

ISSF Participating Company Compliance Audit Checklist

Version 2016/2

General Tuna Corporation

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 April 26, 2016 for activities in 2015)

General Audit Information

Company Name	GENERAL TUNA CORPORATION
Affiliated Company Names	
Company Address	Ngilay Road, Bo. Tambler, General Santos City 9500 Philippine
Contact Information (Name, Phone, Email)	RICARDO B. MAGNAYON JR. +63 917 821 9741 rmagnayon@centurypacific.com.ph
Auditor Name(s)	Chris Spring, Erin Wilson, Phil Bratten, Patricia Bianchi, Jonah van Beijnen
Audit Start Date	January 15, 2016
Audit End Date	March 18, 2016
Time zone(s) for coordinating remote audit conference call	
Language requirements for remote audit conference call	English

Compliance Snapshot		
Conservation Measure	Current	2014
1.1 RFMO Authorized Vessel Record	OBS	OBS
1.2 RFMO Participation	ОК	ОК
2.1 Product Traceability	OBS	ОК
2.2 Quarterly Data Submission to RFMO	MINOR	MINOR
3.1(a) Shark Finning Policy	ОК	ОК
3.1(b) Prohibition of Transactions with Shark Finning Vessels	ОК	ОК
3.1 (c) Prohibition of Transactions with Companies without a Public Policy	MINOR	MINOR
3.2 Large-scale Pelagic Driftnets	ОК	ОК
3.3 Full Retention of tunas	ОК	MINOR
3.4 Skippers Best Practices	MINOR	MINOR
4.1 UVI-IMO	ОК	OBS
4.2 Purse Seine Unique Vessel Identifiers	ОК	ОК
4.3(a) Observer Coverage	OBS	MINOR
4.4(a) Transshipment	OBS	MINOR
5.1 IUU Fishing	ОК	ОК
5.2 IUU Product Response	ОК	MINOR
6.1 Transaction Ban for LPS vessels not Actively Fishing for Tuna on Dec. 31, 2012	MINOR	ОК
6.2(a) 2.a-d and 6.3(a) Requirements for Inclusion in Large-scale Purse Seine Vessels Fishing for Tropical Tunas	N/A	ОК
7.1 Registration of Controlled Vessels	N/A	OBS
8.1 Exemption for Very Small Purse Seine Vessels	N/A	ОК

	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 2015/1.
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 2015/1

	Conformance with ISSF Commitments
Non-conformances	Non-conformances must be raised against specific ISSF conservation measures. The severity of the non-conformance – and in particular whether this jeopardizes the integrity of the ISSF program – determines which non-conformances are raised.
Grading	MRAG Americas defines audit findings as follows:

	 Conformance - the PC can provide evidence of compliance with a particular 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 particular conservation measure, but this does not compromise the integrity of the ISSF initiatives. Major Non-conformance - the PC does not comply with a particular 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: 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. 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 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.

Category Cat	СМ	Category	Category Guidance	Gear	Means of Verification	Grade	Evidence	Corrective Action
--	----	----------	-------------------	------	-----------------------	-------	----------	-------------------

			Туре			
1.1	Tuna RFMO Authorized Vessel Record	All purchases must be from vessels listed on the authorized vessel record of the RFMO governing the ocean area in which the tuna was caught, at the time of the fishing trip, so long as the vessel is of a size subject to listing in the RFMO authorized vessel record. For any purchases from non-PVR vessels, maintain a system check and approve vessel listing.	All	Auditor reviews company system to ensure that purchases are from properly listed vessels. Traceability exercises, reviewing RFMO vessel records and checking ocean areas where vessels are fishing verifies the system.	Ok	The company has an adequate system to verify that purchases come from RFMO listed vessel. During fish procurement, the following documents are sent by fish supplier: Contract of Sales, Commercial Invoice, Bill of Lading, Packing List, Stowage Plan, etc (see traceability documents attached). From the documents, the fishing vessel is determined. Fishing vessel registration is verified from the database found in ISSF website or from the Philippine Bureau of Fisheries Aquatic Resources (BFAR) data.
					Obs	All vessels checked listed on WCPFC. Note the following vessels with wrong IMO: Yap SEAGULL: Win FAR 636 Note vessel name dolly 859 from RFMO data is
					Ok	named dolores 859 in ISSF database All vessels from traceback listed on PVR

