



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

**For Audits Taking Place in 2025
Relating to 2024 Activities**

Version 2024/2

Updates are noted in green.

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Integrated Management of Natural Resources

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1 Introduction

To support tuna stock and tuna ecosystem sustainability, ISSF Participating Companies (PC) have committed to meet conservation measures designed to improve the long-term health of tuna fisheries.

This document describes the protocol for the auditing of PC compliance with those conservation measures (CMs) in effect for Calendar Year 2024 (CY24). The PC requirements for completing the annual audits are specified in the ISSA Compliance Policy.

This document will be amended as required.

2 Program implementation

2.1 Participating Company Compliance

Per the [ISSA Compliance Policy](#), PCs commit to undergo independent auditing against all the in-effect ISSF conservation measures. Table 1 lists the conservation measures in effect for CY24 to be audited under this protocol, provides guidance regarding the required action and/or information, and describes the means of verification that will be used to assess conformance. Each PC is expected to voluntarily provide all necessary information to ISSF and/or MRAG Americas. We encourage PCs to verify that the point of contact they initially provided to ISSF remains up to date. MRAG is authorized by ISSF to liaise only with the PC's designated point of contact. We cannot liaise with anyone else for the purposes of the audit.

The audits will generally follow the principles of ISO 19011. The Program Manager ensures audits are compliant and consistent with the in-effect ISSF conservation measures.

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

In advance of the annual audit, company details including contact information for the designated contact person will be confirmed with each company. Based on activity, the traceability sample size will be determined and sent with the audit plan. Finally, note that annual audit/traceability data requests for companies processing only loins and/or trading finished goods will encompass a longer time frame than for round fish. The basic audit process is described in the following chart:

<u>Step</u>	<u>Task</u>	<u>Actions</u>
1	Audit Planning and Scheduling	PCs provide quarterly RFMO data. Audit planning for annual assessments includes an information request to all PCs for a list of controlled vessels, company policies, confirmation of affiliated companies that will be included in the audit and an information request for data to be used for traceability exercises. Thereafter, the auditor requests information relating to specific transactions/can codes along with evidence of conformance with all other conservation measures. Each phase will have associated deadlines for data submission.
2	RFMO Data Review	This phase of the audit includes a review of all quarterly RFMO data for CY24 submissions, along with a review of recent RFMO compliance committee reports, commission reports, etc. When PCs source from vessels that do not appear on RFMO records, they must provide additional evidence to auditor to demonstrate why a vessel is exempt from RFMO listing.
3	Policy Review	This phase of the audit includes a review of company policies and a request for sales data from which traceability exercises may be based. If the PC sources from vessels not registered on the PVR, they are responsible for providing to the auditor all of the relevant policies for each vessel/supplier.
4	Traceability Audit, etc.	This phase of the audit includes a review of the transactions or can codes that were randomly selected for the traceability exercises.
5	Preliminary Audit Report	At the completion of all audit phases, each PC will receive a preliminary report from the audit team, which outlines performance, including any non-conformances and corrective actions.
6	Remediation Period and Final Audit Report	A 30-day discussion/remediation period will follow each preliminary report, during which PCs can provide to the auditor(s) clarifications or additional information to address non-conformances. At the end of this 30-day period, the auditor(s) will issue a Final Audit Report to the PC and ISSF.
7	Follow-Up Audit (If necessary)	Any follow-up audits will be conducted in accordance with the schedule outlined in the ISSA Compliance Policy. (See Section 7).

3 Conservation Measures and Means of Verification

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

CM	Category	Gear Type	Category Guidance	Means of Verification	Frequency
1.1	Tuna RFMO Authorized Vessel Record	All	<p>All purchases must be from vessels listed on the authorized vessel record of the RFMO governing the ocean area in which the tuna was caught, at the time of the fishing trip, so long as the vessel is of a size subject to listing in the RFMO authorized vessel record. For any purchases from non-PVR vessels, maintain a system to check and approve vessel listing. If company sources from vessels not registered with an RFMO, it must provide audit team with supporting evidence (such as National vessel registries, copies of vessel licenses, etc.) to demonstrate effectiveness of procurement screening system.</p> <p>Purchases made from vessels that participate in MSC certified fisheries will be deemed in compliance with this measure.</p>	<p>Auditor reviews company system to ensure that purchases are from properly listed vessels. If company sources from vessels not registered with an RFMO, auditor reviews additional evidence that vessel was exempt from RFMO listing and legally authorized to fish during the audit period. The traceability exercises, reviewing RFMO vessel records and checking ocean areas where vessels are fishing, verifies the system.</p> <p>Auditor checks evidence provided by the PC that vessel was participating in an MSC certified fishery at the time of sourcing.</p>	Annually
1.2	RFMO Participation	All	<p>All purchases must be from vessels 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.</p> <p>Purchases made from vessels that participate in MSC certified fisheries will be deemed in compliance with this measure.</p>	<p>Auditor reviews quarterly data sent by the company to the RFMO to check that all vessels meet this requirement.</p> <p>Auditor checks evidence provided by the PC that vessel was participating in an MSC certified fishery at the time of sourcing.</p>	Quarterly

CM	Category	Gear Type	Category Guidance	Means of Verification	Frequency
1.3	IOTC Yellowfin Tuna Rebuilding	All	<p>To support the advice of the IOTC Scientific Committee and thereby increase the effectiveness of the Indian Ocean yellowfin rebuilding plan currently contained in Resolution 21/01, and any that further rebuilding plans adopted by the IOTC, processors, traders, importers, transporters, marketers, and others involved in the seafood industry annually purchasing in excess of 1,000 metric round tonnes shall commit to:</p> <ol style="list-style-type: none"> 1. Reduce annual sourcing of Indian Ocean origin yellowfin by between 11% and 22% calculated with respect to the company's average annual level of Indian Ocean yellowfin purchases from 2017-2019. 2. In deciding the level of reduction and its implementation, companies shall consider a flag States' degree of compliance with the rebuilding plan and degree of past catch reductions in support of the rebuilding plan. 3. ISSF Participating Companies shall publish by 31 December 2022, a statement on its company website describing its commitment to and implementation plan, and by 1 April of every year after to address any changes. 	<p>For PCs trading more than 1,000 metric round tonnes in round fish annually, auditor reviews quarterly RFMO reports and establishes company's average annual level of Indian Ocean yellowfin purchases from 2017-2019.</p> <p>For PCs trading the equivalent of more than 1,000 metric round tonnes in loins and finished goods annually, auditor obtains all loins and trading data for IO yellowfin and establishes company's average annual level of Indian Ocean yellowfin purchases from 2017-2019.</p> <p>In Year 1 & 2 audits (Q4 2021 – Q3 2022 & Q4 2022 – Q4 2023), PCs are compliant if they have published their plans.¹</p> <p>In Year 3 audit (Q1-4 2024) and ongoing, PCs need to demonstrate that at least 11% reduction has been achieved by the end of the calendar year. Auditor will assess the reasonableness of the reported percentage on the basis of data provided by the PCs (i.e., such as the quarterly reports to IOTC), including a breakdown of round fish, loins and processed goods, and associated conversion factors used to estimate round fish equivalent.²</p>	Annually

¹ Auditor compares planned reduction figures against company's average annual sourcing established for IO Yellowfin sourcing during the period 2017-2019.

² Auditor determines if IO Yellowfin annual sourcing figures represent an 11% decrease from the average annual sourcing figure established for the period 2017-2019.

