFMO IUU lists by MRAG
				Auditor reviews RFMO compliance committee reports, commission reports, etc. to confirm vessel is not present on such lists.	Quarterly review by MRAG of compliance committee, commission reports, etc.

3 Audits

3.1 Process

3.1.1 Introduction

Table 3 to Table 5 outline the audit coverage for all levels of vessel compliance with the ISSF conservation measures that currently apply to vessels on the PVR. As described in the tables, the data and reporting requirements increase with the level of audit. It is the responsibility of the MRAG Americas Program Manager⁷ to ensure audits are compliant and consistent with the most up to date ISSF Conservation Measures.

Per the [PVR Terms and Conditions](#), ISSF covers all Level 1 & 2 auditing costs for large-scale purse seine vessels, while the vessel owner or external funder is responsible for covering costs associated with a red flag Level 3 audit. For small-scale and very small-scale purse seine vessels, ISSF covers the costs of (i) the initial Level 1 audit necessary for listing of the vessel on the PVR, and (ii) the annual Level 1 audit required to ensure information remains up to date. ISSF does not cover the costs of Level 2 and Level 3 audits. These must be funded by the vessel owner or an external funder. Starting in September 2018, it is mandatory for each vessel on the PVR to be audited at Level 2 at least once every three (3) years. During the first twelve (12) months, vessel owners (or designated representatives) may volunteer their vessel (or fleets). Starting in month 13 (beginning of year 2) onwards, any vessels that have not already received a Level 2 audit will be randomly selected by MRAG Americas. At any time, if a vessel receives a red flag, it must complete an on-site Level 3 audit. Failure to cooperate with the auditor to complete a Level 2 audit when selected may result in a red flag and a mandatory Level 3 audit. New vessels that join in the first half of a 3-year cycle, must be audited during that cycle. New vessels joining in the second half of a 3-year cycle can either volunteer to be audited during that cycle and/or will be audited within the following 3-year cycle, but no later than within the first 18 months of that cycle.

The auditing process begins with the application of a vessel wishing to be added to the PVR. An initial audit of the information supplied with the application is conducted, followed by quarterly checks on observer coverage and skipper best practices education, and annual updates to verify vessel attribute data remain current. The general flow of the audit process is described below in **Figure 1**:

Step	Task	Actions
1	Audit Planning and Scheduling	Information needed to conduct level 1 audits is gathered from: the company application, company information updates, RFMO lists, IMO lists, etc. In addition to the information obtained from these sources, vessel representatives receive annual information requests to verify vessel attribute data remain current. In the case that a vessel is selected for a level 2 or 3 audit, an audit date will be scheduled with the vessel representative and an audit plan sent to detail the audit process and information required.
2	Level 1 (Annually)	There is an initial audit at time of listing on the PVR, followed by annual audits to verify whether or not vessel attribute data has changed.
3	Level 2 Remote Audits (Sample Plan)	Level 2 audits are carried out remotely, per the sample plan in Table 6 and Table 7. These audits include a review of all vessel conservation measures.

⁷ The Program Manager is the main contact point at MRAG Americas for ISSF audit related queries and drives the MRAG Americas program.

4	Level 3 On-Site Audits (Sample Plan)	Level 3 audits are carried out on-site following a red-flag event (see 3.1.4 below). These audits include a review of all conservation measures that may be verified by physically inspecting the vessel as well as a full Level 2 audit. Therefore, a Level 3 audit incorporates a Level 2 audit and, once all issues from the audit have been resolved, satisfies the requirement for at least one Level 2 audit over a three-year period.
5	Preliminary Audit Report	For audit levels 2 & 3, MRAG prepares a preliminary report outlining the vessel's compliance with ISSF conservation measures, including any non-conformances which must be resolved, and provides the report to the vessel and ISSF.
6	Remediation Period and Final Audit Report	A 30-day discussion/remediation period follows each preliminary report, during which vessels can provide to the auditor(s) clarification or additional information to resolve non-conformances. At the end of this 30-day period, the auditor(s) issues a final audit report to the vessel and ISSF.
7	Follow-Up (if necessary)	If any non-conformances were raised during the audit, MRAG will set timeframes for corrective action response (CAR). Vessels then submit CAR to MRAG to establish compliance with ISSF Conservation Measures.

