



Bolton Food

The following information is based on data provided by the companies, which has been independently audited for completeness and accuracy (Pursuant to the Greenpeace & Bolton Agreement Audit Policy Document and Standard Operating Procedures)

Compliance Report (as of 22 December 2020, for activities in 2018 & 2019)

Bolton Food Commitments 2018-2024	Current¹
1.1 Source 100% of our tuna from sustainable fisheries (those in robust FIP or MSC certified) by 2024	IP
2.1 Source 50% of raw material from more selective fishing methods by 2020.	IP
2.2 (a) FAD management measures – Sourcing only from vessels using non-entangling FADs	OK
2.2 (b) FAD management measures – Sourcing only from vessels using max of 300 active drifting FADs	IP
2.2 (c) FAD management measures – Sourcing only from vessels that submit FADs use data to RFMOs	IP
2.3 Promoting the use of FAD management best practices and encouraging the establishment of FMPs ²	IP
2.4 Identifying additional measures for FADs	OK
3.1 Financing initiatives to support MPAs and reduce ocean pollution	OK
4.1 Getting supply chain ISO 22005 certified	OK
4.2 Product packaging – tuna species, ocean of catch and fishing method printed on can/pouch	IP
5.1 Supplier compliance with Bolton Group Code of Ethics and Human Rights Policy	IP
5.2 Supplier compliance with Bolton Food Tuna Supply Policy	NS
5.3 Tri Marine Ethical Sourcing Policy	IP
5.4 Commitment to the Seafood Taskforce Social Standards	OK
6.1 Shared Value Project	OK

Audit purpose	
Audit objective	The purpose of this audit is to assess Bolton’s compliance with all measures in place for the year of activity being audited.
Audit criteria	This audit covers all measures as defined in the Greenpeace and Bolton Agreement: Audit Policy Document and Standard Operating Procedures, Version 2020/1.
Audit outcomes	The auditing serves as an assessment of conformance by Bolton. Any significant gaps in conformance and where corrective actions may be necessary will be specified. Any actions taken pursuant to the results of the audit will be at the discretion of Greenpeace and Bolton.

¹ The key to the grades can be found in the ‘grading’ section of Conformance with Commitments table, on the following page.

² FAD Management Plans (FMPs)

Purpose of this document	All auditors will follow this checklist for conducting Bolton Compliance audits. The completed and approved copy of this checklist will serve as the audit report.
Other relevant documentation	Greenpeace & Bolton Agreement: Audit Policy Document and Standard Operating Procedures, Version 2020/1.

Conformance with Commitments	
Non-conformances	During this first audit, MRAG Americas advises not to use the ‘conformance versus non-conformance’ grading system, which is typically used for mature audit programs. Indeed, during the initial year of a new audit program, and especially when firm due dates do not impact the period being audited, it is preferable to describe the actual situation, along with an assessment of whether a commitment has been met fully, is in progress, or has not been started. This approach provides stakeholders with the information they need to review progress on the Agreement and decide whether a grading system needs to be implemented for future reports.
Grading	MRAG Americas defines audit findings as follows: <ul style="list-style-type: none"> · Commitment Met (OK) – Bolton has provided evidence of compliance with a measure. · Commitment In-Progress (IP) – Bolton has demonstrated progress toward the 2024 commitment. · Commitment Not Started (NS) – Bolton has not yet provided evidence that this commitment has been met, or that work is underway to meet the commitment.
MRAG Americas’ procedures (applicable for audit reports starting in year 2, and based on the grading system agreed to between stakeholders)	MRAG Americas’ procedures for handling non-conformances for Bolton are as follows: <ul style="list-style-type: none"> · MRAG Americas substantiates conformance through documented evidence provided by Bolton. · Where Bolton 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, Greenpeace and Bolton may agree on a Corrective Action Response (CAR). The corrective actions must be in place, and evidence of addressing the condition must be supplied to MRAG Americas, within an agreed timescale, or a follow up audit may be required.
Corrective Action Responses (CARs) (applicable for audit reports starting in year 2, and based on the grading system agreed to between stakeholders)	To rectify non-conformances, a CAR may be applied. The nature of the CAR is at Bolton’s and Greenpeace’s discretion. MRAG Americas does not advise on what specific corrective action Bolton 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 resulting from identified non-conformances. Such action will be at the discretion of Bolton and Greenpeace.

