



**Audit Policy Document
&
Standard Operating Procedures

For

Vessels in Other Sustainability Initiatives
(VOSI)**

Version 2026/2

Updates are noted in green.

MRAG Americas
8950 Martin Luther King Jr. Street N., Suite 202
St. Petersburg FL 33702
Tel: +1 727-563-9070
Fax: +1 727-563-0207
Email: mrag.americas@mragamericas.com

www.mragamericas.com

Integrated Management of Natural Resources

Contents

1	Introduction	2
2	Program implementation	2
2.1	Participation In, and Compliance with, Initiatives and Measures Recognized on VOSI.....	2
2.1.1	Table 1: FIP and MSC Improvement Program Measures and Means of Verification (All Gear Types).....	3
2.1.2	Table 2: MSC Measures and Means of Verification (All Gear Types)	5
2.1.3	Table 3: FADs and Means of Verification (Purse Seine and Supply & Tender)	7
2.1.4	Table 4: Electronic Monitoring (EM) and Electronic Reporting (ER) Systems (All Gear Types)	11
2.1.5	Table 5: Bycatch	13
3	Audits.....	18
3.1	Process	18
3.1.1	Introduction	18
3.1.2	Level 1 Audits	18
3.1.3	Level 2 Audits	18
3.2	Audit Determination and Reporting	18
3.2.1	Non-conformances	19
3.2.2	Corrective Action Responses (CARs).....	19
3.2.3	Audit Reports	19
4	Annex 1. Audit Program Policy	19
4.1	Overall Audit Policy	19
4.2	Assessment Team	20
4.3	Auditor Training	20
4.4	Documentation and Means of Verification	21
4.5	Confidentiality and Data Security	21
4.5.1	Confidentiality	21
4.5.2	Data Security	21
4.6	Compliance with Legal Requirements.....	22
4.7	Program Review	22

1 Introduction

The International Seafood Sustainability Foundation's (ISSF) Proactive Vessel Register (PVR), was established to demonstrate and track tropical tuna fishing vessels' compliance with ISSF's [Conservation Measures](#). Recently, stakeholders indicated that they would like to see additional recognition for Vessels engaged in Other Sustainability Initiatives, which led ISSF to develop and publish the [VOSI¹ vessel list](#). This document describes the protocol for audits of vessels that appear on the VOSI table.

The vessel audits² are carried out remotely and organized in two levels to ensure the goals of auditing are achieved efficiently and effectively. All vessels applying to be recognized undergo an initial Level 1 audit as part of the VOSI listing process. Level 2 audits are conducted on an appropriate sample of vessels to assist in verifying information provided to show implementation of, and/or active participation in, the listed sustainability initiatives. All vessels will receive either a level 1 or level 2 audit on an annual basis.

2 Program implementation

2.1 Participation In, and Compliance with, Initiatives and Measures Recognized on VOSI

All vessels that wish to be recognized for their participation in other sustainability initiatives commit to independent auditing against the measures listed in Tables 1 through 5 below. These tables provide the current 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. These measures will be amended as needed following changes to the guidelines and standards underpinning the listed sustainability initiatives. The information audited will be based upon the data submitted by vessels, and/or data which are otherwise available to MRAG Americas.

¹ It is important to consider that during the same period a vessel may be active in a fishery subject to a recognized sustainability initiative (such as an MSC certified fishery or Fishery Improvement Project) as well as other fisheries.

² Note that these voluntary audits are entirely separate from the audit requirements put in place by other sustainability initiatives.

