



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

Frinsa Del Noroeste S.A.

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 15 March 2017, for activities in 2016)

General Audit Information

Please verify or complete the information in blue boxes.

Company Name	Frinsa Del Noroeste S.A.
Affiliated Company Names	
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Auditor Name(s)	Chris Spring, Erin Wilson, Phil Bratten, Patricia Bianchi, Jonah van Beijnen
Audit Start Date	Week of 14 November, 2016
Audit End Date	Preliminary audit results issued: Week of 30 January, 2017 Final audit results issued: Week of 13 March, 2017
Time zone(s) for coordinating remote audit conference call	Spain
Language requirements for remote audit conference call	Spanish/English

Compliance Snapshot			
Conservation Measure	Current	2015	2014
1.1 RFMO Authorized Vessel Record	OK	OK	OK
1.2 RFMO Participation	OK	OK	OK
2.1 Product Traceability	OK	OK	OK
2.2 Quarterly Data Submission to RFMO	OK	OK	MINOR
3.1(a) Shark Finning Policy	OK	OK	OK
3.1(b) Prohibition of Transactions with Shark Finning Vessels	OK	OK	OK
3.1 (c) Prohibition of Transactions with Companies without a Public Policy	OK	OK	OK
3.2 Large-scale Pelagic Driftnets	OK	OK	OK
3.3(a) Full Retention of tunas	OK	OK	OK
3.4 Skippers Best Practices	OK	OK	OK
4.1 UVI-IMO	OK	OK	MINOR
4.2 Purse Seine Unique Vessel Identifiers	OK	OK	OBS
4.3 Observer Coverage	OK	OK	OK
4.4 Transshipment	OK	OK	OK
5.1 IUU Fishing	OK	OK	OK
5.2 IUU Product Response	OK	OK	OK
6.1 Transaction Ban for LPS vessels not Actively Fishing for Tuna on Dec. 31, 2012	OK	MINOR	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	N/A
7.1 Registration of Controlled Vessels	N/A	OK	OBS
7.3 Purchases from PVR Vessels	OK		
8.1 Exemption for Very Small Purse Seine Vessels	N/A	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 2017/1.
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 2017/1.

Conformance with ISSF Commitments	
Non-conformances	Non-conformances must be raised against specific ISSF conservation measures. The severity of the non-conformance – and whether this jeopardizes the integrity of the ISSF program – determines which non-conformances are raised.
Grading	MRAG Americas defines audit findings as follows: <ul style="list-style-type: none"> · Conformance (Ok) - the PC can provide evidence of compliance with a conservation measure · Observations - the PC is currently in compliance but there is a high risk that non-conformance could occur inadvertently without implementing preventative actions

	<ul style="list-style-type: none"> · Minor Non-conformance – the PC does not comply with a conservation measure, but this does not compromise the integrity of the ISSF initiatives · Major Non-conformance – the PC does not comply with a conservation measure and this compromises the integrity of the ISSF initiatives
MRAG Americas' procedures	<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>