The timing and frequency of PVR Levels 2 and 3 audits depends on the number of vessels on the PVR and the rate of coverage specified by ISSF (see Table 6 & 7).

Table 6: Audit Sample Plan for Large Scale Purse Seine Vessels

Minimum Annual Coverage rate (% of large-scale purse seine vessels audited at each level)	
PVR Level 1 Audit (remote)	100 %
PVR Level 2 Audit (remote)	25%
Red Flag Vessel Audit (remote or on-site)	As needed

Table 7: Audit Sample Plan for Small and Very Small Purse Seine Vessels

Minimum Coverage rate (Small & Very Small PS vessels audited at each level)		Frequency	Funding
PVR Level 1 Audit (remote) ⁸	All vessels	Annual	ISSF
PVR Level 2 Audit (remote)	All vessels	Three-year cycle	owner or external funder
Level 3 Red Flag Vessel Audit (on site)	Some vessels	As needed	owner or external funder

For PVR levels 2 auditing of large-scale purse seine vessels, MRAG Americas plans audits based on quasi-random sampling, information gathered during review of RFMO compliance committee and commission reports, as well as per the instructions received from ISSF. Random sampling is done by downloading the PVR-listed vessels from the ISSF website, assigning a range of sequential numbers to vessels on the list, then generating a selection of random numbers within the range using random.org. Random selections

⁸ Carried out at first listing on the PVR and then annually.

are based on a three-year cycle, so that vessels selected in year 1 are excluded from selection in year 2 and vessels selected in year 1 and 2 are excluded from the selection for year 3. Year 4 starts a new sampling plan and includes all vessels. For PVR levels 2 and 3 auditing of small-scale and very small-scale purse seine vessels, MRAG Americas plans audits based on information gathered during review of RFMO compliance committee and commission reports, as well as per the instructions received from ISSF. Audit plans are reviewed annually or when new ISSF Conservation Measures come into effect. MRAG Americas and ISSF may agree to make changes to the audit plan throughout the year in the case of new vessel additions or previous non-conformance, or information gathered from RFMO Compliance Committee or Commission reports generated throughout the year.

3.1.2 PVR Level 1 Audits

All vessels are subject to an initial PVR level 1 audit at the time of their listing on the PVR, with regular checks of level 1 information thereafter. Regular checks of level 1 information include annual audits of the vessel attribute data, to verify whether there have been any changes since the vessel was listed on the PVR.

3.1.3 PVR Level 2 Audits

For large-scale purse seine vessels, Level 2 audits occur remotely and result either from a risk factor (i.e. red flag) triggered during a PVR level 1 audit or through random selection of vessels (all vessels have equal weighting for random selection). Most of the required information should be available electronically, either through direct communications with the vessel company or from information already held by ISSF. For documents less amenable to uploading electronically (e.g., observer reports) or in the absence of electronic traceability, additional records can be transmitted to MRAG Americas for analysis.

Where VMS data are requested⁹, a vessel can provide VMS data directly to MRAG Americas, if it so chooses. In this event, the vessel should notify ISSF and MRAG Americas of its intention to do so.

At the conclusion of a PVR level 2 audit, the MRAG Americas auditor will produce a report listing all ISSF conservation measures reviewed for the vessel, any non-conformances identified, supporting evidence and where corrective actions may be required.

Starting in September 2018, each small-scale and very small-scale purse seine vessel on the PVR needs to be audited at Level 2 once every three (3) years. All costs associated with Level 2 audits will be the responsibility of the vessel owner (or external funder). MRAG Americas will notify ISSF of the need for, and associated costs of, the Level 2 audit, and ISSF will bill the vessel representative (or external funder) accordingly.

The PVR level 2 audits are not regarded as a substitute in the event a Level 3 red-flag audit is required.

3.1.4 PVR Level 3 Audits

Level 3 red-flag audits may result from a risk factor triggered during a PVR level 1 or PVR level 2 audit, which indicates a vessel may be in non-conformance with ISSF conservation measures (or insufficient

⁹ The submission of VMS, AIS or electronic monitoring data is not a requirement and is not mandatory. However, if it is submitted voluntarily it may provide a relatively easy means of verifying conformance with certain conservation measures and may therefore help to make the audit process both effective and efficient.

information is being provided to determine conformance). A Level 3 red-flag can also result from substantiated complaints received about a vessel, notification of changes in personnel, site or management system, and/or information from ISSF and other public sources.

