ISSF ProActive Vessel Register:
Audit Policy Document
&
Standard Operating Procedures

For

Supply & Tender Vessels

November 2017 (Updated September 2018)

Integrated Management of Natural Resources

Contents

1   Introduction

The ProActive Vessel Register (PVR) of the International Seafood Sustainability Foundation (ISSF) is an innovative and effective way for owners of tuna fishing vessels to identify themselves as active participants in meaningful fishery sustainability efforts. The PVR provides validated information to tuna purchasers and interested stakeholders of the steps each vessel is taking in implementing a series of ISSF conservation measures designed to support responsible tuna fishing practices. The PVR provides information on individual vessel performance against a defined set of conservation measures.

This document describes the protocol for audits of PVR listed supply and tender vessels that operate with purse seine vessels fishing for skipjack, yellowfin and bigeye tuna to verify information on compliance with current ISSF conservation measures.

The PVR vessel audits are organized in three levels to ensure the goals of auditing are achieved efficiently and effectively. Level 1 and 2 audits are carried out remotely and level 3 audits are done on-site. All vessels applying to be on the PVR undergo an initial Level 1 audit as part of the listing process. Vessels are also subject to quarterly level 1 audits of skipper best practices and observer coverage and annual level 1 audits to verify vessel attribute data remain current. Every vessel is subject to a Level 2 audit at least once every three (3) years. This frequency may change if particular issues arise. In the event that a red flag is raised (i.e. a specific concern is raised about compliance), a vessel may be subject to an on-site Level 3 audit. If a vessel has undergone a Level 3 audit and all issues have been resolved, this may count towards the standing requirement for a Level 2 audit every 3 years. A Level 3 audit automatically includes everything done under a Level 2 audit. Note that a standard Level 2 audit is one possible source of a red flag triggering a Level 3 audit.

As of September 2018, more than 1,000 vessels participate in the PVR program, and this number is anticipated to increase over time as various stakeholders (processors, consumers, supermarkets, the environmental community, governments and RFMOs, etc.) continue to demand responsibly sourced tuna. Per the PVR Terms and Conditions, ISSF covers the costs of (i) the initial Level 1 audit necessary for listing of the vessel on the PVR, and (ii) the annual Level 1 audit required to ensure information remains up to date. ISSF does not cover the costs of Level 2 and Level 3 audits. These must be funded by the vessel owner or an external funder. Starting in September 2018, it is mandatory for each vessel on the PVR to be audited at Level 2 at least once every three (3) years. During the first twelve (12) months, vessel owners (or designated representatives) may volunteer their vessel (or fleets). Starting in month 13 (beginning of year 2) onwards, any vessels that have not already received a Level 2 audit will be randomly selected by MRAG Americas. At any time, if a vessel receives a red flag, it must complete an on-site Level 3 audit. Failure to cooperate with the auditor to complete a Level 2 audit when selected may result in a red flag and a mandatory Level 3 audit. New vessels that join in the first half of a 3-year cycle, must be audited during that cycle. New vessels joining in the second half of a 3-year cycle can either volunteer to be audited during that cycle and/or will be audited within the following 3-year cycle, but no later than within the first 18 months of that cycle.

For the purposes of these audits, supply and tender vessels are any vessel used, or intended for use, for fishing or the transport of fishery products. Fishing is defined as:

(a)   searching for, catching, taking or harvesting fish;
(b)   attempting to search for, catch, take or harvest fish;

(c) engaging in any other activity which can reasonably be expected to result in the locating, catching, taking or harvesting of fish for any purpose;

(d) placing, searching for or recovering fish aggregating devices or associated electronic equipment such as radio beacons; and

(e) any operations at sea directly in support of, or in preparation for, any activity described in subparagraphs (a) to (d), including transhipment.

2   Program implementation

2.1 Audit Strategy

There are two main components to the information to be audited:

- **Vessel Attribute Data** submitted as part of a vessel's initial listing on the PVR**;** and
- **Compliance with ISSF Conservation Measures** by the vessels listed on the PVR.

2.1.1 Vessel Attribute Data

The basic attribute data of vessels listed on the PVR must be a true representation of the identity and description of the vessel and its activities, thereby enabling the tracing of vessel history of ownership and operation, flag status, RFMO membership etc. Vessel Attribute Data are verified to ensure that the vessel listed on the PVR is the vessel it purports to be.

