



**ISSF Participating Company Compliance**

**Audit Checklist**

Version 2016/2

**Tri Marine**

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	Tri Marine
Affiliated Company Names	
Company Address	10500 NE 8 <sup>th</sup> Street, Suite 1888 Bellevue, WA 98004
Contact Information (Name, Phone, Email)	Matthew Owens 425-688-1288 mowens@trimarinegroup.com  Jonathan Curto 425-688-1288 jcurto@trimarinegroup.com
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	Tri Marine: US Pacific Standard Time (PST)
Language requirements for remote audit conference call	English

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

Audit purpose	
<b>Audit objective</b>	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.
<b>Audit criteria</b>	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.
<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 participating company.
<b>Other relevant documentation</b>	ISSF Participating Company Compliance: Audit Policy Document and Standard Operating Procedures, Version 2015/1

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 in particular 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 - the PC can provide evidence of compliance with a particular 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 particular 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 particular conservation measure and this compromises the integrity of the ISSF initiatives.</li> </ul>
<b>MRAG Americas' procedures</b>	<p>MRAG Americas' procedures for handling non-conformances for PCs are as follows:</p> <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-conformance must be issued.</li> <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>	<p>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.</p>

CM	Category	Category Guidance	Gear	Means of Verification	Grade	Evidence	Corrective Action
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			Type				
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	Company has an adequate system to ensure that all purchases are from vessels listed on RFMO. Tri Marine maintains a list of all supplier vessels and performs regular cross checks with various RFMO vessel lists to confirm registration and compliance.	
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 OK	All fishing vessels were flagged with flags of member countries  Vessels from traceback flagged with flags of countries members of relevant RFMO	

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 traceability system in place that allows product codes to be traced back to the vessel and vessel trip.	
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.	OK  Obs	RFMO data was copied to relevant RFMOs on: 4/21/15 (QTR1); 7/27/15 (QTR 2); 10/28/15 (QTR 3)  Container shipments were improperly sent as 'transshipments'.	
3.1(a)	Shark-Finching Policy	Company establishes and publishes policy prohibiting shark finching.	All	Auditor reviews company website for published policy.	OK	<a href="http://trimarinegro.com/resources/papers/Tri_Marine-Condemns-Shark-Finching.pdf">http://trimarinegro.com/resources/papers/Tri_Marine-Condemns-Shark-Finching.pdf</a>	





CM	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	Company has an adequate system to ensure that all purchases come from companies with public shark finning policy. Every transaction of tuna raw material is accompanied by a signed Captains Statement containing information about the fishing vessel and a declaration that the vessel complies with the ISSF requirement. Internally the company verifies this. Internally the company has a supplier vessel list, which is regularly updated and contains records of shark finning policies and any past violations.	
CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
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	OK	Fishing vessels were purse seiners or pole & line. No drift nets were	

				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	used.  Vessels from traceback were either PS listed on PVR, or longliners or pole and line.	
				MRAG reviews RFMO compliance committee reports for any indication of vessels using large-scale pelagic driftnets.	OK	CC reports indicate no usage of large-scale pelagic driftnets	
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  OK	Every transaction of tuna raw material is accompanied by a signed Captains Statement containing information about the fishing vessel, including a declaration by the captain that the fish was caught in accordance with all laws and ISSF resolutions.  Vessels from traceback were either PS listed on PVR, longliners or pole and line.	
<b>CM</b>	<b>Category</b>	<b>Category Guidance</b>	<b>Gear Type</b>	<b>Means of Verification</b>	<b>Grade</b>	<b>Evidence</b>	<b>Corrective Action</b>
3.4	Skipper Best Practices	Unless exempt per Conservation Measure 8.1, skipper[1] has attended an	All Purse Seine	Verify that the company has purchased tuna only from vessels with	OK	All purse seine vessels viewed during the audit have been confirmed to	



