



**Audit Policy Document  
&  
Standard Operating Procedures**

**For**

**Vessels in Other Sustainability Initiatives  
(VOSI)**

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*Integrated Management of Natural Resources*

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# 1 Introduction

The International Seafood Sustainability Foundation's (ISSF) Proactive Vessel Register (PVR), was established to demonstrate and track tropical tuna fishing vessels' compliance with ISSF's [Conservation Measures](#). Recently, stakeholders indicated that they would like to see additional recognition for Vessels engaged in Other Sustainability Initiatives, which led ISSF to develop and publish the [VOSI<sup>1</sup> vessel list](#). This document describes the protocol for audits of vessels that appear on the VOSI table.

The vessel audits<sup>2</sup> are carried out remotely and organized in two levels to ensure the goals of auditing are achieved efficiently and effectively. All vessels applying to be recognized undergo an initial Level 1 audit as part of the VOSI listing process. Level 2 audits are conducted on an appropriate sample of vessels to assist in verifying information provided to show conformance with, and/or active participation in, the listed sustainability initiatives. All vessels will receive either a level 1 or level 2 audit on an annual basis.

## 2 Program implementation

### 2.1 Participation In, and Compliance with, Fishery Improvement Projects & MSC Certified Fishery(ies)

All vessels that wish to be recognized for their participation in other sustainability initiatives commit to independent auditing against the measures listed in Tables 1 and 2 below. These tables provide the current list of items to be audited, guidance regarding what is required, and the means of verification that will be used by the auditor to assess conformance. These measures will be amended, as needed, following changes to the guidelines and standards underpinning the listed sustainability initiatives. The information audited will be based upon the data submitted by vessels, and/or data which are otherwise available to MRAG Americas.

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<sup>1</sup> It is important to consider that during the same period a vessel may be active in a fishery subject to a recognized sustainability initiative (such as an MSC certified fishery or Fishery Improvement Project) as well as other fisheries.

<sup>2</sup> Note that these voluntary audits are entirely separate from the audit requirements put in place by other sustainability initiatives.

**2.1.1 Table 1: FIP Measures and Means of Verification (All Gear Types)**

Measure	Category	Guidance - What is being verified?	Audit Type	Means of Verification	Frequency
1.1	FIP Participation	Does your vessel participate in a FIP listed on <a href="http://www.fisheryprogress.org">www.fisheryprogress.org</a> ?	Level 1	<p>'yes' or 'no' answer from vessel representative (rep).</p> <p>If yes, rep identifies the specific FIP in which they are participating.</p> <p>Auditor checks if vessel is listed on <a href="http://www.fisheryprogress.org">www.fisheryprogress.org</a><sup>3</sup> (if available)</p> <p>If FIP is marked as "completed" on fisheryprogress.org, auditor checks that it has not held that status for more than 12 months.<sup>4</sup></p>	Annually
			Level 2 / Red Flag	<p>Auditor asks vessel rep for evidence of FIP active participation. This can include FIP-related documents<sup>3</sup> which name the vessel(s), such as meeting minutes, email exchanges, agendas, action plans, etc. This can also include a signed and dated letter from the FIP lead confirming the vessel(s) sustained participation in the FIP. Additionally, the auditor may request documentation from FisheryProgress, including a description of how the vessel information displayed on <a href="http://www.fisheryprogress.org">www.fisheryprogress.org</a> was collected, and a statement in writing from the FIP Lead acknowledging that they have undertaken best efforts to ensure that the vessel list provided is complete and accurate.</p> <p>Auditor cross-checks vessel information obtained during most recent PVR audit (if applicable) to confirm that the fishing authorization, gear type, geographic region, and general activity correspond with the information reported by the FIP on <a href="http://www.FisheryProgress.org">www.FisheryProgress.org</a>.</p>	Sample Plan or based on 'Red Flag' notifications to ISSF or Fishery Progress.

<sup>3</sup> To the extent that there are multiple versions of the same document, which list the vessels participating in the FIP, the most recent version will be used for the audit.

<sup>4</sup> If after the 12-month period fishery is no longer listed on fisheryprogress.org and does not appear on the MSC website as having entered Full Assessment, ISSF will be notified to remove vessel from VOSI table.

