



**ISSF Data Check Company**

**Audit Checklist**

Version 2019/1

## **Atunes Y Lomos, S.L. (Atunlo)**

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

**Final Compliance Report (as of 31 May 2019, for activities in 2018)**

## General Audit Information

Company Name	Atunes Y Lomos, S.L. (Atunlo)
Affiliated Company Names	Inpesca SA, Pevasa, Coper SL, Frigorificos del Grove SL, Atunlo O Grove, Atunlo Santoña, Frigorificos de Cambados SL, Atunlo Cambados, Atunlo CV
Company Address	Coruña 24, 1° A Aptdo. 5.273 36208 Vigo Spain
Contact Information (Name, Phone, Email)	Jose Salgado +34 986 203617 Jose.salgado@atunlo.com
Auditor Name(s)	Erin Wilson Oleg Martens Jason Anderson
Time zone(s) for coordinating remote audit conference call	Spain
Language requirements for remote audit conference call	English/Spanish

Compliance Snapshot	
Conservation Measure	Current
1.1 RFMO Authorized Vessel Record	Minor
2.2 Quarterly Data Submission to RFMO	Minor
4.1 UVI-IMO	Minor
4.2 Purse Seine Unique Vessel Identifiers	Ok
5.1 IUU Fishing	Ok

Audit purpose	
<b>Audit objective</b>	The purpose of this audit is to validate Data Check Company (DCC) compliance with specific ISSF conservation measures in place for the year of activity being audited.
<b>Audit criteria</b>	The DCC compliance audits cover are carried out as defined in the <a href="#">ISSF Data Check Company Compliance: Audit Policy Document and Standard Operating Procedures, Version 2019/1.</a>
<b>Audit outcomes</b>	The auditing serves as an assessment of conformance by DCCs. Any significant gaps in conformance and where corrective actions may be necessary will be specified. Timelines for remediation will be prescribed by MRAG in the audit report, however any sanctions or other actions will be at the discretion of ISSF. Depending on the nature of the non-conformance and the required corrective action, a follow up audit may be required.
<b>Purpose of this document</b>	All auditors will follow this checklist for conducting ISSF DCC Compliance audits. The completed and approved copy of this checklist will serve as the audit report for each participating company.

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

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence
1.1	Tuna RFMO Authorized Vessel Record	All purchases must be from vessels listed on the authorized vessel record of the RFMO governing the ocean area in which the tuna was caught, at the time of the fishing trip, so long as the vessel is of a size subject to listing in the RFMO authorized vessel record. For any purchases from non-PVR vessels, maintain a system check and approve vessel listing.	All	Auditor reviews company system to ensure that purchases are from properly listed vessels. The traceability exercises, reviewing RFMO vessel records and checking ocean areas where vessels are fishing verifies the system.	Minor	<p>Most of the vessels listed in the quarterly RFMO reports are properly registered with the RFMO for the region where they operate.</p> <p>However, auditor was unable to find several vessels on RFMO records, and thus cannot determine whether they meet the requirements of CM 1.1 and/or are exempt.</p>
2.2	Quarterly Data Submission to RFMO	<p>a. Send information for all round fish purchases (skipjack, albacore, yellowfin, bigeye) as described in the measure to RFMO scientific bodies for each quarter by the last day of the following calendar quarter.</p> <p>b. <a href="#">As described by ISSF</a>, for each quarter, Participating Companies are required to report (no later than the last day of the following calendar quarter) if they have no purchase of round fish (in total or from a typical RFMO region).</p> <p>c. A Participating Company that only purchases loins and finished goods from other ISSF participating companies is exempt from sending RFMO data. However, company must affirm so quarterly via an unprompted email to <a href="mailto:rfmodata@iss-foundation.org">rfmodata@iss-foundation.org</a></p>	All	<p>Auditor checks that information has been sent by companies to RFMO for all purchases.</p> <p>Auditor checks if DCC has sent quarterly report to the RFMO, indicating that company only purchases loins and/or finished goods.</p> <p>Auditor checks that email has been sent to <a href="mailto:rfmodata@iss-foundation.org">rfmodata@iss-foundation.org</a> indicating that company only purchases loins and/or finished goods.</p>	Minor	<p>Most quarterly reports followed the required format and were complete.</p> <p>However, for all quarters, all RFMOs, no final unload port was provided. Only transfer location where appropriate.</p> <p>Additionally, reports where missing UVI and/or IMO numbers for fishing and carrier vessels, flags for carrier and container vessels, and some offload dates were noted as 'PDTE' instead of an actual date.</p>

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence
4.1	Unique Vessel Identifiers - IMO	<p>All purchases must be from vessels with an IMO UVI number, unless ineligible due to IMO requirements or due to other reasons stated by IMO.</p> <p><b>NOTE:</b> The IHS Maritime &amp; Trade (IHSM&amp;T), which manages IMO identification numbers, has <a href="#">expanded the range of vessels</a> 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>	All	Auditor reviews company system to ensure vessel purchases meet this criterion. A sample of non-PVR purchases will be reviewed to assess whether the company system is adequate to ensure that non-PVR vessels meet this requirement.	Minor	<p>Most vessels listed in the quarterly reports had an IMO if eligible to obtain one.</p> <p>However, several vessels were reported without an IMO number, yet they have a 12 m LOA and are reported as operating in an FAO area, which encompasses waters beyond the vessels' national EEZ, so these vessels could qualify for an IMO. Based on the information provided by the Company, auditor is unable to determine if those vessels meet the requirements of CM 4.1.</p>
4.2	Purse Seine Unique Vessel Identifiers	<p>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) CLAV: <a href="http://www.tuna.org/GlobalTVR.htm">http://www.tuna.org/GlobalTVR.htm</a> or a UVI from ISSF: <a href="http://issf.foundation.org/wDCCContent/uploads/downloads/2015/02/UVI-and-IMO-numbering-instructions-2015.pdf">http://issf.foundation.org/wDCCContent/uploads/downloads/2015/02/UVI-and-IMO-numbering-instructions-2015.pdf</a>.</p>	All Purse Seine	Auditor reviews company method to ensure that all vessel purchases meet this criterion. A sample of non-PVR purchases will be reviewed to assess whether the company system is adequate to ensure that non-PVR vessels also meet this requirement.	Ok	Company screens purse seine vessels for IMO numbers ahead of procurement. All PS vessels listed in the quarterly RFMO reports have valid IMO numbers.

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence
		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.				
5.1	Illegal, Unreported and Unregulated (IUU) Fishing	No transactions with vessels on any tuna RFMO IUU vessel list.	All	Auditor checks quarterly data sent by the company to the RFMO for the presence of IUU listed vessels.	Ok	Auditor compared list of vessels reported in the quarterly RFMO reports to IUU lists published by the RFMOs. Auditor also checked vessels against <a href="https://iuu-vessels.org">https://iuu-vessels.org</a> . None of the vessels the Company sourced from was found to be listed as IUU.

**END OF REPORT**