



**ISSF Participating Company Compliance
Audit Checklist
Version 2021/1**

Bumble Bee Seafoods

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):

Brands: Bumble Bee & Clover Leaf

Final Compliance Report (as of 14th March 2022, for activities from Q4 2020 to Q3 2021)

I Jan Tharp (Name/Title) of Bumble Bee Seafoods, acknowledge receipt of this final compliance report, and have taken notice of any potential non-conformances contained within.

Signature¹: 

Date: 15 March 2022

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

General Audit Information

Company Name	Bumble Bee Seafoods
Affiliated Company Names	Bumble Bee Seafoods, Clover Leaf Seafoods, Anova Food LLC
Company Address	280 10th Ave San Diego, CA 92101
Contact Information (Name, Phone, Email)	Leslie Hushka SVP Global Corporate Sustainability Leslie.Hushka@bumblebee.com
Auditor Name(s)	Patricia Bianchi Jonah van Beijnen Oleg Martens Erin Hrastar Jason Anderson
Audit Start Date	11 October 2021
Audit End Date	Preliminary audit results issued: Week of 24 January 2022 Final audit results issued: Week of 14 March 2022
Time zone(s) for coordinating remote audit conference call	San Diego
Language requirements for remote audit conference call	English

Compliance Snapshot								
Conservation Measure	Current	2020	2019	2018	2017	2016	2015	2014
1.1 RFMO Authorized Vessel Record	OK	OK	OK	OK	OK	OK	OK	OK
1.2 RFMO Participation	OK	OK	OK	OK	OK	OK	OK	OK
2.1 Product Traceability	OK	OK	OK	OK	OK	OK	OK	OK
2.2 Quarterly Data Submission to RFMO	OK	OK	OK	OK	OK	OK	OK	MINOR
2.3 Product Labelling by Species and Area of Capture	OK	OK	OK	OK	-	-	-	-
2.4 Supply Chain Transparency, Audit, Reporting and Purchase Requirements	OK	OK	-	-	-	-	-	-
3.1(a) Shark Finning Policy	OK	OK	OK	OK	OK	OK	OK	OK
3.1(b) Prohibition of Transactions with Shark Finning Vessels	OK	OK	OK	OK	OK	OK	OK	OK
3.1(c) Prohibition of Transactions with Companies without a Public Policy	OK	OK	OK	OK	OK	OK	OK	OK
3.2 Large-scale Pelagic Driftnets	OK	OK	OK	OK	OK	OK	OK	OK
3.3 Full Retention of tunas	OK	OK	OK	OK	OK	OK	OK	OK
3.4 Skippers Best Practices	OK	OK	OK	OK	OK	OK	N/A	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	OK	OK	OK	OK	-	-	-	-
3.7 Transactions with Vessels or Companies with Vessel-Based FAD Management Policies	OK	-	-	-	-	-	-	-
4.1 UVI-IMO	OK	OK	OK	OK	OK	OK	OK	MINOR
4.2 Purse Seine Unique Vessel Identifiers	OK	OK	OK	OK	OK	OK	N/A	OK
4.3(a) Observer Coverage	OK	OK	OK	OK	OK	OK	N/A	OK
4.4(a) Transshipment	OK	OK	OK	OK	OK	N/A	N/A	OK
4.4(c) Transshipment at Sea – Observer Coverage	OK	OK	OK	OK	-	-	-	-
5.1 IUU Fishing	OK	OK	OK	OK	OK	OK	OK	OK
5.2 IUU Product Response	OK	OK	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	N/A	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				
7.1(a) Registration of Controlled Vessels (purse seine and supply & tender)	N/A	N/A	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	-	-	-	-	-
7.2 Threshold Requirement for PVR Listing	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	-	-	-	-
7.5 Purchases from PVR Vessels (longline)	OK	OK	-	-	-	-	-	-
8.1 Exemption for Very Small Purse Seine Vessels	N/A	N/A	N/A	N/A	N/A	N/A	N/A	OK
9.1 Public Policy on Social and Labor Standards	OK	-	-	-	-	-	-	-

Audit purpose	
Audit objective	The purpose of this audit is to validate participating company compliance with all ISSF conservation measures in place for the year of activity being audited.
Audit criteria	The PC compliance audits cover all conservation measures as defined in the ISSF Participating Company Compliance: Audit Policy Document and Standard Operating Procedures, Version 2020/1.
Audit outcomes	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.
Purpose of this document	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 participating company.
Other relevant documentation	ISSF Participating Company Compliance: Audit Policy Document and Standard Operating Procedures, Version 2020/1.

