



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

For

Supply & Tender Vessels

Version 2026/2

Updates are noted in green.

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Integrated Management of Natural Resources

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1 Introduction

The ProActive Vessel Register (PVR) of the International Seafood Sustainability Foundation (ISSF) is a 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.

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. 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. **Vessels that are unresponsive to audit requests will receive default grades (red Xs) on the PVR and be removed from the PVR if that status does not change within two years.**

Over 1900 vessels participate in the PVR program, and this number is anticipated to increase significantly over time as various stakeholders (processors, consumers, supermarkets, the environmental community, governments and RFMOs, etc.) continue to increase demand for responsibly sourced tuna. This Audit Policy Document covers **supply & tender** vessels, while vessels with other gear types are covered by separate Audit Policy Documents.

For the purposes of these audits, supply and tender vessels are any vessel used, or intended for use, for the purpose of 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 transshipment.

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 information relating to Vessel Attribute Data pertains to all gear types. 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.	During PVR application, and annually thereafter.
		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.	During PVR application, and annually thereafter.

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.	During PVR application, and annually thereafter.
		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.	During PVR application, and annually thereafter
Vessel History (2 years prior to date of application)	Provide web links or documentation to ISSF that detail the vessel history for the previous 2 years.	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/ • www.interpol.int/How-we-work/Notices/About-Notices	Sample Plan

Specific Information	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
			Historical catch and effort data only to be used if available and if no other sources of information provide verification.	
		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 (v) 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.	During PVR application, and annually thereafter
		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 ISSF's 2022-09: Minimum Standards for Electronic Monitoring Systems in Tropical Tuna Purse Seine and Longline Fisheries (or any subsequent revision). Finally, the auditor checks whether the system is operated as a stand alone or in conjunction with human observers.	Sample Plan
		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. The current version of these conservation measures is provided in Table 2. This table provides 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. 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. Following a review of the MSC Standard, the auditor has determined that vessels currently listed in the VOSI table as participants in an MSC certified fishery or fisheries¹ may present this evidence to demonstrate compliance with some ISSF CMs. Additionally, if an MSC certification report contains evidence that relates specifically to an ISSF Conservation Measure, even if this is not explicitly required by the MSC standard, this may be presented as evidence to demonstrate compliance. Note that red flag events would still require a separate audit, even if the vessel(s) is a participant in an MSC certified fishery(ies). For example, in the event the Annual Surveillance Audit on a MSC Certified Fishery indicates conditions are behind target, a red flag Level 2 audit could be triggered, for which the vessel may have to prove compliance with the CM in the same way as vessels that are not MSC certified, depending upon the relevance of the delinquent MSC certification condition to the matter under audit. CMs for which evidence of exclusive participation in and supply of fish from MSC certified fisheries can be used as evidence of compliance are as follows:

CM 1.1 – Tuna RFMO Authorized Vessel Record

CM 1.2 – RFMO Participation

CM 3.1(b) – Prohibition of Transactions with Shark-Finching Vessels

CM 3.1(c) – Prohibition of Transactions with Companies without a Public Policy Prohibiting Shark Finching (only if fishery is certified under MSC Fisheries Standard 3.0 or later)

CM 3.2 – Large-Scale Pelagic Driftnets Prohibition

CM 5.1 – Illegal, Unreported and Unregulated (IUU) Fishing

¹ See [VOSI Audit Protocol](#) regarding listing requirements.

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

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
1.1	Tuna RFMO Authorized Vessel Record	Vessel 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.	Level 1	Review RFMO record to see if vessel appears. Review that vessel is listed on VOSI. Review MSC's website as appropriate. Review time-stamped vessel list(s) if presented as evidence.	During PVR application, and annually thereafter
		A vessel supplying tuna originating from MSC certified fisheries complies with this CM provided that: - [The MSC certified fishery(ies) is/are located within the RFMO region where the tuna was caught.] And - [The vessel was listed in the VOSI table and linked to the relevant MSC certified fishery(ies) at the time the fish was caught.] Or - [The vessel was included in the vessel list(s) posted on the MSC website at the time the tuna was caught. The vessel owner is responsible for demonstrating that the vessel was properly listed at the time of the fishing trip (e.g. through a time-stamped screenshot).]	Level 2	Review RFMO record against previously submitted vessel attributes to verify accuracy of information. As per Level 1, plus Auditor may cross-reference tuna supply volume from the vessel with MSC volumes declared by PCs under CM 2.5.	
			Level 3	Auditor verifies that physical attributes of the vessel are consistent with RFMO records. As per Level 2, plus Auditor verifies on site that physical attributes of the vessel are consistent with RFMO and MSC records.	
1.2	RFMO Participation	Vessel must be flagged to a member or cooperating non-member (CNM) of the relevant RFMO or have applied with the RFMO for either status. If membership is not possible under the RFMO Convention, processors, traders, importers, transporters, marketers and others involved in the seafood industry shall conduct transactions only with those vessels that are flagged to Invited Experts, or another approved designation, to any such RFMO.	Level 1	RFMO records of member countries, vessel lists, IMO lists, etc. are reviewed to ensure that the vessel is flagged to a member or cooperating non-member of RFMO. Review that vessel is listed on VOSI. Review MSC's website as appropriate. Review time-stamped vessel list(s) if presented as evidence.	Quarterly, or as reports are issued.

