



ISSF Participating Company Compliance

Audit Checklist

Version 2017/1

Bolton Alimentari

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 : Rio Mare, Palmera, Saupiquet, Pêcheurs de France

Final Compliance Report (as of 12 March 2018, for activities in 2017)

General Audit Information

Please verify or complete the information in blue boxes.

Company Name	Bolton Alimentari
Affiliated Company Names	Saupiquet France, Bolton Adriatic, Bolton Austria, Bolton Belgium, Bolton Croatia, Colton Czechia, Saupiquet Deutschland, Bolton Hellas, Bolton Middle East JLT, Bolton Polska, Bolton Swiss, Bolton Nederland, Bolton Serbia
Company Address	Via L. Einaudi 18/22, Cermenate (Como) Italy
Contact Information (Name, Phone, Email)	Luciano Pirovano +39 031779348 lpirovano@boltonalimentari.it
Auditor Name(s)	Chris Spring Erin Wilson Jason Anderson Patricia Bianchi Jonah van Beijnen Oleg Martens
Audit Start Date	Week of 13 November, 2017
Audit End Date	Preliminary audit results issued: Week of 29 January 2018 Final audit results issued: Week of 12 March 2018
Time zone(s) for coordinating remote audit conference call	Italy
Language requirements for remote audit conference call	English/Italian/French

Compliance Snapshot				
Conservation Measure	Current	2016	2015	2014
1.1 RFMO Authorized Vessel Record	OK	OK	OBS	OK
1.2 RFMO Participation	OK	OK	OK	OBS
2.1 Product Traceability	OK	OK	OK	OK
2.2 Quarterly Data Submission to RFMO	MINOR	N/A	N/A	OK
3.1(a) Shark Finning Policy	OK	OK	OK	OK
3.1(b) Prohibition of Transactions with Shark Finning Vessels	OK	OK	OK	MINOR
3.1 (c) Prohibition of Transactions with Companies without a Public Policy	OK	OK	MINOR	OK
3.2 Large-scale Pelagic Driftnets	OK	OK	OK	OK
3.3 Full Retention of tunas	OK	OK	OK	OK
3.4 Skippers Best Practices	OK	OK	OK	OK
3.5 Transactions w/ Vessels that use Only Non-Entangling FADs	OK			
4.1 UVI-IMO	OK	OK	OK	OK
4.2 Purse Seine Unique Vessel Identifiers	OK	OK	OK	OK
4.3 Observer Coverage	OK	OK	OK	OK
4.4 Transshipment	OK	OK	OK	OBS
5.1 IUU Fishing	OK	OK	OK	MINOR
5.2 IUU Product Response	OK	OK	OK	MINOR
6.1 Transaction Ban for LPS vessels not Actively Fishing for Tuna on Dec. 31, 2012	OK	OK	OK	OK
7.1 Registration of Controlled Vessels	OK	OK	OK	OK
7.3 Purchases from PVR Vessels	OK	OK		
8.1 Exemption for Very Small Purse Seine Vessels	OK	N/A	N/A	N/A

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 2018/1.
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 2018/1.

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

	<ul style="list-style-type: none"> · 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
<p>MRAG Americas’ procedures</p>	<p>MRAG Americas’ procedures for handling non-conformances for PCs are as follows:</p> <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. · 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.
<p>Corrective Action Responses (CARs)</p>	<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 Type	Means of Verification	Grade	Evidence	Corrective Action
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	<p>Company does not conduct direct transactions with fishing vessels, but instead sources loins and finished goods. Company has a Tuna Supply Policy to ensure all purchases are from vessels listed on the Proactive Vessel Register and in good standing. If vessel has a red X on PVR, it is flagged in the Supplier Workplace Portal. Fishing vessels not registered in the ISSF PVR list are automatically red-flagged in the SWP and require additional checks re whether they meet ISSF conservation measures.</p> <p>All selected vessels that are part of the traceability exercise are properly listed in RFMO authorized vessel records.</p>	
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 vessels that are part of the traceability exercise are properly flagged and are a member or 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 of can codes or sales invoices by label and destination from which the company will conduct traceability	Ok	The company has a suitable traceability system in place that allows all product codes and produced volumes to be traced back through all stages of the supply chain including the vessel and vessel trip.	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
				exercises. If the company produces cans from loins, or sells loins as a finished good, these products must be included in the assessment.			
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 ISSF, for each quarter, Participating Companies are required to report (no later than the last day of the following calendar quarter) if they have no purchase of round fish (in total or from a typical RFMO region).</p> <p>c. A Participating Company that only purchases loins and finished goods from other ISSF participating companies is exempt from sending RFMO data. However, company must affirm so quarterly via an unprompted email to rfmodata@iss-foundation.org</p>	All	<p>Auditor checks that information has been sent by companies to RFMO for all purchases.</p> <p>Auditor checks if PC has sent quarterly report to MRAG indicating no purchase of round fish. Auditor notes that this requirement did not come into effect until October 2016, therefore if company failed to report no purchases of round fish, this should be noted as an observation.</p> <p>Auditor checks that email has been sent to rfmodata@iss-foundation.org indicating that company only purchases loins and/or finished goods from other ISSF Participating Companies. Here again, requirement came into effect in Oct 2016, thus if company did not send</p>	Minor	Company provided all the required statements, but these were not received within the timeframe set by this CM. Company has since provided auditor with evidence of internal system to ensure future notices/statements are sent on time.	