Bolton Commitments and Conformance Levels

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence
1.1	Sustainable Fisheries	Source 100% of our tuna from sustainable fisheries (those in a robust FIP or MSC certified) by 2024.	All	<p>Starting with Calendar Year 2018 (CY18), auditor will determine % of Bolton’s tuna sourced from fisheries that are either MSC certified or in a robust FIP³.</p> <p>Auditor will review quarterly reports (supplied directly by Bolton to MRAG Americas and using a format similar to the one developed by ISSF under Conservation Measure 2.2) to determine where the tuna was harvested and compare those locations to those listed on MSC’s website and www.fisheryprogress.org.</p> <p>Auditor will conduct this exercise for each annual audit, and CY18 figures will represent the baseline against which progress will be measured.</p> <p>Auditor reviews Bolton procurement policy.</p>	IP	<p>The Bolton Food Tuna Supplying and Sourcing Policy stipulates the company is committed to increase sourcing from Marine Stewardship Council (MSC) certified fisheries. For uncertified fisheries, the company has set the target to ensure Robust Fishery Improvement Projects (Robust FIPs) are in place.</p> <p>Bolton indicated that to ensure its sourcing policy is understood by procurement staff, they are required to take part in key Corporate Social Responsibility (CSR) meetings and updates. The procurement director is a member of the Global Leadership Team and the Vessel Committee, while the procurement manager is a member of the CSR Committee. These two individuals are responsible for making sure all procurement staff remain aware of Bolton sourcing goals.</p> <p>Based on the sourcing data provided, in 2018 and 2019, the company increased its percentage (by over 14%) of tuna originating either from an MSC fishery or a Robust³ FIP.</p>
2.1	Sustainable Fishing Methods	Source 50% of raw material from more selective fishing methods with a lower level of by-catch and environmental	Pole & Line, Handline	Auditor reviews quarterly reports submitted by Bolton for CY18 and CY19, to determine the % of raw material which comes from	IP	The Bolton Food Tuna Sourcing Policy, under point 4, indicates tuna should preferentially be sourced from more selective fishing methods with a lower level of by-catch and environmental

³ The term ‘Robust’ is understood to mean a Comprehensive FIP (of grade A, B or C) as listed on www.fisheryprogress.org.

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		<p>impact [Pole & Line, Handline, Small-scale sustainable vessels*, FAD-free purse seine] by 2020.**</p> <p>* It is understood that small-scale vessels are those less than 20m LOA and which carry out 'short' fishing trips of no more than 2 weeks.</p> <p>** Note: "selective fishing methods" are self-reported by the captain. Until Electronic Monitoring Systems (EMS) are commonly used, self-reporting is of limited use to gain assurances other practices are not used.</p>		<p>selective fishing methods.</p> <p>Auditor will conduct this exercise for each annual audit, and CY18 figures will represent the baseline against which progress will be measured.</p> <p>Auditor reviews Bolton procurement policy.</p>		<p>impact (pole and line, hand line, FAD-free purse seine, small-scale purse seine vessels fishing only in the EEZ of their flag state and participating in a FIP) and provide appropriate documentation (e.g., catch certificates, Captain statements, third party CoC audits). Bolton noted it is the responsibility of the procurement director and manager to ensure the procurement staff are aware of the sourcing goals for selective fishing categories.</p> <p>Based on the sourcing data reviewed by the auditor, between 2018 and 2019 the company increased its sourcing (by over 4%) of raw material from more selective fishing methods with a lower level of by-catch and environmental impact.</p>
2.2(a)	Sustainable Fishing Methods	Source 50% of raw material from large-scale purse seine (lsps) vessels with FAD management measures in place, by 2020: Only from non-entangling FADs (consistent with ISSF requirements).	Large-scale Purse Seine	<p>Auditor reviews quarterly reports to identify large-scale purse seine vessels. Auditor then checks the Proactive Vessel Register to ensure those vessels have an in-effect NE FAD policy.</p> <p>Auditor determines the % of vessels using only NE FADs as of CY18. Auditor will conduct this exercise for each annual audit, and CY18 figures will represent the baseline against which progress will be measured.</p>	Ok	<p>A random sample of large-scale purse seine vessels was taken from the sourcing data provided for 2018. All vessels (100%) were registered on the Proactive Vessel Register (PVR) and in good standing for the Non-Entangling FAD Policy conservation measure (CM 3.5).</p> <p>A similar exercise looking at 2019 data yielded 100% compliance as well.</p> <p>The company procurement guidelines require that it sources tuna only from large-scale purse seine vessels registered on the PVR, and which are in good standing for CM 3.5.</p>