Situations that could initiate a Red Flag Audit include:

- A PVR level 1 or PVR level 2 audit identifies a problem with the vessel's status on the PVR that threatens the integrity of the PVR, including evidence of non-conformance or non-responsiveness to audit information requests.
- An independent report of a vessel's non-compliance with PVR standards submitted to ISSF that is substantiated and/or cannot be satisfactorily resolved easily.
- Third party intelligence (e.g. RFMO) with respect to a vessel or group of vessels indicates purposeful non-compliance with an ISSF conservation measure.

The on-site audit is conducted with reference to ISO 19011 and provides an opportunity for the auditor to examine documentation, particularly the vessel's logbook, upon the vessel's arrival in port. The auditor will also conduct interviews with the captain, observer¹⁰ and crew members where appropriate. All costs associated with Level 3 audits will be the responsibility of the vessel owner (or external funder). MRAG Americas will notify ISSF of the need for, and associated costs of, the Level 3 audit, and ISSF will bill the vessel representative (or external funder) accordingly.

3.2 Audit Determination and Reporting

Audit findings are described in a report summarizing compliance with ISSF Conservation Measures, per vessel. Final audit reports do not issue any type of certification nor place an audited vessel on a higher rating compared with non-audited vessels. Any significant gaps in conformance and where corrective actions may be required will be specified. Timelines for implementation of corrective and/or preventative actions will be assigned by MRAG Americas, however any changes to the vessel listing on the PVR 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.

3.2.1 Non-conformances

Where a vessel is determined to be in less than full compliance, the vessel will be required to undertake a CAR within a specific time frame.

Conformance at level 3 will be categorized into grades (Conformance, Observation, Minor Non-Conformance or Major Non-Conformance). Non-conformances must be linked to specific ISSF Conservation Measures.

MRAG Americas defines audit findings as follows:

- Conformance - vessel provides evidence of compliance with a particular conservation measure
- Observation - vessel is currently in compliance but there is a high risk that a non-conformance could occur inadvertently without implementing preventative actions

¹⁰ Noting that access to the observer may be restricted and not in the purview of the Vessel to grant.

- Minor Non-conformance – Vessel has an inadequate system to comply with a conservation measure, or a ‘one-off’ non-conformance that does compromise the integrity of ISSF initiatives.¹¹
- Major Non-conformance – Vessel has no system in place to comply with ISSF conservation measures, or several minor non-conformances that indicate system failure.¹²

MRAG Americas’ procedures for handling non-conformances for vessels are as follows:

- MRAG Americas substantiates conformance through documented evidence.
- Observations are raised where the company is currently in compliance, but the auditor identifies a high risk that a non-conformance could occur without company action.
- Where a vessel 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 action(s) must be in place and evidence of addressing the condition must be supplied to MRAG or ISSF within an agreed timescale, without which a follow up audit may be required.

3.2.2 Corrective Action Responses (CARs)

To rectify non-conformances, the vessel may be required to provide a CAR. The nature of the CAR is at the discretion of the vessel. MRAG Americas does not advise on what specific corrective action the vessel must 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 changes in the vessel listing on the PVR that may occur as a result of identified non-conformances. ISSF will decide how vessels are listed on the PVR, including any changes that may be appropriate and will communicate with the vessel owner.

3.2.3 Audit Reports

All audit reports are provided directly to ISSF and the vessel owner or representative via email notification. Actions following receipt of the report, including the requirement for a CAR, sanctions and/or changes to the PVR for individual vessels are at the discretion of ISSF. Any issues raised by the vessel with regard to the audit findings will be directed to ISSF.

Audit reports will be retained electronically for the duration of the vessel’s listing on the PVR and will be available to ISSF at all times.