СМ	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 of RFMO relevant to fishing area.	All	Auditor reviews quarterly data sent by the company to the RFMO to check that all vessels meet this requirement.	Ok	All fishing vessels listed in the RFMO reports were flagged with flags of countries that were members or cooperating non-members All vessels from traceback listed on PVR	
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 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.	Ok	The company has a suitable traceability system in place that allows product codes to be traced back to the vessel and vessel trip. However it should be observed that no official catch documentation was provided and vessel and trip records were only provided through a captain's statement.	
2.2	Quarterly Data Submission to RFMO	Send information as described in the measure to RFMO scientific bodies for each quarter (Q1-Q3) by the end of the month following each quarter.	All	Auditor checks that information has been sent by companies to RFMO for all purchases.	Minor	RFMO data were copied to relevant RFMOs on: 8/10/2015 (QTR1)**over 1 QTR late; 10/28/2015 (QTR 2) **over 1 QTR late; 2/8/2016 (QTR 3)**over 1 QTR late Unloading port was not listed in RFMO reports	Establish a system to submit RFMO data within the ISSF timeframe. By Q2 2016 General Tuna will include unloading port in its RFMO reports

					Obs	Transshipments that occur at sea or at port are both described by the coordinates of the transshipments. Data from vessels from traceback submitted to RFMO	By Q2 2015, if a transshipment occurs at Port, the name of the port should be listed. Coordinates should be used for at sea transshipments only
3.1(a)	Shark-Finning Policy	Company establishes and publishes policy prohibiting shark finning.	All	Auditor reviews company website for published policy.	Ok	http://www.centurypac ific.com.ph/webfisherie s.php?d=cD02JnBjPTAm YmQ9MTk5	
3.1(b)	Prohibition of Transactions with Shark-Finning Vessels	Refrain from transactions with vessels that have shark finned 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. The company system is verified by checking purchases against data gathered throughout the year of RFMO compliance reports, media sources, etc.	Ok	Company has anti shark finning policy (see above) and has a system to ensure no transaction with vessels that practice shark finning. Company obtains a captain's statement with each purchase. Fishing vessels are then verified from the database found in ISSF website or from the Philippine Bureau of Fisheries Aquatic Resources (BFAR) data. Verification includes if the vessel has shark finning policy or have shark finning history. All vessels from traceback listed on PVR	

СМ	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
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. If transactions involve flag states that absolutely prohibit shark finning no policy is required. If flag state allows 5% shark fin retention, 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. For flag states that do have an absolute shark finning prohibition, 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 Minor	Fishing vessels are verified from the database found in ISSF website or from the Philippine Bureau of Fisheries Aquatic Resources (BFAR) data. Verification includes if the vessel has shark finning policy or have shark finning history. Only Tri-Marine International (PTE) Ltd and FCF Fishery Co. Ltd have websites and public shark finning policies. Shark finning policy of other fish suppliers will be obtained. All vessels from traceback are listed on PVR	
3.2	Large-Scale Pelagic Driftnets Prohibition	No transactions in vessels using large-scale pelagic 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	All fishing vessels were purse seiners and no drift nets were used All vessels from traceback are listed on PVR	
				MRAG reviews RFMO compliance committee	Ok	No use of driftnets were reported in	