Auditing of Vessel Attribute Data is principally through tracing and examination of official documentation. If needed, additional verification is undertaken as part of Level 3 on-site audits. Vessel Attribute Data are categorized and audited as is described in Table 1 below.

Table 1 Vessel Attribute Data and Means of Verification

Specific Information	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
Vessel Identification (Vessel Name, Flag State, Current Owner, IMO/UVI Number, International Radio Call Sign and Skipper)	Provide accurate, current data to ISSF regarding vessel identity.	Level 1	Check vessel name, flag state, current owner, IMO/UVI, international radio call sign and captain	Initially by ISSF, then annually by MRAG
		Level 2	Comparison with updated IMO/UVI listing and RFMO authorized vessel record(s). Company tax records may be provided to show vessel ownership and the auditor may access company records on Sea-web. Physical licenses, documentation, ownership papers, letter from government agency, etc. showing rights to operate vessel under previously reported attributes should also be reviewed.	Sample Plan
		Level 3	Verification of the vessel attributes in on-site audit. The auditor looks for consistency between the previously attained information and the vessel itself.	
Vessel Characteristics (Location, Year Built, Size, etc.)	Provide accurate data to ISSF regarding vessel characteristics.	Level 1	Check location/year built/size: Supporting documentation could include contract documents, insurance records, vessel commissioning documentation, subsequent marine survey etc. submitted with application; RFMO authorized list; IMO/Fairplay information, IRCS verification if available, IACS certification, if available	Initially by ISSF, then annually by MRAG

Specific Information	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
		Level 2	Photographs of vessel used. Larger variations or inaccuracies can be validated through additional documentation (such as engineering reports)	Sample Plan
		Level 3	Marine or other compliance survey, photographs, and/or auditor vessel tour consistent with previously supplied Vessel Attribute Data	
Current Activity (RFMO Convention, Operating Areas, Current Ports of Landing	Provide current, accurate data to ISSF regarding vessel activity.	Level 1	Must receive supporting documentation with application that aligns with basic (annually updated) IMO listing; verification through RFMO lists as well as IMO/Fairplay	Initially by ISSF, then annually by MRAG
		Level 2	Compare vessel landing records to information gained from national databases.	Sample Plan
		Level 3	Auditor compares documentation available on-site to documentation received as part of level 1 and 2 audits. This may include such things as port access records, logbooks, etc.	
Vessel History (2 years prior to date of application)	Provide web links or documentation to ISSF that detail the vessel history for 2 years prior to the application date.	Level 1	Checks the supporting documentation submitted with application or vessel updates; must align with basic (annually updated) IMO listing; verification through RFMO lists as well as IMO/Fairplay	Initially by ISSF, then annually by MRAG

Specific Information	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
Vessel History (2 years prior to date of application)	Provide web links or documentation to ISSF that detail the vessel history for 2 years prior to the application date.	Level 2	Auditor checks IUU databases, IMO listings or other various web sites with vessel lists. Supporting documentation may also include: • Past company tax records showing vessel ownership and company records on Sea-web. Web resources include: • www.Equasis.org • www.parismou.org/inspection-search • www.tokyo-mou.org/organization/ • www.interpol.int/INTERPOL-expertise/Notices/Public-Purple-notice	Sample Plan
		Level 3	Historical VMS records supplied by the Vessel. Forensic investigation of ownership and company records VMS data from official data center permitted by vessel company to be released to the auditor for limited analysis.	
Electronic Monitoring System (EMS)	Provide current, accurate data to ISSF regarding: (i) what EMS system was installed on the vessel and when was it installed; (ii) which company 'installed' the system; (iii) which company 'maintains' the system; (iv) who collects the data, what kind of data is collected and who does it go to; and how often is the system operated?	Level 1	Vessel representative indicates whether EMS is installed on vessel (yes or no question). Name/identifier of EMS.	
		Level 2	Acceptable evidence which the auditor reviews can include the following: - copy of installation contract - copy of maintenance contract - copy of data management contract - copy of EMS report for randomly selected month Auditor asks whether system(s) was independently audited and meets best practices standards, as described in Restrepo et al. 2018 Minimum Standards for Electronic Monitoring Systems in Tropical Tuna Purse Seine Fisheries. Finally, auditor checks whether system is operated as a stand alone or in conjunction with human observers.	
		Level 3	N/A	

2.1.2 Compliance with Conservation Measures

All vessels listed on the PVR commit to independent auditing against the current ISSF conservation measures specifically measured on the PVR. The current version of these conservation measures is provided in Table 2. It provides the list of items to be audited, guidance regarding what is required, and the means of verification that will be used by the auditor to assess conformance. ISSF Conservation Measures may be amended or added from time to time and voluntary categories may be introduced. The information audited will be based upon the data vessels submit, and/or data which are otherwise available to ISSF and MRAG Americas.