2.1.2 Table 2: MSC Measures and Means of Verification (All Gear Types)

Measure	Category	Guidance - What is being verified?	Audit Type	Means of Verification	Frequency
1.1	Participation in MSC Full Assessment	<p>Does your vessel participate in:</p> <p>A Fishery engaged in an MSC Full Assessment?</p> <p>Or</p> <p>A Fishery which was in a FIP listed on <a href="http://www.fisheryprogress.org">www.fisheryprogress.org</a>, and has moved on to an MSC Full Assessment?</p>	Level 1	<p>‘yes’ or ‘no’ answer from vessel representative (rep).</p> <p>If yes, rep identifies the specific MSC Full Assessment in which they are participating, and (if applicable) in which <a href="http://www.fisheryprogress.org">www.fisheryprogress.org</a> listed FIP they were participating.</p> <p>Auditor checks if vessel/company is listed as an official participant on <a href="http://www.msc.org">www.msc.org</a><sup>5,6</sup> (if available) and checks if FIP and vessel are listed on <a href="http://www.fisheryprogress.org">www.fisheryprogress.org</a><sup>3</sup> (if available).</p>	Annually
			Level 2	<p>Auditor asks vessel rep for evidence of FIP participation (if applicable). This can include FIP-related documents<sup>3</sup> which name the vessel(s), such as meeting minutes, email exchanges, agendas, action plans, etc. This can also include a signed and dated letter from the FIP lead confirming the vessel(s) sustained participation in the FIP. Additionally, the auditor may request documentation from FisheryProgress, including a description of how the vessel information displayed on <a href="http://www.fisheryprogress.org">www.fisheryprogress.org</a> was collected, and a statement in writing from the FIP Lead acknowledging that they have undertaken best efforts to ensure that the vessel list provided is complete and accurate.</p> <p>Auditor asks rep for copies of the documentation produced in conformance with the MSC Full Assessment process identifying the vessel is an official participant in the unit of certification.<sup>5,6</sup></p> <p>Auditor cross-checks vessel information obtained during most recent PVR audit (<i>if applicable</i>), or other publicly available information, to confirm that the fishing authorization and general activity correspond with the area covered by the Unit of Certification.</p>	Sample plan or based on ‘Red Flag’ notifications to ISSF or MSC.

Measure	Category	Guidance - What is being verified?	Audit Type	Means of Verification	Frequency
1.2	MSC Certified Fishery Participation	Does your vessel participate in an MSC Certified Fishery(ies)?	Level 1	<p>'yes' or 'no' answer from vessel representative (rep).</p> <p>If yes, rep identifies the specific MSC Fishery (Unit of Certification) in which they are participating.</p> <p>Auditor checks if vessel/company is listed as an official participant on <a href="http://www.msc.org">www.msc.org</a><sup>5,6</sup> (if available).</p>	Annually
			Level 2 / Red Flag	<p>Since MSC does not currently maintain a 'real-time' public list of vessels active in certified fisheries, auditor asks rep for copies of the documentation produced in conformance with the MSC certification and assessment process identifying the vessel is an official participant in the unit of certification.<sup>5,6</sup></p> <p>Auditor cross-checks vessel information obtained during most recent PVR audit (if applicable), or other publicly available information, to confirm that the fishing authorization and general activity correspond with the area covered by the Unit of Certification.</p>	Sample plan or based on 'Red Flag' notifications to ISSF or MSC.
1.3	MSC Certified Fishery Participation	<p>Does vessel fish outside of the unit of certification?</p> <p>Note 1: This includes fishing with other gear types, in different locations, and/or fishing for other species other than the certified Unit of Assessment (UoA).</p> <p>Note 2: For any activity taking place outside of the UoA, if in a FIP, refer to table 2.1.1 above.</p>	Level 1	<p>'yes' or 'no' answer from rep.</p> <p>If yes, rep identifies the other fishery(ies) where vessel operates.</p>	Annually
			Level 2 / Red Flag	<p>Auditor asks rep for official documentation (such as logbooks or copies of observer reports) showing the dates spent operating within and outside the Unit of Certification.</p>	Sample Plan or based on 'Red Flag' notifications to ISSF or MSC.