Conformance with ISSF Commitments	
Non-conformances	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.
Grading	MRAG Americas defines audit findings as follows: <ul style="list-style-type: none"> · Conformance (Ok) - the PC can provide evidence of compliance with a conservation measure · Observations - 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, but this does not compromise the integrity of the ISSF initiatives · Major Non-conformance – the PC does not comply with a conservation measure, and this compromises the integrity of the ISSF initiatives
MRAG Americas' procedures	MRAG Americas' procedures for handling non-conformances for PCs are as follows: <ul style="list-style-type: none"> · MRAG Americas substantiates conformance through documented evidence. · Where a company cannot provide documented evidence of conformance with a conservation measure, a non-conformance must be issued. · All non-conformances must be graded either major or minor.

	<ul style="list-style-type: none"> 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.
Corrective Action Responses (CARs)	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 the 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>	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>	Ok	<p>Company has system in place to ensure sourcing only occurs from vessels that are registered with the relevant RFMO and/or national authority (i.e., if only operating in their national waters). Auditor found that all vessels listed in the quarterly RFMO reports were listed with the relevant RFMO and/or national authorized list.</p> <p>All selected vessels that are part of the traceability exercise are properly listed in RFMO authorized vessel records or with their national competent authority.</p>	
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,	All	Auditor reviews quarterly data sent by the company to the RFMO to check that all vessels meet this requirement.	Ok	<p>All vessels listed in the quarterly RFMO reports are flagged by members of the relevant RFMO(s).</p> <p>All vessels that are part of the traceability exercise are properly flagged and are a member or</p>	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		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.				cooperating non-member of RFMO relevant to fishing area.	
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	The 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. As described by ISSE, 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</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</p>	Ok	<p>All RFMO data was submitted to the relevant RFMOs using the proper format and in accordance with the CM timeline requirements.</p> <p>The auditor was able to locate all vessels and corresponding trips from direct whole round purchases identified in the traceability exercise in the submitted quarterly RFMO reports.</p>	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		<p>goods from other ISSF participating companies is exempt from sending RFMO data. However, the company must affirm 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>to rmodata@iss-foundation.org when company only purchases loins and/or finished goods.</p>			
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>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 & Black Sea)</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>Auditor randomly selected product type codes, for which company provided evidence of species name and area of capture on labelling or through its traceability website: https://www.bumblebee.com/tracemycatch/</p>	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		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 & 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)					
2.4	Supply Chain Transparency, Audit, Reporting and Purchase Requirements	<p>ISSF Participating Companies will be exempt from compliance with this measure until December 31, 2022, if they publish by January 31, 2020, and annually thereafter:</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 eligible to use the MSC label. 2. Comprehensive FIPs² that are publicly listed and scoring A, B or C in their initial listing. 3. Comprehensive FIPs that are publicly listed and scoring D or E. 4. Fisheries that have entered full assessment for MSC certification but are not in a comprehensive FIP that is publicly listed. 5. 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>	All	<p>Auditor reviews Participating Company's public website, as well 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 FisheryProgress.org FIP listing for 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</p>	Ok	<p>Company shared link to its statement: https://thebumblebeecompany.com/sustaining-fisheries/</p> <p>The statement has been updated to cover the audit period, includes all the required categories, and notes company's intent to reduce sourcing from the 'none of the above' categories.</p> <p>Company also shared an explanation of the methodology it uses to assign category percentages, as well as the volumes associated with MSC, FIP and FA fisheries, and that which was sourced from other Participating Companies. Based on the available evidence, auditor finds the declared percentages to be reasonable.</p>	

² 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)(2) and (3).

