



**ISSF Participating Company Compliance  
Audit Checklist  
Version 2025/2**

## **Bolton Food**

The following information is based on data provided by the company; it has been independently audited for completeness and accuracy (Pursuant to stated ISSF guidelines):

### **Final Compliance Report (as of 23 April 2026, for activities from Q1 to Q4 2025)**

I, Luca Alemanno, CEO of Bolton Food, acknowledge receipt of this final compliance report, and have taken notice of any potential non-conformances contained within.

Signature<sup>1</sup>: 

Date: 09 June 2026

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<sup>1</sup> Please note that ISSF mandates that the head of your company sign the Final draft of this report.

## General Audit Information

Company Name	Bolton Food
Affiliated Company Names	Saupiquet France, Bolton Adriatic, Bolton Austria, Bolton Belgium, Bolton Croatia, Colton Czechia, Saupiquet Deutschland, Bolton Hellas, Bolton Middle East JLT, Bolton Polska, Bolton Swiss, Bolton Nederland, Bolton Serbia
Company Address	Via L. Einaudi 18/22, Ceremate (Como) Italy
Contact Information (Name, Phone, Email)	Luca Alemanno, <a href="mailto:lalemanno@boltonfood.com">lalemanno@boltonfood.com</a>
Auditor Name(s)	Ms. Patricia Bianchi Mr. Jason Anderson Ms. Clara Robison Mr. Jonah van Beijnen Mr. Oleg Martens
Audit Start Date	<b>Week of 3 November 2025</b>
Audit End Date	<b>Preliminary audit results issued: Week of 27 April 2026</b> <b>Final audit results issued: Week of 15 June 2026</b>
Time zone(s) for coordinating remote audit conference call	Italy
Language requirements for remote audit conference call	English

Compliance Snapshot						
Conservation Measure	Current	2024	2023	2022	2021	2020
1.1 RFMO Authorized Vessel Record	OK	OK	OK	OK	OK	OK
1.2 RFMO Participation	OK	OK	OK	OK	OK	OK
1.3 IOTC Yellowfin Tuna Rebuilding	OK	OK	OK	OK	-	-
2.1 Product Traceability	OK	OK	OK	OK	OK	OK
2.2 Quarterly Data Submission to RFMO	OK	OK	OK	OK	OK	OK
2.3 Product Labelling by Species and Area of Capture	OK	OK	OK	OK	OK	OK
2.4 Supply Chain Transparency, Audit, Reporting and Purchase Requirements	-	-	OK	OK	OK	OK
2.5 Transparency in Reporting Progress Against ISSF Five-Year Goal (new measure for 2024)	OK	OK	-	-	-	-
3.1(a) Shark Finning Policy	OK	OK	OK	OK	OK	OK
3.1(b) Prohibition of Transactions with Shark Finning Vessels	OK	OK	OK	OK	OK	OK
3.1(c) Prohibition of Transactions with Companies without a Public Policy	OK	OK	OK	OK	OK	OK
3.2 Large-scale Pelagic Driftnets	OK	OK	OK	OK	OK	OK
3.3 Full Retention of Tunas	OK	OK	OK	OK	OK	OK
3.4 Skippers Best Practices	OK	OK	OK	OK	OK	OK
3.5 Transactions w/ Vessels that use Only Non-Entangling FADs	-	OK	OK	OK	OK	OK
3.6 Transactions with Vessels Implementing Best Practices for Sharks & Sea Turtles	N/A	N/A	N/A	N/A	N/A	N/A
3.7 Transactions with Vessels or Companies with Vessel-Based FAD Management Policies	OK	OK	OK	OK	OK	-
4.1 UVI-IMO	OK	OK	OK	OK	OK	OK
4.2 Purse Seine Unique Vessel Identifiers	OK	OK	OK	OK	OK	OK
4.3(a) Observer Coverage	OK	OK	OK	OK	OK	OK
4.4(a) Transshipment	OK	OK	OK	OK	OK	OK
4.4(c) Transshipment at Sea – Observer Coverage	N/A	N/A	N/A	N/A	N/A	N/A
5.1 IUU Fishing	OK	OK	OK	OK	OK	OK
5.2 IUU Product Response	OK	OK	OK	OK	OK	OK
6.1 Transaction Ban for LPS vessels not Actively Fishing for Tuna on Dec. 31, 2012	OK	OK	OK	OK	OK	OK
6.2(e) Purchases from PS Vessels in Fleets with Other Vessels not in Compliance w/ CMs 6.1 and 6.2(a)	OK	OK	OK	OK	OK	OK
7.1(a) Registration of Controlled Vessels (purse seine and supply & tender)	N/A	N/A	N/A	N/A	N/A	OK
7.1(b) Registration of Controlled Vessels (longline)	N/A	N/A	N/A	N/A	N/A	N/A
7.2 Threshold Requirement for PVR Listing	OK	OK	OK	OK	OK	OK
7.3 Purchases from PVR Vessels (large purse seine)	OK	OK	OK	OK	OK	OK
7.4 Supply and Tender Vessels	N/A	N/A	N/A	N/A	N/A	N/A
7.5 Purchases from PVR Vessels (longline)	N/A	N/A	N/A	N/A	N/A	N/A
8.1 Exemption for Very Small Purse Seine Vessels	N/A	N/A	N/A	N/A	N/A	N/A
9.1 Public Policy on Social and Labor Standards	OK	OK	OK	OK	OK	-

