



ISSF Participating Company Compliance

Audit Checklist

Version 2019/1

SAPMER

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 28 May 2020, for activities in Q3-4 2019)

I, Adrien de CHONGESAN, CEO (Name/Title) of SAPMER, acknowledge receipt of this final compliance report, and have taken notice of any potential non-conformances contained within.

Signature¹:

A handwritten signature in blue ink, appearing to read 'Adrien de Chongesan', is written over a horizontal blue line.

Date: 29 May 2020

¹ Please note that ISSF mandates that the head of your company sign the Final draft of this report.

General Audit Information

Please verify or complete the information in blue boxes.

Company Name	SAPMER
Affiliated Company Names	Tuna Fishing Company (TFC), Indian Ocean Ship Management Service (IOSMS)
Company Address	Freeport Zone 8 - Quay D Road, Port-Louis, Mauritius Tel: +230 405 9700
Contact Information (Name, Phone, Email)	Loic Coutel lcoutel@sapmer.com
Auditor Name(s)	Mr. Jonah van Beijnen Mr. Oleg Martens
Audit Start Date	Week of 30 March 2020
Audit End Date	TBD based on Company Response Time, but not later than week of May 18th 2020
Time zone(s) for coordinating remote audit conference call	Réunion / Mauritius
Language requirements for remote audit conference call	English / French

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

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

Conformance with ISSF Commitments	
Non-conformances	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.
Grading	MRAG Americas defines audit findings as follows: <ul style="list-style-type: none"> · Conformance (Ok) - the PC can provide evidence of compliance with a conservation measure · Observations - the PC is currently in compliance but there is a high risk that non-conformance could occur inadvertently without implementing preventative actions · Minor Non-conformance – the PC does not comply with a conservation measure, but this does not compromise the integrity of the ISSF initiatives · Major Non-conformance – the PC does not comply with a conservation measure and this compromises the integrity of the ISSF initiatives
MRAG Americas' procedures	MRAG Americas' procedures for handling non-conformances for PCs are as follows: <ul style="list-style-type: none"> · MRAG Americas substantiates conformance through documented evidence. · Where a company cannot provide documented evidence of conformance with a conservation measure, a

	<p>non-conformance must be issued.</p> <ul style="list-style-type: none"> · All non-conformances must be graded either major or minor. · In the case of a non-conformance, ISSF may require a Corrective Action Response (CAR). The corrective actions must be in place and evidence of addressing the condition must be supplied to MRAG or ISSF within an agreed timescale or a follow up audit may be required.
Corrective Action Responses (CARs)	<p>To rectify non-conformances, the PC may be given the opportunity to provide a CAR. The nature of the CAR is at the discretion of the PC. MRAG Americas does not advise on what specific corrective action the PC may take but will assess whether the CAR is expected to address the non-conformance. MRAG Americas will also not provide advice with respect to any sanction that might be applied to a PC resulting from identified non-conformances. Such action will be at the discretion of the ISSF.</p>