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				Auditor reviews Bolton procurement policy.		
2.2(b)	Sustainable Fishing Methods	<p>Source 50% of raw material from Ips vessels with FAD management measures in place, by 2020: Max 300 active drifting FADs per vessel* and per ocean**. In any ocean or fleet where FADs number is already less than 300 there will not be any increase up to that number.</p> <p>*This should be viewed as not exceeding 300FADs per vessel as part of the fleet average.</p> <p>**By 'ocean' we mean RFMO area.</p> <p>As of 2018, all Bolton owned vessels: -Cannot use supply vessels; and -Have the following FAD set limits: max 150 active FADs for the Atlantic Ocean (Saupiquet), max 300 active FADs for the Pacific Ocean (Garavilla)</p>	Large-scale Purse Seine	<p>Auditor looks at Bolton data on the number of Ips suppliers that use FADs, and randomly selects 12 vessels to verify:</p> <p>(i) That no more than 300FADs per vessel have been utilized.</p> <p>(ii) # of FADs utilized in each Ocean (RFMO area).</p> <p>Auditor will conduct this exercise for each annual audit, and CY18 figures will represent the baseline against which progress will be measured.</p> <p>-Auditor reviews supplier policies on the deployment and build design of NE FADs.</p> <p>-Auditor reviews FIP reports re FAD design and deployments.</p> <p>Auditor reviews Bolton procurement policy.</p>	IP	<p>The company's Tuna Sourcing Policy indicates that for tuna caught by large-scale purse seiners, staff should ensure FAD management measures are in place including:</p> <ul style="list-style-type: none"> - Not exceeding 300 active (i.e. deployed and activated within 5 miles from the boat only once) drifting FADs per vessel across the fleet and per RFMO area; - Use only fully non-entangling FADs made primarily with natural materials by 2024. <p>No data was collected by the company for 2018, so a baseline could not be established for that year. For 2019, a data summary provided by the company indicates the goal was to source 45% from LPS vessels with these measures in place, and that the actual result was 40,1%.</p>
2.2(c)	Sustainable Fishing Methods	Source 50% of raw material from large scale purse seine vessels with FAD management measures in place, by	Large-scale Purse Seine	Auditor reviews Bolton communications with suppliers requesting that FAD data be shared with RFMOs, and with RFMOs asking them	IP	According to 2019 Bolton fleet meeting minutes the following has been agreed in terms of data reporting:

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		<p>2020: Catch data submission to RFMOs, including FADs use data, within 4 months.</p> <p>Update 9/3/19: Together with WWF, Bolton have agreed to publish on www.transparentsea.org all "owned vessel(s)" trips every 6 months (not every 4 months). Vessel owners communicate data directly to NAVAMA. There is an agreement between NAVAMA and WWF to regulate those frequencies.</p>		<p>to indicate if/when FAD data is received.</p> <p>Auditor reviews Bolton procurement policy.</p> <p>Note: As of 2018, all Bolton owned vessels are listed on www.transparentsea.org where the data related to the fishing trips is communicated within 6 months. Such data will be public; thus they will be available to RFMOs as well.</p>		<p>- Garavilla agrees to submit data based on whichever timeframe is agreed to by the group;</p> <p>- Saupiquet agrees to share the information every 6 months; and</p> <p>According to company's analysis, Garavilla's fleet is currently using fewer FADs than the number agreed to in the Bolton-Greenpeace commitment. Their use is mapped and reported to AZTI. Auditor subsequently reviewed AZTI communications confirming this statement.</p> <p>Auditor verified that Garavilla and Saupiquet vessels do appear on www.transparentseas.org.</p>
2.3	Sustainable Fishing Methods	By 2019 Bolton will promote the use of FAD management best practices with its suppliers and encourage them to establish FAD Management Plans.	Large-scale Purse Seine	Auditor reviews communications between Bolton and its suppliers re the subject of best practices in FAD Management. If supplier FAD management plans are available, those will be reviewed to determine if they note the best practices as described in the following ISSF Study .	IP	<p>The company provided evidence that in 2018 and 2019 it communicated with its suppliers (during fleet meetings) regarding the importance of best practices in FAD management.</p> <p>Auditor was able to review a FAD Management plan which includes the Saupiquet vessels (doc. 43).</p> <p>Regarding Garavilla, auditor reviewed FAD data collection forms and diagrams showing how AZTI is collecting FAD data and sharing it with RFMOs. Auditor also reviewed the first page of a report to an RFMO as an example.</p>