2.1.1 Table 1: FIP and MSC Improvement Program Measures and Means of Verification (All Gear Types)³

V-Measure ⁴	Category	Guidance - What is being verified?	Audit Type	Means of Verification	Frequency
1.1	FIP Participation	Does your vessel participate in a publicly listed FIP that is third-party verified? Vessels participating in a “suspended” FIP cannot be recognized on VOSI. Vessels that are listed on VOSI while a FIP is active, will continue to be recognized on VOSI after the FIP reaches its term.	Level 1	‘Yes’ or ‘no’ answer from vessel contact. If yes, contact identifies the specific FIP in which vessel is participating and provides the FIP URL (if available). Auditor verifies whether FIP is in initial year of listing and/or whether progress has been achieved within the last 36 months. Auditor checks which third-party verified the FIP and notes the frequency of the checks. If FIP is marked as “completed” by the entity that lists it publicly, auditor checks that it has not held that status for more than 12 months.⁵	Annually
			Level 2 / Red Flag	Auditor asks vessel contact for evidence of FIP active participation. This can include FIP-related documents which name the vessel(s), such as meeting minutes, email exchanges, agendas, action plans, etc. This can also include a signed and dated letter from the FIP Coordinator confirming the vessel’s sustained participation in the FIP. Additionally, the auditor may request documentation from the entity listing the FIP, including a description of how the vessel information displayed on its website was collected and third-party verified, and a statement in writing from the FIP Coordinator acknowledging that they have undertaken best efforts to ensure that the vessel list provided is complete and accurate. Auditor cross-checks vessel information obtained during most recent PVR audit (if applicable) to confirm that the fishing authorization, gear type, geographic region, and general activity correspond with the information reported by the entity listing the FIP.	Sample Plan or based on ‘Red Flag’ notifications to ISSF.

³ Irrespective of Level 1 & 2 audits, the VOSI Table may be updated quarterly based on publicly available vessel lists associated to MSC certified fisheries, fisheries that have engaged in the MSC’s Full Assessment (FA) process, and fisheries that have engaged in a Fishery Improvement Program (FIP) that is third-party verified. This is to ensure vessels are properly recognized for their sustainability achievements.

⁴ Note that the numbering of the VOSI Measures is different from the numbering of ISSF Conservation Measures appearing in the Participating Company and the Proactive Vessel Register (PVR) protocols.

⁵ If, after the 12-month period, the fishery is no longer listed on entity’s site and does not appear on the MSC website as having entered Full Assessment, ISSF will be notified to remove vessel from VOSI table.

V-Measure ⁴	Category	Guidance - What is being verified?	Audit Type	Means of Verification	Frequency
				FIP coordinator provides auditor with evidence that they have verified within the last 6 months the vessels currently participating in the FIP. FIP coordinator affirms that the vessel list posted on the FIP webpage, or provided by the coordinator, is up to date per their verifications. Auditor verifies whether FIP is in initial year of listing and/or whether progress has been achieved within the last 36 months.	
1.2	MSC Improvement Program Participation	Does your vessel participate in an Improvement Program publicly listed by MSC? ⁶	Level 1	‘Yes’ or ‘no’ answer from vessel contact. If yes, contact identifies the specific MSC Improvement Program in which vessel is participating and provides the initiative URL (if available). On a quarterly basis, auditor cross-references with Improvement Program list maintained by MSC: https://fisheries.msc.org/en/fisheries/@@search?q=&search=	Annually
			Level 2 / Red Flag	Auditor asks vessel contact for evidence of MSC Improvement Program active participation. This can include Improvement Program-related documents which name the vessel(s), such as meeting minutes, email exchanges, agendas, action plans, etc. This can also include a signed and dated letter from the MSC confirming the vessel’s sustained participation in the Improvement Program. Additionally, the auditor may request documentation directly from MSC, including how they determine which vessels participate in the Improvement Program, and a statement in writing acknowledging that they have undertaken best efforts to ensure that the list of vessels associated with the Improvement Program is complete and accurate. Auditor cross-checks vessel information obtained during most recent PVR audit (if applicable) to confirm that the fishing authorization, gear type, geographic region, and general activity correspond with the information reported by the MSC regarding the Improvement Program.	Sample Plan or based on ‘Red Flag’ notifications to ISSF.

⁶ Auditor will run quarterly checks to determine if the fishery remains listed on MSC’s website.

