



**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 listed on the PVR, which are also active in Fishery Improvement Projects (FIPs) and/or in Marine Stewardship Council (MSC) certified tuna fisheries.<sup>1</sup> Because the latter two conservation initiatives do not always publicly provide a list of vessels that operate within their fishery(ies), it was agreed that vessels seeking additional recognition could volunteer for an independent audit<sup>2</sup> to confirm their participation.

The vessel audits 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 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, FIPs and/or MSC Certified fishery(ies). 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 PVR registered vessels that wish to be recognized for their participation in a FIP or an MSC certified fishery, 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 FIP Guidelines and/or the MSC Standard. The information audited will be based upon the data vessels submit, and/or data which are otherwise available to MRAG Americas.

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<sup>1</sup> It is important to consider that a vessel may be active both in a FIP and in an MSC certified fishery during the same period but may also be active in a fishery that is not engaged in either initiative.

<sup>2</sup> Note that these voluntary audits in no way replace the audit requirements put in place by MSC and/or Fishery Progress. It is only a means to verify whether a vessel registered on the ISSF Proactive Vessel Register (PVR) is also an active participant in a FIP or MSC certified fishery.

**2.1.1 Table 1: FIP Measures and Means of Verification (PVR Registered Vessels – 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 they are participating in.</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>	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,</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.

Measure	Category	Guidance - What is being verified?	Audit Type	Means of Verification	Frequency
				geographic region, and general activity correspond with the information reported by the FIP on <a href="http://www.FisheryProgress.org">www.FisheryProgress.org</a> .	

**2.1.2 Table 2: MSC Measures and Means of Verification (PVR Registered Vessels – All Gear Types)**

Measure	Category	Guidance - What is being verified?	Audit Type	Means of Verification	Frequency
1.1	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) they are participating in.</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>4</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>4</sup></p> <p>Auditor cross-checks vessel information obtained during most recent PVR audit, 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.

<sup>4</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.

Measure	Category	Guidance - What is being verified?	Audit Type	Means of Verification	Frequency
1.2	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 within and outside the Unit of Certification.</p>	<p>Sample Plan or based on 'Red Flag' notifications to ISSF or MSC.</p>

## 3 Audits

### 3.1 Process

#### 3.1.1 Introduction

Table 1 and Table 2 outline the audit coverage for all levels of vessel compliance with the FIP and MSC measures that currently apply to vessels on the Record. As described in the tables, the data and reporting requirements increase with the level of audit. It is the responsibility of the MRAG Americas Program Manager<sup>5</sup> to ensure audits are compliant and consistent with the most up to date ISSF Conservation Measures.

The auditing process begins with the indication of a vessel that it wishes to be recognized for participation in a FIP or MSC certified fishery. 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 asks for detailed evidence to demonstrate the vessel's active participation in the FIP or Certified fishery.

#### 3.1.2 Level 1 Audits

All vessels are subject to an initial level 1 audit at the time of their listing on the Vessels in Other Sustainability Initiatives (VOSI) Table, which will live on the ISSF website, with regular checks of level 1 information thereafter. These regular checks may take place during the Annual PVR Level 1 audits, 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 a 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, Fishery Progress or Marine Stewardship Council. For documents less amenable to uploading electronically, additional records can be transmitted to MRAG Americas by snail mail at:

MRAG Americas  
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

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 and where

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<sup>5</sup> The Program Manager is the main contact point at MRAG Americas for audit related queries and drives the MRAG Americas program.

corrective actions 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 FIP/MSC Participation 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 or Red Flag audit, will be considered to be in nonconformance. Only a successful corrective action response (CAR) will result in lifting the nonconformance.

### **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 FIP/MSC Participation Table that may occur as a result of identified non-conformances. ISSF will decide how vessels are listed on the FIP/MSC Participation 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 FIP and MSC measures current at the time of auditing.<sup>6</sup> 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 in managing quality; receive the training necessary to meet quality 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 on 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 and audit process in maintaining the integrity of the 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 FIP and MSC measures covered in the audit protocol;
- received a copy of 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, 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 specific audit criteria.

The training program will include:

- Desktop training (remote)
- Interactive online training
- Shadow audit(s) observing an MRAG Americas experienced auditor
- Annual refresher training
- Performance review audits by an MRAG Americas experienced 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>7</sup>.

MRAG Americas will use the Level 2 audit checklists for all audits. The completed and reviewed audit checklists will also serve as the audit reports. A copy of the audit report will be provided to both ISSF and the vessel representative.

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

Much 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. 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, provided that they 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.

### 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 output not included in reports sent to ISSF are shredded

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<sup>7</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.

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 audits will occur annually. The Program Manager will also conduct ongoing program reviews (on a minimum annual basis) to ensure program activities are as effective and efficient as practicable to achieve program outcomes.