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
		A vessel supplying tuna originating from MSC certified fisheries complies with this CM provided that: - [The MSC certified fishery(ies) is/are located within the RFMO region where the tuna was caught.] And - [The vessel was listed in the VOSI table and linked to the relevant MSC certified fishery(ies) at the time the fish was caught.] Or	Level 2	Auditor confirms that RFMO reports are consistent with vessel attribute data previously submitted. As per Level 1, plus Auditor may cross-reference tuna supply volume from the vessel with MSC volumes declared by PCs under CM 2.5.	Sample Plan
		Level 3	Auditor confirms vessel flag on-site. As per Level 2, plus Auditor verifies on site that physical attributes of the vessel are consistent with RFMO and MSC records.		
3.1(b)	Prohibition of Transactions with Shark-Finishing Vessels	No shark finning and no evidence of shark finning, and/or do not land sharks without fins naturally attached, if retained, within 2 years prior to the date of application (As found by RFMO or competent national authority). A vessel supplying tuna originating from MSC certified fisheries complies with this CM provided that:	Level 1	Review that vessel is listed on VOSI. Review MSC’s website as appropriate. Review time-stamped vessel list(s) if presented as evidence.	N/A
		- [The MSC certified fishery(ies) is/are located within the RFMO region where the tuna was caught.] And - [The vessel was listed in the VOSI table and linked to the relevant MSC certified fishery(ies) at the time the fish was caught.] Or	Level 2	Review of RFMO and competent national authority sites, for any indication that vessel was found by RFMO or competent national authority to have shark finned and/or landed sharks without their fins naturally attached (if retained) within last two years. As per Level 1, plus Auditor may cross-reference tuna supply volume from the vessel with MSC volumes declared by PCs under CM 2.5.	Annually, or as notified

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
		[The vessel was included in the vessel list(s) posted on the MSC website at the time the tuna was caught. The vessel owner is responsible for demonstrating that the vessel was properly listed at the time of the fishing trip (e.g. through a time-stamped screenshot).]	Level 3	Auditor confirms no evidence of shark finning aboard vessel. As per Level 2, plus Auditor verifies on site that physical attributes of the vessel are consistent with RFMO and MSC records.	Sample Plan
3.1(c)	Prohibition of Transactions w/ Companies without a Public Policy Prohibiting Shark Finning	Maintain a public² policy that prohibits shark finning, and requires sharks be landed with fins naturally attached if retained for the vessel company. Submit copies of policy. If flag state absolutely prohibits shark finning and requires that sharks be landed with fins naturally attached if retained, a documented policy is not necessary. However, vessel must provide copy of flag state regulation, along with evidence that the regulation is in effect and being implemented. If flag state allows 5% shark fin retention, and/or does not require that sharks be landed with fins naturally attached if retained, the company must have a public policy. A vessel supplying tuna originating from fisheries certified under MSC Fishery Standard 3.0 or later complies with this CM provided that:	Level 1	Review of company policy or evidence provided by vessel that flag state absolutely prohibits shark finning and requires that sharks be landed with fins naturally attached if retained. Review that the policy meets the criteria defined in the MSC 3.0 standard. Review that vessel is listed on VOSI. Review MSC's website as appropriate and confirm that the fishery(ies) is certified against MSC Standard 3.0 (or a later version). Review time-stamped vessel list(s) if presented as evidence.	During PVR application, and annually thereafter
		[The vessel was listed in the VOSI table and linked to the relevant MSC certified fishery(ies) at the time the fish was caught.] Or	Level 2	Review of company policy to assess whether it contains elements in accordance with ISSF best practices. Review that the policy meets the criteria defined in the MSC 3.0 standard.	Sample Plan

² 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.