2.1.2 Table 2: MSC Measures and Means of Verification (All Gear Types)

V-Measure	Category	Guidance - What is being verified?	Audit Type	Means of Verification	Frequency
2.1	Participation in MSC Full Assessment	Does your vessel participate in: A fishery engaged in an MSC Full Assessment?⁶ Or A fishery that was in a publicly listed FIP that was third-party verified and has moved on to an MSC Full Assessment?	Level 1	‘Yes’ or ‘no’ answer from vessel contact. If yes, contact identifies the specific MSC Full Assessment in which vessel is participating, and (if applicable) in which publicly listed and third-party verified FIP was participating. Auditor checks if vessel/company is listed as an official participant on www.msc.org⁷ and checks if FIP and vessel are still publicly listed (if available).	Annually
			Level 2 / Red Flag	Auditor asks vessel contact for evidence of FIP participation (if applicable). This can include FIP-related documents which name the vessel(s), such as meeting minutes, email exchanges, agendas, action plans, etc. This can also include a signed and dated letter from the FIP Coordinator confirming the vessel’s sustained participation in the FIP. Additionally, the auditor may request documentation from the entity listing the FIP, including a description of how the vessel information displayed on its website was collected and third-party verified, and a statement in writing from the FIP Coordinator acknowledging that they have undertaken best efforts to ensure that the vessel list provided is complete and accurate. Auditor asks contact for copies of the documentation produced in conformance with the MSC Full Assessment process identifying the vessel is an official participant in the unit of certification.⁷ Auditor cross-checks vessel information obtained during most recent PVR audit (if applicable), or other publicly available information, to confirm that the fishing authorization and general activity are within the area covered by the Unit of Certification.	Sample plan or based on ‘Red Flag’ notifications to ISSF or MSC.

⁷ Auditor can check the Announcement Client Draft Report (ACDR), the Public Comment Draft Report (PCDR), the Final Draft Report (FDR), and/or any other client documents such as the list of vessels uploaded to the MSC track a fishery webpage. To the extent that there are multiple versions of the same document listing vessels participating in the UoA, the most recent version will be used for the audit.

V-Measure	Category	Guidance - What is being verified?	Audit Type	Means of Verification	Frequency
2.2	MSC Certified Fishery Participation	Does your vessel participate in an MSC Certified Fishery(ies)?⁶ Vessels that participate in a certified fishery that has been suspended cannot be listed on VOSI.	Level 1	‘Yes’ or ‘no’ answer from vessel contact. If yes, contact identifies the specific MSC Fishery (Unit of Certification) in which vessel is participating. Auditor checks if vessel/company is listed as an official participant on www.msc.org⁷ (if available).	Annually
			Level 2 / Red Flag	Since MSC does not currently maintain a ‘real-time’ public list of vessels active in certified fisheries, auditor asks contact for copies of the documentation produced in conformance with the MSC certification and assessment process identifying the vessel as an official participant in the Unit of Certification.⁷ Auditor cross-checks vessel information obtained during most recent PVR audit (if applicable), or other publicly available information, to confirm that the fishing authorization and general activity are within the area covered by the Unit of Certification.	Sample plan or based on ‘Red Flag’ notifications to ISSF or MSC.

2.1.3 Table 3: FADs and Means of Verification (Purse Seine and Supply & Tender) ⁸

V-Measure	Category	Guidance - What is being verified?	Audit Type	Means of Verification	Frequency
3.1	Vessels involved in biodegradable FAD trials.	Indicate whether vessel currently participates, or has participated within the prior 12 months,⁹ in a BioFAD trial, which includes(ed) the participation of the relevant RFMO science bodies and/or coastal States, national scientists, and/or ISSF scientists to monitor experimental designs. BioFAD designs must, at a minimum, align with the designs and timelines adopted by the RFMO(s) overseeing the region in which they are deployed.	Level 1	'Yes' or 'no' answer from vessel contact. If yes, the contact identifies the specific BioFAD trial in which vessel is participating (or has participated in within the prior 12 months). Auditor then reviews evidence that vessel is currently participating in a BioFAD trial or was a participant in a BioFAD trial that ended within the prior 12 months, which includes(ed) the participation of the relevant RFMO science bodies and/or coastal States, national scientists, and/or ISSF scientists to monitor experimental designs. Auditor reviews whether BioFAD design(s) aligns with those adopted by the RFMO(s) overseeing the region in which the BioFAD trial(s) are taking place.	Annually
			Level 2 / Red Flag	Auditor asks vessel contact for: - Evidence of vessel's (or company's) current participation in a BioFAD trial or that vessel/company was a participant in a biodegradable FAD trial that ended within the prior 12 months, which includes(ed) the participation of the relevant RFMO science bodies and/or coastal States, national scientists, and/or ISSF scientists to monitor experimental designs. - Auditor reviews whether BioFAD design(s) aligns with those adopted by the RFMO(s) overseeing the region in which the BioFAD trial(s) are taking place.	Sample Plan or based on 'Red Flag' notifications to ISSF.

