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**ISSF Participating Company Compliance  
Audit Checklist  
Version 2018/2**

## **PT Aneka Tuna Indonesia**

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):

### **Compliance Status Update (2019 Audit for activities in 2018)**

**Updated on 16<sup>th</sup> July 2019**

I Tsuyoshi Kawano, CEO of PT Aneka Tuna Indonesia, acknowledge receipt of this final compliance report, and have taken notice of any potential non-conformances contained within.

Signature: \_\_\_\_\_

A handwritten signature in black ink, appearing to read 'Tsuyoshi Kawano', written over a horizontal line.

Date: 17 July 2019

<sup>1</sup> Please note that ISSF mandates that you sign this report.

## General Audit Information

Company Name	PT Aneka Tuna Indonesia	
Affiliated Company Names	N/A	
Company Address	Jl. Surabaya-Malang Km. 38 Gempol Pasuran 67155 – Jawa Timur Indonesia	
Contact Information (Name, Phone, Email)	Mulyadi Sumardi + 62 343 851 361 <a href="mailto:mulyadi@ati.id">mulyadi@ati.id</a>	
Auditor Name(s)	Patricia Bianchi Jonah van Beijnen Oleg Martens	Erin Wilson Jason Anderson
Audit Start Date	<b>Week of 12 November, 2018</b>	
Audit End Date	<b>Preliminary audit results issued: Week of 28 January 2019</b> <b>Final audit results issued: Week of 11 March 2019</b>	
Time zone(s) for coordinating remote audit conference call	Indonesia	
Language requirements for remote audit conference call	English	

Compliance Snapshot						
Conservation Measure	2018 Update	2018	2017 Update	2017	2016 Update	2016
1.1 RFMO Authorized Vessel Record	OK	OK	OK	OK	OK	OK
1.2 RFMO Participation	OK	OK	OK	OK	OK	OK
2.1 Product Traceability	OK	OK	OK	OK	OK	OK
2.2 Quarterly Data Submission to RFMO	OK	MINOR	OK	OK	OK	OK
2.3 Product Labelling by Species and Area of Capture	MINOR	MINOR	-	-	-	-
3.1(a) Shark Finning Policy	OK	OK	OK	OK	OK	OK
3.1(b) Prohibition of Transactions with Shark Finning Vessels	OK	OK	OK	OK	OK	OK
3.1(c) Prohibition of Transactions with Companies without a Public Policy	OK	OK	OK	OK	OK	OK
3.2 Large-scale Pelagic Driftnets	OK	OK	OK	OK	OK	OK
3.3 Full Retention of tunas	OK	OK	OK	OK	OK	OK
3.4 Skippers Best Practices	OK	OK	OK	OK	OK	OK
3.5 Transactions w/ Vessels that use Only Non-Entangling FADs	OK	OK	OK	OK	-	-
3.6 Transactions with Vessels Implementing Best Practices for Sharks & Sea Turtles	N/A	N/A	-	-	-	-
4.1 UVI-IMO	OK	OK	OK	OK	OK	MINOR
4.2 Purse Seine Unique Vessel Identifiers	MINOR	MAJOR	MINOR	MINOR	OK	OK
4.3(a) Observer Coverage	OK	OK	OK	OK	OK	OK
4.4(a) Transshipments	OK	OK	OK	OK	OK	OK
4.4(c) Transshipment at Sea – Observer Coverage	N/A	N/A	-	-	-	-
5.1 IUU Fishing	OK	OK	OK	OK	OK	OK
5.2 IUU Product Response	OK	OK	OK	OK	OK	OK
6.1 Transaction Ban for LPS vessels not Actively Fishing for Tuna on Dec. 31, 2012	OK	OK	OK	OK	OK	MAJOR
6.2(e) Purchases from PS Vessels in Fleets with Other Vessels not in Compliance w/ CMs 6.1 and 6.2(a)	OK	OK	-	-	-	-
7.1 Registration of Controlled Vessels	N/A	N/A	N/A	N/A	N/A	N/A
7.2 Threshold Requirement for PVR Listing	OK	OK	-	-	-	-
7.3 Purchases from PVR Vessels	OK	OK	OK	MAJOR	OK	MAJOR
7.4 Supply and Tender Vessels	N/A	N/A	-	-	-	-
8.1 Exemption for Very Small Purse Seine Vessels	N/A	N/A	N/A	N/A	N/A	N/A