Table 1: Conservation Measures and Conformance Levels

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	Company only sources from vessels it owns, and all vessels are listed in the PVR, and in good standing. All selected vessels that are part of the RFMO reports and traceability exercise are properly listed in RFMO authorized vessel records.	
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 reports are flagged to an RFMO member state.	
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	Ok	Company successfully completed the traceability exercise, demonstrating they can trace the raw material from catcher	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
				codes or sales invoices by label and destination from which the company will conduct traceability exercises. If the company produces cans from loins, or sells loins as a finished good, these products must be included in the assessment and the traceability exercise will cover a 3-month period.		vessel through to consumer facing product.	
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. As described by ISSF, 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 rfmodata@iss-foundation.org</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 rfmodata@iss-foundation.org indicating that company only purchases loins and/or finished goods.</p>	Ok	<p>All RFMO data was received, and submitted to the relevant RFMOs, in accordance with ISSF timeline requirements.</p> <p>Due to a miscommunication regarding reporting requirements, some data had to be resubmitted, and relevant RFMO has since received the corrected reports for Q3 and Q4 2019.</p>	
2.3	Product Labelling by Species and Area of Capture	Processors, traders, importers, transporters, marketers and others involved in the seafood industry shall on all product labeling, or through a publicly available web-based	All	Auditor obtains list of consumer-facing branded products, and checks that said list includes information on the species of	Ok	Company provided list of all consumer-facing product types to auditor. Several codes were selected at random, for which Company provided	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		<p>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>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>		evidence of species name and area of capture appearing on packaging.	
3.1(a)	Shark-Finching Policy	Company establishes and publishes policy prohibiting shark finning.	All	Auditor reviews company website for published policy.	Ok	https://www.sapmer.fr/wp-content/uploads/2015/12/SAPMER-Shark-Policy-1.pdf	
3.1(b)	Prohibition of Transactions with Shark-Finching Vessels	Refrain from transactions with vessels that have shark finned within two years of the product purchase date (as found by RFMO or competent national authority).	All	Auditor reviews company system for ensuring no transactions with vessels that practice shark finning. The company system is verified by checking purchases against data gathered throughout the year of RFMO compliance reports, media sources, etc.	Ok	<p>Company only sources from its own vessels, all of which are listed on the PVR, and in good standing.</p> <p>No evidence of shark finning was found in media or RFMO compliance reports.</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	No transactions with companies	All	Auditor reviews	N/A	Company only sources	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
	Transactions with Companies without a Public Policy Prohibiting Shark Finning	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.		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.		from its own vessels, all of which are listed on the PVR.	
3.2	Large-Scale Pelagic Driftnets Prohibition	No transactions in vessels using large-scale pelagic driftnets.	All	Auditor reviews quarterly report by gear type, and identifies any use of large-scale driftnets. This is done by first identifying vessels using gill nets, then following up on the size of the net. Maximum net size is 2.5 km.	Ok	No large-scale pelagic driftnet use associated with vessels found in the quarterly RFMO reports. None of the selected vessels that are part of the traceability exercise have been associated with the use of drift nets or gill nets.	
				MRAG reviews RFMO compliance committee reports for any indication of vessels using large-scale pelagic driftnets.	Ok	No large-scale driftnet use was identified in 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	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	Ok	All purse seine vessels are listed in the PVR and are compliant with this measure. All selected purse seine	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		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.		PVR, company provides evidence of vessel policy or RFMO requirement regarding full retention of tunas.		vessels that are part of the traceability exercise retain their tuna as per PVR records and/or captain's statements.	
3.4	Skipper Best Practices	Unless exempt per Conservation Measure 8.1, skipper ² has attended an ISSF Skippers Workshop in person, has viewed the Skippers Workshop video online, or has reviewed the Skippers Guidebook. The workshop video is located at this link . The online guidebook is located at www.issfguidebooks.org .	All Purse Seine	Verify that the company has purchased tuna only from vessels with skippers that have completed ISSF best practices education. Auditor checks PVR and ISSF list of individuals who have attended Skippers Workshops or have certified that they read the online Skippers Guidebook or viewed the online Skippers Workshop video; or the PC may provide evidence of skipper review of guidebook, video, including list of skippers, method of review and dates of completion.	Ok	All PS vessels are listed on the PVR with a green check for this CM. All skippers of the selected purse seine vessels that are part of the traceability exercise read the ISSF guidebook as per PVR records.	
3.5	Transactions with Vessels that use Only 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 public policy regarding the use of only non-entangling (NE) FADs. The policy should refer to the ISSF Guide for Non-Entangling FADs and shall	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	Ok	All purse seine vessels are listed in the PVR and are compliant with this measure. Company also provided NE FAD policy, which applies to its support vessels.	