⁸ Vessels that are not registered on the PVR, or that are registered but in default (i.e., red X or in-process grade for Conservation Measure 3.7) must present their company policy(ies) during the Level 1 audit.

⁹ Vessels that cannot demonstrate current participation in a trial(s), or that they participated in a trial(s) that ended within the prior 12 months, cannot be recognized on the VOSI table for this measure.

V-Measure	Category	Guidance - What is being verified?	Audit Type	Means of Verification	Frequency
3.2	Vessels involved in FAD recovery initiatives.	Indicate whether vessel currently participates, or has participated within the last calendar year, ¹⁰ in a FAD recovery initiative, which includes(ed) the participation of the relevant RFMO science bodies and/or coastal States, national scientists, and/or ISSF scientists to monitor experimental designs.	Level 1	‘Yes’ or ‘no’ answer from vessel contact. If yes, the contact identifies the specific FAD recovery initiative in which vessel is participating (or has participated in within the last calendar year). Auditor then reviews evidence that vessel is currently participating in a FAD recovery initiative or was a participant in a FAD recovery initiative that ended within the last calendar year, which includes(ed) the participation of the relevant RFMO science bodies and/or coastal States, national scientists, and/or ISSF scientists to monitor experimental designs.	Annually
			Level 2 / Red Flag	Auditor asks vessel contact for: - Evidence of vessel’s (or company’s) current participation in the FAD recovery initiative, or that vessel/company was a participant in a FAD recovery initiative that ended within the last calendar year, which includes(ed) the participation of the relevant RFMO science bodies and/or coastal States, national scientists, and/or ISSF scientists to monitor experimental designs.	Sample Plan or based on ‘Red Flag’ notifications to ISSF.
3.3	Vessels that are using non-entangling (NE) FADs with no netting in any components, including both the raft and the tail.	Does your vessel use non-entangling FADs with no netting in any components, including both the raft and the tail?	Level 1	‘Yes’ or ‘no’ answer from vessel representative (rep). If yes, the rep provides non-entangling FAD design schematics showing the detail of the materials being used.	Annually
			Level 2 / Red Flag	Auditor asks vessel rep for: - Most recent FAD design schematics, showing the detail of materials being used. - Evidence that purse seine and supply vessels have been retrieving any encountered pre-existing non-fully NEFADs (whether a set is done or not) which are not in compliance with this measure.	Sample Plan or based on ‘Red Flag’ notifications to ISSF.

¹⁰ Vessels that cannot demonstrate current participation in an initiative(s), or that they participated in an initiative(s) that ended within the last calendar year, cannot be recognized on the VOSI table for this measure.

V-Measure	Category	Guidance - What is being verified?	Audit Type	Means of Verification	Frequency
3.4 (a)	Report additional FAD data.	Does your vessel report* daily position FAD buoy data to the relevant RFMO science bodies and/or national scientific institutions and/or flag state? ** *Data must be reported with a maximum time lag of 90 days. **If reporting to a national scientific institution of flag state, vessel company shall request that these data be made available to the relevant RFMO for scientific purposes.	Level 1	'Yes' or 'no' answer from vessel contact. If yes, auditor asks vessel contact for evidence of:¹¹ - Emails or reports demonstrating that daily position FAD buoy data are being shared with the relevant RFMO(s) science bodies; and/or - Emails or reports demonstrating that daily position FAD buoy data are being shared with national scientific institutions and/or flag state. For the latter, email(s) must show that company requested that the data be shared with the relevant RFMO(s) science bodies. - The data are being shared with a maximum time lag of 90 days from the end of the fishing trip. Data submissions must include the vessel name and IMO number (if available). Deployments should be identified in the data submissions when possible.	Annually
			Level 2 / Red Flag	Auditor selects one (1) month at random from the 12 months preceding the audit, for which contact must provide evidence that:¹¹ - Daily position FAD buoy data were shared with the relevant RFMO science bodies and/or national scientific institutions and/or flag state** within 90 days of the end of the fishing trip.	Sample Plan or based on 'Red Flag' notifications to ISSF.
3.4 (b)		Does your vessel report *echo-sounder acoustic biomass FAD buoy data to the relevant RFMO science bodies and/or national scientific institutions and/or flag State? ** *Data must be reported with a maximum time lag of 90 days.	Level 1	'Yes' or 'no' answer from vessel contact. If yes, auditor asks vessel contact for evidence of:¹¹ - Emails or reports demonstrating that echo-sounder acoustic biomass FAD buoy data are being shared with the relevant RFMO(s) science bodies; and/or - Emails or reports demonstrating that echo-sounder acoustic biomass FAD buoy data are being shared with national scientific institutions and/or flag state. For the latter, email(s) must	Annually