Audit purpose	
<b>Audit objective</b>	The purpose of this audit is to validate Participating Company (PC) compliance with all ISSF conservation measures in place for the year of activity being audited.
<b>Audit criteria</b>	The PC compliance audits cover all conservation measures as defined in the <a href="#">ISSF Participating Company Compliance: Audit Policy Document and Standard Operating Procedures, Version 2025/2.</a>
<b>Audit outcomes</b>	The auditing 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 prescribed by MRAG in the audit report; however, any sanctions or other actions 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.
<b>Purpose of this document</b>	All auditors will follow this checklist for conducting ISSF PC Compliance audits. The completed and approved copy of this checklist will serve as the audit report for each PC.
<b>Other relevant documentation</b>	<a href="#">ISSF Participating Company Compliance: Audit Policy Document and Standard Operating Procedures, Version 2025/2.</a>

Conformance with ISSF Commitments	
<b>Non-conformances</b>	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.
<b>Grading</b>	MRAG Americas defines audit findings as follows: <ul style="list-style-type: none"> <li>· Conformance (Ok) - the PC can provide evidence of compliance with a conservation measure</li> <li>· Observations - the PC is currently in compliance but there is a high risk that non-conformance could occur inadvertently without implementing preventative actions</li> <li>· Minor Non-conformance – the PC does not comply with a conservation measure, but this does not compromise the integrity of the ISSF initiatives</li> <li>· Major Non-conformance – the PC does not comply with a conservation measure, and this compromises the integrity of the ISSF initiatives</li> </ul>
<b>MRAG Americas' procedures</b>	MRAG Americas' procedures for handling non-conformances for PCs are as follows: <ul style="list-style-type: none"> <li>· MRAG Americas substantiates conformance through documented evidence.</li> <li>· Where a company cannot provide documented evidence of conformance with a conservation measure, a non-</li> </ul>

	<p>conformance must be issued.</p> <ul style="list-style-type: none"> <li>· All non-conformances must be graded either major or minor.</li> <li>· In the case of a non-conformance, ISSF may require a Corrective Action Response (CAR). The corrective actions must be in place and evidence of addressing the condition must be supplied to MRAG or ISSF within an agreed timescale or a follow-up audit may be required.</li> </ul>
<b>Corrective Action Responses (CARs)</b>	To rectify non-conformances, the PC may be given the opportunity to provide a CAR. 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. MRAG Americas will also not provide advice with respect to any sanction that might be applied to a PC resulting from identified non-conformances. Such action will be at the discretion of ISSF.