CM	Category	Gear Type	Category Guidance	Means of Verification	Frequency
2.1	Product Traceability	All	Demonstrate ability to trace products from can code or sales invoice to vessel and trip.	Auditor will review recent mock recalls, if available, and select a sample (i.e., all sales for a specific month) of can codes or sales invoices by label and destination from which the company will conduct traceability exercises. If the company produces cans from loins, or sells loins as a finished good, these products must be included in the assessment and the traceability exercise will cover a 3-month period.	Annually
2.2	Quarterly Data Submission to RFMO	All	<p>a. Send information for all round fish purchases (skipjack, albacore, yellowfin, bigeye) as described in the measure to RFMO scientific bodies for each quarter by the last day of the following calendar quarter.</p> <p>b. As described by ISSF, for each quarter, Participating Companies are required to report to RFMO (no later than the last day of the following calendar quarter) if they have no purchase of round fish (in total or from a typical RFMO region).</p> <p>c. A Participating Company that only purchases loins and finished goods is exempt from sending RFMO data. However, company must affirm so quarterly via an unprompted email to rmodata@iss-foundation.org</p> <p>This measure requires a specific reporting format (available here) be used for all RFMO submissions.</p>	<p>Auditor checks that the required reporting format has been used and that information has been sent on time by companies to RFMO for all purchases.</p> <p>If applicable, the auditor checks if PC has notified the relevant RFMO(s) that company did not purchase any round fish for a specific quarter.</p> <p>If applicable, auditor checks that quarterly emails have been sent to rmodata@iss-foundation.org when company only purchases loins and/or finished goods.</p>	Quarterly

CM	Category	Gear Type	Category Guidance	Means of Verification	Frequency
2.3	Product Labelling by Species and Area of Capture	All	<p>Processors, traders, importers, transporters, marketers and others involved in the seafood industry shall on all product labeling, or through a publicly available web-based system by product, for all branded tuna products:</p> <p>1. Identify the species of tuna contained in the product. For example:</p> <p>Katsuwonus pelamis, Skipjack, Bonite, Listado</p> <p>Thunnus alalunga, Albacore, Germon, Atún blanco</p> <p>Thunnus albacares, Yellowfin, Thon Jaune, Rabil</p> <p>Thunnus obesus, Bigeye, Thon Obese, Patudo</p> <p>2. Identify the ocean of capture for the tuna contained in the product. If mentioning FAO area, the following format should be used:</p> <p>Area 18 (Arctic Sea) Area 21 (Atlantic, Northwest) Area 27 (Atlantic, Northeast) Area 31 (Atlantic, Western Central) Area 34 (Atlantic, Eastern Central) Area 37 (Mediterranean and Black Sea) Area 41 (Atlantic, Southwest) Area 47 (Atlantic, Southeast) Area 48 (Atlantic, Antarctic) Area 51 (Indian Ocean, Western) Area 57 (Indian Ocean, Eastern) Area 58 (Indian Ocean, Antarctic and Southern) Area 61 (Pacific, Northwest) Area 67 (Pacific, Northeast) Area 71 (Pacific, Western Central) Area 77 (Pacific, Eastern Central) Area 81 (Pacific, Southwest) Area 87 (Pacific, Southeast) Area 88 (Pacific, Antarctic)</p>	<p>Auditor obtains list of consumer-facing branded products, and checks that said list includes information on the species of tuna (scientific name and/or common name), and ocean of capture.</p> <p>Auditor may also verify conformance with this CM during the annual traceability exercise.</p>	Annually

CM	Category	Gear Type	Category Guidance	Means of Verification	Frequency
2.4	Supply Chain Transparency, Audit, Reporting and Purchase Requirements	All	<p>Processors, traders, importers, transporters, marketers, and others involved in the seafood industry shall:</p> <p>1. For purchases from fish trading organizations that trade 10,000 tons or more of tuna annually (not directly from fishing vessels), purchase all round; gilled and gutted; or headed, gilled, and gutted albacore, skipjack, yellowfin and/or bigeye tuna from:</p> <p>(a) ISSF Participating Companies; or</p> <p>(b) companies designated by ISSF as Data Check Companies [as defined by the General Provisions and Terms and Conditions for Data Check Companies]^{3,4} that have a published compliance audit report with respect to ISSF Conservation Measures 2.2, 1.1, 4.1, 4.2, and 5.1, as determined and reported by the ISSF external auditor.</p> <p>2. If purchasing from processing organizations that purchase and process more than 12,500 round tons per year, purchase all frozen loins or processed, shelf-stable, canned, or pouched products of albacore, skipjack, yellowfin and/or bigeye tuna from:</p> <p>(a) ISSF Participating Companies; or</p> <p>(b) companies designated by ISSF as Data Check Companies [as defined by the General Provisions and Terms and Conditions for Data Check Companies]^{3,4} that have a published compliance audit report with respect to ISSF Conservation</p>	<p>Auditor reviews list of all traders and processing organizations that supplied round fish during audit year. Auditor cross references list of traders and processing organizations with quarterly RFMO reports and during traceability exercise.</p> <p>Auditor then checks if trader / processing organization is an ISSF PC or DCC. If neither, then auditor assumes total trade is in excess of 10,000 / 12,500 tons (whichever applies), unless PC provides clear evidence that supplier annual trade / processing is significantly less.</p> <p>By no later than March 15 of each year, auditor reviews Participating Company’s public website, as well as evidence provided by the Company, to determine whether the percentage of their purchases for the audit year was reported for each of the Fishery Source and each of the Supplier Source categories.</p> <p>Auditor reviews MSC website for documentation noting the fishery has entered full assessment.</p>	Annually

³ A Data Check company is considered ‘approved’ if they have a published compliance audit report with respect to ISSF Conservation Measures 2.2, 1.1, 4.1, 4.2, and 5.1, as determined and reported by the ISSF external auditor.

⁴ The classification of a “Data Check Company” is available to processors, marketers, traders of tuna after completing two quarters of data reporting and continually annually thereafter. The “Data Check Company” classification is not available for any company that is an ISSF Participating Company on December 31, 2019.

CM	Category	Gear Type	Category Guidance	Means of Verification	Frequency
			<p>Measure 2.2, 1.1, 4.1, 4.2, and 5.1, as determined and reported by the ISSF external auditor.</p> <p>3. ISSF Participating Companies will be exempt from compliance with this measure until December 31, 2025, if they publish annually before 15 March of each year:</p> <p>(a) the percentage of their purchases (measured in round ton equivalents) for each of the following Fishery Source categories:</p> <ol style="list-style-type: none"> 1. MSC Certified Fisheries.⁵ 2. Fisheries that have entered full assessment for MSC certification. 3. Fisheries in the MSC Fisheries in Transition to MSC (ITM) program. 4. Comprehensive FIPs⁶ that have been publicly listed and have achieved progress within at least the past 24 months; or are in their initial year of listing. 5. Comprehensive FIPs⁶ that are publicly listed but have not achieved progress in their prior 24 months. 6. None of the above. <p>(b) the percentage of their purchases (measured in round ton equivalents) for each of the following Supplier Source categories:</p> <ol style="list-style-type: none"> 1. ISSF participating companies 2. Data Check Companies 3. Direct from vessels 4. None of the above 	<p>Auditor reviews publicly available and third-party verified information for FIP listing, classification information (Comprehensive and scoring).</p> <p>Auditor will assess the reasonableness of the reported percentages on the basis of data provided by the Company, including source of product, a breakdown of round fish, loins and processed goods, and associated conversion factors used to estimate round fish equivalent.</p> <p>The auditor will also check that there is a statement of intent regarding the time-bound implementation plan published on the Company's website as described in the guidance.</p>	

⁵ Disclosure should only count the species certified to carry the MSC label. Species not certified to carry the MSC label should be counted in the other categories, as appropriate.

⁶ ISSF Participating Companies that source from a fishery that had been in a publicly listed comprehensive FIP in the past 12 months, may continue to count this sourcing against their FIP percentage under 3(a)(4) and (5).

CM	Category	Gear Type	Category Guidance	Means of Verification	Frequency
			(c) a statement of intent that includes a time-bound implementation plan to decrease purchases from the “none of the above” categories in 3(a) and (b) above.		
2.5	Transparency in Reporting Progress Against ISSF 5-Year Goal	All	<p>1. Processors, traders, importers, transporters, marketers, and others involved in the seafood industry shall publish by March 15, 2024 (representing tuna purchases for the prior calendar year), and update annually thereafter:</p> <p>(a) The percentage of their purchases (measured in round ton equivalents) for each of the following Fishery Source categories:</p> <ul style="list-style-type: none"> i. MSC certified fisheries.⁵ ii. Fisheries that have entered full assessment for MSC certification. iii. Fisheries in the MSC Fisheries in Transition to MSC (ITM) program. iv. Comprehensive FIPs that have been publicly listed and have achieved progress within at least the past 24 months; or are in their initial year of listing. v. Comprehensive FIPs that have been publicly listed but have not achieved progress in the prior 24 months. vi. None of the above. 	<p>By no later than March 15 of each year, auditor reviews Participating Company’s public website, as well as evidence provided by the Company, to determine whether the percentage of their purchases for the audit year was reported for each of the Fishery Source categories.</p> <p>Auditor reviews MSC website for documentation noting the fishery has entered full assessment.</p> <p>Auditor reviews publicly available and third-party verified information for FIP listing, classification information (Comprehensive and scoring).</p> <p>Auditor will assess the reasonableness of the reported percentages on the basis of data provided by the Company, including source of product, a breakdown of round fish, loins and processed goods, and associated conversion factors used to estimate round fish equivalent.</p> <p>The auditor will also check that Participating Company has published a roadmap and timeline to:</p>	Annually