Audit purpose	
<b>Audit objective</b>	The purpose of this audit is to validate participating company compliance with all ISSF conservation measures in place for the year of activity being audited.
<b>Audit criteria</b>	The PC compliance audits cover all conservation measures as defined in the ISSF Participating Company Compliance: Audit Policy Document and Standard Operating Procedures, Version 2018/2.
<b>Audit outcomes</b>	The auditing serves as an assessment of conformance by PCs. Any significant gaps in conformance and where corrective actions may be necessary will be specified. Timelines for remediation will be prescribed by MRAG in the audit report, however any sanctions or other actions will be at the discretion of ISSF. Depending on the nature of the non-conformance and the required corrective action, a follow up audit may be required.
<b>Purpose of this document</b>	All auditors will follow this checklist for conducting ISSF PC Compliance audits. The completed and approved copy of this checklist will serve as the audit report for each participating company.
<b>Other relevant documentation</b>	ISSF Participating Company Compliance: Audit Policy Document and Standard Operating Procedures, Version 2018/2.

Conformance with ISSF Commitments	
<b>Non-conformances</b>	Non-conformances must be raised against specific ISSF conservation measures. The severity of the non-conformance – and whether this jeopardizes the integrity of the ISSF program – determines which non-conformances are raised.
<b>Grading</b>	MRAG Americas defines audit findings as follows: <ul style="list-style-type: none"> <li>· Conformance (Ok) - the PC can provide evidence of compliance with a conservation measure</li> <li>· Observations - the PC is currently in compliance but there is a high risk that non-conformance could occur inadvertently without implementing preventative actions</li> <li>· Minor Non-conformance – the PC does not comply with a conservation measure, but this does not compromise the integrity of the ISSF initiatives</li> </ul>

	<ul style="list-style-type: none"> <li>· Major Non-conformance – the PC does not comply with a conservation measure and this compromises the integrity of the ISSF initiatives</li> </ul>
<b>MRAG Americas' procedures</b>	<p>MRAG Americas' procedures for handling non-conformances for PCs are as follows:</p> <ul style="list-style-type: none"> <li>· MRAG Americas substantiates conformance through documented evidence.</li> <li>· Where a company cannot provide documented evidence of conformance with a conservation measure, a non-conformance must be issued.</li> <li>· All non-conformances must be graded either major or minor.</li> <li>· In the case of a non-conformance, ISSF may require a Corrective Action Response (CAR). The corrective actions must be in place and evidence of addressing the condition must be supplied to MRAG or ISSF within an agreed timescale or a follow up audit may be required.</li> </ul>
<b>Corrective Action Responses (CARs)</b>	<p>To rectify non-conformances, the PC may be given the opportunity to provide a CAR. The nature of the CAR is at the discretion of the PC. MRAG Americas does not advise on what specific corrective action the PC may take but will assess whether the CAR is expected to address the non-conformance. MRAG Americas will also not provide advice with respect to any sanction that might be applied to a PC resulting from identified non-conformances. Such action will be at the discretion of the ISSF.</p>

