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Negocios Industriales Real S.A. (NIRSA)

The following information is based on data provided by the company; it has been independently audited for completeness and accuracy
(Pursuant to stated ISSF guidelines).

Updated Compliance Report (as of 30 April 2018, for activities in 2017)

I Roberto Aguirre, President of Nirsa, acknowledge receipt of this final compliance report, and have taken notice
of any potential non-conformances contained within.

Signature¹:

A handwritten signature in blue ink, appearing to read "Roberto Aguirre", written over a horizontal blue line.

Date: 05-02-2018

¹ Please note that ISSF mandates that you sign this report.

Compliance Snapshot							
Conservation Measure		2017 Update	2017	2016	2015 Update	2015	2014
1.1 RFMO Authorized Vessel Record		OK	OK	OK	OK	OK	OK
1.2 RFMO Participation		OK	OK	OK	OK	OK	OK
2.1 Product Traceability		OK	OK	OK	OK	OK	OK
2.2 Quarterly Data Submission to RFMO		OK	OK	OK	OK	OK	MINOR
3.1(a) Shark Finning Policy		OK	OK	OK	OK	OK	OK
3.1(b) Prohibition of Transactions with Shark Finning Vessels		OK	OK	OK	OK	OK	OK
3.1 (c) Prohibition of Transactions with Companies without a Public Policy		OK	OK	OK	OK	OK	OK
3.2 f-scale Pelagic Driftnets		OK	OK	OK	OK	OK	OK
3.3 Full Retention of tunas		OK	OK	OK	OK	OK	OK
3.4 Skippers Best Practices		OK	OK	OK	OK	MINOR	OK
3.5 Transactions w/ Vessels that use Only Non-Entangling FADs		OK	OK				
4.1 UVI-IMO		OK	OK	OK	OK	OK	OK
4.2 Purse Seine Unique Vessel Identifiers		OK	OK	OK	OBS	OBS	N/A
4.3 Observer Coverage		OK	MAJOR	OK	OBS	OBS	OK
4.4 Transshipment		OK	OK	OK	N/A	N/A	OK
5.1 IUU Fishing		OK	OK	OK	OK	OK	OK
5.2 IUU Product Response		OK	OK	OK	OK	OK	OK
6.1 Transaction Ban for LPS vessels not Actively Fishing for Tuna on Dec. 31, 2012		OK	OK	OK	OK	OK	OK
7.1 Registration of Controlled Vessels		OK	OK	OK	OK	OK	OK
7.3 Purchases from PVR Vessels		OK	OK	OK			
8.1 Exemption for Very Small Purse Seine Vessels		N/A	N/A	N/A	N/A	N/A	N/A

Detail of Conservation Measure and Corrective Action

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence at the end of Remediation period	Corrective Action
4.3	Observer Coverage	Evidence of 100% observer coverage (human or electronic) unless exempt or prevented by force majeure. The data collected by the observer must be made available to the flag state authorities and, if appropriate, to the RFMO, in the format required by the flag state (and RFMO). In case the flag state (or RFMO) does not accept the data, the vessel owner must store data for at least three years from the end of the trip. At a minimum, data to be made available are those fields required by the flag state for vessel logbooks.	Large Purse Seine	Auditor assesses company system for observer coverage of controlled vessels, company data submission to RFMOs and RFMO committee meetings and compliance reports, etc. 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.	OK	Company has system to verify LSPS vessels are on the PVR and in good standing for this CM. However, three vessels had red Xs for this measure and sourcing still occurred. // On 2/28 company indicated sourcing had occurred due to human error. Company provided evidence that it had stopped sourcing from these vessels and had contacted the owner(s) to have them address their PVR rating for this measure. Auditor recognizes that vessels are above the 335 m3 FHV which qualifies them as LSPS, but under the IATTC threshold for mandatory observer coverage.	Closed on April 30, 2018. Company provided evidence that it has set up a new automated system (buscador de barcos) to screen all purchases from large-scale purse seine vessels against the Proactive Vessel Register (PVR) to ensure vessels are in compliance with all relevant conservation measures. A signed and dated record of staff trained to use this system was also provided. A separate analysis of company's latest quarterly RFMO reports shows all lpsps sourcing was from vessels listed on the PVR and with a green check for observer coverage. Lastly, company has engaged some of its suppliers in a FIP aiming to ensure vessels that fall in the 335m3 and 350m3 category, are fully covered by human observers or an Electronic Monitoring System (EMS).