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SEAFOOD ETHICS
ACTION ALLIANCE



Section 3.	Management											
3.1 General		Cross-over with GDST	Cross-over with SPSv5	Cross-over with RFVS	Cross-over with APR	Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice	Internal or external question	Rewritten question (if external)
.1.1	Does the organization have systems in place to manage critical aspects of legality? These should comply with requirements such as the EU IUU Regulation, relevant policy, standards and labour conventions. These systems should include traceability, processes, information verification and transparency.	0.3	2.12.1 The facility shall prepare and implement standard operating procedures, quality procedures, look safety management procedures, social accountability procedures, and work instructions for all processes and operations having an effect on product safety, legality and quality.  9.4.1 Products shall be packed in bags, boxes or master cartons, britestack pallets (i.e. canned) that are properly labeled with all information, including allergens, as required by local legislattion and legislation of the country of destination.	The vessel, or group of vessels must have a management system in place to ensure compliance with legal requirements (see CP1 section 1, 3 and 4).	ANNEX C- RP B95.01 & RP B95.02	Required	A company should have systems in place to manage critical aspects of legality, that comply with EU IUU Regulation, relevant policy, standards and labor conventions. These systems should include:  -Traceability - third party management system certification such as BRC/IFS will help to ensure a management system is n place, as will MSC chain of custody, although these do not specifically cover aspects for IUU  -Processes -Information verification  -Transparency	A company sourcing policy explicitly stating its desire to avoid buying IUU fish - which also makes reference to the Modern Slavery Act if UK based - or other relevant statutory due diligence requirements is written and available. The policy includes the desire to engage with the supply chain to transition/improve supply chains that have been risk assessed and identified as in need of improvement. The policy is communicated to all suppliers, and basic procedures to check product, supply chain (including EUI IUI Regulation catch certificates), vessels, and suppliers are legal as far as it is practical to check.		achieved with public reporting of policy, practices, supply chains. Full supply	Internal	
	Do the managers of the organization engage on improvement work with other suppliers or actors in the supply chain (e.g. audits, reviews, site visits, etc.)?		improvement of all elements of the Quality  Management System in order to ensure compliance with	through which downstream buyers in the supply-chain can engage with fishing vessels to improve responsble	ANNEX D & 5.3- RP B95.02	Risk assessment consideration	Company managers should engage on improvement work with other suppliers or actors in the supply chain by:  -Conducting audits and reviews  -Conducting regular site visits, engaging in fishery or aquaculture improvement projects that specifically tack IUU relevant issues, supporting research, and advocating for legislation adoption and effective implementation	keeping units/SKUs is available within the business, which details basic information	The company seafood sourcing policy is formally acknowledged by all suppliers. The list of products and suppliers have been risk assessed and categorised into high, medium or low risk according to the company policy, with high risk products and high risk suppliers having either written and agreed improvement plans, or are working to have agreed plans within an agreed timpframe. Audits of high risk supply chains are taking place, ideally using third parties, or are being arranged.	medium risk. All suppliers are working to achieve sustained low risk categorisation with routine risk assessment and monitoring systems established to		
3.1.3	Where improvement work identifies corrective actions that can be completed to satisfy the organization's standards/policies, is support (e.g. approval/verbal, finances, time, meetings, etc.) given to the supplier or actor?		2.1.5 The Quality and Food Safety Management Systems shall: 2.1.5.5 implement action necessary to achieve planned results and continual improvement.		5.3, 8.2, 9.2- <b>RP B95.01</b>	Risk assessment consideration	Support in the form of approval/verbal, finances, time, meetings, etc. should be given to the supplier or supply chain actor in need in need of corrective actions, in order to satisfy the organization's standards/policies. Evidence of this support should be able to be provided upon request.	As above	As above	As above	Internal	
	is all seafood in the supply chain of the organization addressed using the same systems and level of scrutiny? Traceability and legality should be a minimum requirement for all seafood.	Implementation of GDST standards requires the same level of scrutiny for all seafood.	9.1.1 Facilities that source raw material from both wild- caught and farm-raised sources shall properly identify, segregate and label products from different wild-caught and/or aquaculture sources and shall indicate any relevant certifications.		2- RP B95.02	Required		A process is in place which is actively trying to achieve the same level of traceability, based on a risk assessed basis, for all sources of seafood that are within the scope of the policy. The scope might initially be limited, so that the process and practices of mapping and supply chain interrogation are being established. When defining the scope of the sourcing policy, consideration of volume of trade and potential influence on the supply chain should be made.		All seafood within the scope of the company's seafood buying is either assessed as being low risk, having been traced back to source, or is within a process, with the aim to be achieved in a time-bound commitment.	Internal	
3.2 The IUU 3.2.1	Regulation  Does the organization document which of the products they sell are covered by the EU IUU Regulation?	GDST implementation would uniquely label units going to EU and those not.	9.4.1 Products shall be packed in bags, boxes or master cartons, britestack pallets (i.e. canned) that are properly labeled with all information, including allergens, as required by local legislation and legislation of the country of destination.	The vessel shall be able to evidence all the legal documents required to fish (see clause CPI 1.28). This will meet the requirements of the EU IUU Regulation.	3.1, 6.1 & ANNEX A- UNE 195006	Required	A company should document which of the seafood products they sell are covered by the EU IUU Regulation within their buying specifications and their supplier approval lists. These include:  -All imports of fresh and frozen, wild marine capture fishery products, both whole and processed -Imports into the EU including catches made by non-EU vessels landed directly in an EU port, or landed in a third country port and subsequently exported to the EU, whether processed or not processed -Imports into the EU including catches made by EU vessels, landed and imported in a third country and from their imported in the EU, whether processed or not -Exports from EU, including those with a catch certificate if required by a third country who information on the EU IU IU Regulation can be found at: <a href="http://www.iuuwatch.eu/new-background-to-the-iuu-regulation/">http://www.iuuwatch.eu/new-background-to-the-iuu-regulation/</a> .	data on the supply chains of the company so that within as short a time as possible they know which products	gaps in data, along with additional catch information such as bycatch and total catch of vessel during trip, plus stof all vessels used to supply, vessel identifiers, flag, landing port/s, and details of any transhipment.	Best practice information is routinely available with additional information documenting declared retained catch data quantity and product form per box, batch or tank, as well as details on beneficial ownership, background of captain, and other elements as explained in detail elsewhere, providing full supply chain transparency.	Internal	