<sup>5</sup> Auditor can check the Announcement Client Draft Report (ACDR), the Public Comment Draft Report (PCDR), the Final Draft Report (FDR), and/or any other Client document such as the list of vessels uploaded in the MSC track a fishery webpage. To the extent that there are multiple versions of the same document, which lists vessels participating in the UoA, the most recent version will be used for the audit.

<sup>6</sup> To the extent that there are multiple versions of the same document, which lists vessels participating in the UoA, the most recent version will be used for the audit.

2.1.3 Table 3: FADs and Means of Verification (Purse Seine and Supply & Tender)

Measure	Category	Guidance - What is being verified?	Audit Type	Means of Verification	Frequency
2(a)	Vessels involved in biodegradable FAD trials and/or FAD recovery initiatives, or that are using non-entangling FADs with no netting in any components, including both the raft and the tail.	Does your vessel participate in a <b>biodegradable FAD trial</b> , which includes the participation of the relevant RFMO science bodies and/or coastal States, national scientists, and/or ISSF scientists to monitor experimental designs?	Level 1	<p>‘Yes’ or ‘no’ answer from vessel representative (rep).</p> <p>If yes, the rep identifies the specific biodegradable FAD trial in which they are participating.</p> <p>Auditor then reviews evidence that company is participating in a biodegradable FAD trial, which includes the participation of the relevant RFMO science bodies and/or coastal States, national scientists, and/or ISSF scientists to monitor experimental designs.</p>	Annually
			Level 2 / Red Flag	<p>Auditor asks vessel rep for:</p> <ul style="list-style-type: none"> <li>- Evidence of vessel (or company’s) continued active participation in the biodegradable FAD trial, which includes the participation of the relevant RFMO science bodies and/or coastal States, national scientists, and/or ISSF scientists to monitor experimental designs.</li> </ul>	Sample Plan or based on ‘Red Flag’ notifications to ISSF or Fishery Progress.
2(b)		Does your vessel participate in a <b>FAD recovery initiative</b> , which includes the participation of the relevant RFMO science bodies and/or coastal States, national scientists, and/or ISSF scientists to monitor experimental designs?	Level 1	<p>‘Yes’ or ‘no’ answer from vessel representative (rep).</p> <p>If yes, the rep identifies the specific FAD recovery initiative in which they are participating.</p> <p>Auditor then reviews evidence that company is participating in a FAD recovery initiative, which includes the participation of the relevant RFMO science bodies and/or coastal States, national scientists, and/or ISSF scientists to monitor experimental designs.</p>	Annually
			Level 2 / Red Flag	<p>Auditor asks vessel rep for:</p> <ul style="list-style-type: none"> <li>- Evidence of vessel’s (or company’s) continued active participation in the FAD recovery initiative, which includes the participation of the relevant RFMO science bodies and/or coastal States, national scientists, and/or ISSF scientists to monitor experimental designs.</li> </ul>	Sample Plan or based on ‘Red Flag’ notifications to ISSF or Fishery Progress.

2(c)		Does your vessel use <b>non-entangling FADs</b> with no netting in any components, including both the raft and the tail?	Level 1	'Yes' or 'no' answer from vessel representative (rep). If yes, the rep provides non-entangling FAD design schematics showing the detail of the materials being used.	Annually
			Level 2 / Red Flag	Auditor asks vessel rep for: <ul style="list-style-type: none"><li>- Most recent FAD design schematics, showing the detail of materials being used.</li></ul>	Sample Plan or based on 'Red Flag' notifications to ISSF or Fishery Progress.

## 3 Audits

### 3.1 Process

#### 3.1.1 Introduction

Table 1 through 3 outline the audit coverage for all vessels listed on VOSI. As described in the tables, the data and reporting requirements increase with the level of audit.

The auditing process begins with the indication of a vessel that it wishes to be recognized for participation in one or more recognized sustainability initiative(s) separate from ISSF. An initial audit of the information supplied with the application is conducted, followed by annual updates to verify vessel attribute data remain current. Additionally, a vessel may be selected to complete a Level 2 audit, which requires detailed evidence to demonstrate the vessel's active participation in the listed sustainability initiative(s).

