



**ISSF Data Check Company Compliance:  
Audit Policy Document  
&  
Standard Operating Procedures**

**For Audits Taking Place in 2025**

Version 2025/1

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*Integrated Management of Natural Resources*

**Contents**

- 1 Introduction ..... 2**
- 2 Program implementation ..... 2**
  - 2.1 Data Check Company Compliance ..... 2
- 3 Conservation Measures and Means of Verification ..... 3**
  - 3.1 Audit Determination and Reporting ..... 6
    - 3.1.1 Audit Reports ..... 6
- 4 Annex 1. Audit Program Policy ..... 6**
  - 4.1 Overall Audit Policy ..... 6
  - 4.2 Program Manager ..... 7
  - 4.3 Assessment Team ..... 7
  - 4.4 Auditor training..... 8
  - 4.5 Documentation and Means of Verification ..... 8
  - 4.6 Confidentiality and data security ..... 8
    - 4.6.1 Confidentiality ..... 8
    - 4.6.2 Data Security ..... 9
  - 4.7 Compliance with legal requirements ..... 9
  - 4.8 Program Review ..... 9

# 1 Introduction

To support tuna stock and tuna ecosystem sustainability, Data Check Companies (DCCs), per the [Terms and Conditions](#), have committed to meet specific conservation measures designed to improve the long-term health of tuna fisheries.

This document describes the protocol for the auditing of DCC compliance with those conservation measures.

DCCs are obliged to respond fully, accurately and in a timely manner to all reasonable requests made during the audit reviews. DCCs must provide appropriate supporting documents or data to the auditor, especially in instances when vessels listed in quarterly reports are not registered with the relevant RFMO(s). Appropriate confidentiality obligations will be established and observed by DCC staff and the consultant(s). MRAG will provide a Final Audit Report on each DCC's participation and cooperation in the audit process.

This document will be amended as required.

## 2 Program implementation

### 2.1 Data Check Company Compliance

DCCs commit to undergo independent auditing against specific in-effect ISSF conservation measures. Table 1 lists the conservation measures to be audited under this protocol, provides guidance regarding the required action and/or information, and describes the means of verification that will be used to assess conformance. Each DCC is expected to voluntarily provide all necessary information to MRAG Americas. We encourage DCCs to verify that the point of contact they initially provided to ISSF remains up to date. MRAG is authorized by ISSF to liaise only with the DCC's designated point of contact. We cannot liaise with anyone else for the purposes of the audit.

A DCC that downloads the Proactive Vessel Register (PVR) Database may, unless otherwise advised by ISSF, rely on the status of vessels in that downloaded database for the purposes of making purchases for the remainder of the calendar month in which they made the download. Allowance will be made for months that start on a non-working day.

DCCs are audited on a rolling annual schedule, which starts on the day a company applies to become a DCC. Auditors review the two (2) most recent quarters of RFMO report submissions by the DCC and verify compliance and consistency with in-effect ISSF Conservation Measures. All audits follow the principles of ISO 19011.

### 3 Conservation Measures and Means of Verification

**Table 1: ISSF Conservation Measures, Audit Guidance and Means of Verification**

Conservation Measure	Category	Gear Type	Category Guidance	Means of Verification	Frequency
1.1	Tuna RFMO Authorized Vessel Record	All	<p>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 to check and approve vessel listing.</p> <p>If company sources from vessels not registered with an RFMO, it must provide audit team with supporting evidence (such as National vessel registries, copies of vessel licenses, etc.) to demonstrate effectiveness of procurement screening system.</p>	Auditor reviews company system to ensure that purchases are from properly listed vessels. If company sources from vessels not registered with an RFMO, auditor reviews additional evidence that vessel was exempt from RFMO listing and legally authorized to fish during the audit period. The traceability exercises, reviewing RFMO vessel records and checking ocean areas where vessels are fishing, verifies the system.	Annually
2.2	Quarterly Data Submission to RFMO	All	<p>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 of the following calendar quarter. As of Q4 2019, this measure requires that a specific reporting format (available <a href="#">here</a>) be used for all RFMO submissions.</p> <p>b. <a href="#">As described by ISSF</a>, for each quarter, Data Check Companies are required to report to RFMO (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>Auditor checks that the required reporting format has been used and that information has been sent on time by companies to RFMO for all purchases.</p> <p>If applicable, auditor checks if DCC has sent quarterly report to the RFMO, indicating that company only purchases loins and/or finished goods.</p> <p>If applicable, auditor checks that email has been sent to <a href="mailto:rfmodata@iss-foundation.org">rfmodata@iss-foundation.org</a></p>	Annually