**Table 1: Conservation Measures and Conformance Levels**

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
1.1	Tuna RFMO Authorized Vessel Record	<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.</p> <p>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>	All	<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.</p> <p>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>	Ok	<p>Company noted in the audit plan response that it uses the Supplier Workplace Portal (SWP) fishlot management system, which ensures that if any vessel is red flagged for any ISSF conservation measure, it is blocked in the SWP.</p> <p>Company indicated that it does not directly conduct transactions with fishing vessels and provided a statement that only frozen loins are purchased from other ISSF Participating Companies.</p> <p>Auditor confirms that all vessels identified in the traceability exercise are properly listed in RFMO authorized vessel records.</p>	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
1.2	RFMO Participation	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. Purchases made from vessels that participate in MSC certified fisheries will be deemed in compliance with this measure.	All	Auditor reviews quarterly data sent by the company to the RFMO to check that all vessels meet this requirement.  Auditor checks evidence provided by the PC that vessel was participating in an MSC certified fishery at the time of sourcing.	Ok	Company does not source directly from vessels, so it is not required to submit quarterly reports to the relevant RFMO(s). Instead, it is subject to additional traceability exercises to verify compliance against the conservation measures.  All vessels identified in the traceability exercise are properly flagged and are members or cooperating non-members of RFMO relevant to fishing area.	
1.3	IOTC Yellowfin Tuna rebuilding	IOTC yellowfin purchase reduction statement & plan must be posted on company's website (if the company maintains one) or provided to auditor. Company must demonstrate how they are making progress toward planned reductions.	All	Auditor reviews company statement, reduction plan, and posting date. Auditor reviews evidence (such as sourcing volumes, communications with procurement team / suppliers, etc.) that company is making progress toward planned reductions.	Ok	Company's statement can be found here: <a href="https://qualitaresponsabile.riomare.it/wp-content/uploads/2024/08/bolton-food-statement-indian-ocean_31032023_0.pdf">https://qualitaresponsabile.riomare.it/wp-content/uploads/2024/08/bolton-food-statement-indian-ocean_31032023_0.pdf</a>  Statement describes its intent to reduce the sourcing of yellowfin tuna from the Indian Ocean as compared to the average sourcing from years 2017-2019.  Analysis of 2025 RFMO sourcing data by auditor confirms the company has achieved the Indian Ocean yellowfin tuna sourcing reduction requirement.	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
2.1	Product Traceability	Demonstrate ability to trace products from can code or sales invoice to vessel and trip.	All	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.	Ok	Company has a suitable traceability system in place that allows all product codes and produced volumes to be traced through all stages of the supply chain back to the vessel and vessel trip.	
2.2	Quarterly Data Submission to RFMO	<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. <a href="#">As described by ISSF</a>, for each quarter, Participating Companies are required to report (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 from other ISSF participating companies is exempt from sending RFMO data. However, the company must affirm quarterly via an unprompted email to <a href="mailto:rfmodata@iss-foundation.org">rfmodata@iss-foundation.org</a>.</p> <p>This measure requires a specific reporting format (available <a href="#">here</a>) be used for all RFMO submissions.</p>	All	<p>Auditor checks that the required reporting format has been used and that information has been sent on time by companies to RFMO for all purchases.</p> <p>If applicable, auditor checks if 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 <a href="mailto:rfmodata@iss-foundation.org">rfmodata@iss-foundation.org</a> when company only purchases loins and/or finished goods.</p>	Ok	<p>For each quarter, the company provided a statement that it did not source whole round tuna. Statements were delivered within the agreed timeframe.</p> <p>No whole round purchases were identified in the traceability exercise.</p>	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
2.3	Product Labelling by Species and Area of Capture	<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><i>Katsuwonus pelamis</i>, Skipjack, Bonite, Listado</p> <p><i>Thunnus alalunga</i>, Albacore, Germon, Atún blanco</p> <p><i>Thunnus albacares</i>, Yellowfin, Thon Jaune, Rabil</p> <p><i>Thunnus obesus</i>, 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 &amp; 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 &amp; 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>	All	<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>	Ok	<p>Company provided a list of all consumer-facing product types to the auditor.</p> <p>Several codes were selected at random, for which company provided evidence of species name and area of capture appearing on packaging.</p>	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
2.5	Transparency in Reporting Progress Against ISSF 5-Year Goal	<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>1. (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"> <li>i. MSC certified fisheries.<sup>2</sup></li> <li>ii. Fisheries that have entered full assessment for MSC certification.</li> <li>iii. Fisheries in the MSC Improvement Program.</li> <li>iv. Comprehensive FIPs<sup>3</sup> that have been publicly listed and have achieved progress within at least the past 24 months; or are in their initial year of listing.</li> <li>v. Comprehensive FIPs<sup>3</sup> that have been publicly listed but have not achieved progress in the prior 24 months.</li> <li>vi. None of the above.</li> </ul> <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</p>	All	<p>By no later than 15 March each year, the auditor reviews the 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 and Supplier Source categories.</p> <p>Auditor reviews the 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.</p> <p>Auditor will assess the reasonableness of the reported percentages based on data provided by the company, including source of product, a breakdown of round fish, loins &amp; processed goods, and associated conversion factors used to estimate round fish equivalent.</p> <p>Regarding Fishery Source Categories, the auditor will also check that the</p>	Ok	<p>Company provided the link to its updated statement by the 15 March deadline: <a href="https://qualitaresponsabile.riomare.it/wp-content/uploads/2026/03/Bolton-ISSF-reporting-Fishing.pdf">https://qualitaresponsabile.riomare.it/wp-content/uploads/2026/03/Bolton-ISSF-reporting-Fishing.pdf</a></p> <p>The statement contains the required categories and relevant roadmaps and timelines.</p> <p>Company provided the methodology used for assigning category percentages and the detail of which volumes correspond to which supplier and fishery source categories. Based on the available evidence, auditor finds company's declared percentages to be reasonable.</p>	

<sup>2</sup> 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.