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		1. ISSF participating companies 2. Data Check Companies 3. Direct from vessels 4. None of the above (c) a statement of intent to decrease purchases from the “none of the above” categories in 3(a) and (b) above.		factors used to estimate round fish equivalent. The auditor will also check that there is a statement of intent published on the Company’s website as described in the guidance.			
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. ³	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 to be landed with fins naturally attached if retained.	Ok	Company provided a link to its policy prohibiting shark finning, which meets CM requirements: https://thebumblebeecompany.com/sustaining-fisheries/	
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, ³ within two years of the product purchase date (as found by RFMO or competent national authority).	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.	Ok	Company has a system in place to ensure there are no transactions with vessels that practice shark finning. No evidence of shark finning was found on RFMO compliance report or in the media. None of the selected vessels that are part of the traceability exercise have	

³ This section of the measure becomes effective on 31 December 2022.

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
						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 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, ³ 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.	All	Auditor reviews company procedure for ensuring that all tuna purchases have come from a company that has a public policy prohibiting shark finning and which 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. Traceability exercises by transaction or can code to PVR vessels or proof of compliance verifies the system.	Ok	Company screens supplier vessels during procurement to ensure they have a policy prohibiting shark finning. PVR registered vessels listed in the quarterly RFMO reports were in good standing for this measure at the time of sourcing. For non-PVR vessels, company provided copies of supplier policies, which meet this CM's requirements. All vessels identified during the traceability exercises had policies prohibiting shark finning that meet this measures' requirements.	
3.2	Large-Scale Pelagic Driftnets Prohibition	No transactions in vessels using large-scale pelagic driftnets, regardless of the geographic area in which the tunas were caught by such driftnets.	All	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. Maximum net size is 2.5 km.	Ok	No large-scale driftnet use has been identified in the RFMO reports. None of the selected vessels that are part of the traceability exercise have been associated with the use of drift nets or gill nets.	

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	No large-scale driftnet use has been identified in Compliance Committee reports.	
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, 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 did not source directly from PS vessels. No LSPS vessels were listed in the RFMO Quarterly reports. All selected purse seine vessels that are part of the traceability exercise retain their tuna as per PVR records and/or captain's statements.	
3.4	Skipper Best Practices	Unless exempt per Conservation Measure 8.1, skipper ⁴ has: (a) Attended and in-person and/or online ISSF Skippers Workshop; or (b) Attended an in-person Skippers Workshop provided by a purse seine tuna FIP and	All Purse Seine	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.	Ok	Company did not directly source from PS vessels. Company does not directly source from purse seine vessels, however the traceability exercise demonstrated that loins and finished goods the company sourced from	

⁴ 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>conducted by a trainer that has been accredited by ISSF to conduct these workshops; or</p> <p>(c) Viewed the ISSF Skippers Workshop video online; or</p> <p>(d) Reviewed the online ISSF Skippers Guidebook.</p>		<p>Auditor checks PVR and ISSF list of individuals who have:</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>processing plants came from PS vessels listed on the PVR and with a green check for Skipper Best Practices.</p>	
3.5	Transactions with Vessels that use Only Non-Entangling FADs	<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 public 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 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.</p>	All Purse Seine and Support Vessels	<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>	Ok	<p>No LSPS vessels were listed in the RFMO Quarterly reports.</p> <p>Company does not directly source from purse seine vessels, however the traceability exercise demonstrated that loins and finished goods the company sourced from processing plants came from PS and S&T vessels listed on the PVR and with a green check for this measure.</p>	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		<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>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>					
3.6	Transactions with Vessels Implementing Best Practices for Sharks, Sea Turtles and Seabirds. ⁵	<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, 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;⁵</p>	Ok	<p>Large-scale longline vessels listed in the quarterly RFMO reports that are registered on the PVR were in good standing for this measure at the time of sourcing.</p> <p>For non-PVR vessels, company provided copies of supplier policies, which meet this measure's requirements.</p>	

⁵ This section of the measure becomes effective on 31 December 2022.