¹¹ Evidence may be provided by (i) the vessel, (ii) the data provider, (iii) the flag state's scientific institution, and/or (iv) the relevant RFMO (i.e., covering the area from where the FAD buoy data is generated).

V-Measure	Category	Guidance - What is being verified?	Audit Type	Means of Verification	Frequency
		**If reporting to a national scientific institution of flag state, vessel company shall request that these data be made available to the relevant RFMO for scientific purposes.		show that company requested that the data be shared with the relevant RFMO(s) science bodies. - The data are being shared with a maximum time lag of 90 days from the end of the fishing trip. Data submissions must include the vessel name and IMO number (if available).	
			Level 2 / Red Flag	Auditor selects a month at random from the 12 months preceding the audit, for which contact must provide evidence that:¹¹ - Echosounder acoustic biomass FAD buoy data were shared with the relevant RFMO science bodies and/or national scientific institutions and/or flag state** within 90 days of the end of the fishing trip.	Sample Plan or based on 'Red Flag' notifications to ISSF.

2.1.4 Table 4: Electronic Monitoring (EM) and Electronic Reporting (ER) Systems (All Gear Types)

V-Measure	Category	Guidance - What is being verified?	Audit Type	Means of Verification	Frequency
4.1	Electronic Monitoring System (EMS)	Does the EM system operate in line with the minimum standards for EM as described in ISSF 2022-09REV (or any subsequent revision)? The minimum standards cover: EM equipment and installation. EM operations and data collection. Or If applicable, evidence of an EM system that operates in accordance with the relevant, in force, RFMO EM standards and applicable measures for implementing EM, including making EM data available to the relevant RFMO(s), may be presented.	Level 1	‘Yes’ or ‘no’ answer from vessel representative (rep). If yes, rep provides: 1) Vessel company’s written procedures on EMS; and 2) A certificate from the EMS installer listing system specifications Auditor reviews whether written procedures cover: - General system specifications. - System maintenance. - Data collection and transfer. - Required data elements for recording. - Data review and reporting. Auditor reviews whether the certificate from the EMS installer acknowledges the following minimum standards are met: - Utilization of a Global Navigation Satellite System (GNSS). - System works by itself (self-governing) and has its own uninterruptable power supply. - System has a minimum of 4 months of storage capacity (for PS vessels). - Cameras cover all areas of interest on the vessel during fishing operations. - All fishing and related activities are recorded, and image collection shows both catch and bycatch species, correct species identification, and other fishing activities. Alternatively, auditor reviews whether the EM system is operated in accordance with the relevant, in force, RFMO EM standards and applicable measures for implementing EM. Auditor will also review evidence (such as email correspondence) that the data have been made available to the relevant RFMO(s).	Annually

V-Measure	Category	Guidance - What is being verified?	Audit Type	Means of Verification	Frequency
			Level 2 / Red Flag	Auditor asks vessel rep to provide EM reports for all fishing trips that took place during a randomly selected month (from the previous 12 months of fishing activity). Auditor reviews whether report(s) demonstrates that: - EM records were submitted in an approved electronic reporting format. - The data analysis and reporting were done by governments, institutions, organizations, and/or independent companies with proven expertise and experience. - For all fishing trips, at least a portion of which occurred in the randomly selected month, a risk-based approach was used during the review analysis of at least 20% of fishing sets of the entire trip. However, a decrease in a vessel's review rate below 20% could be justified in some cases, such as when its logbook information is found to be consistently accurate over time and the vessel has a good compliance history. In such instances, the auditor will review evidence from the independent entity or reviewer that made this determination to validate the justification for the reduced review rate.	Sample Plan or based on 'Red Flag' notifications to ISSF.