<sup>3</sup> 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	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		<p>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. (a) The percentage of their purchases (measured in round ton equivalents) for each of the following Supplier Source categories:</p> <ul style="list-style-type: none"> <li>i. ISSF participating companies (Founding, Full and Associate members).</li> <li>ii. Data Check Companies designated by ISSF (as defined by the General Provisions and Terms and Conditions for DCCs) that have a published compliance audit report with respect to ISSF CMs 1.1, 2.2, 4.1, 4.2 and 5.1, as determined and reported by the ISSF external auditor.</li> <li>iii. Direct from vessels.</li> <li>iv. None of the above.</li> </ul> <p>(b) A roadmap and timeline to decrease the percentage of their purchases from the “none of the above” category.</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>		<p>company has published a roadmap and timeline to:</p> <ul style="list-style-type: none"> <li>- Increase the percentage of their purchases from fisheries that are certified by the MSC;</li> <li>- 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</li> <li>- Decrease the percentage of their purchases from the “none of the above” category.</li> </ul> <p>Regarding Supplier Source Categories, the auditor will also check that the company has published a roadmap and timeline to:</p> <ul style="list-style-type: none"> <li>- Decrease the percentage of their purchases from the “none of the above” category.</li> </ul> <p>When applicable, auditor cross-references purchase statistics provided by a PC with vessel data from the VOSI table.</p>			

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
3.1(a)	Shark-Fin角度 Policy	Company establishes and publishes policy prohibiting shark finning and requiring sharks be landed with fins naturally attached if retained.	All	Auditor reviews company website for published policy. In the event the company does not maintain a website, auditor obtains copy of 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 be landed with fins naturally attached if retained.	Ok	Company provided the weblink to its policy, which meets the requirements for this measure: <a href="https://www.bolton.com/sites/default/files/2024-07/Shark-Fin角度-Policy-ENG.pdf?_gl=1*2yn0m7*up*MQ..*_ga*MTc4NDcxNDAwNS4xNzY4Mzi2MDE2*_ga_HWMWLJDVDH*cZ E3NjgzMjYwMTUkbzEkZzAkdDE3NjgzMjYwMTUkajYwJGwwJGgw">https://www.bolton.com/sites/default/files/2024-07/Shark-Fin角度-Policy-ENG.pdf?_gl=1*2yn0m7*up*MQ..*_ga*MTc4NDcxNDAwNS4xNzY4Mzi2MDE2*_ga_HWMWLJDVDH*cZ E3NjgzMjYwMTUkbzEkZzAkdDE3NjgzMjYwMTUkajYwJGwwJGgw</a>	
3.1(b)	Prohibition of Transactions with Shark-Fin角度 Vessels	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).  Purchases made from vessels that participate in MSC certified fisheries will be deemed in compliance with this measure.	All	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.  Auditor checks evidence provided by the PC that vessel was participating in an MSC certified fishery at the time of sourcing.	Ok	Company noted in the audit plan response that it does not directly conduct transactions with fishing vessels, and provided a statement that only frozen loins are purchased from other ISSF Participating Companies. In turn, these companies are required to uphold this measure.  None of the vessels identified in the traceability exercise have been associated with shark finning.	
3.1(c)	Prohibition of Transactions with Companies without a Public Policy Prohibiting Shark Finning	No transactions with companies that do not have a public <sup>4</sup> policy prohibiting shark finning and requiring sharks be landed with fins naturally attached if retained. If transactions involve flag states	All	Auditor reviews company procedure to ensure that all tuna purchases have come from a company that has a public policy prohibiting shark finning	Ok	Company noted in the audit plan response that it does not directly conduct transactions with fishing vessels, and provided a statement that only frozen	