				reports for any indication of vessels using large-scale pelagic driftnets.		compliance committee reports	
3.3	Full Retention of Tunas	All purse seine caught tuna (skipjack, yellowfin and bigeye) retained onboard, except those unfit for human consumption as defined, or when in the final set of a trip, there is insufficient well space to accommodate all fish caught in that set. If the vessel fishes in areas where full retention is mandatory, no further policy is needed. If RFMO does not require full retention, vessel must have documented and implemented policy in accordance with this conservation measure.	All Purse Seine	Verify that 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 or RFMO requirement regarding full retention of tunas.	Ok	Most vessels registered on PVR. Ones that are not listed are registered with WCPFC that has full retention policy. All vessels from traceback are listed on PVR	
3.4	Skipper Best Practices	Unless exempt per Conservation Measure 8.1, skipper[1] has attended an ISSF Skippers Workshop in person, has viewed the Skippers Workshop video online, or has reviewed the Skippers Guidebook. The workshop video is located at this link. The online guidebook is located at www.issfguidebooks.org.	All Purse Seine	Verify that the company has purchased tuna only from vessels with skippers that have completed ISSF best practices education. Auditor checks PVR and ISSF list of individuals who have attended Skippers Workshops or have certified that they read the online Skippers Guidebook or viewed the online Skippers Workshop video; or the PC may provide evidence of skipper	Minor	The following vessels were not registered on the PVR and we were unable to determine if their skippers had received ISSF Skipper training: Monalinda 86, Purple Beauty, Purple Beauty, Purple Beauty 888, Dolores 858, Dolly 859 and Prinses Diane 1 All vessels from traceback are listed on PVR	General Tuna should confirm that the skippers of these vessels have received ISSF Skipper training

				review of guidebook, video, including list of skippers, method of review and dates of completion.			
4.1	Unique Vessel Identifiers - IMO	All purchases must be from vessels with an IMO UVI number if the vessel is capable of being registered by IMO.	All	Auditor reviews company system to ensure vessel purchases meet this criteria. 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	Company has a system to ensure all purchases come from vessels with IMO UVI. Fishing vessels from all purchases are identified and verified from the database found in ISSF website or from the Philippine Bureau of Fisheries and Aquatic Resources (BFAR) data. Verification includes the IMO UVI number of the fishing vessel. All purse seine vessels checked had IMO number. See comment on 1.1 regarding wrong IMO numbers	
					O.	traceback are listed on PVR	
4.2	Purse Seine Unique Vessel Identifiers	All purse seine vessels with which the company transacts in tuna, and which are not able to receive an IMO UVI number, must have a TUVI issued by CLAV http://www.tuna-org.org/GlobalTVR.htm or ISSF http://iss-foundation.org/	All Purse Seine	Auditor reviews company method to ensure that all vessel purchases meet this criteria. A sample of non-PVR purchases will be reviewed to assess whether the company system is adequate to ensure that non-PVR	Ok Ok	Company verifies the IMO UVI number of the fishing vessel. All purse seine vessels checked had IMO number All vessels from traceback are listed on	

		download-monitor-demo/ download-info/uvi-and-im o-number-instructions/ unless exempt per Conservation Measure 8.1.		vessels also meet this requirement.		PVR and have IMO	
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 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.	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. For non-PVR vessel purchases, the PC provides details of agreement with observer provider (human or electronic) for 100% coverage. If RFMO requires 100% observer coverage, no further evidence is required.	Obs	Company did not provide information as to how they verify 100% observer coverage. Most company vessels are on PVR or in WCPFC, which has 100% observer coverage requirements All vessels from traceback are listed on PVR	
4.3(b)	Observer Coverage Exemption - WCPO Region	Exemptions may be made for large-scale purse seine vessels in the Western and Central Pacific Ocean fishing in latitudes higher than 20°N/S in cases where the catch (retained and discarded; target and non-target) is adequately sampled and reported to the RFMO. Such exemptions shall be based on a detailed report that will be reviewed and	Large Purse Seine	The auditor will review evidence that the vessel meets the requirements for this exemption.		N/A	

		approved by the ISSF Board.					
СМ	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
4.3(b)(i)	Observer Coverage Exemption – New Zealand Flag Purse Seine Vessels	An exemption is granted for tuna caught by New Zealand flag purse seine vessels that operate only within New Zealand waters targeting free school skipjack during the summer season	Large Purse Seine	The auditor will review evidence that the vessel meets the requirements for this exemption.		N/A	
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.	Obs	No transshipments were viewed.	
4.4(b)(i)	Transshipment Exemption – Papua New Guinea	No transactions in vessels that transship unless they have been granted an exemption under this clause (fishing only in the archipelagic waters of PNG; and that are based in PNG and are associated with processing facilities in PNG).	Large Purse Seine	During the traceability exercise, the auditor reviews any instance of transshipment to assess whether the exemption applies.		N/A	
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 has internal policy not to transact with any seafood company and fishing vessel that has been identified as IUU.	