CM	Category	Gear Type	Category Guidance	Means of Verification	Frequency
			<p>(b) A roadmap and timeline to increase the percentage of their purchases from fisheries that are MSC certified.</p> <p>(c) A roadmap and timeline to decrease the percentage of their purchases from Comprehensive FIPs that have been publicly listed but have not achieved progress in more than 24 months.</p> <p>(d) A roadmap and timeline to decrease the percentage of their purchase from the “none of the above” category.</p> <p>2. Disclosures made by ISSF Participating Companies under paragraph 1 of this Conservation Measure will satisfy the disclosures required for the exemption in paragraph 3(a) of ISSF CM 2.4.</p> <p>3. If ISSF Participating Companies voluntarily elect to publish additional purchase statistics using information published for vessels on ISSF's Vessels in Other Sustainability Initiatives (VOSI) list, the accuracy of such disclosures shall be verified by ISSF compliance auditors.</p>	<ul style="list-style-type: none"> - Increase the percentage of their purchases from fisheries that are MSC certified; - decrease the percentage of their purchases from Comprehensive FIPs that have been publicly listed but have not achieved progress in more than 24 months; and - decrease the percentage of their purchase from the “none of the above” category. <p>When applicable, auditor cross-references purchase statistics provided by a PC with vessel data from the VOSI table.</p>	
3.1(a)	Shark-Finching Policy	All	Company establishes and publishes policy prohibiting shark finning and requiring sharks be landed with fins naturally attached if retained.	Auditor reviews company website for published policy. In the event the company does not maintain a website, the auditor obtains a copy of the policy from company point of contact. The company should also clarify how this policy is made public. Auditor reviews policy to determine if it requires sharks to be landed with fins naturally attached if retained.	Annually

CM	Category	Gear Type	Category Guidance	Means of Verification	Frequency
3.1(b)	Prohibition of Transactions with Shark-Finching Vessels	All	<p>Refrain from transactions with vessels that have shark finned, and/or do not land sharks with fins naturally attached if retained, within two years of the product purchase date (as found by RFMO or competent national authority).</p> <p>Purchases made from vessels that participate in MSC certified fisheries will be deemed in compliance with this measure.</p>	<p>Auditor reviews company system for ensuring no transactions with vessels that practice shark finning and/or do not land all sharks with fins naturally attached if retained.</p> <p>Auditor checks evidence provided by the PC that vessel was participating in an MSC certified fishery at the time of sourcing.</p>	Annually
3.1(c)	Prohibition of Transactions with Companies without a Public Policy Prohibiting Shark Finning	All	<p>No transactions with companies that do not have a public policy prohibiting shark finning and requiring sharks be landed with fins naturally attached if retained. If transactions involve flag states that absolutely prohibit shark finning and require sharks be landed with fins naturally attached if retained, no policy is required. 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.</p> <p>Purchases made from vessels that participate in MSC certified fisheries (certified under MSC Fishery Standard 3.0 or later) will be deemed in compliance with this measure.</p> <p>For the purpose of this measure the following fins naturally attached definition from the MSC 3.0 standard will be used:</p> <p>“[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.”</p>	<p>Auditor reviews company procedure for ensuring that all tuna purchases have come from a company that has a public policy prohibiting shark finning and requires that sharks be landed with fins naturally attached when retained.</p> <p>For flag states that have an absolute shark finning prohibition and require that sharks be landed with fins naturally attached when retained, auditor will review all publicly available materials to ensure no shark finning has taken place. Traceability exercises by transaction or can code to PVR vessels or proof of compliance verifies the system.</p> <p>Auditor checks evidence provided by the PC that vessel was participating in an MSC certified fishery (certified under MSC Fishery Standard 3.0 or later) at the time of sourcing.</p>	Annually

CM	Category	Gear Type	Category Guidance	Means of Verification	Frequency
3.2	Large-Scale Pelagic Driftnets Prohibition	All	<p>No transactions in vessels using large-scale pelagic driftnets, regardless of the geographic area in which the tunas were caught by such driftnets.</p> <p>Purchases made from vessels that participate in MSC certified fisheries will be deemed in compliance with this measure.</p>	<p>Auditor reviews quarterly report by gear type and identifies any use of large-scale driftnets. This is done by first identifying vessels using gill nets, then following up on the size of the net. The max net size is 2.5 km.</p> <p>Auditor checks evidence provided by the PC that vessel was participating in an MSC certified fishery at the time of sourcing.</p> <p>Auditor 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.</p>	Quarterly, or as reports are issued.
3.3	Full Retention of Tunas	All Purse Seine	<p>All purse seine caught tuna (skipjack, yellowfin and bigeye) retained onboard, except those unfit for human consumption (as defined in the measure), or when in the final set of a trip, there is insufficient well space to accommodate all fish caught in that set. If the vessel fishes in areas where full retention is mandatory, no further policy is needed. If RFMO does not require full retention, vessel must have documented and implemented policy in accordance with this conservation measure.</p>	<p>Auditor reviews whether the company sources tuna from vessels that practice full retention of tunas. Auditor checks PVR. For vessels not listed on the PVR, the company provides evidence of vessel policy such as: agreement with observer provider to check tuna retention and RFMO or flag state requirement regarding full retention of tunas. RFMO compliance reports are reviewed to identify any vessels/trips that may not comply.</p>	Annually

CM	Category	Gear Type	Category Guidance	Means of Verification	Frequency
3.4	Skipper Best Practices	All Purse Seine and Longline Vessels	<p>Unless exempt per Conservation Measure 8.1, skipper⁷ has:</p> <ul style="list-style-type: none"> (a) Attended and in-person and/or online ISSF Skippers Workshop; or (b) Attended an in-person Skippers Workshop conducted by a trainer that has been accredited by ISSF to conduct these workshops; or (c) Viewed the ISSF Skippers Workshop video online; or (d) Reviewed the online ISSF Skippers Guidebook. <p>The ISSF Skippers Workshop Videos and ISSF Skippers Guidebooks can both be found online here.</p>	<p>Auditor reviews whether the company has purchased tuna only from vessels with skippers that have completed one of the 4 ISSF best practices education formats.</p> <p>Auditor checks the PVR and ISSF list of individuals who have attended in-person and/or online ISSF Skippers Workshops (taught by ISSF or by a trainer accredited by ISSF), reviewed online ISSF Skippers Guidebook or viewed the ISSF Skippers Workshop video online.</p> <p>PC may also provide evidence of skipper workshop attendance or completion certificates for the review of the ISSF guidebook / video.</p>	Annually
3.5	Transactions with Vessels that use Only Non-Entangling FADs	All Purse Seine and Supply & Tender Vessels	<p>Processors, traders, importers, transporters, marketers and others involved in the seafood industry shall conduct transactions only with those purse seine vessels whose owners have a public⁸ policy regarding the use of only non-entangling (NE) FADs. The policy should refer to the ISSF Guide for Non-Entangling FADs and shall apply to all new FAD deployments, regardless of the type of vessel that deploys the FADs.</p> <p>For purposes of this measure, NE FADs should meet the minimum specifications in the ISSF Guide for Non-Entangling FADs. Vessel owners shall not deploy FADs that meet the description of "highest entanglement" contained in the ISSF Guide.</p>	<p>Auditor reviews evidence showing that the company conducts transactions only with purse seine vessels that have a public policy regarding the use of only non-entangling FADs. Auditor reviews whether RFMO/flag state or fleet association has an in-effect mandatory requirement for NE FADs, which equals or surpasses ISSF guidelines for NE FADs.</p>	Annually

⁷ The intent of this conservation measure is that the person or persons trained are those in leadership roles onboard the vessel directing the fishing operations.

⁸ 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.