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2.4	Sustainable Fishing Methods	By 2020 Bolton will identify additional measures, such as limits on the number of FAD sets, targets for biodegradable FADs and supply vessels management.	Large-scale Purse Seine	Auditor reviews Bolton draft plan for achieving this commitment. If timeline has been established by Bolton, it will be used to determine progress during annual audits.	Ok	<p>The company provided evidence that in 2018 and 2019 it identified and investigated potential additional management measures, such as limits on the number of FAD sets, targets for biodegradable FADs and supply vessels management. Discussions on this topic were also held during fleet meetings (bi-annually), at ISSF Implementation Team meetings (bi-annually) and in FIP meetings.</p> <p>In 2019, the company participated in a joint research project with IATTC and WCPFC on biodegradable FADs.</p> <p>The company is also engaged with Aquafil in a project to investigate the recycling of old discarded fishing nets.</p> <p>Finally, the company engaged in a FAD beaching and FAD recovery study performed in 2019.</p>
3.1	Support Marine Ecosystems	Finance initiatives aimed at supporting marine protected areas or at reducing ocean pollution.	All	<p>Auditor will review evidence (such as grant awards) provided by Bolton indicating its support MPAs and/or for reducing marine pollution.</p> <p>Auditor checks evidence with recipients of the financial assistance, and/or through reviewing actions taken across the Bolton owned fleet or fleets sourced from.</p>	Ok	<p>Through support to WWF the company is engaged in a project to assist in the protection of Tetepare Island in the Solomon Islands. The company has made funds available to buy equipment and to organize several community related projects, and a turtle tagging program. More information on the project and Bolton's support can be found here: https://qualitaresponsabile.it/sites/riomarequre/files/download/wwf_bf_par</p>

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						<p>tnership_progress_report_year_2.pdf pag.30</p> <p>Auditor also reviewed evidence (copy of contract) of company's engagement in Italy with assisting the management of a local marine protected area. It supports the MASTER project which combats bottom trawl fishing along the coast of the area. It assists in the management of the Foca Monaca Observatory in Castello di Punta Troia in Marettimo, and it is helping with the improvement of the Recovery Centre for sea turtles in Favignana.</p> <p>Finally, as mentioned under measure 2.4, the company is engaged in projects to find ways to reduce the waste generated by its fishing activities, including the use of biodegradable FADs, FAD recoveries and the recycling of fishing nets. These efforts minimize impacts on Marine Protected Areas.</p>
4.1	Traceability	Trading products supply chain is ISO 22005 traceable by 2018.	All	Auditor reviews the ISO22005 certificate and ensures it covers the 'trading products supply chain'.	Ok	The company is ISO 22005 certified. The certificate covers canned tuna and tuna pate from the following brands: Rio Mare, Saupiquet, Palmera and Pêcheurs de France.
4.2	Traceability	Tuna species, ocean of catch, FAO area and fishing method are printed on product packaging (consumer-facing).	All	Auditor requests list of all the different types of consumer-facing products sold by Bolton. Auditor then reviews random sample of four products for CY18 and checks that required information is printed on packaging.	IP	<p>During the 2018 and 2019 ISSF Participating Company audits, Bolton provided evidence that randomly selected consumer-facing products displayed species name and ocean of capture on packaging.</p> <p>Company runs two real-time traceability websites, one for Rio Mare</p>