#### 3.1.2 Level 1 Audits

All vessels are subject to an initial Level 1 audit at the time of their listing on the VOSI Table, which lives on the [ISSF website](#), with regular checks of Level 1 information thereafter. These checks may take place during the Annual PVR Level 1 audits (if applicable), which look at the vessel attribute data, to verify whether there have been any changes since the vessel was listed.

#### 3.1.3 Level 2 Audits

For all gear types, Level 2 audits occur remotely and result either from an identified risk factor (i.e., red flag) triggered during a Level 1 audit or through random selection of vessels (all vessels have equal weighting for random selection). Most of the required information should be available electronically, either through direct communications with the vessel company or from information already held by ISSF or other sustainability initiatives. For documents that cannot be uploaded electronically, additional records can be transmitted to MRAG Americas by regular mail at:

MRAG Americas, Inc.  
Attn: Mr. Oleg Martens  
8950 Dr M.L.K. Jr St N  
Suite 202  
St. Petersburg, FL 33702 / USA

### 3.2 Audit Determination and Reporting

During a Level 1 audit, if the vessel(s) meets the means of verification requirements, it is either listed or remains on the VOSI table. Level 2 audit findings are described in a report summarizing compliance with the Measures listed in this audit protocol, per vessel. Final audit reports do not issue any type of certification nor place an audited vessel on a higher rating compared with non-audited vessels. Any

significant gaps in conformance<sup>7</sup> and where corrective actions<sup>8</sup> may be required will be specified. Timelines for implementation of corrective and/or preventative actions will be assigned by MRAG Americas, however any changes to the vessel listing on the VOSI Table will be at the discretion of ISSF. Depending on the nature of the non-conformance and the required corrective action, a follow-up audit may be required.

### 3.2.1 Non-conformances

Vessels that fail to provide the requested evidence during a Level 1, 2, will be in non-conformance. Only a successful Corrective Action Response (CAR) will result in lifting the non-conformance.

### 3.2.2 Corrective Action Responses (CARs)

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

### 3.2.3 Audit Reports

## 4 Annex 1. Audit Program Policy

### 4.1 Overall Audit Policy

It is the policy of MRAG Americas to ensure that its audit operations are consistent with defined standards and procedures in order to maintain the highest appropriate level of quality. To this end, MRAG Americas undertakes vessel Level 1 & 2 audits according to the standards and procedures described in this manual and only within the scope of the VOSI measures current at the time of auditing. The procedures described in this manual apply to all levels of audits. MRAG Americas has developed this document and its auditing procedures with guidance from ISO/IEC 17065:2012(E).

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

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

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<sup>7</sup> Meaning a vessel being able to demonstrate active participation in an initiative which qualifies the vessel for listing on VOSI.

<sup>8</sup> For example, a vessel would provide information in accordance with the audit protocol, which demonstrates active participation in the initiative.

standards for job tasks; and are encouraged to identify and suggest improvements to the program.

## 4.2 Assessment Team

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

- a) Contractual obligations for auditors, including requirements to report actual and potential conflicts of interest and to maintain confidentiality;
- b) Specification of division of responsibilities between auditors and experts of MRAG Americas;
- c) Procedures to be undertaken by auditors;
  - prior to audits
  - during audits
  - after audits,e.g., specification of responsibilities and recommended schedules for report writing
- d) Information about the overall role of the auditor in maintaining the integrity of the audit process and ISSF Conservation Measures.

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

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

## 4.3 Auditor training

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

The training program will include:

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

## 4.4 Documentation and Means of Verification

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

Copies of vessel documentation (either electronic or hard copy) are acceptable for Level 1 and 2 vessel audits. In some instances, for example in the case of commercially sensitive documents, sighting of a document on a computer screen during a webinar session (i.e., using screen sharing) may be an option.<sup>9</sup>

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

## 4.5 Confidentiality and data security

### 4.5.1 Confidentiality

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

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

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<sup>9</sup> The decision regarding whether sighting of a document in this way is acceptable will be made by the Auditor following policy advice from MRAG Americas. This will depend on the nature of the document and the measure for which it is being used as evidence of conformance.

## **4.5.2 Data Security**

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

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

## **4.6 Compliance with legal requirements**

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

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

## **4.7 Program Review**

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