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
				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.			
2.2	Quarterly Data Submission to RFMO	<p>a. Send information for all round fish purchases (skipjack, albacore, yellowfin, bigeye) as described in the measure to RFMO scientific bodies for each quarter by the last day of the following calendar quarter.</p> <p>b. As described by ISSE, for each quarter, Participating Companies are required to report (no later than the last day of the following calendar quarter) if they have no purchase of round fish (in total or from a typical RFMO region).</p> <p>c. A Participating Company that only purchases loins and finished goods from other ISSF participating companies is exempt from sending RFMO data. However, company must affirm so quarterly via an unprompted email to rmodata@iss-foundation.org</p>	All	<p>Auditor checks that information has been sent by companies to RFMO for all purchases.</p> <p>Auditor checks if PC has sent quarterly report to MRAG indicating no purchase of round fish. Auditor notes that this requirement did not come into effect until October 2016, therefore if company failed to report no purchases of round fish, this should be noted as an observation.</p> <p>Auditor checks that email has been sent to rmodata@iss-foundation.org indicating that company only purchases loins and/or finished goods from other ISSF Participating Companies. Here again, requirement came into effect in Oct 2016, thus if company did not send the emails, it should be</p>	Ok	Most vessels identified in the traceability exercise are present in RFMO data and major trip details have been confirmed.	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
				noted as an observation.			
3.1(a)	Shark-Finching Policy	Company establishes and publishes policy prohibiting shark finching.	All	Auditor reviews company website for published policy.	Ok	http://www.frinsa.es/wp-content/uploads/2015/12/Frinsa_Sustainability-policy.pdf	
3.1(b)	Prohibition of Transactions with Shark-Finching Vessels	Refrain from transactions with vessels that have shark finched within two years of the product purchase date (as found by RFMO or competent national authority).	All	Auditor reviews company system for ensuring no transactions with vessels that practice shark finching. The company system is verified by checking purchases against data gathered throughout the year of RFMO compliance reports, media sources, etc.	Ok	<p>Company has a documented procedure to ensure no transactions with vessels that practice shark finching.</p> <p>No evidence of shark finching was found in RFMO reports and/or compliance committee reports.</p> <p>None of the vessels that are part of the traceability exercise have been associated with shark finching.</p>	
3.1(c)	Prohibition of Transactions with Companies without a Public Policy Prohibiting Shark Finching	No transactions with companies that do not have a public policy prohibiting shark finching. If transactions involve flag states that absolutely prohibit shark finching no policy is required. If flag state allows 5% shark fin retention, the company must have a public policy.	All	Auditor reviews company procedure for ensuring that all tuna purchases have come from a company that has a public policy prohibiting shark finching. For flag states that do have an absolute shark finching prohibition, auditor will review all publicly available	Ok	<p>Company requires and verifies that all non-PVR vessels have a policy-prohibiting shark finching or otherwise ratify company's policy.</p> <p>Company provided anti shark finching policy for all suppliers.</p>	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
				material to ensure no shark finning has taken place. Traceability exercises by transaction or can code to PVR vessels or proof or proof of compliance verifies the system.		All the vessels that are part of the traceability exercise have a policy in place prohibiting shark finning and all vessels are listed in the PVR as compliant with this measure.	
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	None of the vessels that are part of the traceability exercise use gill nets or have been associated with the use of gill nets.	
				MRAG reviews RFMO compliance committee reports for any indication of vessels using large-scale pelagic driftnets.	Ok	No use of large pelagic drift nets was found in the RFMO compliance committee reports.	
3.3	Full Retention of Tunas	All purse seine caught tuna (skipjack, yellowfin and bigeye) retained onboard, except those unfit for human consumption as defined, or when in the final set of a trip, there is insufficient well space to accommodate all fish caught in that set. If the vessel fishes in areas where full retention is mandatory, no further	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	Company provided evidence (captain statements, policies) of full retention of tunas for its suppliers. All vessels that are part of the traceability exercise retain their tuna as per PVR records.	

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		policy is needed. If RFMO does not require full retention, vessel must have documented and implemented policy in accordance with this conservation measure.					
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	Company provided evidence of skippers that have completed ISSF best practices education for its suppliers. All skippers of vessels that are part of the traceability exercise read the ISSF guidebook as per PVR records	
4.1	Unique Vessel Identifiers - IMO	All purchases must be from vessels with an IMO UVI number if the vessel is capable of being registered by IMO.	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	Ok	Company has a documented procedure to ensure all transactions are from vessels with an IMO UVI number if eligible. Company verifies and records IMO in an internal database.	