2.1.5 Table 5: Bycatch ¹²

V-Measure	Category	Guidance - What is being verified?	Audit Type	Means of Verification	Frequency
5.1	Fins Naturally Attached (All Gear Types)	Demonstrate that all sharks are landed with fins naturally attached if retained. If flag state absolutely prohibits shark finning and requires that sharks be landed with fins naturally attached if retained, vessel may provide copy of flag state regulation, along with evidence that the regulation is in effect and being implemented. Additional evidence may include, but is not limited to: - Copy of the transshipment declaration,¹³ signed and dated by the human observer onboard the carrier vessel, noting that all retained sharks had their fins naturally attached; - Landing site observer or Government reports stating that sharks are landed with fins naturally attached, or that no shark fins are landed by themselves; - EMS reports through the end of the fishing trip (only if it specifies that the camera system + software tracks all shark interactions in the water near the vessel, and when landed on the vessel); - Copy of the Port State fishing vessel and/or carrier inspection report, which specifies whether all landed sharks have their fins naturally attached.	Level 1	Auditor will review all of the following: - The fishery is certified under MSC Standard 3.0 (or subsequent updates to the Standard). - Evidence provided by vessel that flag state absolutely prohibits shark finning, requires that sharks be landed with fins naturally attached if retained, and meets the criteria defined in the MSC 3.0 standard. - Evidence presented by the VOSI contact to demonstrate that the policy is being implemented.	Annually
			Level 2 / Red Flag	Auditor selects a month at random from the 12 months preceding the audit, for which rep must provide evidence to demonstrate that sharks, if retained, are landed with fins naturally attached.	Sample Plan or based on 'Red Flag' notifications to ISSF.

¹² Vessels that are not registered on the PVR, or that are registered but in default (i.e., red X or in-process grade for Conservation Measures 3.1(c) and/or 3.6), will be required to provide their company policy(ies) during the Level 1 audit.

¹³ If the transshipment declaration was issued more than 12 months from the date of the audit (Level 1 or 2), then vessel must present time stamped photographic evidence from within 12 months preceding the audit.

V-Measure	Category	Guidance - What is being verified?	Audit Type	Means of Verification	Frequency
		The following information may be submitted to support the evidence mentioned above, for use in cross-referencing: - Time stamped photographic evidence of the sharks in the freezer hold, or at landing sites, with fins naturally attached;¹⁴ - Dated and signed Captain Statement (which matches fishing trip dates) stating that all sharks were landed with fins naturally attached; For the purpose of this measure the following fins naturally attached definition from the MSC 3.0 standard will be used: “All retained sharks must be landed with their fins still attached to the carcass by prohibiting the removal of shark fins on board vessels as well as the prohibition of retaining onboard, transshipping or landing removed shark fins.”			
5.2 (a)	Best Practices for Sharks, Sea Turtles and Seabirds (Longline) – Circle Hooks	Demonstrate that your vessel(s) is only using circle hooks. Evidence may include: - Port / Landing inspection report, which describes the gear being used, along with bycatch mitigation measures, and if any sharks, sea turtles or seabirds are landed; Human observer report,¹⁵ which must provide details of: - The hooks being used, including the required number of mitigation techniques if so required by the relevant RFMO. EMS report, which tracks all fishing operations, so auditor may see: - The hooks being used, including whether bycatch mitigation techniques are being used; and - All interactions with sharks, sea turtles and seabirds.	Level 1	Review evidence (see Guidance column) provided by vessel that circle hooks are being used.	Annually
			Level 2 / Red Flag	Auditor selects a month at random from the 12 months preceding the audit, for which rep must provide evidence that circle hooks were being used on the fishing trip(s) that occurred during that month.	Sample Plan or based on ‘Red Flag’ notifications to ISSF.

¹⁴ Photos must be geotagged, meaning the GPS coordinates, date and time associated with when the photo was taken are embedded in the JPEG file.

¹⁵ If the human observer report was issued more than 12 months from the date of the audit (Level 1 or 2), then vessel must present time stamped photographic evidence from within 12 months preceding the audit.