Table 2 ISSF Conservation Measures and Means of Verification (Supply & Tender Vessels)

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
3.5	Using Non-Entangling FADs	Processors, traders, importers, transporters, marketers and others involved in the seafood industry shall conduct transactions only with those purse seine and supply & tender vessels whose owners have a public policy regarding the use of only non-entangling FADs. The policy should refer to the ISSF Guide for Non-Entangling FADs and shall apply to all new FAD deployments, regardless of the type of vessel that deploys the FADs. 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. For purposes of this measure, non-entangling 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 entanglement" contained in the ISSF Guide.	Level 1	Auditor reviews vessel policy, evidence of RFMO/flag state requirement or fleet association policy and affirmation of acceptance by the vessel representative, or whether policy has been provided for the vessel. If above RFMO/flag-state measure does not exist, then auditor reviews whether vessel has public policy on NE FADs, which references the ISSF Guide on NE FADs or mandates FAD construction in a way that equals or surpasses the ISSF guidelines. If the vessel is a member of a fleet association that has a public policy on NE FADs, the Auditor reviews	Annually

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
		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 may provide evidence RFMO/flag state requirement in lieu of .		whether the fleet association policy equals or surpasses ISSF guidelines for NE FADs and whether the individual vessel has public policy implementing the fleet association policy.	
		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 provide evidence of policy acceptance. Initially, this may be confirmed in writing or verbally to an auditor, however once implementation of the policy is required, vessels must provide evidence of effectiveness.		Finally, auditor reviews date on which policy was published.	
			Level 2	Same as Level 1.	Sample Plan
			Level 3	Same as Level 1.	Sample Plan
7.4 (a)	Supply and Tender Vessels	Processors, traders, importers, transporters, marketers and others involved in the seafood industry, for skipjack, yellowfin and bigeye tuna with controlled supply or tender vessels that operate with purse seine vessels fishing for skipjack, yellowfin and bigeye tuna, shall: Register all such vessels on the ISSF ProActive Vessel Register (PVR) and thereafter maintain such registration indefinitely; For the purposes of this measure, controlled vessels include vessels as defined in ISSF CM 7.1. When registering all controlled supply or tender vessels on the PVR, in addition to the vessel attribute data already required as part of the	Level 1	Vessel representative provides a list of all supply and tender vessels controlled by the vessel owner, and a list of all purse seine vessels associated with each S&T vessel. These lists must be signed/certified by the vessel owner, and contain vessel name, flag and IMO number for each vessel.	Annually
			Level 2	Auditor reviews list of controlled supply & tender vessels, and list of purse seine vessels associated with each S&T vessel. Auditor compares both lists	Sample Plan

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
		PVR listing application, the vessel owner must provide the vessel names and flags of all the purse seine vessels that the listed supply or tender vessels support, to the maximum extent possible.		to PVR record and checks for consistency. Publicly available information sources (such as RFMO databases, Seaweb, etc.) may be utilized to confirm RFMO registration, for checking that vessel(s) are not on any IUU lists, and to confirm vessel attribute data.	
			Level 3	Photo evidence of vessel attributes will be obtained on-site and compared to ISSF, RFMO and IHS records.	Sample Plan
7.4(b)	Supply and Tender Vessels	Processors, traders, importers, transporters, marketers and others involved in the seafood industry, for skipjack, yellowfin and bigeye tuna with controlled supply or tender vessels that operate with purse seine vessels fishing for skipjack, yellowfin and bigeye tuna, shall: Ensure all such vessels are listed on the authorized vessel record of any of the RFMO governing the ocean area in which the tuna was caught.	Level 1	Auditor reviews RFMO record to see if vessel appears.	Annually
			Level 2	Auditor reviews RFMO record against previously submitted vessel attributes to verify accuracy of information.	Sample Plan
			Level 3	Auditor verifies that physical attributes of the vessel are consistent with RFMO records.	Sample Plan