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				vessels meet this requirement.		All purchases that are part of the traceability exercise are from vessels that have an UVI-IMO number.	
4.2	Purse Seine Unique Vessel Identifiers	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 http://www.tuna-org.org/GlobalTVR.htm or ISSF http://issf-foundation.org/download-monitor-demo/download-info/uvi-and-imo-number-instructions/ unless exempt per Conservation Measure 8.1.	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	If Purse Seine is less than 100GT company requires ISSF TUVI. All vessels that are part of the traceability exercise have either an IMO UVI number or a TUVI issued by CLAV in place.	
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	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. For non-PVR vessel purchases, the PC provides details of agreement with observer provider (human or electronic) for 100%	Ok	Company provided evidence of 100% observer coverage for all LPS vessels. All vessels that are part of the traceability exercise have 100% observer coverage as per PVR records.	

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		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.		coverage. If RFMO requires 100% observer coverage, no further evidence is required.			
4.3(b)	Observer Coverage Exemption - WCPO Region	Exemptions may be made for large-scale purse seine vessels in the Western and Central Pacific Ocean fishing in latitudes higher than 20°N/S in cases where the catch (retained and discarded; target and nontarget) is adequately sampled and reported to the RFMO. Such exemptions shall be based on a detailed report that will be reviewed and approved by the ISSF Board and announced publicly through the ISSF website.	Large Purse Seine	The auditor will review evidence that the vessel meets the requirements for this exemption.	N/A		
4.3(b)(i)	Observer Coverage Exemption – New Zealand Flag Purse Seine Vessels	An exemption is granted for tuna caught by New Zealand flag purse seine vessels that operate only within New Zealand waters targeting free school skipjack during the summer season	Large Purse Seine	The auditor will review evidence that the vessel meets the requirements for this exemption.	N/A		
4.3(c)	Observer Coverage – Grace Period for Electronic Monitoring Systems for Certain Large-Scale Purse Seine Vessels	ISSF has defined for its Conservation Measures that large-scale purse seine vessels are those with at least 335 m ³ fish hold	Large Purse Seine	The auditor will review evidence that vessel(s) meets the requirements of this grace period.	N/A		

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		<p>volume. However, certain vessels who meet this definition are not considered large-scale in certain RFMOs and therefore are unable to obtain human observers for each fishing trip to meet the requirements of ISSF Conservation Measure 4.3(a). Owners of large-scale purse seine vessels who fit in this category may seek to install an electronic monitoring system (if proven to be effective) in lieu of human observers. In such an event, the following provisions apply:</p> <ol style="list-style-type: none"> 1. The vessel owner must identify each vessel involved and provide satisfactory evidence of an executed agreement with a service provider to install an electronic monitoring system on each vessel. 2. Once such evidence has been determined to be satisfactory, the vessel will be deemed to follow this measure for a period of six (6) months, which will allow appropriate time for installation of and 		<p>Evidence can include a successful Level 2 audit of the vessel(s), but if that is not available, the vessel(s) is subject to the following:</p> <p>Auditor requests the name and IMO of the vessel(s), the name of the provider, EM system type, and installation date.</p> <p>Auditor might also request copy of executed services agreement, which clearly states the name and contact information of the provider, copy of receipt for the installation date, and evidence of crew/staff training in operating the EM system.</p> <p>If needed, auditor reviews services agreement with EM provider and physical inspection of EM system aboard vessel to verify that it contains stated attributes.</p>			

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		<p>training on the electronic monitoring system.</p> <p>3. The vessel owner must provide satisfactory proof that the equipment has been installed and is operating within that period; if such proof is not provided within grace period, the vessel will return to a non-compliant status with ISSF Conservation Measure 4.3(a).</p>					
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.	Ok	All vessels that are part of the traceability exercise only transshipped in ports and raw material is traceable through transshipment.	
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		