<sup>4</sup> 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	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		<p>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:          “[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>and requires that sharks be landed with fins naturally attached if retained. For flag states that do have an absolute shark finning prohibition and require that sharks be landed with fins naturally attached when retained, auditor will review all publicly available material to ensure no shark finning has taken place.</p> <p>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>		<p>loins are purchased from other ISSF Participating Companies. In turn, these companies are required to uphold this measure.</p> <p>Company also operates a Supplier Workplace Portal (SWP) to verify that vessels are fully compliant with ISSF Conservation Measures (CMs) and conducts regular cross-checks of vessel data.</p> <p>All suppliers identified in the traceability exercise have a policy in place prohibiting shark finning.</p>	
3.2	Large-Scale Pelagic Driftnets Prohibition	<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>	All	<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. 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>	Ok	<p>Company indicated that it does not directly conduct transactions with fishing vessels and provided a statement that only frozen loins are purchased from other ISSF Participating Companies.</p> <p>The traceability exercise did not identify vessels associated with large-scale pelagic driftnets.</p>	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
				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.	Ok	Company does not directly source from vessels. No vessels cited in RFMO compliance reports, or in government reports, for using pelagic driftnets were identified during the traceability exercise.	
3.3	Full Retention of Tunas	All purse seine caught tuna (skipjack, yellowfin and bigeye) is retained onboard, except those unfit for human consumption as defined in the measure, or when in the final set of a trip, where 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.	All Purse Seine	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, 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.	Ok	Company indicated that it does not directly conduct transactions with fishing vessels and provided a statement that only frozen loins are purchased from other ISSF Participating Companies.  The traceability exercise demonstrated that loins and finished goods the company sourced from processing plants came from PS vessels listed on the PVR and in good standing for this measure.	
3.4	Skipper Best Practices	Unless exempt per Conservation Measure 8.1, skipper <sup>5</sup> has:  (a) Attended an in-person and/or online ISSF Skippers Workshop; or  (b) Attended an in-person Skippers Workshop provided by a purse seine tuna FIP and conducted by a trainer that has been accredited by ISSF to conduct these workshops; or	All Purse Seine & Large-Scale Longline	Auditor reviews whether the company has purchased tuna only from vessels with skippers that have completed one of the four ISSF best practices education formats.  Auditor checks PVR and ISSF list of individuals who have:	Ok	Company does not directly source from PS vessels; however, the traceability exercise demonstrated that loins and finished goods the company sourced from processing plants came from PS vessels listed appear on ISSF's Record of Trained Skippers.	

<sup>5</sup> 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.

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		<p>(c) Viewed the ISSF Skippers Workshop video online; or</p> <p>(d) Reviewed the online ISSF Skippers Guidebook.</p>		<p>(i) Attended Skippers Workshops (in-person or virtual)</p> <p>(ii) Certified that they read the online Skippers Guidebook; or viewed the online Skippers Workshop video.</p> <p>PC may also provide evidence of skipper workshop completion or review of the ISSF guidebook/video, including list of skippers, method of review and dates of completion.</p>		<p>Company provided a statement that it does not source from LL vessels. This gear type was not identified during the traceability exercises.</p>	
3.6	Transactions with Vessels Implementing Best Practices for Sharks, Sea Turtles, and Seabirds.	<p>Processors, traders, importers, marketers and others involved in the seafood industry shall conduct transactions only with those longline vessels whose owners have a public<sup>4</sup> policy requiring the implementation of Best Practices for sharks, sea turtles and seabirds.</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>	Large-Scale Longline	<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, sea turtles, and seabirds:</p> <p>(a) The use of circle hooks and only monofilament line;</p> <p>(b) The use of whole finfish bait;</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 ISSF Skippers' Guidebook to Longline Fishing Practices;</p>	N/A	<p>Company provided a statement that it does not source from LL vessels.</p> <p>No LL vessels were identified in the traceability exercise.</p>	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
				and  (d) No use of “shark lines” at any time. <sup>6</sup>  Auditor reviews date on which policy was put in effect.			
3.7	Transactions with Vessels or Companies with Vessel-Based FAD Management Policies	<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 public<sup>4</sup> 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>	Purse Seine and Supply Vessels	<p>Auditor reviews purse seine and supply &amp; 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>Auditor also reviews:</p> <p>(i) 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>(ii) That FMPs include a</p>	Ok	<p>Company indicated that it does not directly conduct transactions with fishing vessels and provided a statement that only frozen loins are purchased from other ISSF Participating Companies.</p> <p>Company noted in the audit plan response that it ensures FAD management compliance by sourcing tuna only from vessels listed on the PVR or, if not listed, through other Participating Companies that are required to uphold this measure. In addition to its suppliers’ internal controls, the company conducts its own due diligence by using the Supplier Workplace Portal (SWP) to verify full compliance with this CM before approving any shipment from suppliers.</p> <p>All suppliers identified in the traceability exercise have a FAD Management Policy in place.</p>	