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
1.1	Tuna RFMO Authorized Vessel Record	All purchases must be from vessels listed on the authorized vessel record of the RFMO governing the ocean area in which the tuna was caught, at the time of the fishing trip, so long as the vessel is of a size subject to listing in the RFMO authorized vessel record. For any purchases from non-PVR vessels, maintain a system check and approve vessel listing.	All	Auditor reviews company system to ensure that purchases are from properly listed vessels. The traceability exercises, reviewing RFMO vessel records and checking ocean areas where vessels are fishing verifies the system.	Ok	The company checks before delivery that vessels are registered with the relevant RFMO or National authority.  For local vessels, which only operate in Indonesian EEZ, the company (i) checks the National vessel registry and (ii) obtains written, signed and dated statements from vessel owners indicating vessels only operate within Indonesia's EEZ.	
1.2	RFMO Participation	All purchases must be from vessels flagged to a member or cooperating non-member of RFMO relevant to fishing area.	All	Auditor reviews quarterly data sent by the company to the RFMO to check that all vessels meet this requirement.	Ok	All vessels listed in the quarterly RFMO reports are flagged by members of the relevant RFMO(s).	
2.1	Product Traceability	Demonstrate ability to trace products from can code or sales invoice to vessel and trip.	All	Auditor will review recent mock recalls, if available, and select a sample (i.e. all sales for a specific month) of can codes or sales invoices by label and destination from which the company will conduct traceability exercises. If the company produces cans from loins, or sells loins as a finished good, these products must be	Ok	Company has a suitable traceability system in place to trace the final products back to the vessel(s) and trip(s).	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
				included in the assessment and the traceability exercise will cover a 3-month period.			
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 PC 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>	Ok	<p>Majority of quarterly RFMO reports were complete and sent to the competent RFMO authorities within the agreed timeline</p> <p>One RFMO report was received late during the audit period, thus why the Minor NC was assigned at the time the final audit report was delivered.</p> <p><b>July 16th, 2019 Update:</b> The Company provided a Corrective Action Response (CAR), and during the period the CAR was applied, all RFMO reports were submitted on time and contained a complete set of data. The Minor non-conformance has been removed.</p>	During remediation period, Company provided evidence of internal procedure to ensure quarterly RFMO reports would be sent on time going forward. // <b>July 16th Update</b> – Review of Q4 2018 and Q1-2 2019 showed that complete reports were received on time, thus supporting the fact that internal procedure changes have had an impact.
2.3	Product Labelling by Species and Area of Capture	Processors, traders, importers, transporters, marketers and others involved in the seafood	All	Auditor obtains list of consumer-facing branded products, and	Minor	Company provided evidence that species names and ocean of	None. Company has already demonstrated it

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		<p>industry shall on all product labeling, or through a publicly available web-based system by product, for all branded tuna products:</p> <p>1. Identify the species of tuna contained in the product. For example:</p> <p>Katsuwonus pelamis, Skipjack, Bonite, Listado</p> <p>Thunnus alalunga, Albacore, Germon, Atún blanco</p> <p>Thunnus albacares, Yellowfin, Thon Jaune, Rabil</p> <p>Thunnus obesus, Bigeye, Thon Obese, Patudo</p> <p>2. Identify the ocean of capture for the tuna contained in the product.</p> <p>This measure will apply to all product labeling as of <a href="#">January 1st, 2018</a>.</p>		<p>checks that said list includes information on the species of tuna (scientific name and/or common name), and ocean of capture.</p> <p>Auditor may also verify conformance with this CM during the annual traceability exercise.</p> <p>Measure applies from Q1 2018 onwards.</p>		<p>capture would appear on all consumer-facing products starting 2/20/19 onward. Minor NC is assigned because Company failed to have this in place during the audit period.</p> <p><b>July 16th, 2019 Update:</b> This measure was not reviewed during the CAR; thus the Minor NC remains. The measure will next be audited during the 2020 audit looking at 2019 activities.</p>	has addressed the issue.
3.1(a)	Shark-Finching Policy	Company establishes and publishes policy prohibiting shark finning.	All	Auditor reviews company website for published policy.	Ok	<a href="http://tunaindonesia.com/about.html">http://tunaindonesia.com/about.html</a>	
3.1(b)	Prohibition of Transactions with Shark-Finching Vessels	Refrain from transactions with vessels that have shark finned within two years of the product purchase date (as found by RFMO or competent national authority).	All	Auditor reviews company system for ensuring no transactions with vessels that practice shark finning. The company system is verified by checking purchases against data	Ok	Company screens vessels against RFMO and National vessel lists for instances of shark finning. The practice of shark finning is banned in Indonesian EEZ.	



CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
				gathered throughout the year of RFMO compliance reports, media sources, etc.		<p>No evidence of shark finning was found on RFMO reports or media.</p> <p>None of the selected vessels that are part of the traceability exercise have been associated with shark finning.</p>	
3.1(c)	Prohibition of Transactions with Companies without a Public Policy Prohibiting Shark Finning	No transactions with companies that do not have a public policy prohibiting shark finning. If transactions involve flag states that absolutely prohibit shark finning no policy is required. If flag state allows 5% shark fin retention, the company must have a public policy.	All	Auditor reviews company procedure for ensuring that all tuna purchases have come from a company that has a public policy prohibiting shark finning. For flag states that do have an absolute shark finning prohibition, auditor will review all publicly available material to ensure no shark finning has taken place. Traceability exercises by transaction or can code to PVR vessels or proof of compliance verifies the system.	Ok	<p>The company asks suppliers to send them the Shark Finning Policy before delivery of the raw material.</p> <p>Company submitted anti shark finning policy of a sample of suppliers.</p> <p>Indonesia has national ban on shark finning.</p> <p>All the suppliers that are part of the traceability exercise have a policy in place prohibiting shark finning and all purse seine vessels are listed in the PVR are compliant with this measure.</p>	
3.2	Large-Scale Pelagic Driftnets Prohibition	No transactions in vessels using large-scale pelagic driftnets.	All	Auditor reviews quarterly report by gear type and identifies any use of large-scale driftnets. This is done by first identifying vessels using gill nets, then following up on the size of the net. Maximum net size is 2.5 km.	Ok	<p>No large-scale pelagic drift net use was identified in quarterly RFMO reports.</p> <p>None of the selected vessels that are part of the traceability exercise have been associated with the use of drift nets or gill nets.</p>	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
				MRAG reviews RFMO compliance committee reports for any indication of vessels using large-scale pelagic driftnets.	Ok	No use of large-scale pelagic drift net was identified in RFMO compliance committee reports.	
3.3	Full Retention of Tunas	All purse seine caught tuna (skipjack, yellowfin and bigeye) retained onboard, except those unfit for human consumption as defined, or when in the final set of a trip, there is insufficient well space to accommodate all fish caught in that set. If the vessel fishes in areas where full retention is mandatory, no further policy is needed. If RFMO does not require full retention, vessel must have documented and implemented policy in accordance with this conservation measure.	All Purse Seine	Verify that the company sources tuna from vessels that practice full retention of tunas. Auditor checks PVR. For vessels not listed on the PVR, company provides evidence of vessel policy or RFMO requirement regarding full retention of tunas.	Ok	All PS vessels are listed on the PVR with a green check for this CM.  The company submitted Full retention of tuna policy for a sample of suppliers.	