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
		a. In line with CM 1.1, vessel(s) must be 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 subject to listing in the RFMO authorized vessel record.			
7.4(c)	Supply and Tender Vessels	Processors, traders, importers, transporters, marketers and others involved in the seafood industry, for skipjack, yellowfin and bigeye tuna with controlled supply or tender vessels that operate with purse seine vessels fishing for skipjack, yellowfin and bigeye tuna, shall:

Ensure all such vessels have an IMO unique vessel identifier.

NOTE: The IHS Maritime & Trade (IHSM&T), which manages IMO identification numbers, has expanded the range of vessels that are potentially eligible to obtain an IMO number to include small-scale vessels of less than 100 GT down to a size limit of 12 meters in length overall (LOA) that are authorized to operate/fish outside waters under national jurisdiction. Vessels that are now eligible to obtain an IMO UVI number under this change must apply for and/or have received an IMO number by December 31, 2017.

Vessels that fish only in waters under national jurisdiction that provide a national certificate of operation will be considered compliant under this section. | Level 1 | Auditor reviews IMO record to see if vessel appears. | Annually |
| | | | Level 2 | Auditor reviews IMO record against previously submitted vessel attributes to verify accuracy of the information. | Sample Plan |
| | | | Level 3 | Auditor verifies that physical attributes of the vessel are consistent with IMO record. | Sample Plan |

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
7.4(d)	Supply and Tender Vessels	Processors, traders, importers, transporters, marketers and others involved in the seafood industry, for skipjack, yellowfin and bigeye tuna with controlled supply or tender vessels that operate with purse seine vessels fishing for skipjack, yellowfin and bigeye tuna, shall: Ensure all such vessels are not listed on the IUU Vessel List of any RFMO.	Level 1	RFMO lists are reviewed at the time of application, then checked annually for updates.	Initially by ISSF, then annual review of RFMO IUU lists by MRAG.
				Auditor reviews RFMO compliance committee reports, commission reports, etc. to confirm vessel is not present on such lists.	Quarterly review by MRAG of compliance committee, commission reports, etc.

3 Audits

3.1 Process

3.1.1 Introduction

Table 2 outlines the audit coverage for all levels of vessel compliance with the ISSF conservation measures that currently apply to vessels on the PVR. As described in the table, the data and reporting requirements increase with the level of audit. It is the responsibility of the MRAG Americas Program Manager[1] to ensure audits are compliant and consistent with the most up to date ISSF Conservation Measures.

Per the PVR Terms and Conditions, ISSF covers the costs of (i) the initial Level 1 audit at the time of first listing of the vessel on the PVR, and (ii) the annual Level 1 audits. The cost of Level 2 and 3 audits must be funded by the vessel owner or another external funder. Starting in September 2018, each vessel on the PVR must be audited at Level 2 at least once every three (3) years. During the first twelve (12) months after first listing on the PVR, vessel owners (or designated representatives) may volunteer their vessel (or fleets) for a Level 2 audit. Starting month 13th (beginning of year 2) onwards, vessels will be randomly selected by the auditor. New vessels that join in the first half of a 3-year cycle, will be audited during that cycle. New vessels joining in the second half of a 3-year cycle can either volunteer to be audited during that cycle and/or will be audited within the following 3-year cycle, but no later than within the first 18 months of that cycle.

The auditing process begins with the application of a vessel wishing to be added to the PVR. An initial audit of the information supplied with the application is conducted, followed by quarterly checks on observer coverage and skipper best practices education, and annual updates to verify vessel attribute data remain current. The general flow of the audit process is described below in **Figure 1**:

Figure 1   **The PVR audit process**

Step	Task	Actions
1	**Audit Planning and Scheduling**	Information needed to conduct level 1 audits is gathered from: the company application, company information updates, RFMO lists, IMO lists, etc. In addition to the information obtained from these sources, vessel representatives receive annual information requests to verify vessel attribute data remain current. In the case that a vessel is selected for a level 2 or 3 audit, an audit date will be scheduled with the vessel representative and an audit plan sent to detail the audit process and information required.
2	**Level 1 (Annually)**	There is an initial audit at time of listing on the PVR, followed by annual audits to verify whether or not vessel attribute data has changed.
3	**Level 2 Remote Audits (Sample Plan)**	Level 2 audits are carried out remotely, per the sample plan in Table 3. These audits include a review of all vessel conservation measures.

