



**ISSF Participating Company Compliance
Audit Checklist**
Version 2016/2

Foodtech JSC

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 April 26, 2016 for activities in 2015)

General Audit Information

Company Name	Foodtech JSC
Affiliated Company Names	
Company Address	AP 1, NHUT CHANH, BEN LUC, LONG AN, VIETNAM
Contact Information (Name, Phone, Email)	MR WICANATE PRAPUTH /PLANT MANAGER TEL: +84 72 3871 080 EMAIL: WICANATE@FOODTECH.VN
Auditor Name(s)	Chris Spring, Erin Wilson, Phil Bratten, Patricia Bianchi, Jonah van Beijnen
Audit Start Date	January 15, 2016
Audit End Date	March 18, 2016
Time zone(s) for coordinating remote audit conference call	14 hours
Language requirements for remote audit conference call	English

Compliance Snapshot		
Conservation Measure	Current	2014
1.1 RFMO Authorized Vessel Record	OK	MINOR
1.2 RFMO Participation	OK	OK
2.1 Product Traceability	OK	MINOR
2.2 Quarterly Data Submission to RFMO	MINOR	MINOR
3.1(a) Shark Finning Policy	OK	OK
3.1(b) Prohibition of Transactions with Shark Finning Vessels	OBS	OK
3.1 (c) Prohibition of Transactions with Companies without a Public Policy	MINOR	MINOR
3.2 Large-scale Pelagic Driftnets	OK	OK
3.3 Full Retention of tunas	MINOR	OK
3.4 Skippers Best Practices	OK	MAJOR
4.1 UVI-IMO	OK	MINOR
4.2 Purse Seine Unique Vessel Identifiers	OK	OK
4.3(a) Observer Coverage	OK	OK
4.4(a) Transshipment	N/A	OK
5.1 IUU Fishing	MINOR	MINOR
5.2 IUU Product Response	MINOR	MINOR
6.1 Transaction Ban for LPS vessels not Actively Fishing for Tuna on Dec. 31, 2012	OK	OK
6.2(a) 2.a-d and 6.3(a) Requirements for Inclusion in Large-scale Purse Seine Vessels Fishing for Tropical Tunas	N/A	N/A
7.1 Registration of Controlled Vessels	N/A	N/A
8.1 Exemption for Very Small Purse Seine Vessels	N/A	N/A

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 2015/1.
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 2015/1

Conformance with ISSF Commitments	
Non-conformances	Non-conformances must be raised against specific ISSF conservation measures. The severity of the non-conformance – and in particular 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 - the PC can provide evidence of compliance with a particular

	<p>conservation measure</p> <ul style="list-style-type: none"> · 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 particular conservation measure, but this does not compromise the integrity of the ISSF initiatives · Major Non-conformance – the PC does not comply with a particular conservation measure and this compromises the integrity of the ISSF initiatives
MRAG Americas' procedures	<p>MRAG Americas' procedures for handling non-conformances for PCs are as follows:</p> <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 non-conformance must be issued. · 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>

				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.		to be traced back to the vessel and vessel trip.	
CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
2.2	Quarterly Data Submission to RFMO	Send information as described in the measure to RFMO scientific bodies for each quarter by the last day of the following calendar quarter.	All	Auditor checks that information has been sent by companies to RFMO for all purchases.	Minor	Carrier Vessel IMO number has not been listed in the RFMO reports	Carrier vessel IMO number must be included in the RFMO reports
					Minor	Although many local purse seiners have been assigned an ISSF UVI number, these numbers have not been included in the RFMO reports as a UVI number.	UVI numbers assigned by ISSF to the local purse seiners will be included in the RFMO reports.
					Minor	Unloading port has not been listed in the RFMO reports	Beginning in Q2 2016, the final unloading port should be listed in the RFMO reports
					Ok	All vessels from traceback were listed on Q reports	
3.1(a)	Shark-Finching Policy	Company establishes and publishes policy prohibiting shark finning.	All	Auditor reviews company website for published policy.	Ok	WWW.FOODTECHJSC.COM	