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						<p>and the other for Saupiquet. Auditor ran can codes through the sites, which returned species name, ocean of capture and gear type.</p> <p>Saupiquet: https://www.saupiquet.com/tracabilite/</p> <p>Rio Mare : https://www.riomare.ca/traceability/</p>
5.1	Human Rights	<p>All suppliers sign and comply with the Bolton Group Code of Ethics and Human Rights Policy.</p> <p>Note: During the initial audit, it is expected that Bolton will explain what it has done to date (i.e. site visits, hotline, etc.) to ensure suppliers “comply” with the Code of Ethics and Human Rights policy.</p> <p>Thereafter, Bolton can explain steps taken to ensure sustained independent social audits (if applicable).</p> <p>The above will also apply to 5.2 below, and Oxfam has been tasked with verifying compliance.</p>	All	<p>Auditor reviews quarterly RFMO reports to identify Bolton suppliers. Auditor randomly selects 4 suppliers and asks for evidence that they have signed the Bolton Group Code of Ethics and Human Rights Policy.</p> <p>Auditor checks Bolton procedure to ensure the Code of Ethics is signed by supplier(s) prior to procurement taking place.</p> <p>Auditor reviews procedure Bolton follows to ensure supplier(s) complies with policy.</p>	IP	<p>The company indicated that its Tier 1 supplier is responsible for making sure suppliers sign and comply with the Bolton Group Code of Ethics and Human Rights Policy. Company also indicated contracts include a clause requiring suppliers to respect the Code of Ethics.</p> <p>Because the Group Code of Ethics and Human Rights Policy was being rolled out by Tier 1 supplier, auditor was unable to complete the random sampling of suppliers during the Year 1 audit. Progress on the roll-out will be reflected in the Year 2 audit.</p>
5.2	Human Rights	All suppliers sign and comply with the Bolton	All	Auditor reviews quarterly RFMO reports to identify	NS	Company indicated work on this commitment is underway, with results

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		Food Tuna Supply Policy that includes specific requirements on human rights standards on vessels.		<p>Bolton suppliers. Auditor randomly selects 4 suppliers and asks for evidence that they have signed the Bolton Food Tuna Supply Policy.</p> <p>Auditor checks Bolton procedure to ensure the Tuna Supply Policy is signed by supplier(s) prior to procurement taking place.</p> <p>Auditor reviews procedure Bolton follows to ensure supplier(s) comply with policy.</p>		ready to be shared in 2021.
5.3	Human Rights	<p>Tri Marine Ethical Sourcing Policy*</p> <p>* Bolton's Code of Conduct applies to all vessels it sources from, including the Tri Marine fleet and all of Tri Marine's suppliers.</p>	All	<p>Auditor randomly selects 4 vessels supplying loins and checks that they have signed the Tri Marine Ethical Sourcing Policy.</p> <p>Auditor checks Bolton procedure to ensure the policy is signed ahead of procurement taking place.</p> <p>Tri Marine will also be asked to explain what procedures they have in place to ensure their suppliers comply with the policy.</p>	IP	The company indicated that Tier 1 supplier is responsible for making sure all suppliers sign its Ethical Sourcing Policy. Tier 1 supplier applies an Ethical Sourcing policy consistent with the Seafood Task Force Standards Auditor presented Tier 1 supplier with four randomly selected vessels and asked to see their signed policies. Sufficient evidence for 1 vessel was received, but not for the other three. Progress on this commitment will be reviewed during the Year 2 audit..
5.4	Human Rights	<p>Commitment to the Seafood Taskforce Social Standards*</p> <p>* Bolton's Code of Conduct goes further than the STF Social Standards.</p>	All	Auditor reviews evidence provided by Bolton which shows its support for the Seafood Taskforce Social Standards. Evidence may include meeting minutes reflecting Bolton interventions, advocacy	Ok	Auditor notes that Bolton's Code of Conduct, which applies to all its suppliers, goes further than the Seafood Taskforce Social Standards.

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence
				efforts, letters to suppliers, etc.		
6.1	Shared Value Project	Commitment to promote shared value initiatives with coastal communities where Bolton sources from.	All	<p>Auditor reviews evidence presented by Bolton demonstrating investments benefiting coastal communities in the locations it sources tuna from.</p> <p>Auditor checks quarterly reports to verify tuna was sourced from locations where Bolton engaged in shared value initiatives.</p>	Ok	<p>Through WWF the company is engaged in a project to assist in the protection of Tetepare Island in the Solomon Islands. The company has made funds available to buy equipment and to organize several community related projects, and a turtle tagging program. More information on the project and Bolton's support can be found here: https://qualitaresponsabile.it/sites/riomaregure/files/download/wwf_bf_partnership_progress_report_year_2.pdf pag.30</p>

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