<sup>6</sup> For the purposes of this measure, shark lines are those defined as follows: <http://issfguidebooks.squarespace.com/s/Shark-Lines-Illustration.pdf>

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		<p>(f) For silky sharks (the main bycatch issue in FAD sets) implement further mitigation efforts.</p> <p>2. In developing a FAD Management Policy, purse seine vessels and purse seine vessel owning companies should refer to <a href="#">ISSF Technical Paper 2019-11</a> (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), 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 trial(s) 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.</p> <p>4. With respect to the element on the use of only non-entangling FADs (item d above), no later than <a href="#">1 April 2025</a>, 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</p>		<p>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 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>(iii) If from <a href="#">1 April 2025</a>, FMPs include a statement that purse seine vessels and supply vessels covered by the policy are only deploying or redeploying (i.e., placed in the water) fully non-entangling FADs, without any netting in any components, including</p>			

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		<p>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), 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 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. 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 their 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), public FAD</p>		<p>both the raft and the tail. FMP should also note that, 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>			

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		<p>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 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 <a href="#">1 April 2025</a>.</p>					
4.1	Unique Vessel Identifiers - IMO	<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 &amp; Trade (IHSM&amp;T), which manages IMO identification numbers, has <a href="#">expanded the range of vessels</a> that are potentially eligible to obtain an IMO number to include small-scale vessels of less than 100 GT down to a size limit of 12 meters in length overall (LOA) that are authorized to fish outside waters under national</p>	All	Auditor reviews company system to ensure 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 meet this requirement.	Ok	<p>Company indicated that it does not directly conduct transactions with fishing vessels and provided a statement that only frozen loins are purchased from other ISSF Participating Companies. In turn, these companies must uphold this measure's requirements.</p> <p>Additionally, the company verifies the IMO Number, the TUVI, or the national registration of a fishing vessel prior to purchase.</p>	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		<p>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, and that provide a national certificate of operation, will be considered compliant under this section.</p>				All purchases identified in the traceability exercise are from vessels that have an IMO or UVI number or that are exempted.	
4.2	Purse Seine Unique Vessel Identifiers	<p>If IMO requirements do not provide for a particular vessel to receive an IMO UVI for reasons other than vessel size, the vessel shall obtain a TUVI from the Consolidated List of Authorized Vessels (CLAV): <a href="http://www.tuna.org/GlobalTVR.htm">http://www.tuna.org/GlobalTVR.htm</a> or a UVI from ISSF: <a href="http://iss-foundation.org/wpcontent/uploads/downloads/2015/02/UVI-and-IMO-numbering-instructions-2015.pdf">http://iss-foundation.org/wpcontent/uploads/downloads/2015/02/UVI-and-IMO-numbering-instructions-2015.pdf</a>.</p> <p>If IMO requirements do not provide for a vessel to receive an IMO UVI due to vessel size, such vessels do not need to obtain a TUVI from the CLAV or a UVI from ISSF.</p>	All Purse Seine	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.	Ok	<p>Company indicated that it does not directly conduct transactions with fishing vessels and provided a statement that only frozen loins are purchased from other ISSF Participating Companies.</p> <p>All PS vessels identified in the traceability exercise have either an IMO or UVI number or a TUVI issued by ISSF.</p>	
4.3(a)	Observer Coverage	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	Large Purse Seine	Auditor assesses company system for observer coverage of controlled vessels, company data submission to RFMOs, and RFMO committee meetings and compliance reports, etc. If RFMO requires 100% observer coverage, no further evidence is required.	Ok	<p>Company indicated that it does not directly conduct transactions with fishing vessels and provided a statement that only frozen loins are purchased from other ISSF Participating Companies.</p> <p>Through the traceability exercise, which reviews PS</p>	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		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.				vessels that supply raw material to processing plants, and in turn supply finished goods to the company, it was determined that 100% observer coverage occurred.	
4.4(a)	Transshipments	No transactions in tuna where transportation included transshipment, except when exempt per Conservation Measure 4.4 (b)(i) or Conservation Measure 8.1.	All Purse Seine	Auditor reviews data submission for relevant RFMO, transshipment documents, and RFMO compliance committee and commission reports to verify that tuna purchased has not undergone unauthorized transshipment.	Ok	Company did not directly source from PS vessels; however, through the traceability exercise it was determined that no transshipments occurred on PS vessels that supplied raw tuna to the processing facilities that sold loins and finished goods to the PC.	
4.4(c)	Transshipment at Sea – Observer Coverage	Processors, traders, importers, marketers and others involved in the seafood industry shall conduct trans-actions 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	Large-Scale Longline	Auditor assesses PC system to determine observer coverage on large-scale longline, and/or trans-shipment, vessels from which it sources.  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, the vessel crew list, or other evidence for that vessel.	N/A	Company stated that it did not source from LL vessels in 2025.  No large-scale LL vessels were identified during the traceability exercise.	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		<p>which TDs were submitted using the E-reporting system.</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>					
