



**ISSF Participating Company Compliance**

**Audit Checklist**


Version 2019/2

## **Tropical Canning (Thailand) Public Co., LTD**

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):

**Updated Compliance Report (as of 10<sup>th</sup> September 2020, for activities from Q4 2018 to Q3 2019)**

I, *Kampol Watcharanimit*, Managing Director of Tropical Canning (Thailand) Public Co., acknowledge receipt of this final compliance report, and have taken notice of any potential non-conformances contained within.

Signature<sup>1</sup>:  \_\_\_\_\_

Date: 14 September 2020

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

**General Audit Information**

Company Name	Tropical Canning (Thailand) Public Co., LTD	
Affiliated Company Names	Tropical Canning, Tropical Food MFG, PT Meden Tropical Canning & Frozen Industries, Subsidiaries: Tropical Canning Public Company Limited, Tropical Food Manufacturing, PT. Medan Tropical Canning & Frozen Industries	
Company Address	1/1 M.2, T. THUNGYAI, HATYAI, SONGKHLA, 90110 THAILAND	
Contact Information (Name, Phone, Email)	Harry Tan <a href="mailto:harrytan@tropicalgrp.com">harrytan@tropicalgrp.com</a>	
Auditor Name(s)	Patricia Bianchi Jonah van Beijnen Oleg Martens	Erin Wilson Jason Anderson
Audit Start Date	<b>31 October 2019</b>	
Audit End Date	<b>Preliminary audit results issued: Week of 27 January 2020</b> <b>Final audit results issued: Week of 9 March 2020</b>	
Time zone(s) for coordinating remote audit conference call	Thailand	
Language requirements for remote audit conference call	English	

Compliance Snapshot							
Conservation Measure	2019 update	2019	2018	2017	2016	2015	2014
1.1 RFMO Authorized Vessel Record	OK	OK	OK	OK	OK	OK	OK
1.2 RFMO Participation	OK	OK	OK	OK	OK	OK	OK
2.1 Product Traceability	OK	OK	OK	OK	OK	OK	OK
2.2 Quarterly Data Submission to RFMO	OK	OK	MINOR	OK	OK	OK	MINOR
2.3 Product Labelling by Species and Area of Capture	OK	MINOR	OK	-	-	-	-
3.1(a) Shark Finning Policy	OK	OK	OK	OK	OK	OK	OK
3.1(b) Prohibition of Transactions with Shark Finning Vessels	OK	OK	OK	OK	OK	OK	OK
3.1(c) Prohibition of Transactions with Companies without a Public Policy	OK	OK	OK	OK	OK	OK	OK
3.2 Large-scale Pelagic Driftnets	OK	OK	OK	OK	OK	OK	OK
3.3 Full Retention of tunas	OK	OK	OK	OK	OK	MINOR	OBS
3.4 Skippers Best Practices	OK	OK	OK	OK	OK	MINOR	OBS
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	OK	OK	OK	-	-	-	-
4.1 UVI-IMO	OK	OK	OK	OK	OK	OK	MINOR
4.2 Purse Seine Unique Vessel Identifiers	OK	OK	OK	OK	OK	OK	MINOR
4.3 Observer Coverage	OK	OK	OK	OK	OK	OK	OK
4.4(a) Transshipment	OK	OK	OK	OK	OK	OK	OK
4.4(c) Transshipment at Sea – Observer Coverage	N/A	N/A	N/A	-	-	-	-
5.1 IUU Fishing	OK	OK	OK	OK	OK	OK	OK
5.2 IUU Product Response	OK	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	OK	OK
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	OK	-	-	-	-
7.1 Registration of Controlled Vessels	N/A	N/A	N/A	OK	N/A	N/A	OBS
7.2 Threshold Requirement for PVR Listing	OK	OK	OK	-	-	-	-
7.3 Purchases from PVR Vessels	OK	OK	OK	OK	OK	-	-
7.4 Supply and Tender Vessels	N/A	N/A	N/A	-	-	-	-
8.1 Exemption for Very Small Purse Seine Vessels	N/A	N/A	N/A	OK	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 2019/2.
<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 2019/2.