						During fish procurement, the following documents are sent by fish supplier: Contract of Sales, Commercial Invoice, Bill of Lading, Packing List, Stowage Plan, etc. From the documents, the fishing vessel is determined. Fishing vessel registration is verified from the database found in ISSF website or from the Philippine Bureau of Fisheries an Aquatic Resources (BFAR) data. Fish can be verified immediately if IUU or not. All vessels from traceback are listed on PVR
				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.	ОК	Company has adequate system to prevent IUU fish
5.2	Illegal, Unreported and Unregulated (IUU) Product Response	No IUU purchases. If IUU found, company must withdraw these products	All	Auditor reviews company recall procedure for presence	Ok	Company has a documented recall procedure if it's

		from the marketplace.		of IUU policy, then reviews company purchases and compares to RFMO IUU lists.		identified that an IUU fish has been accepted for processing (attached). The company will conduct Forward Trace in order to identify the whereabouts of the IUU fish. In case the IUU fish has already been packed and shipped, the company will withdraw the shipped goods.	
				Company initiates market withdrawal of IUU products.		N/A	
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	The 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. If source vessels do not appear in the Record, the company must provide evidence in accordance with Conservation Measure 6.2(a) as described below.	Minor	PRINSES DIANE 1 and DOLLY 859 could not be found on the LPS record All vessels from traceback are listed on the PVR	Please provide additional information for the listed vessels
6.2(a).2.a	Requirements for Inclusion in Record of Large-Scale Purse Seine Vessels Fishing For Tropical Tunas	Provide certification from government body that vessel was licensed to fish for tuna before December 31, 2012.	Large Purse Seine	ISSF reviews evidence provided by vessel owner to determine whether vessel is eligible to be listed in the ISSF		N/A	

				Record.		
6.2(a).2.b	Requirements for Inclusion in Record of Large-Scale Purse Seine Vessels Fishing For Tropical Tunas	To demonstrate that the vessel was contracted for construction before 12/31/12, the vessel representative may provide such evidence as a signed contract, supporting correspondence, deposit paid, plans, photos, etc., certificate from IACS member, IMO number or RFMO record. To demonstrate that construction was completed before 6/30/15, the vessel may provide such evidence as completion of sea trial, certificate from shipyard, sale of fish, skippers log, observer report, etc., certificate from government agency.	Large Purse Seine	MRAG reviews evidence provided by company to determine whether vessel is eligible to be listed in the ISSF Record.	N/A	
6.2(a).2.c	Requirements for Inclusion in Record of Large-Scale Purse Seine Vessels Fishing For Tropical Tunas	Vessel provides update regarding name, flag or registration number.	Large Purse Seine	ISSF reviews evidence provided by vessel owner to determine whether vessel is eligible to be listed in the ISSF Record.	N/A	
6.2(a).2.d	Requirements for Inclusion in Record of Large-Scale Purse Seine Vessels Fishing For Tropical Tunas	If vessel replacement is one to one, the well volume of the new vessel must be less than or equal to the well volume of the vessel being removed. If a new vessel is intended to	Large Purse Seine	MRAG reviews evidence provided by vessel owner to determine whether vessel is eligible to be listed in the ISSF Record.	N/A	

		replace multiple vessels listed in the ISSF Record, the aggregated replaced capacity of more than one vessel already on the ISSF Record must be at least 1.2 times the new capacity (aggregated replaced capacity/1.2 = permitted new capacity).					
6.2(a).3	Requirements for Inclusion in Record of Large-Scale Purse Seine Vessels Fishing For Tropical Tunas	If a vessel on the ISSF Record is to be refurbished, the new fish hold volume must show that the aggregated replaced capacity is at least 1.2 times the capacity of the vessel before refurbishment ((original vessel capacity + replaced capacity)/1.2 = refurbished capacity).	Large Purse Seine	MRAG reviews evidence provided by company to determine whether vessel is eligible to be listed in the ISSF Record.		N/A	
7.1	Registration of Controlled Vessels	Register all controlled purse seine 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.	ОК	Company confirms they have no controlled vessels	
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 4.2 Purse Seine Unique Vessel Identifiers 4.4(a) Transshipment	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	