² 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
		<p>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 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>		state or fleet association has an in-effect mandatory requirement for NE FADs, which equals or surpasses ISSF guidelines for NE FADs.			
3.6	Transactions with Vessels Implementing Best Practices for Sharks and Sea Turtles	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.	Large-Scale Longline	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	N/A	<p>Company stated it does not source from large-scale longline vessels.</p> <p>No large-scale longline vessels identified in quarterly reports or during the traceability exercise.</p>	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		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>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.³</p> <p>Auditor reviews date on which policy was put in effect and understands measure applies from Q3 2018 onwards.</p>			
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>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</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 Company sourced from have valid IMO numbers.</p> <p>All purchases that are part of the traceability exercise are from vessels that have an UVI-IMO number or that are exempted.</p>	

³ 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-Sharks.pdf

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		<p>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>					
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: http://www.tuna.org/GlobalTVR.htm or a UVI from ISSF: http://issf-foundation.org/wpcontent/uploads/downloads/2015/02/UVI-and-IMO-numbering-instructions-2015.pdf.</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>	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	<p>Company only sources from its PS vessels, which are registered on the PVR and have a valid IMO number.</p> <p>All selected purse seine vessels that are part of the traceability exercise have either an IMO UVI number or a TUVI issued by CLAV in place.</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 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	Large Purse Seine	Auditor assesses company system for observer coverage of controlled vessels, company data submission to RFMOs and RFMO committee meetings and compliance reports, etc.	Ok	<p>All LSPS vessels are listed on the PVR with a green check for this CM.</p> <p>All selected large purse seine vessels that are part of the traceability exercise have 100% observer coverage as per PVR</p>	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		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.		If RFMO requires 100% observer coverage, no further evidence is required.		records.	
4.3(b)	Observer Coverage Exemption - WCPO Region	Exemptions may be made for large-scale purse seine vessels in the Western and Central Pacific Ocean fishing in latitudes higher than 20°N/S in cases where the catch (retained and discarded; target and nontarget) is adequately sampled and reported to the RFMO. Such exemptions shall be based on a detailed report that will be reviewed and approved by the ISSF Board and announced publicly through the ISSF website.	Large Purse Seine	The auditor will review evidence that the vessel meets the requirements for this exemption.	N/A		
4.3(b)(i)	Observer Coverage Exemption – New Zealand Flag Purse Seine Vessels	An exemption is granted for tuna caught by New Zealand flag purse seine vessels that operate only within New Zealand waters targeting free school skipjack during the summer season	Large Purse Seine	The auditor will review evidence that the vessel meets the requirements for this exemption.	N/A		
4.3(c)	Observer Coverage – Grace Period for Electronic Monitoring Systems for Certain Large-Scale Purse Seine Vessels	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 to meet the requirements of ISSF Conservation Measure 4.3(a). Owners of large-scale purse seine	Large Purse Seine	The auditor will review evidence that vessel(s) meets the requirements of this grace period. Evidence can include a successful Level 2 audit of the vessel(s), but if that is not available, the vessel(s) is subject to the following: Auditor requests the name and IMO of the	N/A		

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		<p>vessels who fit in this category may seek to install an electronic monitoring system (if proven to be effective) in lieu of human observers. In such an event, the following provisions apply:</p> <p>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. A satisfactory 'executed agreement' should:</p> <ul style="list-style-type: none"> - be dated and signed, - list all parties engaged in the transaction along with their contact information, - list the vessel name(s) and IMO or registration number, - describe the type of system to be installed, and - Indicate when the system will be installed and the expected length of the agreement. <p>Once such evidence has been determined to be satisfactory, the vessel will be deemed to follow this measure for a period of six (6) months, which will allow appropriate time for installation of and training on the electronic monitoring system.</p> <p>The vessel owner must provide satisfactory proof that the equipment has been installed and is operating within that period; if such proof is not provided within grace period, the vessel will return to a non-compliant status with ISSF</p>		<p>vessel(s), the name of the provider, EM system type, and installation date.</p> <p>Auditor might also request copy of executed services agreement, which clearly states the name and contact information of the provider, copy of receipt for the installation date, and evidence of crew/staff training in operating the EM system.</p> <p>If needed, auditor reviews services agreement with EM provider and physical inspection of EM system aboard vessel to verify that it contains stated attributes.</p>			