Conservation Measure	Category	Gear Type	Category Guidance	Means of Verification	Frequency
			<p>c. A Data Check Company that only purchases loins and finished goods is exempt from sending RFMO data. However, company must affirm so quarterly via an unprompted email to <a href="mailto:rfmodata@iss-foundation.org">rfmodata@iss-foundation.org</a></p> <p>d. A processor or trader in the IATTC convention area will not need to undergo an annual audit for compliance with ISSF CM 2.2 (this measure) if it provides evidence of quarterly data submission to IATTC.</p>	indicating that company only purchases loins and/or finished goods.	
4.1	Unique Vessel Identifiers - IMO	All	<p>All purchases must be from vessels with an IMO UVI number, unless ineligible due to IMO requirements or due to other reasons stated by IMO.</p> <p><b>NOTE:</b> The IHS Maritime &amp; Trade (IHSM&amp;T), which manages IMO identification numbers, has <a href="#">expanded the range of vessels</a> 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 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.</p> <p>Vessels that fish only in waters under national jurisdiction that provide a national certificate of operation will be considered compliant under this section. Company is responsible for gathering evidence of IMO ineligibility for all applicable vessels and provide such evidence to auditor upon request.</p>	Auditor reviews that all vessels listed in the quarterly RFMO reports, which are capable of receiving an IMO, have one. A sample of non-PVR purchases will be reviewed to assess whether the company system is adequate to ensure that vessels not registered on the PVR meet this requirement. If applicable, auditor reviews evidence for vessel being ineligible for an IMO number.	Annually

Conservation Measure	Category	Gear Type	Category Guidance	Means of Verification	Frequency
4.2	Purse Seine Unique Vessel Identifiers	All Purse Seine	<p>If IMO requirements do not provide for a particular purse seine vessel to receive an IMO for reasons other than vessel size, the vessel shall obtain a TUVI from the Consolidated List of Authorized Vessels (CLAV) CLAV: <a href="http://www.tuna-org.org/GlobalTVR.htm">http://www.tuna-org.org/GlobalTVR.htm</a> or a UVI from ISSF: <a href="https://www.issf-foundation.org/vessel-and-company-commitments/other-vessel-lists/tuna-vessel-imos-and-other-uvi-numbers/">https://www.issf-foundation.org/vessel-and-company-commitments/other-vessel-lists/tuna-vessel-imos-and-other-uvi-numbers/</a></p> <p>If IMO requirements do not provide for a particular vessel to receive an IMO UVI due to vessel size, such vessels do not need to obtain a TUVI from the CLAV or a UVI from ISSF. In such cases, company must present evidence to auditor that it has verified vessel size during (or before) procurement.</p>	<p>Auditor reviews that all purse seine vessels listed in the quarterly RFMO reports, which do not qualify for an IMO number, either have a TUVI number from CLAV or a UVI number from ISSF.</p> <p>If applicable, auditor reviews evidence that vessel(s) is exempt due to its size.</p>	Annually
5.1	Illegal, Unreported and Unregulated (IUU) Fishing	All	No transactions with vessels on any tuna RFMO IUU vessel list.	<p>Auditor reviews quarterly data sent by the company to the RFMO and cross-references with IUU lists to determine whether any IUU vessels are present.</p> <p>Auditor may also compare list of vessels from quarterly reports to RFMO compliance committee reports, commission reports, etc. to determine if any vessels are mentioned for IUU activities.</p>	Annually

## 3.1 Audit Determination and Reporting

The auditing described in this document serves as an assessment of conformance by DCCs. Any significant gaps in conformance will be specified.

