



ISSF Participating Company Compliance

Audit Checklist

Version 2017/1

PT Bali Maya Permai

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 12 March 2018, for activities in 2017)

General Audit Information

Please verify or complete the information in blue boxes.

Company Name	PT Bali Maya Permai	
Affiliated Company Names	N/A	
Company Address	Jl. Pluit Raya No. 19 Blok D No. 1-2 Jakarta Utara 14440 Jakarta, Indonesia	
Contact Information (Name, Phone, Email)	Sally Sukardjo sally@bmpfood.co.id	
Auditor Name(s)	Chris Spring Erin Wilson Jason Anderson	Patricia Bianchi Jonah van Beijnen Oleg Martens
Audit Start Date	Week of 13 November, 2017	
Audit End Date	Preliminary audit results issued: Week of 29 January 2018 Final audit results issued: Week of 12 March 2018	
Time zone(s) for coordinating remote audit conference call	Indonesia	
Language requirements for remote audit conference call	English	

Compliance Snapshot			
Conservation Measure	Current	2016 Update	2016
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	MAJOR
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 Full Retention of tunas	OK	OK	OK
3.4 Skippers Best Practices	MINOR	OK	OK
3.5 Transactions w/ Vessels that use Only Non-Entangling FADs	OK		
4.1 UVI-IMO	N/A	OK	OK
4.2 Purse Seine Unique Vessel Identifiers	MAJOR	OK	OK
4.3 Observer Coverage	N/A	N/A	N/A
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	N/A	N/A	N/A
7.1 Registration of Controlled Vessels	N/A	N/A	N/A
7.3 Purchases from PVR Vessels	N/A	N/A	N/A
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 2018/1.
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 2018/1.

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
<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 Obs.	<p>Company was able to provide evidence confirming purchases are from vessels listed on the authorized vessel record of the RFMO(s) and/or registered with the Indonesian authorities (when only fishing Indo EEZ).</p> <p>However, auditor found that company does not have a system in place to check and guarantee that all purchases are from properly listed vessels. Company indicated it relies instead on established trust relationships with its suppliers. Company should keep track of the legality of suppliers' vessels independently, by requesting license numbers, expiration dates and vessel details (IMO / UVI numbers, GT, overall length etc.) ahead of purchasing.</p> <p>All selected vessels that are part of the traceability exercise are properly listed in RFMO authorized vessel records.</p>	

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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	<p>All vessels are listed as flagged by Indonesia, which is a member of the IOTC.</p> <p>All vessels that are part of the traceability exercise are properly flagged and are a member or cooperating non-member of RFMO relevant to fishing area.</p>	
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 exercises. If the company produces cans from loins, or sells loins as a finished good, these products must be included in the assessment.	Ok	The company has a suitable traceability system in place that allows all product codes and produced volumes to be traced back through all stages of the supply chain including the vessel and vessel trip.	
2.2	Quarterly Data Submission to RFMO	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	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</p>	Ok	<p>All quarterly RFMO reports were received within the timeframe of this measure.</p> <p>Auditor was able to locate all vessels and</p>	

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		<p>of the following calendar quarter.</p> <p>b. As described by ISSF, 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 rfmodata@iss-foundation.org</p>		<p>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 rfmodata@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 noted as an observation.</p>		<p>corresponding trips from direct whole round purchases identified in the traceability exercise in RFMO data.</p>	
3.1(a)	Shark-Finching Policy	Company establishes and publishes policy prohibiting shark finching.	All	Auditor reviews company website for published policy.	Ok	http://bmpfood.co.id/abolutus.php?page=	
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	Ok	<p>Company provided copy of internal procedure to screen suppliers against national and RFMO lists of vessels having shark finched.</p> <p>None of the selected</p>	

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				purchases against data gathered throughout the year of RFMO compliance reports, media sources, etc.		vessels that are part of the traceability exercise have been associated with shark finning. No evidence of shark finning was found on RFMO compliance report or online.	
3.1(c)	Prohibition of Transactions with Companies without a Public Policy Prohibiting Shark Finning	No transactions with companies that do not have a public policy prohibiting shark finning. If transactions involve flag states that absolutely prohibit shark finning 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 finning. For flag states that do have an absolute shark finning prohibition, auditor will review all publicly available material to ensure no shark finning has taken place. Traceability exercises by transaction or can code to PVR vessels or proof of compliance verifies the system.	Ok	The company provided evidence (supplier shark finning policies) that it does not have any transactions with companies that do not have a public policy prohibiting shark finning. All of the vessels that are part of the traceability exercise have a policy in place prohibiting shark finning and all vessels are listed on the PVR are 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	Ok	No mention of pelagic driftnet uses in the quarterly RFMO reports. None of the selected vessels that are part of the traceability exercise have been associated with the use of drift nets or gill nets.	