CM	Category	Gear Type	Category Guidance	Means of Verification	Frequency
			<p>If RFMO/flag state where vessel(s) operate has an in-effect mandatory requirement for NE FADs, which equals or surpasses the ISSF guidelines for NE FADs, then vessel owner is not required to have an individual public policy.</p> <p>If the vessel is a member of a fleet association that has a public policy on NE FADs, which equals or surpasses the ISSF guidelines for NE FADs, the individual vessel must have a policy implementing the fleet association policy.</p> <p>As of 1 April 2025, ISSF CM 3.5 will be repealed and replaced by CM 3.7.</p>		
3.6	Transactions with Vessels Implementing Best Practices for Sharks, Sea Turtles and Seabirds . ⁹	Large-scale Longline	<p>Processors, traders, importers, marketers, and others involved in the seafood industry shall conduct transactions only with those longline vessels whose owners have a policy requiring the implementation of best practices for sharks, marine turtles, and seabirds.¹⁰</p> <p>For the purposes of this measure, a large-scale longline vessel is defined as a vessel that is equal to or greater than 20m length overall (LOA).</p>	<p>Auditor reviews evidence showing that the company conducts transactions only with large-scale longline vessels that have a policy requiring the implementation of the following best practices for sharks, marine turtles, & seabirds:</p> <p>(a) the use of circle hooks and only monofilament line;</p> <p>(b) the use of whole finfish bait;⁹</p> <p>(c) the implementation by the crew of best practice handling techniques for sharks, seabirds and marine turtles, such as those outlined in the</p>	Annually

⁹ Please note this Conservation Measure was revised in Q4 2021 to include language on “Seabirds” and “the use of whole finfish bait”. This language will be required in policies starting on [1 April 2024](#).

¹⁰ For seabirds, seabird bycatch mitigation techniques include (i) bird-scaring lines (also known as bird curtains, streamer or tori lines), (ii) weighted branch lines, (iii) night setting, (iv) side-setting w/ bird curtains, (v) blue-dyed bait, (vi) offal management (i.e., disposing of fish bait away from where line will be set); and (vii) underwater setting chute and line shooter.

CM	Category	Gear Type	Category Guidance	Means of Verification	Frequency
				<p>ISSF Skippers' Guidebook to Longline Fishing Practices; and</p> <p>(d) No use of “shark lines” at any time.¹¹</p> <p>Auditor reviews date on which policy was put in effect.</p>	
3.7	Transactions with Vessels of Companies with Vessel-Based FAD Management Policies	Purse Seine and Supply & Tender Vessels	<p>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 public⁸ FAD Management Policies that include the activities purse seine and supply vessels are undertaking (if any) on the following elements:</p> <p>(a) Comply with flag state and RFMO reporting requirements for fisheries statistics by set type;</p> <p>(b) Report additional FAD buoy data (FAD daily position data and echosounder acoustic records) for use by RFMO science bodies;</p> <p>(c) Support science-based limits on the overall number of FADs used per vessel and/or FAD sets made;</p> <p>(d) Use only non-entangling FADs to reduce ghost fishing;</p> <p>(e) Mitigate other environmental impacts due to FAD loss including through the use of biodegradable FADs and FAD recovery policies;</p> <p>(f) For silky sharks (the main bycatch issue in FAD sets) implement further mitigation efforts.</p>	<p>Auditor reviews purse seine and supply & tender FAD Management Policies (FMPs) and notes which elements of 1(a) – (f) are covered.</p> <p>Auditor reviews FMPs to determine whether they make mention, or have been designed on the basis, of ISSF Technical Paper 2019-11 (or any subsequent revision).</p> <p>By 1 January 2023, auditor reviews whether FMPs include a statement that purse seine vessels and supply 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.</p> <p>By 1 January 2023, auditor reviews that FMPs include a statement that purse seine vessels and supply vessels covered by the policy are reporting FAD buoy daily position</p>	Annually

¹¹ For the purposes of this measure, shark lines are those defined in the following link: <http://issfguidebooks.squarespace.com/s/Shark-Lines-Illustration.pdf>

CM	Category	Gear Type	Category Guidance	Means of Verification	Frequency
			<p>2. In developing a FAD Management Policy, purse seine vessels and purse seine vessel owning companies should refer to ISSF Technical Paper 2019-11 (or any subsequent revision) in designing the activities for each element.</p> <p>3. With respect to the element on mitigating other environmental impacts due to FAD loss (item e above), by 1 January 2023, public FAD Management Policies developed under this measure shall include a statement that purse seine vessels and supply 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 designs.</p> <p>4. With respect to the element on the use of only non-entangling FADs (item d above), no later than 1 April 2025, public FAD management Policies developed under this measure shall include a statement that purse seine vessels and supply vessels covered by the policy will from this date only deploy or redeploy (i.e., will be placed in the water) fully non-entangling FADs without any netting in any components, including both the raft and the tail. From 1 April 2025 (where practicable), the purse seine vessels and supply vessels should retrieve any encountered pre-existing non-fully NEFAD (whether a set is done or not) which is not in compliance with this measure.</p> <p>5. With respect to the element on reporting additional FAD buoy daily position data for use by RFMO science bodies (item b above); By 1 January 2023, public FAD Management Policies developed</p>	<p>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 data submissions when possible. 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.</p> <p>By 1 April 2024, auditor reviews that FMPs include a statement that purse seine vessels and supply vessels covered by the policy are reporting FAD 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</p>	

CM	Category	Gear Type	Category Guidance	Means of Verification	Frequency
			<p>under this measure shall include a statement that purse seine vessels and supply vessels covered by the policy are reporting FAD 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. 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.</p> <p>6. With respect to the element on reporting additional FAD buoy echosounder acoustic biomass data for use by RFMO science bodies (item b above); by 1 April 2024, 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 FAD echosounder and biomass 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). 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.</p> <p>ISSF CM 3.5 is repealed and replaced by this measure as of 1 April 2025.</p>	<p>reviews evidence that vessel representative / operator / owner requested that these data be made available to the relevant RFMO for scientific purposes.</p> <p>No later than 1 April 2025, 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 FADs without any netting in any components, including both the raft and the tail. Auditor will also check if the policy mentions that from April 1, 2025, any encountered pre-existing non-fully NE FADs that are not in compliance with CM 3.7 should be retrieved (where practicable).</p>	

CM	Category	Gear Type	Category Guidance	Means of Verification	Frequency
4.1	Unique Vessel Identifiers - IMO	All	<p>All purchases must be from vessels with an IMO UVI number, unless ineligible due to IMO requirements or due to other reasons stated by IMO.</p> <p>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.</p> <p>Vessels that fish only in waters under national jurisdiction that provide a national certificate of operation will be considered compliant under this section. Company is responsible for gathering evidence of IMO ineligibility for all applicable vessels and provide such evidence to auditor upon request.</p>	Auditor reviews company system to ensure vessel purchases meet this criterion. A random sample of non-PVR purchases will be reviewed to assess whether the company system is adequate to ensure that vessels not registered on the PVR meet this requirement. If applicable, auditor reviews evidence for vessel being ineligible for an IMO number.	Annually
4.2	Purse Seine Unique Vessel Identifiers	All Purse Seine	<p>If IMO requirements do not provide for a particular purse seine vessel to receive an IMO for reasons other than vessel size, the vessel shall obtain a TUVI from the Consolidated List of Authorized Vessels (CLAV) or a UVI from ISSF.</p> <p>If IMO requirements do not provide for a particular vessel to receive an IMO due to vessel size, such vessels do not need to obtain a TUVI from the CLAV or a UVI from ISSF. In such cases, company must present evidence to auditor that it has verified vessel size during (or before) procurement.</p>	Auditor reviews company method to ensure that all vessel purchases meet this criterion. A sample of non-PVR purchases will be reviewed to assess whether the company system is adequate to ensure that non-PVR vessels also meet this requirement. If applicable, auditor reviews evidence that vessel(s) is exempt due to its size.	Annually