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				the emails, it should be noted as an observation.			
3.1(a)	Shark-Finching Policy	Company establishes and publishes policy prohibiting shark finning.	All	Auditor reviews company website for published policy.	Ok	http://responsiblequality.riomare.com/download/BOLTON_REPORT_ENG.pdf	
3.1(b)	Prohibition of Transactions with Shark-Finching 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	<p>Company has system in place to check if suppliers' vessels are listed on the PVR and in good standing for this conservation measure. If vessel is not listed on the PVR, company checks vessel name against RFMO lists of vessels having shark finned.</p> <p>No evidence of shark finning was found on RFMO compliance reports or online sources.</p> <p>None of the selected vessels that are part of the traceability exercise have been associated with shark finning.</p>	
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	Ok	<p>Company has system in place to check that suppliers' vessels are listed on the PVR and in good standing for this CM.</p> <p>For non-PVR vessels, company provided evidence of policies prohibiting shark finning and/or contract system whereas vessel owner takes notice of company policy and</p>	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
				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.		commits not to fin sharks. All of the vessels that are part of the traceability exercise have a policy in place prohibiting shark finning and all vessels are listed in the PVR are compliant with this measure.	
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	No mention of pelagic driftnets in quarterly 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.	
				MRAG reviews RFMO compliance committee reports for any indication of vessels using large-scale pelagic driftnets.	Ok	No mention of pelagic driftnets associated with company's source vessels in 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	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	Ok	PVR registered purse seine vessels company sourced from were in good standing for this CM. For non-PVR vessels, company provided evidence of full tuna retention policies and/or contract system whereas vessel owner takes notice of company	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		does not require full retention, vessel must have documented and implemented policy in accordance with this conservation measure.		full retention of tunas.		<p>policy and commits to retain all tunas.</p> <p>All selected purse seine vessels that are part of the traceability exercise retain their tuna as per PVR records.</p>	
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 review of guidebook, video, including list of skippers, method of review and dates of completion.	Ok	<p>Purse seine vessels registered on the PVR were in good standing for this CM.</p> <p>For non-PVR purse seiners, company provided evidence exempting them from this measure (see CM 8.1).</p> <p>All skippers of the selected purse seine vessels that are part of the traceability exercise read the ISSF guidebook as per PVR records.</p>	

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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 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> <p>The vessel owner must have a policy in place and published no later than April 18, 2017. Said policy will be effective for new FAD deployments no later than 12 months after the vessel owner adopts its policy. 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>	All Purse Seine and Support Vessels	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 a in effect mandatory requirement for NE FADs, which equals or surpasses ISSF guidelines for NE FADs. Each vessel policy must be dated and must be in place no later than April 18, 2017 and come into effect for all new FAD deployments no later than 12 months after adoption date.	Ok	All selected purse seine vessels that are part of the traceability exercise have a Non-Entangling FAD policy in place as per PVR records.	

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		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.					
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 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 purchases were from either PVR-listed LSPS vessels in good standing for this CM, or from vessels that only operate within their National EEZ, thus exempting them from obtaining an IMO.</p> <p>Note: As of December 31st, 2017, IMO numbers will be required for all vessels of at least 12m LOA and which operate in international waters.</p> <p>All purchases that are part of the traceability exercise are from vessels that have an UVI-IMO number.</p>	
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/GlobalTVR.htm or ISSF http://iss-foundation.org/download-monitor-demo/download-info/uvi-and-imo-number-instructions/ unless exempt	All Purse Seine	Auditor reviews company method to ensure that all vessel purchases meet this criterion. A sample of non-PVR purchases will be reviewed to assess whether the company system is adequate to ensure that non-PVR	Ok	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.	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
		per Conservation Measure 8.1.		vessels also meet this requirement.			
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.	Ok	All LSPS vessels listed on PVR with no red flags for this CM. All selected large purse seine vessels that are part of the traceability exercise have 100% observer coverage as per PVR records.	
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	No transshipments associated with PS vessels this company sourced from through its suppliers.	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
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	None of the vessels the company sourced from were listed on RFMO or National (Indonesia) IUU lists.	
				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 provided copy of its tuna purchasing policy, highlighting how it screens its suppliers and the vessels they use, to prevent IUU fish from entering its supply chain. 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 evidence of two internal procedures to manage and withdraw products in an eventual presence or use of IUU fish. No evidence of IUU was found on http://iuu-vessels.org/iuu	
				Company initiates market withdrawal of IUU products.	Ok	Based on online references the company has made no IUU related market withdrawals in the past 12 months.	
6.1	Transaction Ban for	Demonstrate that all purchases	Large	The auditor reviews a	Ok	All LSPS vessels that company	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
	Large-Scale Purse-Seine Vessels not Actively Fishing for Tuna as of December 31, 2012	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).	Purse Seine	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.		sourced from through its suppliers, were properly listed on the Record. The company does not make direct purchases from any vessels, however all vessels that are part of the traceability exercise are listed on the PVR or on the ISSF large-scale purse seine record.	
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.	Ok	Company provided list of controlled vessels, and all were registered on the PVR and in good standing.	
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 requested to verify the accuracy of trip dates.	Ok	Company does not make direct purchases from vessels, however loins and finished goods it received from its suppliers where from large-scale purse seine vessels listed on the PVR.	

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Corrective Action
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.	Ok	Company provided vessel registrations and link to Government database with vessel characteristics, for all vessels under 30GT that it sourced from.	