

Notice to the ISSF [Participating Companies](#) and Vessels listed on the [Proactive Vessel Register](#): Audit Protocol Override due to COVID-19.

The global impact of the COVID–19 pandemic extends to the operation and monitoring of tropical tuna fisheries. This is adversely affecting the capacity of Participating Companies (PCs) and vessels on the Proactive Vessel Register (PVR) to demonstrate continued conformance with ISSF Conservation Measures. There are many concerns arising as systems become increasingly restricted. A particular issue is the immediate effect of international travel restrictions on the practicalities of deploying human observers onto fishing and transshipment vessels.

While the response to the outbreak continues to evolve rapidly, it is important to ensure that the PC and PVR audits proceed in an orderly way and all those seeking to maintain their conformance record understand what MRAG Americas will be requiring with respect to evidence covering this period of unprecedented disruption. We are recommending a practical approach be put in place until further notice that recognizes the limitations everybody is experiencing.

Below we list the ISSF Conservation Measures for which the audit requirements will be under a temporary modification until further notice. For these measures, where a PC or vessel listed on the PVR is unable to provide the normally required audit-related evidence and can demonstrate this is due to COVID–19 disruptions, retroactive to 1st March 2020, MRAG Americas will record an **observation** in the place of a **non-conformance**. The table lists the information that will be needed in each case for the observation to be recorded. The observation is needed to demonstrate that the audit process has been followed, but it does not carry with it any consequences with respect to the conformance record of the PC or vessel being audited.

This list has been developed in the light of the rapidly changing situation and is intended to be sufficiently flexible that it will not need to be significantly revised. Nevertheless, we recognize that the level of disruption to normal services and procedures is unprecedented and some updates may be needed. If situations arise that are not specifically anticipated in this list, MRAG Americas will take a practical and realistic approach to assessment of conformance and the impact of the COVID-19 outbreak. Any situation (not just those in the table) that might normally have resulted in a non-conformance being assessed but can be reasonably shown through official correspondence or announcement at the time to have been unavoidable as a direct result of COVID-19 disruption will be recorded as an observation; no non-conformance will result. If you have any questions or concerns, please contact the MRAG Americas lead auditor, Mr. Oleg Martens, at oleg.martens@mragamericas.com.

Conservation Measure	Issue	MRAG guidance to PCs and PVR Vessels
1.1 – Tuna RFMO Authorized Vessel Record	Vessel(s) cannot be registered with RFMO due to disruption of the Flag State and/or tRFMO registration process due to COVID-19.	Provide dated correspondence (electronic or scanned copy of letter) between vessel owner and Flag State (or tRFMO) showing attempts to register (or renew registration of) vessel(s). Evidence should be provided to MRAG Americas at the time when the attempts to register were made.
3.1 (b) – Prohibition of Transactions w/ Shark Finning Vessels	RFMO records of vessels that have been found to fin sharks, might not be kept up-to-date due to COVID – 19 disruptions.	MRAG Americas will download RFMO shark fin vessel lists monthly and compare quarterly report data to those lists issued at the time (i.e. not to RFMO vessel lists which might be revised at a later date after the COVID – 19 disruption has abated).
4.3 (a) – Observer Coverage (Large Purse Seine (LPS) vessels)	RFMOs and Flag States suspend observer programs during the COVID-19 outbreak.	MRAG Americas is gathering tRFMO statements regarding the status of their respective observer programs. PC / Vessel may provide direct correspondence with tRFMO and/or Flag State regarding the status of the observer program and/or demonstrating efforts to obtain an observer for a fishing trip. If the correspondence shows that the observer program was suspended at the time of the fishing trip and/or the fishing vessel was unable to obtain an observer and was issued a waiver by the RFMO for the period covering the fishing trip, then an observation will be recorded instead of a non-conformance.
4.4 (c) – Transshipment at sea – Observer Coverage (LPS)	No observer is present during transshipments due to suspension/disruption of RFMO transshipment observer program [also transshipment declaration not countersigned by the observer].	MRAG Americas is gathering tRFMO statements regarding the status of their respective observer programs. Additionally, PC / Vessel may provide correspondence with tRFMO and/or Flag State demonstrating efforts to obtain observer for the carrier vessel. If the correspondence shows that the observer program was suspended at the time of the transshipment and/or the carrier vessel was unable to obtain an observer and was issued a waiver by the RFMO for the period covering the transshipment then an observation will be recorded instead of a non-conformance.
5.1 – Illegal, Unreported and Unregulated (IUU) Fishing	RFMO records of IUU vessels, might not be kept up-to-date due to COVID-19 disruptions.	MRAG Americas will download IUU RFMO lists monthly and compare quarterly report data to those lists issued at the time (i.e. not to IUU lists which might be revised by the RFMO(s) at a later date after the COVID-19 disruption has abated).