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> <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'</b>	MRAG Americas' procedures for handling non-conformances for PCs are as follows:

<b>procedures</b>	<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>

**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	<p>Company has system in place to screen all vessels against RFMO and National registries ahead of purchase.</p> <p>All the vessels listed in the quarterly RFMO reports are either registered with the relevant RFMO(s) or National Authority (if they only fish within their EEZ).</p> <p>All selected vessels that are part of the traceability exercise are properly listed in RFMO authorized vessel records.</p>	
1.2	RFMO Participation	All purchases must be from vessels flagged to a member or cooperating non-member of	All	Auditor reviews quarterly data sent by the company to the	Ok	All vessels are flagged to an RFMO member or cooperating non-member.	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		the relevant RFMO (or have applied with the RFMO for such status), or if membership is not possible, flagged to an Invited Expert or another such designation established by the RFMO.		RFMO to check that all vessels meet this requirement.		All vessels that are part of the traceability exercise are properly flagged and are a member or cooperating non-member of RFMO relevant to the fishing area.	
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 included in the assessment and the traceability exercise will cover a 3-month period.	Ok	The company has a suitable traceability system in place that allows all product codes and produced volumes to be traced through all stages of the supply chain back to the vessel and vessel trip.	
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>	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 the 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></p>	Ok	<p>All RFMO data was submitted, and copied to the relevant RFMOs, in accordance with ISSF timeline requirements.</p> <p>The auditor was able to locate all vessels and corresponding trips from direct whole round purchases identified in the traceability exercise in the submitted RFMO reports.</p>	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		c. A Participating Company that only purchases loins and finished goods from other ISSF participating companies is exempt from sending RFMO data. However, the company must affirm quarterly via an unprompted email to <a href="mailto:rfmodata@iss-foundation.org">rfmodata@iss-foundation.org</a>		indicating that the company only purchases loins and/or finished goods.			
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 system by product, for all branded tuna products:  1. Identify the species of tuna contained in the product. For example:  Katsuwonus pelamis, Skipjack, Bonite, Listado  Thunnus alalunga, Albacore, Germon, Atún blanco  Thunnus albacares, Yellowfin, Thon Jaune, Rabil  Thunnus obesus, Bigeye, Thon Obese, Patudo  2. Identify the ocean of capture for the tuna contained in the product.	All	Auditor obtains list of consumer-facing branded products, and checks that said list includes information on the species of tuna (scientific name and/or common name), and ocean of capture.  Auditor may also verify conformance with this CM during the annual traceability exercise.	Ok	For randomly selected product codes, the species name could be identified. However, the ocean of capture was not specified, and 4 different potential oceans of capture are provided on the can instead.  <a href="#">10 September 2020 update: Company provided auditor with sample of product labeling from Q4 2019 through Q2 2020. Labels properly listed the species name, along with ocean of capture.</a>	During remediation, Company provided evidence they had changed their labelling so that only one ocean of capture / FAO would appear on each can. Random sampling can be carried out during the compliance update period (Q3 2020) to confirm system effectiveness. // <a href="#">Company provided evidence to remediate the Minor nonconformance.</a>
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="https://www.tropical.co.th/files/policy/ISSFSharkFin.pdf">https://www.tropical.co.th/files/policy/ISSFSharkFin.pdf</a>	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
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 the company system for ensuring no transactions with vessels that practice shark finning. The company system is verified by checking purchases against data from RFMO compliance reports, media sources, etc.	Ok	<p>Company screens vessels against RFMO and National lists, and the PVR, ahead of sourcing.</p> <p>No evidence of shark finning was found on 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 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 the 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, the 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 provided anti shark finning policy of its suppliers.</p> <p>Suppliers that are part of the traceability exercise have a policy in place prohibiting shark finning and all PS vessels that are listed on 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,	Ok	<p>No large-scale pelagic driftnet use identified in the quarterly RFMO reports.</p> <p>None of the selected vessels that are part of the</p>	



CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
				then following up on the size of the net. Maximum net size is 2.5 km.		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 evidence of large-scale pelagic driftnets associated with vessels the company sourced from was found in Compliance Committee reports.	
3.3	Full Retention of Tunas	All purse seine caught tuna (skipjack, yellowfin and bigeye) is retained onboard, except those unfit for human consumption as defined, or when in the final set of a trip, where 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	ICCAT: Not applicable. No PS were sourced from this region.  WCPFC: All PS are listed on the PVR with a green check for this CM.  IOTC: All are small-scale PS and are not listed on the PVR, however the IOTC requires full retention of all tuna as defined by Resolution 19/05.  All selected purse seine 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 <sup>2</sup> has attended an ISSF Skippers Workshop in person, has viewed the Skippers Workshop video online, or has reviewed the Skippers	All Purse Seine	Verify that the company has purchased tuna only from vessels with skippers that have completed ISSF Skipper Best Practices education. Auditor	Ok	WCPFC: All PS are listed on the PVR with a green check for this CM.  For the other regions, or for PS vessels not on the PVR, the Company	

<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
		<p>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>.</p>		<p>checks the PVR and ISSF list of individuals who have either attended Skippers Workshops, have certified that they read the online Skippers Guidebook, or have viewed the online Skippers Workshop video. The PC may also provide evidence of skipper review of guidebook, video, including list of skippers, method of review and dates of completion.</p>		<p>provided a copy of captains' statements certifying that PS captains completed training.</p> <p>All skippers of the selected PS vessels that are part of the traceability exercise read the ISSF guidebook as per PVR records.</p>	
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</a></p>	All Purse Seine and Support Vessels	<p>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.</p>	Ok	<p>The Company has a procedure of requesting signed captain statements from all its suppliers that they have a non-entangling FAD Policy. The Company will refrain to procure from any fishing vessel found to violate this policy. Evidence of these signed statements was provided by the Company.</p> <p>ICCAT: Not applicable. No PS were sourced from this region.</p> <p>WCPFC: All PS are listed on the PVR with a green check for this CM</p> <p>All selected suppliers that are part of the traceability exercise have a Non-Entangling FAD policy in place as per PVR records.</p>	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		<p><a href="#">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 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>	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</p>	Ok	<p>The Company requests all tuna suppliers to provide a signed captain statement certifying that they have a policy in place that requires Best Practices for sharks and sea turtles for all longline vessels.</p> <p>Company provided copies of policies for its large-scale longline suppliers.</p> <p>All longline vessels identified in the traceability exercise have a policy requiring the implementation of best practices for sharks and sea turtles.</p>	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
				those outlined in the ISSF Skippers' Guidebook to Longline Fishing Practices; and  (c) No use of "shark lines" at any time. <sup>3</sup>			
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, and 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>Company has procedure in place to screen vessels for IMO numbers prior to sourcing. All vessels in the quarterly reports have valid IMO or UVI number, if capable of receiving one. For smaller vessels that only operate within their EEZ, Company either requires them to provide a UVI number or National registration number.</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>	