CM	Category	Gear Type	Category Guidance	Means of Verification	Frequency
4.3(a)	Observer Coverage	Large Purse Seine ¹²	Evidence of 100% observer coverage (human or electronic) unless exempt or prevented by force majeure. The data collected by the observer must be made available to the flag state authorities and, if appropriate, to the RFMO, in the format required by the flag state (and RFMO). In case the flag state (or RFMO) does not accept the data, the vessel owner must store data for at least three years from the end of the trip. At a minimum, data to be made available are those fields required by the flag state for vessel logbooks.	Auditor assesses company system for observer coverage of controlled vessels, company data submission to RFMOs, and RFMO committee meetings and compliance reports, etc. For non-PVR vessel purchases, the PC provides details of agreement with observer provider (human or electronic) for 100% coverage. If RFMO requires 100% observer coverage, no further evidence is required.	Annually
4.3(b)	Observer Coverage Exemption - WCPO Region	Large Purse Seine	Exemptions may be made for large-scale purse seine vessels in the Western and Central Pacific Ocean fishing in latitudes higher than 20°N/S in cases where the catch (retained and discarded; target and non-target) is adequately sampled and reported to the RFMO. Such exemptions shall be based on a detailed report that will be reviewed and approved by the ISSF Board and announced publicly through the ISSF website.	Auditor reviews evidence that the vessel meets the requirements for this exemption.	Annually
4.3(b)(i)	Observer Coverage Exemption – New Zealand Flag Purse Seine Vessels	Large Purse Seine	An exemption is granted for tuna caught by New Zealand flag purse seine vessels that operate only within New Zealand waters targeting free school skipjack during the summer season	Auditor reviews evidence that the vessel meets the requirements for this exemption.	Annually
4.3(b)(ii)	Observer Coverage Exemption – Japan Flag Purse Seine Vessels Fishing North of 20°N	Large Purse Seine	An exemption is granted for tuna caught by Japan flag large-scale purse seine vessels that are on the ISSF Proactive Vessel Record (PVR) and operate north of 20°N, provided that: 1. Each year, vessels wishing to qualify for this exemption notify ISSF about the months when they	Auditor reviews evidence that the vessel meets the requirements for this exemption.	Annually

¹² Large-scale purse seine vessels are defined as those with at least 335 m³ fish hold volume.

CM	Category	Gear Type	Category Guidance	Means of Verification	Frequency
			<p>plan to be fishing north of 20°N. If the exemption is granted to them, it will only cover these months.</p> <p>2. Within one month after the end of each fishing trip, the vessel-owning company sends a trip catch report for each vessel covered under this exemption to the Secretariat of the Pacific Community (SPC, the science provider to WCPFC).</p> <p>3. The trip catch reports in paragraph 1 must consist of the two data sets below, in a format agreed by SPC:</p> <ul style="list-style-type: none"> i) Set-by-set estimated catches and discards for target tunas (Albacore, Bigeye, Yellowfin and Skipjack) and non-target species (e.g., sharks, turtles, yellowtail). The set-by-set information shall indicate fishing day, time of set, latitude and longitude, and school type. ii) Final Outturn Data (FOT). These are total trip catches by target species and size categories, corrected with sampling data. The size break downs shall be <1.8 Kg, 1.8-3.5 Kg, 3.5-10.0 Kg and > 10.0 Kg. <p>4. For the purpose of verifying compliance with this measure, ISSF will contact SPC quarterly to determine which vessels are submitting the reports in <i>paragraph 3</i>. Vessels that have not submitted complete reports for the past three months according to their fishing plan in paragraph 1 will no longer qualify for this exemption.</p>		
4.3(c)	Observer Coverage – Grace Period for Electronic Monitoring Systems for Certain Large-	Large Purse Seine	Certain vessels that meet the definition of large-scale purse seine vessels under ISSF conservation measures are not considered large-scale in certain RFMOs and therefore are unable to obtain human observers for each fishing trip to meet the requirements of ISSF Conservation Measure 4.3(a).	Auditor reviews list of vessels having applied for, and being granted, the grace period. Auditor compares vessel(s) grace period to PC sourcing records to ensure the dates align.	Annually

CM	Category	Gear Type	Category Guidance	Means of Verification	Frequency
	Scale Purse Seine Vessels		<p>Owners of large-scale purse seine vessels who fit in this category may seek to install an electronic monitoring system (if proven to be effective) in lieu of human observers. In such an event, the following provisions apply:</p> <ol style="list-style-type: none"> 1. The vessel owner must identify each vessel involved and provide satisfactory evidence of an executed agreement with a service provider to install an electronic monitoring system on each vessel. A satisfactory 'executed agreement' should: <ul style="list-style-type: none"> - be dated and signed, - list all parties engaged in the transaction along with their contact information, - list the vessel name(s) and IMO or registration number, - describe the type of system to be installed, and - Indicate when the system will be installed and the expected length of the agreement. 2. Once such evidence has been determined to be satisfactory, the vessel will be deemed to be in compliance with this measure for a period of six (6) months, which will allow appropriate time for installation of and training on the electronic monitoring system. 3. The vessel owner must provide satisfactory proof that the equipment has been installed and is operating within that time period; in the event that such proof is not provided within grace period, the vessel will return to a non-compliant status with ISSF Conservation Measure 4.3(a). 		

CM	Category	Gear Type	Category Guidance	Means of Verification	Frequency
4.4(a)	Transshipments	All Purse Seine	No transactions in tuna where transportation included transshipment, except when exempt per Conservation Measure 4.4 (b)(i) or Conservation Measure 8.1.	Auditor reviews data submission for relevant RFMO, transshipment documents, public data/reports, and RFMO compliance committee and commission reports to verify that tuna purchased has not undergone unauthorized transshipment.	Quarterly
4.4(b)	Transshipment Exemptions - General	All Purse Seine	Exemptions will be made in cases where the at-sea transshipments are authorized (as necessary, by all of the following: the vessel's flag state , by the coastal state where the transshipment took place, and by the relevant RFMO) and the transshipped catch is adequately sampled according to the RFMO science provider. Such exemptions shall be based on a detailed report that will be reviewed and approved by the ISSF Board and announced publicly through the ISSF website.	Auditor reviews whether the ISSF Board has reviewed and approved a report detailing the transshipment exemptions.	Annually
4.4(b)(i)	Transshipment Exemption – Papua New Guinea	Large Purse Seine	No transactions in vessels that transship unless they have been granted an exemption under this clause (fishing only in the archipelagic waters of PNG; and that are based in PNG and are associated with processing facilities in PNG).	During the traceability exercise, the auditor reviews any instance of transshipment to assess whether the exemption applies.	Annually
4.4(b)(ii)	Transshipment Exemption – Philippines	All Purse Seine	Processors, traders, importers, transporters, marketers and others involved in the seafood industry may conduct transactions with those Philippine-flagged purse seiners that engage in transshipments in the WCPFC High Seas Pocket no. 1. This exemption applies only to: <ul style="list-style-type: none"> • Purse seine catcher vessels with carrying capacity ≤ 600mt; and • that fish and transship only in High Seas Pocket no. 1 and are allowed to do so by the WCPFC; and • that are based in Philippines and are associated with processing facilities in Philippines. 	Auditor reviews quarterly RFMO reports and identifies instances of transshipments in high seas pocket no. 1. Auditor reviews if vessels involved meet the requirements of the exemption.	Annually

CM	Category	Gear Type	Category Guidance	Means of Verification	Frequency
			<p>The above vessels are allowed to transship on to carrier vessels that must go to a Philippines port operated by the Philippines Fisheries Development Authority for either offloading or for transshipping in port under strict monitoring controls. These carrier vessels are not allowed to take the catch directly from High Seas Pocket no. 1¹³ waters to a port outside the Philippines.</p> <p>Under Philippines regulations, the catcher and carrier vessels shall operate under the following conditions:</p> <ol style="list-style-type: none"> 1. Notification of transshipment is sent to the Philippines Bureau of Fisheries and Aquatic Resources (BFAR) (information on the catcher and carrier vessels, date and time of transshipment, and quantities by species). 2. One hundred percent observer coverage on both the catcher and, in compliance with the WCPFC CMM on transshipment, the receiving vessels. The observers verify the transshipment details. 3. VMS coverage on both the carrier and catcher vessels. 4. A Captain/Mate's Transfer Certificate (with details about the date, place of transshipment and fish quantities) is completed by the carrier vessel for each transshipment, with the certificates being submitted to the BFAR and the data reported to the WCPFC. The form requires signatures/verification from the captains/masters on both the catcher and carrier vessels as well as the observer/inspector on board. 		

¹³ For the purpose of this measure, High Seas Pocket no. 1 is the area of high seas bounded by the Exclusive Economic Zones of the Federated States of Micronesia to the North and East, Republic of Palau to the West, Indonesia and Papua New Guinea to the South.