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
				<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; and</p> <p>(d) No use of "shark lines" at any time.⁶</p> <p>Auditor reviews date on which policy was put in effect.</p>			
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 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) Voluntarily report additional FAD buoy data 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>	Large-scale Purse Seine and Supply Vessels	<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.</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</p>	Ok	Company does not directly source from purse seine vessels, however the traceability exercise demonstrated that when tuna originated from large-scale purse seine vessels, these were registered on the PVR and in good standing for this measure at the time of sourcing. No supply & tender vessels listed in the quarterly RFMO reports.	

⁶ 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>(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>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), by 1 January 2024, public FAD management Policies developed under this measure shall include a statement that purse seine</p>		<p>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 2024, auditor reviews whether FMPs include a statement that purse seine vessels and supply vessels covered by the policy will use and deploy only non-entangling FADs without any netting in any components, including both the raft and the tail.</p>			

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		<p>vessels and supply vessels covered by the policy will from this date only use and deploy fully non-entangling FADs without any netting in any components, including both the raft and the tail.</p> <p>ISSF CM 3.5 is repealed and replaced by this measure as of 1 January 2024.</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 & 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, and that provide a national certificate of operation, will be considered compliant under this section.</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>All vessels listed on the RFMO Quarterly Reports capable of receiving one have valid IMO numbers.</p> <p>All purchases that are part of the traceability exercise are from vessels that have an IMO-UVI number or that are exempted.</p>	
4.2	Purse Seine Unique Vessel Identifiers	If IMO requirements do not provide for a particular vessel to receive an IMO UVI for reasons other than vessel size, the vessel	All Purse Seine	Auditor reviews company method to ensure that all vessel purchases meet this	Ok	Company does not purchase directly from PS vessels, but all finished goods it sourced from its	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		<p>shall obtain a TUVI from the Consolidated List of Authorized Vessels (CLAV) CLAV: http://www.tuna-org.org/GlobalTVR.htm or a UVI from ISSF: http://iss-foundation.org/wpcontent/uploads/downloads/2015/02/UVI-and-IMO-numbering-instructions-2015.pdf.</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>		<p>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.</p>		<p>suppliers came from PS vessels with a valid IMO number.</p> <p>All selected purse seine vessels that are part of the traceability exercise have either an IMO-UVI number or a TUVI issued by CLAV in place</p>	
4.3(a)	Observer Coverage	<p>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.</p>	Large Purse Seine	<p>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.</p>	Ok	<p>Company did not purchase directly from purse seine vessels. However, through the traceability exercise, which investigates PS vessels that supply raw material to processing plants, and in turn supply finished goods to the PC, it was determined that 100% observer coverage occurred.</p>	
4.4(a)	Transshipments	<p>No transactions in tuna where transportation included transshipment, except when exempt per Conservation Measure 4.4 (b)(i) or Conservation Measure 8.1.</p>	All Purse Seine	<p>Auditor reviews data submission for relevant RFMO, transshipment documents and RFMO compliance committee and commission reports to verify that tuna purchased has not undergone</p>	Ok	<p>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</p>	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
				unauthorized transshipment.		facilities that sold loins and finished goods to the PC.	
4.4(c)	Transshipment at Sea – Observer Coverage	<p>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).</p> <p>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.</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 assesses participating company system to determine observer coverage on large-scale longline, and/or transshipment, vessels they source from.</p> <p>Company shall maintain record(s) of RFMO transshipment declarations, which must be signed by the observer present during transshipment.</p> <p>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.</p>	Ok	<p>When large-scale longline transship at sea, company has procedure in place to collect all transshipment declarations along with Captain Statements.</p> <p>Auditor randomly selected months across RFMOs, for which Company provided all TDs and CSs. All TDs either contained the name and signature of the observer or received a derogation from the relevant RFMO due to COVID disruptions to the observer program.</p> <p>Selected transactions from the traceability exercise carried observers onboard during at-sea transshipments.</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	No IUU vessels were identified in the RFMO reports.	