4 Annex 1. Audit Program Policy

4.1 Overall Audit Policy

It is the policy of MRAG Americas to ensure that its audit operations are consistent with defined standards and procedures in order to maintain the highest appropriate level of quality. To this end, MRAG Americas undertakes PVR level 2&3 audits according to the standards and procedures described in this manual and only within the scope of the ISSF conservation measures current at the time of auditing. The procedures

¹¹ Example: The vessel has a policy which prohibits shark finning, however it does not contain all required elements.

¹² Example: Vessel does not have an implemented policy against shark finning, in an RFMO that does not absolutely prohibit shark finning.

described in this manual apply to all levels of audits. MRAG Americas has developed this document and its auditing procedures with guidance from ISO/IEC 17065:2012(E).

Specifically, it is the policy of MRAG Americas to ensure that:

- All PVR audits meet these documented standards for independence, accuracy, precision, representativeness, comparability, and suitability to their intended purposes;
- All PVR audits are verifiable and defensible, and all components related to their generation are properly documented;
- Data integrity is maintained and documented;
- Data confidentiality is maintained;
- Audit Program reviews are conducted on a scheduled and documented basis; and
- Managers, supervisors, and staff throughout MRAG Americas, and its contractors, understand their roles in managing quality; receive the training necessary to meet quality standards for job tasks; and are encouraged to identify and suggest improvements to the program.

4.2 Program Manager

In all respects, the Program Manager (Mr. Oleg Martens) is responsible for ensuring that the content of this manual is followed. The Program Manager is the main contact point at MRAG Americas for PVR audit related queries and drives the MRAG Americas program.

The Program Manager's main responsibilities include:

- a) Organizing and coordinating ISSF audits for MRAG Americas
- b) Supervising assessment teams
- c) The first point of contact for ISSF audit enquiries
- d) Ensuring quality assurance of documentation
- e) Maintenance of data confidentiality
- f) Regularly convening MRAG Americas senior management for review and oversight
- g) Identifying potential conflicts of interest
- h) Leading program review and improvements

The Program Manager ensures the policy manual and systems are amended and updated as necessary and is responsible for ensuring changes and improvements are captured and communicated to auditors for implementation in subsequent assessments, as appropriate.

4.3 Assessment Team

MRAG Americas selects auditors on the basis of their competence, training, qualifications, and experience. All personnel involved in the audit are provided with, and briefed on, up-to-date ISSF documentation for auditors. Documentation includes:

- a) Contractual obligations on auditors, including requirements to report actual and potential conflicts of interest and to maintain confidentiality;
- b) Specification of division of responsibilities between auditors and experts of MRAG Americas;
- c) Procedures to be undertaken by auditors;
 - prior to audits
 - during onsite audits

- after audits, e.g., specification of responsibilities and recommended schedules for report writing
- d) Information about the overall role of the auditor and audit process in maintaining the integrity of the conservation measures.

Any person hired by MRAG Americas as an auditor for the ISSF audit program has:

- received a copy of this PVR audit protocol document;
- received sufficient training in the correct procedures and requirements for ISSF audits;
- been provided with access to all applicable ISSF conservation measures;
- received a copy of ISSF audit checklists (Annex 2);
- been provided with access to the ISO 19011 Standard;
- sufficiently demonstrated their performance and capabilities to the appropriate level prior to conducting solo audits; and
- signed an MRAG Americas contract (either as an employee or contractor), which includes terms of reference, conflict of interest, confidentiality, a Statement of Non-Disclosure, timing, and responsibilities of the assessor.

4.4 Auditor training

Audits are carried out by fully trained MRAG Americas auditors. These auditors are typically already experienced in other audit programs and are provided with ISSF audit training to ensure they fully understand the specific PVR audit criteria.

As the program grows and the economics of conducting on-site audits dictate, on-site auditors at key locations will be trained. The growth of the program, the distribution of the fleets and final determinations about audit coverage will dictate how many and where additional audit capacity is established. MRAG Americas' full-time auditors will also be sent to ports from time to time to ensure standardization of the audit process. The regular program review will specify the requirements for additional auditors as the program grows.

The training program will include:

- Desktop training (remote)
- Interactive online training
- Shadow audit(s) observing an MRAG Americas experienced auditor
- Annual refresher training
- Performance review audits by an MRAG Americas experienced auditor

4.5 Documentation and Means of Verification

Document control procedures are used to ensure accurate tracking and management of all documentation utilized during audits. Other than documents requiring an original signature, such as contracts with clients, which may be kept in both paper and electronic formats, MRAG Americas keeps electronic versions of documents for official record keeping.