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[1] The Program Manager is the main contact point at MRAG Americas for ISSF audit related queries and drives the MRAG Americas program.

4	**Level 3 On-Site Audits (Sample Plan)**	Level 3 audits are carried out on-site following a red-flag event (see 3.1.4 below). These audits include a review of all conservation measures that may be verified by physically inspecting the vessel as well as a full Level 2 audit. Therefore, a Level 3 audit incorporates a Level 2 audit and, once all issues from the audit have been resolved, satisfies the requirement for at least one Level 2 audit over a three-year period.	
5	**Preliminary Audit Report**	For audit levels 2 & 3, MRAG prepares a preliminary report outlining the vessel's compliance with ISSF conservation measures, including any non-conformances which must be resolved, and provides the report to the vessel and ISSF.	
6	**Remediation Period and Final Audit Report**	A 30-day discussion/remediation period follows each preliminary report, during which vessels can provide to the auditor(s) clarification or additional information to resolve non-conformances. At the end of this 30-day period, the auditor(s) issues a final audit report to the vessel and ISSF.	
7	**Follow-Up (if necessary)**	If any non-conformances were raised during the audit, MRAG will set timeframes for corrective action response (CAR). Vessels then submit CAR to MRAG to establish compliance with ISSF Conservation Measures.	

The timing and frequency of PVR Levels 2 and 3 audits depends on the number of vessels on the PVR and the rate of coverage specified by ISSF (see Table 3).

Table 3: Audit Sample Plan

Minimum Coverage rate (Supply & Tender vessels audited at each level)		Frequency	Funding
PVR Level 1 Audit (remote)[2]	All vessels	Annual	ISSF
PVR Level 2 Audit (remote)	All vessels	Three-year cycle	owner or external funder
Level 3 Red Flag Vessel Audit (on site)	Some vessels	As needed	owner or external funder

For PVR levels 2 and 3 auditing, MRAG Americas plans audits based on information gathered during review of RFMO compliance committee and commission reports, as well as per the instructions received from ISSF. Audit plans are reviewed annually or when new ISSF Conservation Measures come into effect. MRAG Americas and ISSF may agree to make changes to the audit plan throughout the year in the case of new vessel additions or previous non-conformance, or information gathered from RFMO Compliance Committee or Commission reports generated throughout the year.

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[2] Carried out at first listing on the PVR and then annually.

3.1.2   PVR Level 1 Audits

All vessels are subject to an initial PVR level 1 audit at the time of their listing on the PVR, with regular checks of level 1 information thereafter. Regular checks of level 1 information include annual audits of the vessel attribute data, to verify whether there have been any changes since the vessel was listed on the PVR.

3.1.3   PVR Level 2 Audits

PVR Level 2 audits occur remotely and are required every three (3) years from the initial listing of the vessel on the PVR, or from September 2018, whichever comes last. Most of the required information should be available electronically, either through direct communications with the vessel company or from information already held by ISSF. For documents less amenable to uploading electronically (e.g., observer reports) or in the absence of electronic traceability, additional records can be transmitted to MRAG Americas for analysis.

Where VMS data are requested[3], a vessel can provide VMS data directly to MRAG Americas, if it so chooses. In this event, the vessel should notify ISSF and MRAG Americas of its intention to do so.

At the conclusion of a PVR level 2 audit, the MRAG Americas auditor will produce a report listing all ISSF conservation measures reviewed for the vessel, any non-conformances identified, supporting evidence and where corrective actions may be required. All costs associated with Level 2 audits will be the responsibility of the vessel owner (or external funder). MRAG Americas will notify ISSF of the need for, and associated costs of, the Level 2 audit, and ISSF will bill the vessel representative (or external funder) accordingly.

The PVR level 2 audits are not regarded as a substitute in the event a Level 3 red-flag audit is required.