					Minor	Most traceback vessels were small scale purse seine with vietnamese flag. Could not find evidence of public shark finning policy for these vessels	
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	All fishing vessels are purse seiners. No drift nets are used.	
				MRAG reviews RFMO compliance committee reports for any indication of vessels using large-scale pelagic driftnets.	Ok	Vessels from traceback are purse seiners listed on the PVR No evidence of large-scale drift nets in the compliance committee reports	
CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
3.3	Full Retention of Tunas	All purse seine caught tuna (skipjack, yellowfin and bigeye) retained onboard, except those unfit for human consumption as defined, or when in the final set of a trip, there is insufficient well space to	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	Minor	Imported tuna comes from vessels listed on PVR. Locally sourced tuna come from small scale purse seine fisheries with Vietnam flag.	Provide evidence of full tuna retention policy for vietnamese purse seiners

		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.		or RFMO requirement regarding full retention of tunas.		Vietnam is a cooperating non-member of WCPFC. Unable to confirm whether vessels have full retention of tuna policy. Could not find evidence of full tuna retention policy for vietnamese flagged purse seiners	
3.4	Skipper Best Practices	Unless exempt per Conservation Measure 8.1, skipper[1] 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	In November 2015, Foodtech used the Vietnamese version of the ISSF Skippers guide book to facilitate the training of 72 skippers of the local purse seiner fleet. Their completion was documented through the ISSF training feedback form. .	
CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
4.1	Unique Vessel Identifiers - IMO	All purchases must be from vessels with an IMO UVI number if the vessel is	All	Auditor reviews company system to ensure vessel purchases	Ok	Company states that they only purchase tuna from fishing vessels with	

		capable of being registered by IMO.		meet this criteria. 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>catch certificate issued by fishery authority.</p> <p>The company did not specify if this was internally verified at purchase.</p> <p>All imported tuna come from vessels on PVR and have IMO number.</p> <p>Locally sourced tuna are from small scale vietnamese purse seiner IMO N/A.</p> <p>Vessels from traceback either have IMO or were exempt due to size</p>	
4.2	Purse Seine Unique Vessel Identifiers	<p>All purse seine vessels with which the company transacts in tuna, and which are not able to receive an IMO UVI number, must have a TUVI issued by CLAV</p> <p>http://www.tuna-org.org/GlobalTVR.htm or ISSF http://iss-foundation.org/download-monitor-demo/download-info/uvi-and-imo-number-instructions/ unless exempt per Conservation Measure 8.1.</p>	All Purse Seine	Auditor reviews company method to ensure that all vessel purchases meet this criteria. 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>Foodtech sources from small scale vietnamese purse seiner IMO N/A.</p> <p>UVI has been obtained for part of the fleet. There are 31 new vessels. The application form for ISSF UVI for these vessels has been provided.</p> <p>Small scale vessels from traceback either have ISSF UVI or are applying to one as shown in application attached</p>	
4.3(a)	Observer Coverage	Evidence of 100% observer coverage (human or electronic) unless exempt or prevented by force	Large Purse Seine	Auditor assesses company system for observer coverage of controlled vessels,	Ok	Imported tuna comes from large scale purse seine vessels listed on the PVR.	

		<p>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.</p>		<p>company data submission to RFMOs and RFMO committee meetings and compliance reports, etc. For non-PVR vessel purchases, the PC provides details of agreement with observer provider (human or electronic) for 100% coverage. If RFMO requires 100% observer coverage, no further evidence is required.</p>	Ok	<p>Internally sourced by small scale vessels.</p> <p>Vessels from traceback were small scale or listed on the PVR</p>	
4.3(b)	Observer Coverage Exemption - WCPO Region	<p>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 non-target) 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.</p>	Large Purse Seine	<p>The auditor will review evidence that the vessel meets the requirements for this exemption.</p>		N/A	
4.3(b)(i)	Observer Coverage Exemption – New Zealand Flag Purse Seine Vessels	<p>An exemption is granted for tuna caught by New Zealand flag purse seine vessels that operate only within New Zealand waters</p>	Large Purse Seine	<p>The auditor will review evidence that the vessel meets the requirements for this exemption.</p>		N/A	

		targeting free school skipjack during the summer season					
CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
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	No evidence of transshipments in RFMO reports or compliance committee reports	
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	
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 vessels in RFMO reports	
				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	Minor	Company states that they only purchase tuna from fishing vessels with catch certificate issued by fishery authority. The company did not specify if and how this	Develop a system to prevent IUU fish. This could be checking RFMO black list before purchase of raw material.