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				km.			
				MRAG reviews RFMO compliance committee reports for any indication of vessels using large-scale pelagic driftnets.	Ok	No mention of company or its suppliers being associated with pelagic driftnets in 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 policy is needed. If RFMO does not require full retention, vessel must have documented and implemented policy in accordance with this conservation measure.	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 retention policies for its main suppliers. Auditor notes that the traceability exercise only contained longline vessels. This is a result of the random sampling nature of this effort.	
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	Minor	Company provided evidence that some skippers had attended a workshop held by AP2HI. Company and ISSF also confirmed that two additional skippers were trained in late 2017, while several more sent notices in Q1 2018. However, no evidence that other purse seine skippers had	

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				<p>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.</p>		<p>attended a training or studied the online guidebooks could be provided. // On 3/5/18 company noted that it was working with its suppliers to ensure they contacted ISSF to indicate which skippers had read the online guidebooks. This measure will be reviewed as part of the Updated Compliance audit report (summer 2018).</p> <p>Auditor notes that the traceability exercise only contained longline vessels. This is a result of the random sampling nature of this effort.</p>	

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3.5	Transactions with Vessels that use Only Non-Entangling FADs	<p>Processors, traders, importers, transporters, marketers and others involved in the seafood industry shall conduct transactions only with those purse seine vessels whose owners have a public policy regarding the use of only non-entangling (NE) FADs. The policy shall apply to all new FAD deployments, regardless of the type of vessel that deploys the FADs.</p> <p>For the purposes of this measure a policy is “public” if it is published on the company’s website or is otherwise available to the general public.</p> <p>The vessel owner must have a policy in place and published no later than April 18, 2017. Said policy will be effective for new FAD deployments no later than 12 months after the vessel owner adopts its policy.</p> <p>For purposes of this measure, NE FADs should meet the minimum specifications in the ISSF Guide for Non-Entangling FADs. Vessel owners shall not deploy FADs that meet the description of “highest</p>	All Purse Seine and Support Vessels	<p>Auditor reviews evidence showing that the company conducts transactions only with purse seine vessels that have a public policy regarding the use of only non-entangling FADs. Auditor reviews whether RFMO/flag-state or fleet association has an in effect mandatory requirement for NE FADs, which equals or surpasses ISSF guidelines for NE FADs. Each vessel policy must be dated and must be in place no later than April 18, 2017 and come into effect for all new FAD deployments no later than 12 months after adoption date.</p>	Ok	<p>A public policy regarding the use of only non-entangling FADs was provided for all Indonesian purse seine vessels.</p> <p>Auditor notes that the traceability exercise only contained longline vessels. This is a result of the random sampling nature of this effort.</p>	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		<p>entanglement" contained in the ISSF Guide.</p> <p>If RFMO/flag state where vessel(s) operate has an in effect mandatory requirement for NE FADs, which equals or surpasses the ISSF guidelines for NE FADs, then vessel owner is not required to have an individual public policy.</p> <p>If the vessel is a member of a fleet association that has a public policy on NE FADs, which equals or surpasses the ISSF guidelines for NE FADs, the individual vessel must have a policy implementing the fleet association policy.</p>					
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 vessels meet this requirement.	N/A	<p>Company sources from purse seine vessels under 100 GT, which do not have IMO numbers. Indonesian vessel registrations were provided for all vessels.</p> <p>Company is aware that as of December 31st, 2017, all vessels of at least 12m LOA and which operate in waters beyond their national jurisdiction, must obtain an IMO.</p>	
4.2	Purse Seine Unique Vessel Identifiers	All purse seine vessels with which the company	All Purse Seine	Auditor reviews company method to	Major	Company was unable to provide TUVI number for	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		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.		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.		several purse seine vessels between 30-100 GT (instead providing national registration numbers). Company provided evidence of email request to ISSF asking for help in obtaining TUVI numbers for its suppliers, but this request occurred in Q1 2018. This measure will be reviewed during the Updated Compliance Audit report (summer 2018).	
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 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.	N/A	Company does not source from LSPS vessels.	
4.4(a)	Transshipments	No transactions in tuna where transportation included transshipment, except when exempt per	All Purse Seine	Auditor reviews data submission for relevant RFMO, transshipment documents and RFMO	Ok	No transshipments could be found in the quarterly RFMO reports.	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		Conservation Measure 4.4 (b)(i) or Conservation Measure 8.1.		compliance committee and commission reports to verify that tuna purchased has not undergone unauthorized transshipment.			
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	Compared vessels on RFMO report with IOTC IUU vessel list. None found. No IUU listed vessels were found during the traceability exercise.	
				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	No evidence of IUU was found on RFMO blacklists or media.	
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 to withdraw products from the marketplace when IUU is identified.	
				Company initiates	Ok	Based on online references	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
				market withdrawal of IUU products.		the company has made no IUU related market withdrawals in the past 12 months.	
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.	N/A	Company does not source from LSPS vessels.	
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 indicated that it does not control any 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	N/A	Company does not source from LSPS vessels.	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
				documentation may be requested to verify the accuracy of trip dates.			
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	Company does not source from very small purse seine vessels.	