3.1.4   PVR Level 3 Red Flag Audits

Level 3 red-flag audits may result from a risk factor triggered during a PVR level 1 or PVR level 2 audit, which indicates a vessel may be in non-conformance with ISSF conservation measures (or insufficient information is being provided to determine conformance). A Level 3 red-flag can also result from substantiated complaints received about a vessel, notification of changes in personnel, site or management system, and/or information from ISSF and other public sources.

Situations that could initiate a Red Flag Audit include:

- A PVR level 1 or PVR level 2 audit identifies a problem with the vessel's status on the PVR that threatens the integrity of the PVR, including evidence of non-conformance or non-responsiveness to audit information requests.
- An independent report of a vessel's non-compliance with PVR standards submitted to ISSF that is substantiated and/or cannot be satisfactorily resolved easily.
- Third party intelligence (e.g. RFMO) with respect to a vessel or group of vessels indicates purposeful non-compliance with an ISSF conservation measure.

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[3] The submission of VMS, AIS or electronic monitoring data is not a requirement and is not mandatory. However, if it is submitted voluntarily it may provide a relatively easy means of verifying conformance with certain conservation measures and may therefore help to make the audit process both effective and efficient.

The on-site audit is conducted with reference to ISO 19011 and provides an opportunity for the auditor to examine documentation, particularly the vessel's logbook, upon the vessel's arrival in port. The auditor will also conduct interviews with the captain, observer[4] and crew members where appropriate. All costs associated with Level 3 audits will be the responsibility of the vessel owner (or external funder). MRAG Americas will notify ISSF of the need for, and associated costs of, the Level 3 audit, and ISSF will bill the vessel representative (or external funder) accordingly.

3.2 Audit Determination and Reporting

Audit findings are described in a report summarizing compliance with ISSF Conservation Measures, per vessel. Final audit reports do not issue any type of certification nor place an audited vessel on a higher rating compared with non-audited vessels. Any significant gaps in conformance and where corrective actions may be required will be specified. Timelines for implementation of corrective and/or preventative actions will be assigned by MRAG Americas, however any changes to the vessel listing on the PVR 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.

3.2.1 Non-conformances

Where a vessel is determined to be in less than full compliance, the vessel will be required to undertake a CAR within a specific time frame.

Conformance at level 3 will be categorized into grades (Conformance, Observation, Minor Non-Conformance or Major Non-Conformance). Non-conformances must be linked to specific ISSF Conservation Measures.

MRAG Americas defines audit findings as follows:

- Conformance - vessel provides evidence of compliance with a particular conservation measure
- Observation - vessel is currently in compliance but there is a high risk that a non-conformance could occur inadvertently without implementing preventative actions
- Minor Non-conformance – Vessel has an inadequate system to comply with a conservation measure, or a 'one-off' non-conformance that does compromise the integrity of ISSF initiatives.[5]
- Major Non-conformance – Vessel has no system in place to comply with ISSF conservation measures, or several minor non-conformances that indicate system failure.[6]

MRAG Americas' procedures for handling non-conformances for vessels are as follows:

- MRAG Americas substantiates conformance through documented evidence.
- Observations are raised where the company is currently in compliance, but the auditor identifies a high risk that a non-conformance could occur without company action.
- Where a vessel cannot provide documented evidence of conformance with a conservation measure, a non-conformance must be issued.

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[4] Noting that access to the observer may be restricted and not in the purview of the Vessel to grant.
[5] Example: The vessel has a policy which prohibits shark finning, however it does not contain all required elements.
[6] Example: Vessel does not have an implemented policy against shark finning, in an RFMO that does not absolutely prohibit shark finning.

- 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 action(s) must be in place and evidence of addressing the condition must be supplied to MRAG or ISSF within an agreed timescale, without which a follow up audit may be required.

3.2.2   Corrective Action Responses (CARs)

To rectify non-conformances, the vessel may be required to provide a CAR. The nature of the CAR is at the discretion of the vessel. MRAG Americas does not advise on what specific corrective action the vessel must 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 changes in the vessel listing on the PVR that may occur as a result of identified non-conformances. ISSF will decide how vessels are listed on the PVR, including any changes that may be appropriate and will communicate with the vessel owner.

3.2.3   Audit Reports

All audit reports are provided directly to ISSF and the vessel owner or representative via email notification. Actions following receipt of the report, including the requirement for a CAR, sanctions and/or changes to the PVR for individual vessels are at the discretion of ISSF. Any issues raised by the vessel with regard to the audit findings will be directed to ISSF.