				vessels and by reviewing compliance committee reports, commission reports, etc.	Ok	was internally verified. No evidence of IUU was identified on vessels from traceback	
CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
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.	Minor	No evidence was submitted regarding a recall procedure to identify and withdrawal in case of IUU detection	Develop system to identify and withdrawal IUU fish
				Company initiates market withdrawal of IUU products.	N/A	No withdrawal due to IUU.	
6.1	Transaction Ban for Large-Scale Purse-Seine Vessels not Actively Fishing for Tuna as of December 31, 2012	Demonstrate that all purchases from large-scale purse seine vessels are from vessels actively fishing for tuna as of December 31, 2012 and listed on the ISSF Record of Large-Scale Purse Seine Vessels (Record). If a vessel is not listed on the Record, the company shall provide evidence of the vessel attributes in accordance with Conservation Measure 6.2 (a). Any updates to the Record must be made in accordance with 6.2(a).	Large Purse Seine	The auditor reviews a list of company purchases from large-scale purse seine vessels to assess whether the source vessels are listed on the ISSF Record of Large-Scale Purse Seine Vessels. If source vessels do not appear in the Record, the company must provide evidence in accordance with Conservation Measure 6.2(a) as described below.	Ok	All vessels are on PVR or not a large purse seine	
6.2(a).2.a	Requirements for Inclusion in Record of Large-Scale Purse Seine Vessels Fishing For	Provide certification from government body that vessel was licensed to fish	Large Purse Seine	ISSF reviews evidence provided by vessel owner to determine		N/A	

	Tropical Tunas	for tuna before December 31, 2012.		whether vessel is eligible to be listed in the ISSF Record.			
CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
6.2(a).2.b	Requirements for Inclusion in Record of Large-Scale Purse Seine Vessels Fishing For Tropical Tunas	To demonstrate that the vessel was contracted for construction before 12/31/12, the vessel representative may provide such evidence as a signed contract, supporting correspondence, deposit paid, plans, photos, etc., certificate from IACS member, IMO number or RFMO record. To demonstrate that construction was completed before 6/30/15, the vessel may provide such evidence as completion of sea trial, certificate from shipyard, sale of fish, skippers log, observer report, etc., certificate from government agency.	Large Purse Seine	MRAG reviews evidence provided by company to determine whether vessel is eligible to be listed in the ISSF Record.		N/A	
6.2(a).2.c	Requirements for Inclusion in Record of Large-Scale Purse Seine Vessels Fishing For Tropical Tunas	Vessel provides update regarding name, flag or registration number.	Large Purse Seine	ISSF reviews evidence provided by vessel owner to determine whether vessel is eligible to be listed in the ISSF Record.		N/A	
6.2(a).2.d	Requirements for Inclusion in Record of Large-Scale Purse	If vessel replacement is one to one, the well	Large Purse	MRAG reviews evidence provided by vessel		N/A	

	Seine Vessels Fishing For Tropical Tunas	volume of the new vessel must be less than or equal to the well volume of the vessel being removed. If a new vessel is intended to replace multiple vessels listed in the ISSF Record, the aggregated replaced capacity of more than one vessel already on the ISSF Record must be at least 1.2 times the new capacity (aggregated replaced capacity/1.2 = permitted new capacity).	Seine	owner to determine whether vessel is eligible to be listed in the ISSF Record.			
6.2(a).3	Requirements for Inclusion in Record of Large-Scale Purse Seine Vessels Fishing For Tropical Tunas	If a vessel on the ISSF Record is to be refurbished, the new fish hold volume must show that the aggregated replaced capacity is at least 1.2 times the capacity of the vessel before refurbishment ((original vessel capacity + replaced capacity)/1.2 = refurbished capacity).	Large Purse Seine	MRAG reviews evidence provided by company to determine whether vessel is eligible to be listed in the ISSF Record.		N/A	
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	No controlled vessels.	.
8.1	Exemption for Very Small Purse Seine Vessels	Very small purse seine vessels are exempted from the following ISSF	Small Purse Seine	The company can demonstrate that the vessel is less than 30 GT		N/A	

		Conservation Measures: 3.4 Skipper Best Practices 4.2 Purse Seine Unique Vessel Identifiers 4.4(a) Transshipment		by providing fishing licenses, vessel surveys, photos, etc.			
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