CM	Category	Gear Type	Category Guidance	Means of Verification	Frequency
4.4(c)	Transshipment at Sea – Observer Coverage	Large-scale Longline ¹⁴	Processors, traders, importers, marketers and others involved in the seafood industry shall conduct transactions with longline vessels that conduct transshipments at sea, whether high seas, EEZ, territorial seas or archipelagic waters, only if 100% of such transshipments are observed (either by a human observer on board the longline vessel or onboard the carrier vessel). Note: The WCPFC E-reporting system allows transshipment declarations (TDs) to be filed without the observer’s signature. In such cases, Company should obtain a copy of the observer contract, the crew list (signed and dated by the skipper), or some other evidence of 100% observer coverage for the period during which TDs were submitted using the E-reporting system.	Auditor assesses participating company system to determine observer coverage on large-scale longline, and/or transshipment, vessels they source from. Company shall maintain record(s) of RFMO transshipment declarations, which must be signed by the observer present during transshipment. If vessel uses the WCPFC E-reporting system for a TD, auditor asks Company to provide a copy of the observer contract, crew list or other evidence for that vessel.	Annually
5.1	Illegal, Unreported and Unregulated (IUU) Fishing	All	No transactions with vessels on any tuna RFMO IUU vessel list. Purchases made from vessels that participate in MSC certified fisheries will be deemed in compliance with this measure.	Auditor reviews quarterly data sent by the company to the RFMO for the presence of IUU listed vessels.	Quarterly
				Auditor reviews the company purchasing system to prevent IUU fish. This will also be assessed during traceability exercises to verify that products do not originate from IUU vessels and by reviewing compliance committee reports, commission reports, etc. Auditor checks evidence provided by the PC that vessel was participating in an MSC certified fishery at the time of sourcing.	Annually

¹⁴ For the purposes of this measure, a large-scale` longline vessel is defined as a vessel that is equal to or greater than 20m length overall (LOA).

CM	Category	Gear Type	Category Guidance	Means of Verification	Frequency
5.2	Illegal, Unreported and Unregulated (IUU) Product Response	All	No IUU purchases. If IUU is found, the company must withdraw these products from the marketplace.	Auditor reviews company recall procedure for presence of IUU policy, then reviews company purchases and compares to RFMO IUU lists.	Annually
				Company initiates market withdrawal of IUU products.	As needed
6.1	Transaction Ban for Large-Scale Purse-Seine Vessels not Actively Fishing for Tuna as of December 31, 2012	Large Purse Seine	Demonstrate that all purchases from large-scale purse seine vessels are from vessels actively fishing for tuna on or before December 31, 2012, but cannot have ceased fishing operations prior to January 1, 2010, and listed on the ISSF Record of Large-Scale Purse Seine Vessels (Record). If a vessel is not listed on the Record, the company shall provide evidence of the vessel attributes in accordance with Conservation Measure 6.2 (a). Any updates to the Record must be made in accordance with 6.2(a).	Auditor reviews company purchases from large-scale purse seine vessels to assess whether the source vessels are listed on the ISSF Record of Large-Scale Purse Seine Vessels. If source vessels do not appear in the Record, the company must provide evidence in accordance with Conservation Measure 6.2(a) as described below.	Annually
6.2(a).2a	Requirements for Inclusion in Record of Large-Scale Purse Seine Vessels Fishing for Tropical Tunas	Large Purse Seine	Provide certification from government body that vessel was licensed to fish for tuna on or before December 31, 2012, and that vessel did not cease fishing operations prior to January 1, 2010.	ISSF reviews evidence provided by vessel owner to determine whether vessel is eligible to be listed on the ISSF Record.	Annually or as needed
6.2(a).2b	Requirements for Inclusion in Record of Large-Scale Purse Seine Vessels Fishing for Tropical Tunas	Large Purse Seine	To demonstrate that the vessel was contracted for construction before 12/31/12, the vessel representative may provide such evidence as a signed contract, supporting correspondence, deposit paid, plans, photos, etc., certificate from IACS member, IMO number or RFMO record. To demonstrate that construction was completed before 6/30/15, the vessel may provide such evidence as completion of sea trial, certificate from shipyard, sale of fish, skippers log, observer report, etc., certificate from government agency.	Auditor reviews evidence provided by company to determine whether vessel is eligible to be listed on the ISSF Record.	Annually or as needed

CM	Category	Gear Type	Category Guidance	Means of Verification	Frequency
6.2(a).2c			Vessel provides update regarding name, flag, or registration number.	ISSF reviews evidence provided by vessel owner to determine whether vessel is eligible to be listed on the ISSF Record.	
6.2(a).2d			<p>The addition of a new large-scale purse seine vessel that is built as a replacement for a vessel already on the Record that has sunk, has been scrapped or otherwise permanently transferred out of the tropical tuna fishery.¹⁵ The addition of the new vessel will be permitted only to the extent it replaces one or more older vessels on the ISSF Record and its fish hold volume is less than or equal to the fish hold volume of the older vessel(s) that were on the ISSF Record.</p> <p>The request for the addition of new vessels shall come either from the owner of the older vessel, or from a new owner designated by the owner of the older vessel.</p> <p>Vessels that do not provide verified proof of the existence of a fish hold are not eligible for use as replacement capacity under this subsection.</p> <p>In circumstances where the vessel owner does not provide proof of a fish hold volume (m3), an independent auditor will make a conservative calculation in accordance with then-current ISSF technical papers.</p> <p>Note: Per CM 7.2, ISSF recognizes that there can be a gap in time after a contract for scrapping the vessel is in place until the time that the vessel is scrapped. A vessel owner may produce an executed scrapping</p>	<p>Auditor determines whether the old vessel has been scrapped, has sunk and/or has been permanently retired from all tuna fisheries. If scrapping of an old vessel is presented as evidence, the auditor looks for scrapping contract and evidence that scrapping has occurred. Such evidence must be received within 6 months of the scrapping contract date.</p> <p>Auditor then reviews whether the new vessel meets the CM requirements.</p>	

¹⁵ “Permanently transferred out of the tropical tuna fishery” means that the vessel cannot operate in any tropical tuna fishery, even if it is no longer operating as a large-scale purse seine vessel and is now being used for supply and tender operations.

CM	Category	Gear Type	Category Guidance	Means of Verification	Frequency
			contract and demonstrate that the vessel is permanently retired from fishing activities to begin the auditor’s review under this CM. The vessel will then be listed on the Record and PVR ‘conditionally’ until auditor receives evidence that the old vessel has, in effect, been scrapped, and the new vessel meets the requirements of the CM.		
6.2(a).3			Vessels on the Record that are refurbished in such a way that their fish hold volume increases will be removed from the Record unless the aggregated replaced capacity is at least 1.0 times the capacity of the vessel before refurbishment.	Auditor reviews evidence provided by company to determine whether vessel is eligible to be listed in the ISSF Record.	
6.2(c)	Investment in Purse Seine Vessels Subject to the PNA Special Arrangement	Large Purse Seine	Processors, traders, importers, transporters, marketers and others involved in the seafood industry that are investors in any new ¹⁶ vessels that meet all of the conditions in ISSF Conservation Measure 6.2(b) , and are therefore exempted from compliance with ISSF Conservation Measures 6.1 and 6.2(a) , shall buy out and scrap existing capacity up to the percent of capacity of the new vessel that corresponds to their ownership interest in the new vessel, in accordance with paragraph 2(d) of ISSF Conservation Measure 6.2(a). Note: If a vessel changes flags to a non-PNA country, starts fishing outside of the WCPFC Convention Area, stops participating in the VDS or is delisted from the WCPFC Record of Authorized Vessels, it will need to immediately meet the requirements of CMs 6.1 and 6.2(a), or it will be delisted from the Record and the PVR. Additionally, per CM 7.2(3) any large-scale purse seine vessels	Auditor reviews public records as well as evidence provided by vessel owner to determine whether vessel is eligible to be listed on the Record. Auditor will review evidence that majority owner has bought out and scrapped existing capacity up to the percent of capacity of the new vessel that corresponds to their ownership interest in the new vessel, in accordance with paragraph 2(d) of ISSF Conservation Measure 6.2(a). This can include: 1) Sales receipt for the capacity that has been bought out and scrapped, which clearly states Fish Hold Volume figures for said capacity; and	Annually

¹⁶ For the purposes of this measure, a new large-scale purse seine vessel is a vessel that was built after December 31, 2012, and was originally flagged to a PNA member country and has remained so.