V-Measure	Category	Guidance - What is being verified?	Audit Type	Means of Verification	Frequency
		The following information may be submitted to support the evidence mentioned above: - Time stamped photographic evidence of the hooks being deployed, along with the bycatch mitigation measures being employed by the fishing vessel.¹⁴ - Dated and signed Captain Statement (which matches fishing trip dates) stating that the requirements of this measure have been implemented during the fishing trip.			
5.2 (b)	Best Practices for Sharks, Sea Turtles and Seabirds (Longline) – Finfish Bait	Demonstrate that your vessel(s) is only using finfish bait. Evidence may include: - Port / Landing inspection report, which describes the bait being used, along with bycatch mitigation measures, and if any sharks, sea turtles and seabirds are landed; Human observer report,¹⁵ which must provide details of: - The bait being used, including the required number of mitigation techniques if so required by the relevant RFMO. EMS report, which tracks all fishing operations, so auditor may see: - The bait being used, including whether bycatch mitigation techniques are being used; and - All interactions with sharks, sea turtles and seabirds. The following information may be submitted to support the evidence mentioned above, for use in cross-referencing: - Time stamped photographic evidence of the bait being deployed, along with the bycatch mitigation measures being employed, by the fishing vessel.¹⁴ - Dated and signed Captain Statement (which matches fishing trip dates) stating that the requirements of this measure have been implemented during the fishing trip.	Level 1	Review evidence (see Guidance column) provided by vessel that finfish bait is being used.	Annually
			Level 2 / Red Flag	Auditor selects a month at random from the 12 months preceding the audit, for which rep must provide evidence that finfish bait was being used on the fishing trip(s) that occurred during that month.	Sample Plan or based on 'Red Flag' notifications to ISSF.

V-Measure	Category	Guidance - What is being verified?	Audit Type	Means of Verification	Frequency
5.2 (c)	Best Practices for Sharks, Sea Turtles and Seabirds (Longline) – Monofilament Lines	Demonstrate that your vessel(s) is only using monofilament lines (e.g., the use of wire trace is prohibited). Evidence may include: - Port / Landing inspection report, which describes the monofilament lines being used, along with bycatch mitigation measures, and if any sharks, sea turtles and seabirds are landed; Human observer report,¹⁵ which must provide details of: - The monofilament line being used, including the required number of mitigation techniques if so required by the relevant RFMO. EMS report, which tracks all fishing operations, so auditor may see: - The monofilament line being used, including whether bycatch mitigation techniques are being used; and - All interactions with sharks, sea turtles and seabirds. The following information may be submitted to support the evidence mentioned above, for use in cross-referencing: - Time stamped photographic evidence of the monofilament line being deployed, along with the bycatch mitigation measures being employed, by the fishing vessel.¹⁴ - Dated and signed Captain Statement (which matches fishing trip dates) stating that the requirements of this measure have been implemented during the fishing trip.	Level 1	Review evidence (see Guidance column) provided by vessel that monofilament lines are being used.	Annually
			Level 2 / Red Flag	Auditor selects a month at random from the 12 months preceding the audit, for which rep must provide evidence that monofilament lines were being used on the fishing trip(s) that occurred during that month.	Sample Plan or based on 'Red Flag' notifications to ISSF.

V-Measure	Category	Guidance - What is being verified?	Audit Type	Means of Verification	Frequency
5.2 (d)	Best Practices for Sharks, Sea Turtles and Seabirds (Longline) – Shark Lines	Demonstrate that your vessel(s) does not use shark lines at any time. Evidence may include: - Port / Landing inspection report, which describes the gear being used, along with bycatch mitigation measures, and if any sharks, sea turtles and seabirds are landed; Human observer report,¹⁵ which must provide details of: - The gear being used, including the required number of mitigation techniques if so required by the relevant RFMO.	Level 1	Review evidence (see Guidance column) provided by vessel that shark lines are not being used.	Annually
		EMS report, which tracks all fishing operations, so auditor may see: - The gear being used, including whether bycatch mitigation techniques are being used; and - All interactions with sharks, sea turtles and seabirds. The following information may be submitted to support the evidence mentioned above, for use in cross-referencing: - Time stamped photographic evidence of the gear being deployed, along with the bycatch mitigation measures being employed, by the fishing vessel.¹⁴ - Dated and signed Captain Statement (which matches fishing trip dates) stating that the requirements of this measure have been implemented during the fishing trip.	Level 2 / Red Flag	Auditor selects a month at random from the 12 months preceding the audit, for which rep must provide evidence of all the gear being used on the fishing trip(s) that occurred during that month.	Sample Plan or based on 'Red Flag' notifications to ISSF.