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
		- [The vessel was included in the vessel list(s) posted on the MSC website at the time the tuna was caught. The vessel owner is responsible for demonstrating that the vessel was properly listed at the time of the fishing trip (e.g. through a time-stamped screenshot).] For the purpose of this measure the following fins naturally attached definition from the MSC 3.0 standard will be used: “[A policy that requires] all retained sharks to 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.”		As per Level 1, plus Auditor may cross-reference tuna supply volume from the vessel with MSC volumes declared by PCs under CM 2.5.	
			Level 3	Physical inspection of posted policies, vessel flag, etc. Physical inspection of the vessel during offloading to determine if all sharks being landed have their fins naturally attached. Review that the policy meets the criteria defined in the MSC 3.0 standard. As per Level 2, plus Auditor verifies on site that physical attributes of the vessel are consistent with RFMO and MSC records.	
3.2	Large-Scale Pelagic Driftnets Prohibition	No use of large-scale pelagic driftnets, regardless of the geographic area in which the tunas were caught. A vessel supplying tuna originating from MSC certified fisheries complies with this CM provided that: - [The vessel was listed in the VOSI table and linked to the relevant MSC certified fishery(ies) at the time the fish was caught.] And - [The MSC certified fishery(ies) is/are located within the RFMO region where the tuna was caught.] Or	Level 1	MRAG reviewer identifies driftnet vessels for further investigation of net size. Maximum net size is 2.5 km. Review that vessel is listed on VOSI. Review MSC’s website as appropriate. Review time-stamped vessel list(s) if presented as evidence.	Quarterly, or as reports are issued.
			Level 2	MRAG reviews RFMO compliance committee reports, as well as Government reports (e.g., for those vessels that only operate within their EEZ), for any indication of vessels using large-scale pelagic driftnets.	Sample Plan

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
		- [The vessel was included in the vessel list(s) posted on the MSC website at the time the tuna was caught. The vessel owner is responsible for demonstrating that the vessel was properly listed at the time of the fishing trip (e.g. through a time-stamped screenshot).]		As per Level 1, plus Auditor may cross-reference tuna supply volume from the vessel with MSC volumes declared by PCs under CM 2.5.	
			Level 3	Auditor physically views gear type of vessel. As per Level 2, plus Auditor verifies on site that physical attributes of the vessel are consistent with RFMO and MSC records.	
3.7	Transactions with Vessels or Companies with Vessel-based FAD Management Policies	1. Processors, traders, importers, transporters, marketers and others involved in the seafood industry shall conduct transactions only with those purse seine vessels whose owners develop and make public FAD Management Policies that include the activities purse seine and supply vessels are undertaking (if any) on the following elements: (a) Comply with flag state and RFMO reporting requirements for fisheries statistics by set type; (b) Report additional FAD buoy data (FAD daily position data and echosounder acoustic records) for use by RFMO science bodies; (c) Support science-based limits on the overall number of FADs used per vessel and/or FAD sets made; (d) Use only non-entangling FADs to reduce ghost fishing; (e) Mitigate other environmental impacts due to FAD loss including through the use of biodegradable FADs and FAD recovery policies; (f) For silky sharks (the main bycatch issue in FAD sets) implement further mitigation efforts.	Level 1	Auditor reviews purse seine and supply & tender anchored and/or drifting FAD Management Policies (FMPs) and notes which elements of 1(a) – (f) are covered. Auditor reviews whether FMPs include a statement that purse seine vessels covered by the policy are participating in trials of biodegradable FAD designs and/or FAD recovery programs that include the participation of the relevant RFMO science bodies and/or coastal States, national scientists, and/or ISSF scientists. Auditor reviews that FMPs include a statement that purse seine vessels and supply vessels covered by the policy are reporting FAD buoy daily position data to the relevant RFMO science bodies and/or national scientific institutions and/or their flag state, with a maximum time lag of 90 days. Statement indicates that data submissions must include the vessel name and IMO number (if available), and that deployments should be identified in the	During PVR application, and annually thereafter