3.4	Skipper Best Practices	Unless exempt per Conservation Measure 8.1, skipper <sup>2</sup> has attended an ISSF Skippers Workshop in person, has viewed the Skippers Workshop video online, or has reviewed the Skippers Guidebook. The workshop video is located at this <a href="#">link</a> . The online guidebook is located at <a href="http://www.issfguidebooks.org">www.issfguidebooks.org</a> .	All Purse Seine	Verify that the company has purchased tuna only from vessels with skippers that have completed ISSF best practices education. Auditor checks PVR and ISSF list of individuals who have attended Skippers Workshops or have certified that they read the online Skippers Guidebook or viewed the online Skippers Workshop video; or the PC may provide evidence of skipper	Ok	Most PS vessels are listed on the PVR and have a green check for this CM.  For PS vessels not on the PVR, the company submitted skipper training certificates for a sample of vessels randomly selected by auditor.	

<sup>2</sup> 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.

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
				review of guidebook, video, including list of skippers, method of review and dates of completion.			
3.5	Transactions with Vessels that use Only 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 (NE) FADs. The policy should refer to the <a href="#">ISSF Guide for Non-Entangling FADs</a> 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, NE FADs should meet the minimum specifications in the <a href="#">ISSF Guide for Non-Entangling FADs</a>. 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 <a href="#">ISSF guidelines for</a></p>	All Purse Seine and Support Vessels	Auditor reviews evidence showing that the company conducts transactions only with purse seine vessels that have a public policy regarding the use of only non-entangling FADs. Auditor reviews whether RFMO/flag state or fleet association has an in-effect mandatory requirement for NE FADs, which equals or surpasses ISSF guidelines for NE FADs.	Ok	<p>The company asks suppliers to send them the NE FADs policy before delivery of the raw material.</p> <p>All PS listed on the PVR have a green check for this CM. No S&amp;T vessels identified in quarterly RFMO reports.</p> <p>Company provided NE FAD policies for all vessels not on the PVR.</p>	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		<p><a href="#">NE FADs</a>, 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 <a href="#">ISSF guidelines for NE FADs</a>, the individual vessel must have a policy implementing the fleet association policy.</p>					
3.6	Transactions with Vessels Implementing Best Practices for Sharks and Sea Turtles	<p>Processors, traders, importers, marketers and others involved in the seafood industry shall conduct transactions only with those longline vessels whose owners have a policy requiring the implementation of best practices for sharks and marine turtles.</p> <p>For the purposes of this measure, a large-scale longline vessel is defined as a vessel that is equal to or greater than 20m length overall (LOA).</p> <p>This measure comes into effect <a href="#">July 1st, 2018</a>.</p>	Large-Scale Longline	<p>Auditor reviews evidence showing that the company conducts transactions only with large-scale longline vessels that have a policy requiring the implementation of the following best practices for sharks and marine turtles:</p> <p>(a) the use of circle hooks and only monofilament line;</p> <p>(b) the implementation by the crew of best practice handling techniques, such as those outlined in the ISSF Skippers' Guidebook to Longline Fishing Practices; and</p> <p>(c) No use of "shark lines" at any time.<sup>3</sup></p>	N/A	<p>Company provided a statement that it does not source from large-scale longline vessels.</p> <p>Gear type not identified in quarterly RFMO reports or during the traceability exercise.</p>	