3 Audits

3.1 Process

3.1.1 Introduction

Table 1 through 5 outline the audit coverage for all vessels listed on VOSI. As described in the tables, the data and reporting requirements increase with the level of audit.

The auditing process begins with a vessel indicating a desire to be recognized for participation in one or more recognized sustainability initiative(s) separate from ISSF. An initial audit of the information supplied with the application is conducted, followed by annual updates to verify vessel attribute data remain current. Additionally, a vessel may be selected to complete a Level 2 audit, which requires detailed evidence to demonstrate the vessel's active participation in the listed sustainability initiative(s).

3.1.2 Level 1 Audits

All vessels are subject to an initial Level 1 audit at the time of their listing on the VOSI Table, which can be found on the [ISSF website](#), with regular checks of Level 1 information thereafter. These checks may take place during the Annual PVR Level 1 audits (if applicable), which look at the vessel attribute data to verify whether there have been any changes since the vessel was listed.

3.1.3 Level 2 Audits

For all gear types, Level 2 audits occur remotely and result either from an identified risk factor (i.e., red flag) triggered during a Level 1 audit or through random selection of vessels (all vessels have equal weighting for random selection). Most of the required information should be available electronically, either through direct communications with the vessel company or from information already held by ISSF or other sustainability initiatives. For documents that cannot be uploaded electronically, additional records can be transmitted to MRAG Americas by regular mail at:

MRAG Americas, Inc.
Attn: Mr. Oleg Martens
8950 Dr M.L.K. Jr St N
Suite 202
St. Petersburg, FL 33702 / USA

3.2 Audit Determination and Reporting

During a Level 1 audit, if the vessel(s) meets the means of verification requirements, it is either listed or remains on the VOSI table. Level 2 audit findings are described in a report summarizing an individual vessel's compliance with the Measures listed in this audit protocol. Final audit reports neither issue any type of certification nor place an audited vessel on a higher rating compared with non-audited vessels. Any significant gaps in conformance¹⁶ and where corrective actions¹⁷ may be required will be specified. Timelines for implementation of corrective and/or preventative actions will be assigned by MRAG

¹⁶ Meaning a vessel being able to demonstrate active participation in an initiative which qualifies the vessel for listing on VOSI.

¹⁷ For example, a vessel would provide information in accordance with the audit protocol, which demonstrates active participation in the initiative.

Americas; however, any changes to the vessel listing on the VOSI Table 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

Vessels that fail to provide the requested evidence during a Level 1 or 2 audit will be in non-conformance. Only a successful Corrective Action Response (CAR) will result in lifting the non-conformance.

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 VOSI Table that may occur as a result of identified non-conformances. ISSF will decide how vessels are listed on the VOSI Table, 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 contact via email notification. Actions following receipt of the report, including the requirement of a CAR, sanctions, and/or changes to the VOSI 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 VOSI 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 vessel Level 1 & 2 audits according to the standards and procedures described in this manual and only within the scope of the VOSI 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 audits meet these documented standards for independence, accuracy, precision, representativeness, comparability, and suitability to their intended purposes;
- All 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 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 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 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, and
 - after audits,
 e.g., specification of responsibilities and recommended schedules for report writing;
- 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 ISSF audit program has:

- Received a copy of this audit protocol document;
- Received sufficient training in the correct procedures and requirements for audits;
- Been provided with access to all applicable VOSI measures covered in the audit protocol;
- Received a copy of the VOSI audit checklist;
- 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, requirements concerning conflict of interest, confidentiality, a Statement of Non-Disclosure, timing, and responsibilities of the assessor.

4.3 Auditor Training

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

The training program will include:

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

4.4 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.¹⁸

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.

4.5 Confidentiality and Data Security

4.5.1 Confidentiality

Some of the information needed to confirm conformance 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 with a *bona fide* need to access that information. 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, 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 vessel company) a reasonable opportunity to review the disclosure before it is made, and to interpose its own objection to the disclosure.

4.5.2 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 outputs not included in reports sent to ISSF are shredded

¹⁸ 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 measure for which it is being used as evidence of conformance.

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.

4.6 Compliance with Legal Requirements

MRAG Americas complies with all legal requirements in the countries in which the vessel 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.

4.7 Program Review

Program review for 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.

END OF DOCUMENT