MRAG Americas defines audit findings as follows:

- Conformance – the DCC can provide evidence of compliance with a conservation measure or commitment
- Non-conformance – the DCC does not comply with a conservation measure or commitment

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

- MRAG Americas substantiates conformance through documented evidence.
- Where a company cannot provide documented evidence of conformance with a conservation measure or commitment, a non-conformance must be issued.

### 3.1.1 Audit Reports

All audit reports are provided directly to ISSF and the DCC designated contact person via email notification. Any issues raised by the DCC with regard to the audit findings will be directed to ISSF.

Final Audit Reports and any updated compliance status reports will be retained electronically for the duration of the DCC's participation 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 to maintain the highest appropriate level of quality. To this end, MRAG Americas undertakes DCC audits per the standards and procedures described in this manual and only within the scope of the relevant ISSF conservation measures current at the time of auditing. 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 DCC audits meet these documented standards for independence, accuracy, precision, representativeness, comparability, and suitability to their intended purposes;
- All DCC 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;
- Managers, supervisors, and staff throughout MRAG Americas, and its contractors, understand their roles with respect to 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 ISSF audit-related queries and drives the MRAG Americas program.

The Program Manager's main responsibilities include:

- a) Organizing and coordinating DCC audits for MRAG Americas
- b) Supervising assessment teams
- c) The first point of contact for DCC 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 audit policy 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 and other experts based on their competence, training, qualifications, and experience for an Assessment Team (or individual) to conduct DCC audits. All personnel involved in the audit are provided with and briefed on up-to-date DCC documentation for auditors. Documentation includes:

- a) Contractual obligations for 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 audits;
  - after audits, e.g., specification of responsibilities and recommended schedules for report writing; and
- d) Information about the overall role of the auditor in maintaining the integrity of the audit process and ISSF Conservation Measures.

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

- received a copy of this document;
- received sufficient training in the correct procedures and requirements for DCC audits;
- received a copy of all applicable ISSF conservation measures;
- received a copy of the DCC Audit Checklists;
- received a copy of 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, requirements concerning 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 experienced in other audit programs and will be provided with DCC audit training to ensure they fully understand the specific DCC audit criteria.

The training program will include:

- Desktop training (remote)
- Shadow audit(s) observing an experienced MRAG Americas auditor
- Annual refresher training
- Performance review audits by an experienced MRAG Americas 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. For DCC audits, only quarterly RFMO reports will be required from the DCCs.

A DCC that downloads the Proactive Vessel Register (PVR) Database may, unless otherwise advised by ISSF, rely on the status of vessels in that downloaded database for the purposes of making purchases for the remainder of the calendar month in which they made the download. Allowance will be made for months that start on a non-working day.

MRAG Americas will use the DCC Compliance checklist for all audits. The completed and reviewed audit checklist will also serve as the audit report. A copy of the audit report will be provided to both ISSF and the DCC.

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

#### 4.6 Confidentiality and data security

##### 4.6.1 Confidentiality

The quarterly RFMO reports needed to confirm conformance with ISSF conservation measures are confidential to the DCC being audited. MRAG Americas limits access to confidential data to employees and contract auditors authorized to work on specific audits with a *bona fide* need to access that information. All MRAG Americas employees involved in DCC 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

or the DCC(s). 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 DCC audit process, without the express consent of ISSF and the DCC(s).

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, and will 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 DCC) 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**

DCC 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 the DCC 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 company operates, and key personnel have a 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 of the DCC audit procedures will occur at least annually. The Program Manager will conduct ongoing program reviews (on a minimum annual basis) to ensure program activities are as effective and efficient as practicable to achieve program outcomes.

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