<sup>3</sup> For the purposes of this measure, shark lines are those defined in the following paper: [https://www.ccsbt.org/sites/ccsbt.org/files/userfiles/file/other\\_rfmo\\_measures/wcpfc/CMM-2014-05-Conservation-and-Management-Measure-for-](https://www.ccsbt.org/sites/ccsbt.org/files/userfiles/file/other_rfmo_measures/wcpfc/CMM-2014-05-Conservation-and-Management-Measure-for-)

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
				Auditor reviews date on which policy was put in effect and understands measure applies from Q3 2018 onwards.			
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.	Ok	<p>All vessels linked to imported tuna have a valid IMO number.</p> <p>Company provided registration numbers and signed and dated company statements for all vessels that only operate within the Indonesian EEZ and are therefore not eligible for an IMO number.</p>	
4.2	Purse Seine Unique Vessel Identifiers	If IMO requirements do not provide for a particular vessel to receive an IMO UVI for reasons	All Purse Seine	Auditor reviews company method to ensure that all vessel	Minor	All import tuna purse seine vessels have a valid IMO.	Company has indicated it will pursue additional

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		<p>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.org/GlobalTVR.htm">http://www.tuna-org.org/GlobalTVR.htm</a> or a UVI from ISSF: <a href="http://iss-foundation.org/wpcontent/uploads/downloads/2015/02/UVI-and-IMO-numbering-instructions-2015.pdf">http://iss-foundation.org/wpcontent/uploads/downloads/2015/02/UVI-and-IMO-numbering-instructions-2015.pdf</a>.</p> <p>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.</p>		<p>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.</p>		<p>Some local tuna purse seine vessels have UVI numbers issued by CLAV or ISSF. However, several other purse seine vessels that only operate within the Indonesian EEZ and are larger than 30GT do not have a UVI number. Major is applied because this issue carries on from last audit cycle and previous remediation effort has not accomplished the desired result.</p> <p><b>July 16th, 2019 Update:</b> During the CAR, company was able to demonstrate that all purse seine vessels it sourced from now either have an IMO number (if able to receive one) or a UVI number. The Major non-conformance has been downgraded to a Minor to note the fact that compliance with the measure occurred after the final audit report was delivered.</p>	<p>efforts to obtain UVI numbers for the remaining local purse seine vessels, and refrain from sourcing from said vessels until UVI numbers are obtained. Company understands that auditor will want to see evidence that eligible vessels have either obtained (or applied for) an IMO through IHS Maritime, or a UVI through TUVI/CLAV. // <b>July 16th, 2019 Update:</b> Company's efforts were successful and all purse seine vessels it sources from now have either an IMO or UVI number. This was confirmed by reviewing the two most recent RFMO quarterly reports.</p>
4.3(a)	Observer Coverage	Evidence of 100% observer coverage (human or electronic) unless exempt or prevented by force majeure. The data collected by the observer must	Large Purse Seine	Auditor assesses company system for observer coverage of controlled vessels, company data	Ok	All LSPS vessels are listed on the PVR and have a green check for this CM.	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		be made available to the flag state authorities and, if appropriate, to the RFMO, in the format required by the flag state (and RFMO). In case the flag state (or RFMO) does not accept the data, the vessel owner must store data for at least three years from the end of the trip. At a minimum, data to be made available are those fields required by the flag state for vessel logbooks.		submission to RFMOs and RFMO committee meetings and compliance reports, etc. If RFMO requires 100% observer coverage, no further evidence is required.			
4.4(a)	Transshipments	No transactions in tuna where transportation included transshipment, except when exempt per Conservation Measure 4.4 (b)(i) or Conservation Measure 8.1.	All Purse Seine	Auditor reviews data submission for relevant RFMO, transshipment documents and RFMO compliance committee and commission reports to verify that tuna purchased has not undergone unauthorized transshipment.	Ok	No unauthorized transshipments have been identified in quarterly RFMO reports or during the traceability exercise.	
4.4(c)	Transshipment at Sea – Observer Coverage	Processors, traders, importers, marketers and others involved in the seafood industry shall conduct transactions with longline vessels that conduct transshipments at sea, whether high seas, EEZ, territorial seas or archipelagic waters, only if 100% of such transshipments are observed (either by a human observer on board the longline vessel or onboard the carrier vessel).  For the purposes of this measure, a large-scale longline vessel is defined as a vessel that	Large-Scale Longline	Auditor assesses participating company system to determine observer coverage on large-scale longline, and/or transshipment, vessels they source from.  Company shall maintain record(s) of RFMO transshipment declarations, which must be signed by the observer present during transshipment.	N/A	The company provided a statement that they do not source from large-scale longline vessels. No large longline at sea transfers were reported in quarterly RFMO reports or during the traceability exercise.	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		<p>is equal to or greater than 20m length overall (LOA).</p> <p>This measure comes into effect <a href="#">January 1st, 2018</a>.</p>		Measure applies from Q1 2018 onwards.			
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	<p>No IUU-listed vessels have been identified in quarterly RFMO reports.</p> <p>No IUU listed vessels were found during the traceability exercise.</p>	
				The auditor reviews the company purchasing system to prevent IUU fish. This will also be assessed during traceability exercises to verify that products do not originate from IUU vessels and by reviewing compliance committee reports, commission reports, etc.	Ok	<p>Company has a purchase system that ensures vessels are not listed on IUU lists.</p> <p>No evidence of IUU was found on combined IUU vessel list.</p>	
5.2	Illegal, Unreported and Unregulated (IUU) Product Response	No IUU purchases. If IUU found, company must withdraw these products from the marketplace.	All	Auditor reviews company recall procedure for presence of IUU policy, then reviews company purchases and compares to RFMO IUU lists.	Ok	The company has a recall procedure to withdraw products from market place in case of IUU identification.	
				Company initiates market withdrawal of IUU products.	N/A	No market withdrawals were required during audit period.	



CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
6.1	Transaction Ban for Large-Scale Purse-Seine Vessels not Actively Fishing for Tuna as of December 31, 2012	Demonstrate that all purchases from large-scale purse seine vessels are from vessels actively fishing for tuna as of December 31, 2012 and listed on the ISSF Record of Large-Scale Purse Seine Vessels (Record). If a vessel is not listed on the Record, the company shall provide evidence of the vessel attributes in accordance with Conservation Measure 6.2 (a). Any updates to the Record must be made in accordance with 6.2(a).	Large Purse Seine	Auditor reviews a list of company purchases from large-scale purse seine vessels to assess whether the source vessels are listed on the ISSF Record of Large-Scale Purse Seine Vessels.	Ok	All LSPS vessels Company sourced from are on the LSPS Record.	
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)	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).  For the purposes of this measure, "owned" means a registered or controlling (majority) interest in the vessels:  (1) directly or indirectly (through intermediary entities) by any business organization or its affiliated business organizations, including commonly controlled organizations, or	Large Purse Seine	Vessel representative will be asked to provide a complete list of all owned large-scale purse seine vessels, including IMO numbers.  Auditor reviews list of owned vessels and compares it to the PVR record. Auditor may review RFMO records, and other publicly available sources of information, to cross-reference ownership declarations.  Measure applies from Q1 2018 onwards.	Ok	Company has procedure in place to ensure that all LSPS vessels it sources from are listed on the Record. None of the LSPS vessels listed in quarterly RFMO reports were found to belong to fleets with other LSPS vessels not listed on the Record.  All LSPS vessels identified in the traceability exercise are listed on the PVR.	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		<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> <p>This measure comes into effect <a href="#">January 1st, 2018</a>.</p>					
7.1	Registration of Controlled Vessels	Register all controlled purse seine vessels on the PVR.	All Purse Seine	Auditor will obtain list of controlled vessels from company and compare to PVR. Information may also come from industry and media sources.	N/A	Company stated that it does not control any purse seine vessels.	
7.2	Threshold Requirement for PVR Listing	<p>Obtain written verification that all supplier purse seine vessels owned by the same business organization meet the requirements of CM 7.2.</p> <p>For the purposes of this measure, "owned" means a registered or controlling (majority) interest in the vessel(s).</p> <p>This measure comes into effect <a href="#">January 1st, 2018</a>.</p>	Large Purse Seine	<p>Auditor reviews the efficacy of the verification process used by PCs.</p> <p>Auditor reviews publicly available information on the ownership of vessels.</p> <p>Measure applies from Q1 2018 onwards.</p>	Ok	Company has procedure in place to ensure that all LSPS vessels it sources from are listed on the Record. None of the LSPS vessels listed in quarterly RFMO reports were found to belong to fleets with other LSPS vessels not listed on the Record.	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
7.3	Purchases from PVR Vessels	For fishing trips beginning on or after January 1, 2016, source 100% of skipjack, yellowfin and bigeye tuna caught by large-scale purse seine vessels from vessels registered in the PVR.	Large Purse Seine	Auditor isolates skipjack, yellowfin and bigeye tuna caught by large-scale purse seiners within the quarterly RFMO data submission and compares trip dates and purchase data to PVR listing dates. Supporting documentation may be requested to verify the accuracy of trip dates.	Ok	All LSPS vessels are registered on the PVR.	
7.4	Supply and Tender Vessels	<p>1. Processors, traders, importers, transporters, marketers and others involved in the seafood industry, for skipjack, yellowfin and bigeye tuna with controlled supply or tender vessels that operate with purse seine vessels fishing for skipjack, yellowfin and bigeye tuna, shall:</p> <p>(a) register all such vessels on the ISSF ProActive Vessel Register (PVR) and thereafter maintain such registration indefinitely;</p> <p>(b) ensure all such vessels are listed on the authorized vessel record of any of the RFMO governing the ocean area in which the tuna was caught;</p> <p>(c) ensure all such vessels have an IMO unique vessel identifier; and</p>	All Purse Seine	<p>Auditor asks participating company for list of supply and tender vessels and checks whether vessels are listed on the PVR.</p> <p>Auditor verifies vessel attribute data, IMO number, RFMO registration, ownership, and whether vessel(s) appear on RFMO IUU lists.</p> <p>Auditor reviews list of PS vessels linked to each supply &amp; tender vessel. PS vessel list must include vessel names and flags.</p> <p>Measure applies from Q1 2018 onwards.</p>	N/A	Company stated that it does not control any supply & tender vessels.	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		<p>(d) ensure all such vessels are not listed on the IUU Vessel List of any RFMO.</p> <p>2.For the purposes of this measure, controlled vessels include vessels as defined in ISSF CM 7.1.</p> <p>3.When registering all controlled supply or tender vessels on the PVR, in addition to the vessel attribute data already required as part of the PVR listing application, the vessel owner must provide the vessel names and flags of all the purse seine vessels that the listed supply or tender vessels support, to the maximum extent possible.</p> <p>4.For purposes of this measure, supply and tender vessels are any vessel used, or intended for use, for the purpose of fishing or the transport of fishery products.</p> <p>This measure comes into effect <a href="#">January 1st, 2018</a>.</p>					
8.1	Exemption for Very Small Purse Seine Vessels	<p>Very small purse seine vessels are exempted from the following ISSF Conservation Measures:</p> <p>3.4 Skipper Best Practices</p> <p>4.4(a) Transshipment</p>	Small Purse Seine	The company can demonstrate that the vessel is less than 30 GT by providing fishing licenses, vessel surveys, photos, etc.	N/A	Company stated that it did not source from very small purse seine vessels. Gear type not identified in quarterly RFMO reports or during the traceability exercise.	

**END OF REPORT**