5.1	Illegal, Unreported and Unregulated (IUU) Fishing	No transactions with vessels on any tuna RFMO IUU vessel list.	All	Auditor checks quarterly data sent by the company to the RFMO for the presence of IUU-listed vessels.	Ok	Company indicated that it does not directly conduct transactions with fishing vessels and provided a statement that only frozen loins are purchased from other ISSF Participating Companies.	
				The 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.	Ok	<p>Company stated in the audit plan response that it ensures compliance with this measure by sourcing tuna only from vessels listed on the PVR or, if not listed, through other PCs, which are required to uphold ISSF Conservation Measures. Additionally, company conducts its own due diligence by using the Supplier Workplace Portal (SWP) to verify full compliance with this measure before approving any shipment from suppliers.</p> <p>No IUU-listed vessels were identified during the traceability exercise.</p>	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
5.2	Illegal, Unreported and Unregulated (IUU) Product Response	No IUU purchases. If IUU found, company must withdraw these products from the marketplace.  Purchases made from vessels that participate in MSC certified fisheries will be deemed in compliance with this measure.	All	Auditor reviews company recall procedure for presence of IUU policy, then reviews company purchases & compares to RFMO IUU lists.	Ok	Company provided a copy of its recall procedure to remove products from the market if IUU is identified.	
				Company initiates market withdrawal of IUU products.  Auditor checks evidence provided by the PC that vessel was participating in an MSC certified fishery at the time of sourcing.	N/A	No IUU product was found in company's supply chain during audit period, so no market withdrawal had to be initiated.	
6.1	Transaction Ban for Large-Scale Purse-Seine Vessels not Actively Fishing for Tuna as of December 31, 2012	Demonstrate that all purchases from large-scale purse seine vessels are from vessels actively fishing for tuna as of December 31, 2012, 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).	Large Purse Seine	Auditor reviews a list of 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.	Ok	Company indicated that it does not directly conduct transactions with fishing vessels and provided a statement that only frozen loins are purchased from other ISSF Participating Companies.  LSPS vessels identified during the traceability exercises were all registered on the ISSF Record of Large-Scale PS Vessels (the Record).	
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)	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 vessels owned by business organizations or individuals that	Large Purse Seine	Vessel representative will be asked to provide a complete list of all owned large-scale purse seine vessels, including IMO numbers.  Auditor reviews list of owned vessels and	Ok	Company does not directly source from LSPS vessels. However, company has a system to ensure finished goods sourced from its suppliers originate from LSPS vessels registered on the PVR and, if applicable,	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		<p>also own large-scale purse seine vessels not in compliance with ISSF CMs 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> <p>(1) Directly or indirectly (through intermediary entities) by any business organization or its affiliated business organizations, including commonly controlled organizations, or</p> <p>(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 and his or her family members (including spouse, domestic partner, child, sibling, parent, or grandparent, whether natural, adopted or by marriage).</p>		<p>compares it to the PVR record. Auditor may review RFMO records, and other publicly available sources of information, to cross-reference ownership declarations.</p>		<p>are part of fleets where all LSPS vessels are registered on the PVR.</p> <p>Per evidence noted in CM 6.1 (above), all LSPS vessels identified during the traceability exercise were on the Record and, when applicable, part of fleets where all other LSPS vessels were on the Record.</p>	
7.1(a)	Registration of Controlled Vessels	Register all controlled purse seine and supply & tender vessels on the PVR.	All Purse Seine and Supply Vessels	Auditor will obtain list of controlled vessels from company and compare to PVR. Information may also come from industry and media sources.	N/A	<p>Company provided a written statement that it does not control any PS or S&amp;T vessels.</p> <p>Auditor notes that the company does own Tri Marine International (TMI), which in turn owns several vessels. These are listed in the TMI Compliance Report.</p>	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
7.1(b)	Registration of Controlled Vessels	Register all controlled longline vessels on the PVR.	Longline	Auditor will obtain list of controlled vessels from company and compare to PVR. Information may also come from industry and media sources.	N/A	Company provided a written statement that it does not control any LL vessels.  Additional verifications by the auditor did not yield evidence to the contrary.	
7.2	Threshold Requirement for PVR Listing	Obtain written verification that all supplier purse seine vessels owned by the same business organization meet the requirements of CM 7.2.  For the purposes of this measure, “owned” means a registered or controlling (majority) interest in the vessel(s).	Large Purse Seine	Auditor reviews the efficacy of the verification process used by PCs.  Auditor reviews publicly available information on the ownership of vessels.	Ok	Company does not directly source from LSPS vessels but screens any procurement of loins or finished goods, which originate from LSPS vessels, against the PVR to determine if vessel is properly listed.  All LSPS vessels identified during the traceability exercise were registered on the PVR at the time of procurement.	
7.3	Purchases from PVR Vessels	Source 100% of skipjack, yellowfin and bigeye tuna (in round fish, frozen loins or finished goods format) caught by large-scale purse seine vessels from vessels that are registered in the PVR. <sup>7</sup>	Large Purse Seine	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. Auditor cross-references with evidence provided during the traceability exercises. Supporting documentation may be requested to verify the accuracy of trip dates.	Ok	Company did not source from LSPS vessels. However, through the traceability exercise it was determined that LSPS vessels that supplied raw product to processing facilities, which in turn supplied the PC with finished goods, were all registered on the PVR and in good standing.	