Audit reports will be retained electronically for the duration of the vessel's listing on the PVR and will be available to ISSF at all times.

4   Annex 1. Audit Program Policy

4.1   Overall Audit Policy

It is the policy of MRAG Americas to ensure that its audit operations are consistent with defined standards and procedures in order to maintain the highest appropriate level of quality. To this end, MRAG Americas undertakes PVR level 2&3 audits according to the standards and procedures described in this manual and only within the scope of the ISSF conservation measures current at the time of auditing. The procedures described in this manual apply to all levels of audits. MRAG Americas has developed this document and its auditing procedures with guidance from ISO/IEC 17065:2012(E).

Specifically, it is the policy of MRAG Americas to ensure that:

- All PVR audits meet these documented standards for independence, accuracy, precision, representativeness, comparability, and suitability to their intended purposes;
- All PVR audits are verifiable and defensible, and all components related to their generation are properly documented;
- Data integrity is maintained and documented;
- Data confidentiality is maintained;
- Audit Program reviews are conducted on a scheduled and documented basis; and
- Managers, supervisors, and staff throughout MRAG Americas, and its contractors, understand their roles in managing quality; receive the training necessary to meet quality standards for job tasks; and are encouraged to identify and suggest improvements to the program.

4.2   Program Manager

In all respects, the Program Manager (Mr. Oleg Martens) is responsible for ensuring that the content of this manual is followed. The Program Manager is the main contact point at MRAG Americas for PVR audit related queries and drives the MRAG Americas program.

The Program Manager's main responsibilities include:

a) Organizing and coordinating ISSF audits for MRAG Americas
b) Supervising assessment teams
c) The first point of contact for ISSF audit enquiries
d) Ensuring quality assurance of documentation
e) Maintenance of data confidentiality
f) Regularly convening MRAG Americas senior management for review and oversight
g) Identifying potential conflicts of interest
h) Leading program review and improvements

The Program Manager ensures the policy manual and systems are amended and updated as necessary and is responsible for ensuring changes and improvements are captured and communicated to auditors for implementation in subsequent assessments, as appropriate.

4.3   Assessment Team

MRAG Americas selects auditors on the basis of their competence, training, qualifications, and experience. All personnel involved in the audit are provided with, and briefed on, up-to-date ISSF documentation for auditors. Documentation includes:

a) Contractual obligations on auditors, including requirements to report actual and potential conflicts of interest and to maintain confidentiality;
b) Specification of division of responsibilities between auditors and experts of MRAG Americas;
c) Procedures to be undertaken by auditors;
   - prior to audits
   - during onsite audits
   - after audits, e.g., specification of responsibilities and recommended schedules for report writing
d) Information about the overall role of the auditor and audit process in maintaining the integrity of the conservation measures.

Any person hired by MRAG Americas as an auditor for the ISSF audit program has:

- received a copy of this PVR audit protocol document;
- received sufficient training in the correct procedures and requirements for ISSF audits;
- been provided with access to all applicable ISSF conservation measures;
- received a copy of ISSF audit checklists (Annex 2);
- been provided with access to the ISO 19011 Standard;
- sufficiently demonstrated their performance and capabilities to the appropriate level prior to conducting solo audits; and

-   signed an MRAG Americas contract (either as an employee or contractor), which includes terms of reference, conflict of interest, confidentiality, a Statement of Non-Disclosure, timing, and responsibilities of the assessor.

4.4   Auditor training

Audits are carried out by fully trained MRAG Americas auditors. These auditors are typically already experienced in other audit programs and are provided with ISSF audit training to ensure they fully understand the specific PVR audit criteria.

As the program grows and the economics of conducting on-site audits dictate, on-site auditors at key locations will be trained. The growth of the program, the distribution of the fleets and final determinations about audit coverage will dictate how many and where additional audit capacity is established. MRAG Americas' full-time auditors will also be sent to ports from time to time to ensure standardization of the audit process. The regular program review will specify the requirements for additional auditors as the program grows.