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
		2. In developing a FAD Management Policy (either for drifting or anchored FADs), purse seine vessels and purse seine vessel owning companies should refer to ISSF Technical Paper 2023-10 (or any subsequent revision) in designing the activities for each element. 3. With respect to the element on mitigating other environmental impacts due to FAD loss (item e above), for both drifting and anchored FADs, public FAD Management Policies developed under this measure shall include a statement that purse seine vessels covered by the policy are participating in trials of biodegradable FAD designs and/or FAD recovery programs that include the participation of the relevant RFMO science bodies and/or coastal States, national scientists, and/or ISSF scientists to monitor experimental design. For anchored FADs (aFADs), FAD recovery programs should involve cooperative efforts to recover lost and broken aFADs. 4. With respect to the element on the use of only non-entangling FADs (item d above), public FAD management Policies developed under this measure shall include a statement that purse seine vessels covered by the policy will from this date only deploy or redeploy (i.e., will be placed in the water) fully non-entangling drifting or anchored FADs without any netting in any components, including both the raft and the tail. Where practicable,³ the purse seine vessels and supply vessels should retrieve any encountered pre-existing drifting non-fully NEFAD (whether a set is done or not) which is not in compliance with this measure.		data submissions when possible. For aFADs, no more than one position is required, except if and when and aFAD is removed/lost. In the event that purse seine vessels and supply vessels covered by the policy report these data to national scientific institutions and/or their flag state, auditor reviews evidence that vessel representative / operator / owner requested that these data be made available to the relevant RFMO for scientific purposes. Auditor reviews that FMPs include a statement that purse seine vessels and supply vessels covered by the policy are reporting dFAD buoy echosounder acoustic biomass data to the relevant RFMO science bodies and/or national scientific institutions and/or their flag state, with a maximum time lag of 90 days. Statement indicates that data submissions must include the vessel name and IMO number (if available). In the event that purse seine vessels and supply vessels covered by the policy report these data to national scientific institutions and/or their flag state, auditor reviews evidence that vessel representative / operator / owner requested that these data be made available to the relevant RFMO for scientific purposes.	

³ The language “where practicable” means “when possible and practical” as ISSF recognizes that it may not always be feasible for a vessel to remove encountered pre-existing non-fully NEFAD.

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
		5. With respect to the element on reporting additional FAD buoy daily position data for use by RFMO science bodies (item b above); public FAD Management Policies developed under this measure shall include a statement that purse seine vessels and supply vessels covered by the policy are reporting drifting FAD (dFAD) position data to the relevant RFMO science bodies and/or national scientific institutions and/or its flag state, with a maximum time lag of 90 days. Data submissions must include the vessel name and IMO number (if available). Deployments should be identified in the data submissions when possible. With respect to aFADs, public FAD management Policies developed under this measure shall include a statement that purse seine vessels and supply vessels covered by the policy are reporting one aFAD deployment / position data point to the relevant RFMO science bodies and/or national scientific institutions and/or their flag State, with a maximum time lag of 90 days (not more than one position is required, except if and when an aFAD is removed/lost). In the event that purse seine vessels and supply vessels covered by the policy report these data to national scientific institutions and/or its flag state, they shall document that they requested that these data be made available to the relevant RFMO for scientific purposes. 6. With respect to the element on reporting additional FAD buoy echosounder acoustic biomass data for use by RFMO science bodies (item b above); public FAD Management Policies developed under this measure shall include a statement that purse seine vessels and supply vessels covered by the policy are reporting dFAD echosounder and biomass data to the relevant RFMO science bodies and/or national scientific institutions		Auditor reviews whether FMPs include a statement that purse seine vessels and supply vessels covered by the policy will deploy or redeploy only fully non-entangling drifting or anchored FADs without any netting in any components, including both the raft and the tail. Policy should also mention that any pre-existing drifting non-fully NE FADs will be retrieved when encountered (where practicable). ³	
			Level 2	Auditor reviews FMPs to determine whether they make mention, or have been designed on the basis, of ISSF Technical Paper 2023-10 (or any subsequent revision). If FAD daily position and echosounder data are being shared with RFMO, a sample of fishing trips are selected at random. For these trips, vessel is asked to explain the method used to share data with the RFMO and provide evidence of RFMO confirmation that the data was received. Auditor verifies how vessel is ensuring that data submissions include the vessel name and IMO number (if available). Auditor verifies if the vessel identifies deployments in the data submissions.	Sample Plan
			Level 3	N/A	N/A

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
		and/or its flag state, with a maximum time lag of 90 days. Data submissions must include the vessel name and IMO number (if available). In the event that purse seine vessels and supply vessels covered by the policy report these data to national scientific institutions and/or its flag state, they shall document that they requested that these data be made available to the relevant RFMO for scientific purposes.			
4.1	Unique Vessel Identifiers - IMO	Vessel must obtain an IMO UVI number unless ineligible due to IMO requirements or due to other reasons stated by IMO. 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 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	Review IMO record to see if vessel appears.	During PVR application, and annually thereafter
			Level 2	Review 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.	