<sup>7</sup> The new language in this measure became effective on 1 May 2025.

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
7.4	Supply and Tender Vessels	<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 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>	All Purse Seine	<p>Auditor asks PC for a 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, &amp; whether vessel(s) appear on RFMO IUU lists.</p> <p>Auditor reviews list of purse seine vessels linked to each supply &amp; tender vessel. Purse seine vessel list must include vessel names and flags.</p>	N/A	<p>Company stated that it does not control any S&amp;T vessels.</p> <p>No S&amp;T vessels were identified during the traceability exercise.</p>	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		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.					
7.5	Purchases from PVR Vessels	<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 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, or indicate no such purchases made.</p>	Longline	<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 PVR 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>	N/A	<p>Company stated in the audit plan response that it did not source from LL vessels in 2025.</p> <p>No LL vessels were identified during the traceability exercises.</p>	
8.1	Exemption for Very Small Purse Seine Vessels	Very small purse seine vessels are exempted from the following ISSF Conservation Measures: 3.4 Skipper Best Practices 4.4(a) Transshipment	Very Small Purse Seine	The company can demonstrate that the vessel is less than 30 GT by providing fishing licenses, vessel surveys, photos, etc.	N/A	<p>Company stated that it does not directly conduct transactions with fishing vessels.</p> <p>No very small PS vessels were identified in the traceability exercise.</p>	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
9.1	Public Policy on Social and Labor Standards	Processors, traders, importers, transporters, marketers and others involved in the seafood industry shall develop and publish a public <sup>d</sup> 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:  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	All	Auditor determines when public policy(ies) was/were 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 each policy applies to production facilities, supplier vessels, or both.  Auditor determines if each public policy contains elements a-h noted under category guidance.	Ok	Company provided link to its social and human rights policies, which apply to it and its supply chain, and contain all the elements required by this measure:  <a href="https://www.bolton.com/commitment/our-policies?gl=1*b3ys8y*_u p*MQ.*_ga*MTA2NTEwMzMyNi4xNzY0NjYzNzc2*_ga_HWMWLJDVDH*czE3NjQ2NiM3NzUkbzEkZzAkdDE3NjQ2NjM3NzUkajYwJGwwJGgw">https://www.bolton.com/commitment/our-policies?gl=1*b3ys8y*_u p*MQ.*_ga*MTA2NTEwMzMyNi4xNzY0NjYzNzc2*_ga_HWMWLJDVDH*czE3NjQ2NiM3NzUkbzEkZzAkdDE3NjQ2NjM3NzUkajYwJGwwJGgw</a>	

END OF REPORT