The training program will include:

-   Desktop training (remote)
-   Interactive online training
-   Shadow audit(s) observing an MRAG Americas experienced auditor
-   Annual refresher training
-   Performance review audits by an MRAG Americas experienced auditor

4.5   Documentation and Means of Verification

Document control procedures are used to ensure accurate tracking and management of all documentation utilized during audits. Other than documents requiring an original signature, such as contracts with clients, which may be kept in both paper and electronic formats, MRAG Americas keeps electronic versions of documents for official record keeping.

Copies of vessel documentation (either electronic or hard copy) are acceptable for Level 1 and 2 vessel audits. In some instances, for example in the case of commercially sensitive documents, sighting of a document on a computer screen during a webinar session (i.e. using screen sharing) may be an option[7].

Where a vessel is audited for purposes other than the PVR, evidence from those audits can be submitted as evidence for the purposes of the PVR audit. However, while those other audits can be used to provide additional evidence and enhance efficiency for the vessel or company to report information showing conformance with conservation measures, they cannot be used to supplant the MRAG Americas audit.

MRAG Americas will use the Level 2 and Level 3 audit checklists for all audits. The completed and reviewed audit checklists will also serve as the audit reports. A copy of the audit report will be provided to both ISSF and the vessel representative.

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[7] The decision regarding whether sighting of a document in this way is acceptable will be made by the Auditor following policy advice from MRAG Americas. This will depend on the nature of the document and the ISSF conservation measure for which it is being used as evidence of conformance. Level 3 audits will require sighting of the original documents; copies can be taken as audit evidence where necessary.

MRAG Americas will endeavor to allocate auditors who speak the language in common use on the vessel being audited. Translation of audit evidence into English and/or audit reports from English into the language of the vessel or company will be the responsibility of ISSF.

4.6 Confidentiality and data security

4.6.1 Confidentiality

Much of the information needed to confirm conformance with ISSF conservation measures may be confidential to the entity being audited. MRAG Americas limits access to confidential data to employees and contract auditors authorized to work on specific audits. Our staff understands that the operations they assess may include proprietary fishing strategies, locations, data, and business information and practices. All MRAG Americas employees involved in vessel audits, including office personnel and individuals participating in subcontracts (e.g. contract auditors) sign a binding confidentiality/non-disclosure agreement in which they undertake not to discuss or communicate any confidential information to third parties other than as required within MRAG Americas as a normal part of the audit program. Data are not to be released, reproduced, distributed, or published without prior approval of ISSF. MRAG Americas follows strict data management procedures to protect the confidentiality of audit information. MRAG does not publish any form of audit data, other than as required in the ISSF audit process, without the express consent of ISSF.

MRAG Americas reserves the right to disclose Confidential Information to its responsible employees and individuals participating in subcontracts with a *bona fide* need to know such Confidential Information. Recipients are informed that the information is confidential and is for the sole purpose of the specific project. MRAG Americas may disclose Confidential Information if and to the extent that such disclosure is required by applicable law, provided that they use reasonable efforts to limit the disclosure by means of a protective order or a request for confidential treatment and provide the owners of the information (i.e. the vessel company) a reasonable opportunity to review the disclosure before it is made, and to interpose its own objection to the disclosure.

4.6.2 Data Security

ISSF data and/or open computer files will not be left unattended and confidential data are gathered from output devices immediately. Any data output not included in reports sent to ISSF are shredded immediately. MRAG uses a multi-user network of computers. MRAG will ensure security of the network with a three-level approach. The original networking software will contain firewall code that will protect the network from unauthorized access. Access to all network terminals is by password only.

All computer files associated with, or containing, confidential data are stored only in directories on a system that is password-protected and only authorized personnel have access to system passwords. Each authorized employee will have a unique password and passwords will allow access to only select files. The Program Manager is responsible for maintaining data security.

4.7   Compliance with legal requirements

MRAG Americas complies with all legal requirements in the countries in which the vessel operates and key personnel have demonstrable understanding of such legislation and regulations.

Should MRAG Americas become aware at any time that legal proceedings have been instigated or other allegations concerning the legal compliance of MRAG Americas activities associated with this program arise, we shall notify ISSF as soon as is practicable and within a maximum of seven days. MRAG Americas shall advise ISSF of the outcome of any such proceedings or allegations.

4.8   Program Review

Program review for PVR audits will occur annually. The Program Manager will also conduct ongoing program reviews (on a minimum annual basis) to ensure program activities are as effective and efficient as practicable to achieve program outcomes.