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		Conservation Measure 4.3(a).					
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.	N/A	The Company stated it did not engage in any transshipments. No transshipments noted in quarterly RFMO reports or mention in Compliance Committee Reports that vessels Company sourced from had transhipped.	
4.4(b)(i)	Transshipment Exemption – Papua New Guinea	No transactions in vessels that transship unless they have been granted an exemption under this clause (fishing only in the archipelagic waters of PNG; and that are based in PNG and are associated with processing facilities in PNG).	Large Purse Seine	During the traceability exercise, the auditor reviews any instance of transshipment to assess whether the exemption applies.	N/A		
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 is equal to or greater than 20m length overall (LOA).	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. Measure applies from Q1 2018 onwards.	N/A		

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
5.1	Illegal, Unreported and Unregulated (IUU) Fishing	No transactions with vessels on any tuna RFMO IUU vessel list.	All	Auditor checks quarterly data sent by the company to the RFMO for the presence of IUU listed vessels.	Ok	No vessels listed in the quarterly RFMO reports were found on IUU list. https://iuu-vessels.org No IUU listed vessels were found during the traceability exercise.	
				The auditor reviews the company purchasing system to prevent IUU fish. This will also be assessed during traceability exercises to verify that products do not originate from IUU vessels and by reviewing compliance committee reports, commission reports, etc.	Ok	Company owns all the vessels it sources from and ensures they are in full compliance with RFMO and Flag State regulations. No IUU-listed vessels were identified in the quarterly RFMO reports.	
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 ensure the withdrawal of products from the marketplace in the event any of its vessels is associated with IUU activities.	
				Company initiates market withdrawal of IUU products.	N/A	No IUU product was found in supply chain during audit period, so no market withdrawal had to be initiated.	
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	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-	Ok	All LSPS vessels Company sourced from are on the ISSF LPS Record. All large purse seine vessels that are part of the traceability exercise are	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		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).		Scale Purse Seine Vessels.		listed on the Record of Large-Scale PS vessels.	
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,</p>	Large Purse Seine	<p>Vessel representative will be asked to provide a complete list of all owned large-scale purse seine vessels, including IMO numbers.</p> <p>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.</p> <p>Measure applies from Q1 2018 onwards.</p>	Ok	<p>All LSPS vessels Company sourced from are owned by the Company and are listed on the PVR.</p> <p>Note: no suspicious vessels identified in the traceability exercise belong to a “fleet”.</p>	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		parent or grandparent, whether natural, adopted or by marriage).					
7.1	Registration of Controlled Vessels	Register all controlled purse seine vessels on the PVR.	All Purse Seine	Auditor will obtain list of controlled vessels from company and compare to PVR. Information may also come from industry and media sources.	Ok	Company provided list of all controlled vessels. All controlled purse seine vessels are properly registered on the PVR.	
7.2	Threshold Requirement for PVR Listing	Obtain written verification that all supplier purse seine vessels owned by the same business organization meet the requirements of CM 7.2. For the purposes of this measure, "owned" means a registered or controlling (majority) interest in the vessel(s).	Large Purse Seine	Auditor reviews the efficacy of the verification process used by PCs. Auditor reviews publicly available information on the ownership of vessels.	Ok	All LSPS vessels Company sourced from are owned by the Company and are listed on the PVR. All LSPS vessels within the traceability exercise come from fleets where all LSPS vessels are registered on the PVR.	
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 Company sourced from are listed on the PVR. All vessels, trip details and catch volumes of direct purchases from LSPS that are part the traceability exercise match with PVR listings.	
7.4	Supply and Tender Vessels	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	All Purse Seine	Auditor asks participating company for list of supply and tender vessels and checks whether vessels are listed on the PVR. Auditor verifies vessel	Ok	All controlled supply and tender vessels are listed on the PVR and are authorized by the relevant RFMO.	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		<p>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> <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>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 & tender vessel. PS vessel list must include vessel names and flags.</p> <p>Measure applies from Q1 2018 onwards.</p>			

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
8.1	Exemption for Very Small Purse Seine Vessels	Very small purse seine vessels are exempted from the following ISSF Conservation Measures: 3.4 Skipper Best Practices 4.4(a) Transshipment	Small Purse Seine	The company can demonstrate that the vessel is less than 30 GT by providing fishing licenses, vessel surveys, photos, etc.	N/A	The Company does not source from very small purse seine vessels.	

END OF REPORT