<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\\_rfm0\\_measures/wcpfc/CMM-2014-05-Conservation-and-Management-Measure-for-Sharks.pdf](https://www.ccsbt.org/sites/ccsbt.org/files/userfiles/file/other_rfm0_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
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.org/GlobalTVR.htm">http://www.tuna.org.org/GlobalTVR.htm</a> or a UVI from ISSF: <a href="http://issf-foundation.org/wpcontent/uploads/downloads/2015/02/UVI-and-IMO-numbering-instructions-2015.pdf">http://issf-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 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>All PS vessels listed in the quarterly RFMO reports had either an IMO or UVI number.</p> <p>All selected PS 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 case the flag state (or RFMO) does not accept the data, the vessel owner must store data for at least three years from the end of the trip. At a minimum, data to be made available are those fields required by the flag state for vessel logbooks.	Large Purse Seine	Auditor assesses company system for observer coverage of controlled vessels, company data submission to RFMOs and RFMO committee meetings and compliance reports, etc. If RFMO requires 100% observer coverage, no further evidence is required.	Ok	<p>All LSPS vessels listed in the RFMO reports have green checks on the PVR for this CM.</p> <p>All selected LSPS vessels that are part of the traceability exercise have 100% observer coverage as per PVR records or were exempted.</p>	
4.4(a)	Transshipments	No transactions in tuna where transportation included transshipment, except when	All Purse Seine	Auditor reviews data submission for relevant RFMO, transshipment	Ok	No unauthorized at-sea transshipments were found in the quarterly	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		exempt per Conservation Measure 4.4 (b)(i) or Conservation Measure 8.1.		documents and RFMO compliance committee and commission reports to verify that tuna purchased has not undergone unauthorized transshipment.		RFMO reports.  All transshipments by vessels identified in the traceability exercise are properly listed and reported.	
4.4(c)	Transshipment at Sea – Observer Coverage	<p>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).</p> <p>Note: The WCPFC E-reporting system allows transshipment declarations (TDs) to be filed without the observer’s signature. In such cases, company should obtain a copy of the observer contract, the crew list (signed and dated by the skipper), or some other evidence of 100% observer coverage for the period during which TDs were submitted using the E-reporting system.</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>	Large-Scale Longline	<p>Auditor assesses participating company system to determine observer coverage on large-scale longline, and/or transshipment, vessels they source from.</p> <p>Company shall maintain record(s) of RFMO transshipment declarations, which must be signed by the observer present during transshipment.</p> <p>If vessel uses the WCPFC E-reporting system for a TD, auditor asks company to provide a copy of the observer contract, the vessel crew list or other evidence for that vessel.</p>	N/A	<p>Company stated it does not source from large-scale longline vessels that transship at sea.</p> <p>No large-scale longline transshipments were listed in the quarterly RFMO reports.</p> <p>Note: no transshipments at sea were recorded during the traceability exercise.</p>	

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 IUU-listed vessels were identified in the quarterly RFMO reports.  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	The company described its procedure to ensure no purchases from IUU vessels.  No evidence of IUU was found at <a href="https://iuu-vessels.org/Home/Search">https://iuu-vessels.org/Home/Search</a>	
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 in place to ensure no purchases of IUU fish.	
				Company initiates market withdrawal of IUU products.	N/A	No IUU product was found in supply chain during audit period, so market withdrawal was not 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-	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	Ok	All LSPS vessels are on the LPS record.  All LSPS vessels that are part of the traceability exercise are listed on the	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		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).		ISSF Record of Large-Scale Purse Seine Vessels.		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</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>	Ok	<p>Company has a procedure in place to ensure that all LSPS vessels it sources from are listed on the Record. None of the LSPS vessels listed in the quarterly RFMO reports were found to belong to fleets with other LSPS vessels not listed on the Record.</p> <p>Note: no vessels identified in the traceability exercise belong to a “fleet”.</p>	



CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		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).					
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 provided a statement that it does not control any PS vessels.	
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	Company has procedure in place to ensure that all LSPS vessels it sources from are listed on the PVR. None of the LSPS vessels listed in the quarterly RFMO reports were found to belong to fleets with other LSPS vessels not 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	Ok	All LSPS vessels are on the PVR.  All vessels, trip details and catch volumes of direct purchases from LSPS that are part the traceability	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
				compares trip dates and purchase data to PVR listing dates. Supporting documentation may be requested to verify the accuracy of trip dates.		exercise match with PVR listings.	
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> <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>	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>	N/A	The Company provided a statement that it does not control any supply and tender vessels.	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		<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>					
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 4.4(a) Transshipment</p>	Very 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	<p>Company stated it does not source from very small PS vessels.</p> <p>No very small PS vessels were found during the traceability exercise or in RFMO reports.</p>	

**END OF REPORT**