Copies of vessel documentation (either electronic or hard copy) are acceptable for Level 1 and 2 vessel audits. In some instances, for example in the case of commercially sensitive documents, sighting of a document on a computer screen during a webinar session (i.e. using screen sharing) may be an option¹³.

Where a vessel is audited for purposes other than the PVR, evidence from those audits can be submitted as evidence for the purposes of the PVR audit. However, while those other audits can be used to provide additional evidence and enhance efficiency for the vessel or company to report information showing conformance with conservation measures, they cannot be used to supplant the MRAG Americas audit.

MRAG Americas will use the Level 2 and Level 3 audit checklists for all audits. The completed and reviewed audit checklists will also serve as the audit reports. A copy of the audit report will be provided to both ISSF and the vessel representative.

MRAG Americas will endeavor to allocate auditors who speak the language in common use on the vessel being audited. Translation of audit evidence into English and/or audit reports from English into the language of the vessel or company will be the responsibility of ISSF.

4.6 Confidentiality and data security

4.6.1 Confidentiality

Much of the information needed to confirm conformance with ISSF conservation measures may be confidential to the entity being audited. MRAG Americas limits access to confidential data to employees and contract auditors authorized to work on specific audits. Our staff understands that the operations they assess may include proprietary fishing strategies, locations, data, and business information and practices. All MRAG Americas employees involved in vessel audits, including office personnel and individuals participating in subcontracts (e.g. contract auditors) sign a binding confidentiality/non-disclosure agreement in which they undertake not to discuss or communicate any confidential information to third parties other than as required within MRAG Americas as a normal part of the audit program. Data are not to be released, reproduced, distributed, or published without prior approval of ISSF. MRAG Americas follows strict data management procedures to protect the confidentiality of audit information. MRAG does not publish any form of audit data, other than as required in the ISSF audit process, without the express consent of ISSF.

MRAG Americas reserves the right to disclose Confidential Information to its responsible employees and individuals participating in subcontracts with a *bona fide* need to know such Confidential Information. Recipients are informed that the information is confidential and is for the sole purpose of the specific project. MRAG Americas may disclose Confidential Information if and to the extent that such disclosure is required by applicable law, provided that they use reasonable efforts to limit the disclosure by means of a protective order or a request for confidential treatment and provide the owners of the information (i.e. the vessel company) a reasonable opportunity to review the disclosure before it is made, and to interpose its own objection to the disclosure.

¹³ The decision regarding whether sighting of a document in this way is acceptable will be made by the Auditor following policy advice from MRAG Americas. This will depend on the nature of the document and the ISSF conservation measure for which it is being used as evidence of conformance. Level 3 audits will require sighting of the original documents; copies can be taken as audit evidence where necessary.

4.6.2 Data Security

ISSF data and/or open computer files will not be left unattended and confidential data are gathered from output devices immediately. Any data output not included in reports sent to ISSF are shredded immediately. MRAG uses a multi-user network of computers. MRAG will ensure security of the network with a three-level approach. The original networking software will contain firewall code that will protect the network from unauthorized access. Access to all network terminals is by password only.

All computer files associated with, or containing, confidential data are stored only in directories on a system that is password-protected, and only authorized personnel have access to system passwords. Each authorized employee will have a unique password and passwords will allow access to only select files. The Program Manager is responsible for maintaining data security.

4.7 Compliance with legal requirements

MRAG Americas complies with all legal requirements in the countries in which the vessel operates and key personnel have demonstrable understanding of such legislation and regulations.

Should MRAG Americas become aware at any time that legal proceedings have been instigated or other allegations concerning the legal compliance of MRAG Americas activities associated with this program arise, we shall notify ISSF as soon as is practicable and within a maximum of seven days. MRAG Americas shall advise ISSF of the outcome of any such proceedings or allegations.

4.8 Program Review

Program review for PVR audits will occur annually. The Program Manager will also conduct ongoing program reviews (on a minimum annual basis) to ensure program activities are as effective and efficient as practicable to achieve program outcomes.