



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

Starkist Co.

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	StarKist Co.
Affiliated Company Names	
Company Address	225 North Shore Drive, Suite 400, Pittsburgh, PA 15212
Contact Information (Name, Phone, Email)	Cary Gann (+1)-412-323-7576 Cary.gann@starkist.com
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	
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	OK
2.2 Quarterly Data Submission to RFMO	OK	MINOR
3.1(a) Shark Finning Policy	OK	OK
3.1(b) Prohibition of Transactions with Shark Finning Vessels	OK	OK
3.1 (c) Prohibition of Transactions with Companies without a Public Policy	MINOR	OK
3.2 Large-scale Pelagic Driftnets	OK	OK
3.3 Full Retention of tunas	OBS	OBS
3.4 Skippers Best Practices	MINOR	OK
4.1 UVI-IMO	OK	OK
4.2 Purse Seine Unique Vessel Identifiers	OK	OK
4.3(a) Observer Coverage	OK	OBS
4.4(a) Transshipment	OK	MINOR
5.1 IUU Fishing	OK	OK
5.2 IUU Product Response	OK	OK
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	OK
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 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. · 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.
<p>MRAG Americas' procedures</p>	<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.
<p>Corrective Action Responses (CARs)</p>	<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
1.1	Tuna RFMO Authorized Vessel Record	All purchases must be from vessels listed on the authorized vessel record of the RFMO governing the ocean area in which the tuna was caught, at the time of the fishing trip, so long as the vessel is of a size subject to listing in the RFMO authorized vessel record. For any purchases from non-PVR vessels, maintain a system check and approve vessel listing.	All	Auditor reviews company system to ensure that purchases are from properly listed vessels. Traceability exercises, reviewing RFMO vessel records and checking ocean areas where vessels are fishing verifies the system.	Ok	Company stated they check all their suppliers' vessels against the RFMOs' authorized vessel records prior to purchasing any tunas. All vessels from traceback registered on RFMO, except for those listed above where no evidence of RFMO registration was found	
1.2	RFMO Participation	All purchases must be from vessels flagged to a member or cooperating non-member of RFMO relevant to fishing area.	All	Auditor reviews quarterly data sent by the company to the RFMO to check that all vessels meet this requirement.	Ok Ok	All fishing vessels were flagged with flags of countries that were members or participating non-members All flags from traceback were members of relevant RFMO.	
2.1	Product Traceability	Demonstrate ability to trace products from can code or sales invoice to vessel and trip.	All	Auditor will review recent mock recalls, if available, and select a sample of can codes or sales invoices by label and destination from which the company will conduct traceability	Ok	The company's traceability system allows for products to be traced to vessel/trip via the product code and PO number to the catch certificate, which indicates vessel name	

				exercises. If the company produces cans from loins, or sells loins as a finished good, these products must be included in the assessment.		and trip date(s).	
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 (Q1-Q3) by the end of the month following each quarter.	All	Auditor checks that information has been sent by companies to RFMO for all purchases.	Ok	Sent RFMO data to relevant RFMOs on: 4/20/2015 (QTR1); 7/21/15 (QTR2); 10/29/2015 (QTR 3)	
3.1(a)	Shark-Fin角度 Policy	Company establishes and publishes policy prohibiting shark finning.	All	Auditor reviews company website for published policy.	Ok	http://starkist.com/about-starkist/corporate-responsibility	

		guidebook is located at www.issfguidebooks.org .		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.		vessel has a non-compliance for this CM.	
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 capable of being registered by IMO.	All	Auditor reviews company system to ensure 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 meet this requirement.	Ok Ok	Company checks all suppliers' vessel's IMO number, if they are eligible, through various websites prior to purchasing any tunas. (e.g., http://maritime-connect.or.com) Traceback vessels are either purse seiners listed on PVR or longliners less than 100 gt where an IMO number is not applicable.	
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	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	Ok Ok	All purse seine vessels which SK purchases fish from have an IMO number (see above). All PS vessels from	

		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.					
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	
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.	Ok Ok	Transshipments properly detailed and verified as sent to RFMOs. All PS vessels from traceback are listed on the PVR	
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	No transactions with	All	Auditor checks quarterly	Ok	Reviewed the IUU lists	

	Unregulated (IUU) Fishing	vessels on any tuna RFMO IUU vessel list.		data sent by the company to the RFMO for the presence of IUU listed vessels.		for ICCAT, IATTC, IOTC and WCPFC and did not find any IUU vessels on StarKist's data 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	The company has an adequate system to prevent IUU fish from being sourced. The company checks all suppliers' vessels against all RFMO / National and NGOs IUU vessel lists prior to purchasing tunas.	
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.	Ok	Company has a check in place for IUU and a thorough, documented recall program that could be used to withdraw IUU fish if necessary.	.
				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 December 31, 2012 and listed on the ISSF Record of Large-Scale Purse Seine Vessels (Record). If a vessel is not listed on the	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	Ok Ok	All LPS viewed during the audit were in compliance with this measure. All PS vessels from traceback are listed on the PVR	.

		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).		do not appear in the Record, the company must provide evidence in accordance with Conservation Measure 6.2(a) as described below.			
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	
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.,	Large Purse Seine	MRAG reviews evidence provided by company to determine whether vessel is eligible to be listed in the ISSF Record.		N/A	

		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 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	Company states they have no controlled vessels.	
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	