						than 100GT	
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 <a href="http://www.tuna-org.org/GlobalTVR.htm">http://www.tuna-org.org/GlobalTVR.htm</a> or ISSF <a href="http://iss-foundation.org/download-monitor-demo/download-info/uvi-and-imo-number-instructions/">http://iss-foundation.org/download-monitor-demo/download-info/uvi-and-imo-number-instructions/</a> unless exempt per Conservation Measure 8.1.	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 vessels also meet this requirement.	OK	Company has an adequate system to ensure all vessels have UVI number through captain statements with UVI information and internally cross checked with databases.	
					OK	UVI numbers have been issued by ISSF for small-scale Indonesian purse seiners.  Vessels from traceback were either PS listed on PVR, longliners or pole and line.	
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	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.	OK	All purchases from large purse seine vessels were from vessels listed as compliant on the PVR.  Vessels from traceback were either PS listed on PVR, longliners or pole and line.	

		logbooks.					
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 approved by the ISSF Board and announced publicly through the ISSF website.	Large Purse Seine	The auditor will review evidence that the vessel meets the requirements for this exemption.	N/A		
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.	OK	CC reports indicate no unauthorized transshipments	
4.4(b)(i)	Transshipment Exemption – Papua New Guinea	No transactions in vessels that transship unless they	Large Purse	During the traceability exercise, the auditor		N/A	

		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).	Seine	reviews any instance of transshipment to assess whether the exemption applies.			
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	Reviewed IUU lists for IATTC, ICCAT and WCPFC and confirmed that no IUU had been purchased	
					OK	Vessels from traceback not listed on IUU black list	
				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	Company has an adequate system to ensure no purchase of IUU fish.  Every transaction of tuna raw material is accompanied by a signed Captains Statement containing information about the fishing vessel and a declaration by the captain that the fish was caught in accordance with all laws and ISSF resolutions, including no IUU.  Internally, Tri Marine maintains a list of all supplier vessels and	

						performs regular cross checks with various RFMO vessel lists to confirm proper registration and compliance.	
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	The company has a documented Product Recall and Withdrawal Procedure (Attached) that can identify and withdraw IUU products	
				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.	OK	ALL LPS ARE ON PVR  Vessels from traceback were either PS listed on PVR, longliners or pole and line.	
<b>CM</b>	<b>Category</b>	<b>Category Guidance</b>	<b>Gear Type</b>	<b>Means of Verification</b>	<b>Grade</b>	<b>Evidence</b>	<b>Corrective Action</b>
6.2(a).2.a	Requirements for Inclusion in Record of Large-Scale Purse	Provide certification from government body that	Large Purse	ISSF reviews evidence provided by vessel		N/A	

	Seine Vessels Fishing For Tropical Tunas	vessel was licensed to fish for tuna before December 31, 2012.	Seine	owner to determine whether vessel is eligible to be listed in the ISSF 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	
<b>CM</b>	<b>Category</b>	<b>Category Guidance</b>	<b>Gear Type</b>	<b>Means of Verification</b>	<b>Grade</b>	<b>Evidence</b>	<b>Corrective Action</b>
6.2(a).2.d	Requirements for Inclusion in	If vessel replacement is	Large	MRAG reviews evidence		N/A	



	Record of Large-Scale Purse Seine Vessels Fishing For Tropical Tunas	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 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).	Purse Seine	provided by vessel owner to determine whether vessel is eligible to be listed in the ISSF Record.			
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	
<b>CM</b>	<b>Category</b>	<b>Category Guidance</b>	<b>Gear Type</b>	<b>Means of Verification</b>	<b>Grade</b>	<b>Evidence</b>	<b>Corrective Action</b>
7.1	Registration of Controlled	Register all controlled	All	Auditor will obtain list of	OK	Cape Breton	

	Vessels	purse seine vessels on the PVR.	Purse Seine	controlled vessels from company and compare to PVR. Information may also come from industry and media sources.		Cape Cod Cape Elizabeth III Cape Ferrat Cape Finisterre Cape Horn Cape May cape San Lucas Cape Ann Captain Vincent Gann Solomon Emerald Solomon Jade Solomon Opal Solomon Pearl Solomon Ruby  ALL VESSELS ARE ON PVR	
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	