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 vessels listed in the quarterly 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 vessels and by reviewing compliance committee reports, commission reports, etc.	Ok	Company has a documented procedure which requires copies of all documentation prior to accepting the purchase. Company verifies that the vessel is registered with relevant RFMO, has an IMO and is on the PVR. All information is recorded in an internal database. No evidence of IUU vessels was found during the traceability exercise.	
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	Company has a recall procedure (crisis management) triggered in case of IUU detection, to withdraw these products from the marketplace.	
				Company initiates market withdrawal of IUU products.	N/A		
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	Large Purse Seine	The auditor reviews a list of company purchases from large-scale purse seine vessels to assess whether the source	Ok	All LPS are on the PVR. All 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
		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).		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.		PVR or in the ISSF large scale purse seine records.	
6.2(a).2. a	Requirements for Inclusion in Record of Large-Scale Purse Seine Vessels Fishing for Tropical Tunas	Provide certification from government body that vessel was licensed to fish for tuna before December 31, 2012.	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. 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, skipper's log,	Large Purse Seine	MRAG reviews evidence provided by company to determine whether vessel is eligible to be listed in the ISSF Record.	N/A		

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		observer report, etc., certificate from government agency.					
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 Seine Vessels Fishing for Tropical Tunas	If vessel replacement is one to one, the well 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).	Large Purse Seine	MRAG reviews evidence provided by vessel owner to determine whether vessel is eligible to be listed in the ISSF Record.	N/A		
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	Large Purse Seine	MRAG reviews evidence provided by company to determine whether vessel is eligible to be listed in the ISSF Record.	N/A		

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		capacity).					
6.2(b)	Requirements for Inclusion in Record of Large-Scale Purse Seine Vessels Fishing for Tropical Tunas	<p>If a vessel is to be exempt from Conservation Measures 6.1 and 6.2(a), MRAG will review records to establish that the vessel is, in fact, flagged to a PNA member country, and vessel representative will be asked to provide:</p> <ol style="list-style-type: none"> 1) Evidence of current registration on the WCPFC Record of Fishing Vessels; 2) Evidence of current participation in the Vessel Day Scheme (VDS) management system; <p>A statement from the vessel owner or operator that the vessel only fishes within the WCPFC Convention Area.</p>	Large Purse Seine	MRAG reviews online records to verify flag, and evidence provided by vessel owner to determine whether vessel is eligible to be listed in the Record.	N/A		

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
6.2(c)	Requirements for Inclusion in Record of Large-Scale Purse Seine Vessels Fishing for Tropical Tunas	<p>If ownership into a new vessel is to be approved, auditor will need to see evidence that owner has bought out and scrapped existing capacity up to the percent of capacity of the new vessel that corresponds to their ownership interest in the new vessel, in accordance with paragraph 2(d) of ISSF Conservation Measure 6.2(a).</p> <p>This can include:</p> <ol style="list-style-type: none"> 1) Sales receipt for the capacity that has been bought out and scrapped, which clearly states Fish Hold Volume figures for said capacity; and 2) Evidence that the Fish Hold Volume of the new vessel corresponding to the % ownership stake is (i) less than or equal to that of older vessel that was on the ISSF Record, or (ii) than 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 	Large Purse Seine	MRAG reviews public records as well as evidence provided by vessel owner to determine whether vessel is eligible to be listed in the Record.	N/A		

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		capacity).					
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 has no controlled vessels.	
7.3	Purchases from PVR Vessels	For fishing trips beginning on or after January 1, 2016, source 100% of skipjack, yellowfin and bigeye tuna caught by large-scale purse seine vessels from vessels registered in the PVR.	Large Purse Seine	Auditor isolates skipjack, yellowfin and bigeye tuna caught by large-scale purse seiners within the quarterly RFMO data submission and compares trip dates and purchase data to PVR listing dates. Supporting documentation may be requested to verify the accuracy of trip dates.	Ok	All LPS vessels were listed on the PVR. All vessels, trip details and catch volumes that are part of the traceability exercise match with PVR listings.	
8.1	Exemption for Very Small Purse Seine Vessels	Very small purse seine vessels are exempted from the following ISSF Conservation Measures: 3.4 Skipper Best Practices 4.2 Purse Seine Unique Vessel Identifiers 4.4(a) Transshipment	Small Purse Seine	The company can demonstrate that the vessel is less than 30 GT by providing fishing licenses, vessel surveys, photos, etc.	N/A		