CM	Category	Gear Type	Category Guidance	Means of Verification	Frequency
			<p>under the same ownership will also be delisted from the Record.</p> <p>Note: If a vessel listed on the Record under this exemption is permanently transferred out of the tropical tuna fishery, any replacement vessel will also need to meet all the requirements of CM 6.2(b).</p>	<p>2) Evidence that the Fish Hold Volume of the new vessel corresponding to the % ownership stake is less than or equal to that of older vessel(s) that was on the ISSF Record.</p>	
6.2(d)	Investment in purse seine vessels not in compliance with ISSF Conservation Measure 6.1 and 6.2(a)	Large Purse Seine	Processors, traders, importers, transporters, marketers and others involved in the seafood industry, that are investors in any new vessel that does not meet all of the conditions in ISSF Conservation Measures 6.1 and 6.2(a) shall buy out and scrap existing capacity of large-scale tuna purse seine vessel(s) that corresponds to the full capacity of the new vessel, in accordance with Paragraph 2(d) of ISSF Conservation Measure 6.2(a).	<p>Auditor reviews public records as well as evidence provided by vessel owner to determine whether vessel is eligible to be listed on the Record. Auditor will review evidence the ISSF PC (and its affiliates) or the owner with a controlling interest, has bought out and scrapped existing capacity in accordance with paragraph 2(d) of ISSF Conservation Measure 6.2(a).</p> <p>This can include:</p> <ol style="list-style-type: none"> 1) Sales receipt for the capacity that has been bought out and scrapped, which clearly states Fish Hold Volume figures for said capacity; and 2) Evidence that the Fish Hold Volume of the new vessel(s) is less than or equal to that of the vessel(s) being scrapped (for one-to-one replacements). 	Annually

CM	Category	Gear Type	Category Guidance	Means of Verification	Frequency
6.2(e)	Purchases from Purse Seine Vessels in Fleets with Other Vessels not in Compliance with ISSF Conservation Measures 6.1 and 6.2(a)	Large Purse Seine	<p>Processors, traders, importers, transporters, marketers and others involved in the seafood industry shall refrain from transactions in skipjack, bigeye and yellowfin tuna caught by any and all large-scale purse seine vessels¹² owned by business organizations or individuals that also own large-scale purse seine vessels not in compliance with ISSF Conservation Measures 6.1 and 6.2(a).</p> <p>For the purposes of this measure, “owned” means a registered or controlling (majority) interest in the vessels:</p> <ol style="list-style-type: none"> (1) directly or indirectly (through intermediary entities) by any business organization or its affiliated business organizations, including commonly controlled organizations, or (2) directly or indirectly by any individuals, including individual ownership of any equity or investment interest in whatever form of any business organization operating, managing, controlling or receiving revenues from a vessel. Individuals shall include any natural person & his or her family members (including spouse, domestic partner, child, sibling, parent or grandparent, whether natural, adopted or by marriage). 	<p>Vessel representative will be asked to provide a complete list of all owned large-scale purse seine vessels, including IMO numbers.</p> <p>Auditor reviews list of owned vessels and compares it to the PVR record. Auditor may review RFMO records, and other publicly available sources of information, to cross-reference ownership declarations.</p>	Annually
7.1(a)	Registration of Controlled Vessels	Purse Seine and Supply and Tender Vessels	<p>Processors, traders, importers, transporters, marketers and others involved in the seafood industry, for skipjack, yellowfin and bigeye tuna caught by purse seine vessels shall register all controlled vessels fishing, or operating as supply and tender vessels, for skipjack, yellowfin and bigeye tuna on the ISSF Proactive Vessel Register (PVR) and thereafter maintain such registration indefinitely. Controlled vessels include:</p>	<p>Auditor reviews list of controlled vessels provided by the companies and/or obtained through the PVR database. Auditor uses the PVR, Record of Large-Scale Purse Seine vessels, RFMO authorized vessel lists, national vessel databases and public data/reports to cross-reference list of controlled vessels. If vessels are chartered, the auditor</p>	Annually

CM	Category	Gear Type	Category Guidance	Means of Verification	Frequency
			<p>(a) vessels majority owned or controlled directly or indirectly (through intermediary entities) by any ISSF Participating Company or any member of the corporate group of which such Participating Company is a part; or</p> <p>(b) vessels majority owned or controlled directly or indirectly by any individuals¹⁷ who are majority shareholders (or any equivalent form of ownership) of any ISSF Participating Company; or</p> <p>(c) vessels under the following charter types that are contracted directly or indirectly (through intermediary entities) by any ISSF Participating Company or any member of the corporate group of which such Participating Company is a part or directly or indirectly by any individuals who are majority shareholders (or any equivalent form of ownership) of any ISSF Participating Company:</p> <p>(i) bareboat charters, no matter the duration of the charter; and</p> <p>(ii) time and/or association charters if the duration of the charter is 12 months or longer.</p>	will review charter contract(s). Auditor also reviews specialized press for announcements regarding 'new' vessels controlled by, and associated with, companies participating in ISSF.	
7.1(b)	Registration of Controlled Vessels	Longline	Processors, traders, importers, transporters, marketers, and others involved in the seafood industry, for albacore, yellowfin and bigeye tuna caught by longline vessels shall register all controlled longline vessels fishing for albacore, yellowfin, and bigeye tuna on the ISSF Proactive Vessel Register (PVR) and thereafter maintain such registration indefinitely. Controlled vessels include:	Auditor reviews list of controlled vessels provided by the companies and/or obtained through the PVR database. Auditor uses the PVR, RFMO authorized vessel lists, national vessel databases and public data/reports to cross-reference list of controlled vessels and ensure it is complete. If vessels are chartered,	Annually

¹⁷ For the purposes of this measure, 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).

CM	Category	Gear Type	Category Guidance	Means of Verification	Frequency
			<ul style="list-style-type: none"> - vessels majority owned or controlled directly or indirectly (through intermediary entities) by any ISSF Participating Company (PC) or any member of the corporate group of which such PC is a part; or - vessels majority owned or controlled by any individuals who are majority shareholders (or any equivalent form of ownership) of any ISSF PC; or - vessels under the following charter types that are contracted directly or indirectly (through intermediary entities) by any ISSF Participating Company or any member of the corporate group of which such Participating Company is a part or directly or indirectly by any individuals who are majority shareholders (or any equivalent form of ownership) of any ISSF Participating Company: <ul style="list-style-type: none"> (i) bareboat charters, no matter the duration of the charter; and (ii) time and/or association charters if the duration of the charter is a minimum of 12 months or longer. 	<p>auditor will review charter contract(s).</p> <p>Auditor also reviews specialized press for announcements regarding 'new' vessels controlled by, and associated with, companies participating in ISSF.</p> <p>Finally, auditor verifies that all controlled longline vessels are registered on the PVR.</p>	
7.2	Threshold Requirement for PVR Listing	Large Purse Seine	Obtain written verification that all supplier large-scale purse seine vessels owned ¹⁸ by the same business organization meet the requirements of Section 6 – Capacity.	<p>Auditor reviews the efficacy of the verification process used by PCs.</p> <p>Auditor reviews publicly available information on the ownership of vessels.</p>	Annually

¹⁸ For the purposes of this measure, “owned” means a registered or controlling (majority) interest in the vessel(s).