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
5.1	Illegal, Unreported & Unregulated (IUU) Fishing	Vessel does not appear on RFMO IUU vessel list. A vessel supplying tuna originating from MSC certified fisheries complies with this CM provided that: - [The MSC certified fishery(ies) is/are located within the RFMO region where the tuna was caught.] And - [The vessel was listed in the VOSI table and linked to the relevant MSC certified fishery(ies) at the time the fish was caught.] Or - [The vessel was included in the vessel list(s) posted on the MSC website at the time the tuna was caught. The vessel owner is responsible for demonstrating that the vessel was properly listed at the time of the fishing trip (e.g. through a time-stamped screenshot).]	Level 1	RFMO lists are reviewed at the time of application, then checked annually for updates. Review that vessel is listed on VOSI. Review MSC's website as appropriate. Review time-stamped vessel list(s) if presented as evidence.	During PVR application, and annually thereafter
				Auditor reviews RFMO compliance committee reports, commission reports, etc. to confirm vessel is not present on such lists.	Quarterly
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, and 7.4 b, c, and d (below), controlled vessels include vessels majority owned or controlled: (a) directly or indirectly (through intermediary entities) by any ISSF Participating Company or any	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.	During PVR application, and annually thereafter
			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 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	Sample Plan

Conservation Measure	Category	Guidance - What is Required?	Audit Type	Means of Verification	Frequency
		member of the corporate group of which such Participating Company is a part; or (b) directly or indirectly by any individuals who are majority shareholders (or any equivalent form of ownership) of any ISSF Participating Company. Individuals shall include any natural person and his or her family members (including spouse, domestic partner, child, sibling, parent, or grandparent, whether natural, adopted or by marriage). When registering all controlled supply or tender vessels on the PVR, in addition to the vessel attribute data already required as part of the 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, where available.		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, so long as the vessel is subject to listing in the RFMO authorized vessel record.	Level 1	Auditor reviews RFMO record to see if vessel appears.	During PVR application, and annually thereafter
			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
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.	During PVR application, and annually thereafter
			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
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 IUU lists are reviewed at the time of application, then checked annually for updates.	During PVR application, and annually thereafter
				Auditor reviews RFMO compliance committee reports, commission reports, etc. to confirm vessel is not present on such lists.	Quarterly

3 Audits

3.1 Process

3.1.1 Introduction

Table 2 describes 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 Manager⁴ 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. It is mandatory for each vessel on the PVR to be audited at Level 2 at least once every three (3) years. MRAG Americas is mandated to randomly select vessels for Level 2 audits, at which point the vessel representative is obligated to complete the audit. However, vessel representatives may also elect to volunteer vessels for Level 2 audits prior to being selected by the auditor. 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. **Vessels that are unresponsive to audit requests will receive default grades (red Xs) on the PVR and be removed from the PVR if that status does not change within two years.**

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 annual updates to verify vessel attribute data remain current. The general flow of the audit process is described below in Figure 1:

⁴ The Program Manager is the main contact point at MRAG Americas for ISSF audit related queries and drives the MRAG Americas program.

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.
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.

Figure 1: Audit Process

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		Frequency	Funding
PVR Level 1 Audit (remote) ⁵	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 Level 2 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.

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 result either from a risk factor (i.e., red flag) triggered during a PVR 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. 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 EMS data are requested,⁶ a vessel can provide 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 for Level 3 (on-site) audits.

⁵ Carried out at first listing on the PVR and then annually.

⁶ 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 w/ certain conservation measures and may therefore help to make the audit process both effective and efficient.

3.1.4 PVR Level 3 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.
- A vessel fails to respond to a Level 2 audit request.

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,⁷ 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 Conformance Levels

Conformance at Levels 2 and 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.

⁷ Noting that access to the observer may be restricted and not in the purview of the Vessel to grant.

- 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.⁸
- Major Non-conformance – Vessel has no system in place to comply with ISSF conservation measures, or several minor non-conformances that indicate system failure.⁹

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.
- 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

⁸ Example: The vessel has a policy which prohibits shark finning; however, it does not contain all required elements.

⁹ Example: Vessel does not have an implemented policy against shark finning, in an RFMO that does not absolutely prohibit shark finning.

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 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 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 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 onsite audits
 - 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 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 the 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, 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 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 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. 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.¹⁰

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.

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

Some 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 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.

¹⁰ 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.

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 audit procedures will occur at least 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.

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