				The auditor reviews the company purchasing system to prevent IUU	Ok	No IUU vessels were found in the combined IUU list:	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
				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.		https://iuu-vessels.org/search . Company indicated they review all fish entering system against consolidated RFMO IUU lists: https://www.iuu-vessels.org/ No incidents of IUU associated with the vessels listed on RFMO were identified on RFMO blacklists. No IUU listed vessels were found during the traceability exercise.	
5.2	Illegal, Unreported and Unregulated (IUU) Product Response	No IUU purchases. If IUU found, company must withdraw these products from the marketplace.	All	Auditor reviews company recall procedure for presence of IUU policy, then reviews company purchases and compares to RFMO IUU lists.	Ok	Company provided a copy of its recall procedure, which covers illegal product through the following statement “the removal from distribution and/or correction of products that do not meet a company’s own quality standards, or which may, in a technical but minor way, violate federal or state law.”	
				Company initiates market withdrawal of IUU products.	N/A	Company stated that no IUU product was found in 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	Demonstrate that all purchases from large-scale purse seine vessels are from vessels actively fishing for tuna as of December	Large Purse Seine	Auditor reviews a list of company purchases from large-scale purse seine vessels to assess	Ok	Company did not directly source from PS vessels. All large purse seine vessels that are part of the	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
	Tuna as of December 31, 2012	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).		whether the source vessels are listed on the ISSF Record of Large-Scale Purse Seine Vessels.		traceability exercise are listed on the Record of Large-Scale PS vessels.	
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)	<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 vessels 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> <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</p>	Large Purse Seine	<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>	Ok	Company does not directly source from LSPS vessels, but it screens any procurement of loins or finished goods, which originate from LSPS vessels, against the LSPS Record to determine if vessel is properly listed.	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		family members (including spouse, domestic partner, child, sibling, parent or grandparent, whether natural, adopted or by marriage).					
7.1(a)	Registration of Controlled Vessels	Register all controlled purse seine and supply & tender vessels on the PVR.	All Purse Seine	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 purse seine and/or supply & tender vessels.	
7.1(b)	Registration of Controlled Vessels	Register all controlled longline vessels on the PVR.	All 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 longline vessels.	
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.	
7.3	Purchases from PVR Vessels	For fishing trips beginning on or after January 1, 2016, source 100% of skipjack, yellowfin and bigeye tuna caught by large-scale purse seine vessels from vessels registered in the PVR.	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. Supporting documentation may be	Ok	Company did not source directly from LSPS vessels. However, through the traceability exercise we determined that LSPS vessels that supplied raw product to processing facilities that supplied the PC with finished goods, were all registered on the PVR and in good standing.	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
				requested to verify the accuracy of trip dates.			
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 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.</p> <p>Auditor reviews list of PS vessels linked to each supply & tender vessel. PS vessel list must include vessel names and flags.</p>	N/A	<p>No supply and tender vessels were found in the RFMO reports.</p> <p>No supply and tender vessels were recorded in 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 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>	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>	Ok	<p>The company provided a link to its statement:</p> <p>https://thebumblebeecompany.com/sustaining-fisheries/</p> <p>The statement notes the percentage of albacore tuna sourced from longline vessels registered on the PVR in 2021. The statement also notes company's intent to increase sourcing from longline vessels registered on the PVR.</p> <p>Auditor compared declared percentages to sourcing volumes in the quarterly RFMO reports. The company's reported figures are reasonable.</p>	

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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	Company stated it did not source directly from any very small PS vessels. No very small purse seine vessels identified in the quarterly RFMO reports or through the traceability exercise.	
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 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 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.	All	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. This measure is effective 1st January 2021, onward.	Ok	Company provided link to its policy, which meets this CM’s requirements: https://thebumblebeecompany.com/wp-content/uploads/2021/07/Supplier-Code-of-Conduct-2021.pdf The policy applies to the company and its entire supply chain.	

END OF REPORT