CM	Category	Gear Type	Category Guidance	Means of Verification	Frequency
7.3	Purchases from PVR Vessels	Large Purse Seine	Source 100% of skipjack, yellowfin and bigeye tuna caught by large-scale purse seine vessels from vessels registered in the PVR.	Auditor isolates skipjack, yellowfin and bigeye tuna caught by large-scale purse seiners within the quarterly RFMO data submission and compares trip dates and purchase data to PVR listing dates. Supporting documentation may be requested to verify the accuracy of trip dates.	Quarterly
7.4	Supply and Tender Vessels	All Purse Seine	<p>1. 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:</p> <p>(a) register all such vessels on the ISSF ProActive Vessel Register (PVR) and thereafter maintain such registration indefinitely;</p> <p>(b) 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;</p> <p>(c) ensure all such vessels have an IMO unique vessel identifier; and</p> <p>(d) ensure all such vessels are not listed on the IUU Vessel List of any RFMO.</p> <p>2. For the purposes of this measure, controlled vessels include vessels as defined in ISSF CM 7.1.</p> <p>3. When registering all controlled supply or tender vessels on the PVR, in addition to the vessel attribute</p>	<p>Auditor asks participating company for list of supply and tender vessels and checks whether vessels are listed on the PVR.</p> <p>Auditor verifies vessel attribute data, IMO number, RFMO registration, ownership, and whether vessel(s) appear on RFMO IUU lists. Auditor reviews list of PS vessels linked to each supply & tender vessel. PS vessel list must include vessel names and flags.</p>	Annually

CM	Category	Gear Type	Category Guidance	Means of Verification	Frequency
			<p>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, to the maximum extent possible.</p> <p>4.For purposes of this measure, supply and tender vessels are any vessel used, or intended for use, for the purpose of fishing or the transport of fishery products.</p>		
7.5	Purchases from PVR Vessels	Longline	<p>If purchasing albacore, yellowfin and bigeye tuna from longline vessels, processors, traders, importers, transporters, marketers and others involved in the seafood industry shall:</p> <p>Develop and make public by December 31, 2019, a statement of intent to increase purchases from longline vessels registered on the PVR.</p> <p>Publish the percentage of their longline purchases from PVR registered longline vessels by March 31, 2020 or indicate no such purchases made.</p>	<p>If PC purchases albacore, yellowfin or bigeye tuna from longline vessels, auditor checks for public PC statement of intent to increase purchases from longline vessels registered on the PVR.</p> <p>Auditor checks for published PC statement(s) regarding the percentage of tuna sourced from PVR registered longline vessels. Auditor verifies the stated percentage against volumes reported in the quarterly RFMO reports.</p> <p>Or, if no purchases of albacore, yellowfin or bigeye tuna are made from longline vessels, auditor checks for PC statement indicating that no purchase was made from PVR registered longline vessels and cross-checks with quarterly RFMO reports.</p>	Annually

CM	Category	Gear Type	Category Guidance	Means of Verification	Frequency
8.1	Exemption for Very Small Purse Seine Vessels ¹⁹	Very Small Purse Seine	Very small purse seine vessels are exempted from the following ISSF Conservation Measures: 3.4 Skipper Best Practices 4.4(a) Transshipment	The company can demonstrate that the vessel is less than 30 GT by providing fishing licenses, vessel surveys, photos, etc.	Annually
9.1	Public ⁸ Policy on Social and Labor Standards	All	Processors, traders, importers, transporters, marketers and others involved in the seafood industry shall develop and publish a public social and labor standards policy and/or sourcing policy that applies to it and its supply chain, including production facilities and fishing and supply vessels, that addresses, at a minimum, the following categories: <ul style="list-style-type: none"> a. Forced labor b. Child labor c. Freedom of association d. Wages, benefits, and employment contracts e. Working hours f. Health and safety g. Discrimination, harassment, and abuse h. Grievance mechanisms 	Auditor determines when public policy(ies) was published, and whether Company has used a format developed by, or signed onto, one of the policies described in the ISSF matrix. Auditor reviews policy(ies) and determines whether it applies to production facilities, supplier vessels, or both. Auditor determines if each public policy contains elements a-f noted under category guidance.	Annually

¹⁹ For the purposes of this measure “very small purse seine vessels” are those vessels of a size less than 30 GT.

3.1 Audit Determination and Reporting

The auditing described in this document serves as an assessment of conformance by PCs. Any significant gaps in conformance and where corrective actions may be necessary will be specified. Timelines for remediation will be in accordance with the [ISSA Compliance Policy](#) and confirmed by MRAG. Depending on the nature of the non-conformance and the required corrective action, a follow up audit may be required (see ISSA Compliance Policy).

3.1.1 Non-conformances

Conformance is categorized into grades (Conformance, Observation, Minor Non-Conformance or Major Non-Conformance). Non-conformances must be raised against specific ISSF conservation measures. The severity of the non-conformance – and whether this jeopardizes the integrity of the ISSF program – determines which non-conformances are raised.

MRAG Americas defines audit findings as follows:

- Conformance - the PC can provide evidence of compliance with a conservation measure or commitment
- Observation - the PC is currently in compliance but there is a high risk that non-conformance could occur inadvertently without implementing preventative actions
- Minor Non-conformance – the PC does not comply with a conservation measure or commitment, but this does not compromise the integrity of the ISSF initiatives²⁰
- Major Non-conformance – the PC does not comply with a conservation measure or commitment, and this compromises the integrity of the ISSF initiatives²¹

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

- MRAG Americas substantiates conformance through documented evidence.
- Where a company cannot provide documented evidence of conformance with a conservation measure or commitment, a non-conformance must be issued.
- 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) in accordance with the ISSA Compliance Policy.

3.1.2 Corrective Action Responses (CARs)

To rectify certain non-conformances, the PC may be given the opportunity to provide a CAR in accordance with the ISSA Compliance Policy. The nature of the CAR is at the discretion of the PC. MRAG Americas does not advise on what specific corrective action the PC may take but will assess whether the CAR is expected to address the non-conformance.

3.1.3 Audit Reports

All audit reports are provided directly to ISSF and the PC designated contact person via email notification. Actions following receipt of the final report, including the opportunity for a CAR and/or sanctions are in

²⁰ Example: PC submitted RFMO data beyond the stated deadline.

²¹ Example: PC did not submit RFMO data.

accordance with the ISSA Compliance Policy. Any issues raised by the PC with regard to the audit findings will be directed to ISSF.

Final Audit Reports and any updated compliance status reports will be retained electronically for the duration of the PC's participation and will be available to ISSF at all times.

4 Annex 1. Audit Program Policy

4.1 Overall Audit Policy

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

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

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

4.2 Program Manager

In all respects, the Program Manager is responsible for ensuring that the content of this manual is followed. The Program Manager is the main contact point at MRAG Americas for ISSF audit-related queries and drives the MRAG Americas program.

The Program Manager's main responsibilities include:

- a) Organizing and coordinating 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 audit policy and systems are amended and updated as necessary and is responsible for ensuring changes and improvements are captured and communicated to auditors for implementation in subsequent assessments, as appropriate.

4.3 Assessment Team

MRAG Americas selects auditors and other experts based on their competence, training, qualifications, and experience for an Assessment Team (or individual) to conduct ISSF audits. All personnel involved in the audit are provided with and briefed on up-to-date ISSF documentation for auditors. Documentation includes:

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

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

- received a copy of this document;
- received sufficient training in the correct procedures and requirements for ISSF audits;
- received a copy of all applicable ISSF conservation measures;
- received a copy of ISSF Audit Checklists (Annex 2);
- received a copy of ISO 19011 Standard;
- sufficiently demonstrated their performance and capabilities to the appropriate level prior to conducting solo audits; and
- signed an MRAG Americas contract (either as an employee or contractor), which includes terms of reference, requirements concerning conflict of interest, confidentiality, a Statement of Non-Disclosure, timing, and responsibilities of the assessor.

4.4 Auditor training

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

The training program will include:

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

4.5 Documentation and Means of Verification

Document control procedures are used to ensure accurate tracking and management of all documentation utilized during audits. 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 and company documentation (either electronic or hard copy) are considered acceptable audit evidence. 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.²² **A PC that downloads the Proactive Vessel Register (PVR) Database may, unless otherwise advised by ISSF, rely on the status of vessels in that downloaded database for the purposes of making purchases for the remainder of the calendar month in which they made the download. Allowance will be made for months that start on a non-working day.**

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

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

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

4.6 Confidentiality and data security

4.6.1 Confidentiality

Some of the information needed to confirm conformance with ISSF conservation measures may be confidential to the PC 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. MRAG Americas understands that the fishing, management, and/or processing operations they assess may include proprietary fishing strategies, locations, data, and business information and practices. All MRAG Americas employees involved in PC 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 programme. Data are not to be released, reproduced, distributed, or published without prior approval of ISSF. MRAG Americas follows strict data

²² 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 conservation measure or commitment for which it is being used as evidence of conformance.

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 PC) a reasonable opportunity to review the disclosure before it is made, and to interpose its own objection to the disclosure.

4.6.2 Data Security

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

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

4.7 Compliance with legal requirements

MRAG Americas complies with all legal requirements in the countries in which the company 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 PC audit procedures will occur at least annually. The Program Manager will conduct ongoing program reviews (on a minimum annual basis) to ensure program activities are as effective and efficient as practicable to achieve program outcomes.

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