3.2.2	Does the organization have management systems in place covering the requirements of the EU IUU Regulation (if sold)?	Applying GDST standards takes the EU IUU requirements into account.	2.12.1 The facility shall prepare and implement standard operating procedures, quality procedures, food safety management procedures, social accountability procedures, and work instructions for all processes and operations having an effect on product safety, legality and quality.	This will meet the requirements of the EU	3.1, 6.1- UNE 195006	Required	A company should have management systems in place that cover the requirements of the EU IUU Regulation if it sels any of the products covered by this Regulation. Management systems will notube traceability system and policy, incoming raw material lot assessment, and performance reporting which specifically covers IUU related topics such as ports of landing, timely presentation of catch certificates, cross checking UVIs.	communicated to suppliers. Information on both seafood sources and people involved within the supply chain should	Traceability systems capture all steps of people, product and process through which the seafood passes or is handled, as well as collating catch certificates for species covered by the EU IUU Regulation. Verification of this information happens routinely via internal or third party audit, which informs what actions need to be taken to be able to continue sourcing products of high risk.	established monitoring system that collects information on the seafood and people involved in the supply chains, with data collected in accordance with GDST		
3.3 Policies	and Processes											
3.3.1.1	Are documented policies and processes in place that provide requirements for full chain traceability to be ensured?		9.0 Traceability Management 9.1.2 Proper identification shall be maintained for each lot, for each wild-caught and farmraised source, on all documents and at each step of the process flow from raw material receiving, handling, processing, packaging, storage and dispatch. Records shall be maintained to ensure product identity and demonstrate that products from wild-caught and aquaculture sources and those from certified and non-certified sources are not mixed.	vessel identifier, species name and stock, sea area code of capture, flag State, fishing trip dates (including landing date), Declared retained catch data	3.3, 6.1, & ANNEX J - UNE 195006 INNEX D - RP B93.02	Required	The PAS 1550 defines full chain traceability as the "linkage from the point of capture to the consumer of one stage of production at a time, from any stage of production to any other point along the entire supply chain (often through documentation)". In other words, capturing product information that tracks it at every stage of the supply chain from verses to retailer.  Full chain traceability policies and processes should outline but are not limited to: how risk is assessed, type of data required, methodology of data collection, frequency of data collection audit schedule, and response to gaps in data.  The co-mingling of seafood from different sources can pose challenges to achieving full chain traceability. As such, companies may use a combination of recognised traceability standards and schemes to inform full chain traceability policies and processes. Some examples include the British Retail Consortium Global Standard (BRCGS) for food safety and the Global Dialogue on Seafood Traceability (GDST) standard.	Identifiers', species name, FAO stock and sub area of capture, flag State, fishing trip dates, including landing date, being collected. The fact that this information is required to be collected is stated in a company sourcing policy or specification that has been communicated to all suppliers.	consignment details are required from suppliers. Third party	All information required in best practise is provided by supply chain in a timely and transparent manner that fully conforms to the GDST KDE standard. The whole supply chain is transparent with people and seafood interactions fully understood and verification / validation processes are embedded to demonstrate compliance. Digital traceability system is in place providing traceability at will.		What policies and processes are in place that provide requirements for full chain traceability to be ensured? Can traceback exercises be conducted from end point (i.e. retailer) to start point (i.e. vessel), to support full chain traceability claims?
3.3.1.2	Are policies and processes audited and have the contents reviewed on, at a minimum, an annual basis in case changes or amendments are required to be made?			Management policies and procedures are broadly covered in Section 1, CP1 changes will be reviewed at annual surveillance audits.	5.2, 7, 8.1.1, 8.1.2- <b>RP B95.01</b>	Required		A seafood sourcing policy is in place that makes reference to the company ambition that both it, and its implementation, will be reviewed and audited on an annual basis.	Policies and processes are audited annually to ensure that the assessment of IUU risk within the supply chain is sufficient to manage risk.		Internal	
	Are reports produced (at least annually) on the implementation and monitoring of the policies and processes that are in place to address risks?			The RFVS CP1 section 1 expects that a annual review of their processes are conducted annually and reports are maintain and any non compliances are identied and mitigated against.		Required		As above		annually to not only assess the assessment of IUU risk within the supply chain, but also to assess the implementation of the risk mitigation improvement processes.		
3.3.1.4	Are policies and processes available upon request and made available to other actors in the supply chain within seven days of such a request being made?			Not an RFVS requirement for fishing vessels. However records of all vessels that meet the standard shall be placed on a publically facincg GSA website.	hat meet the standard shall be placed on	Required		The company has a seafood sourcing policy that is communicated to suppliers and available to customers upon request, with basic processes to assess suppliers.	The company seafood sourcing policy is communicated to and acknowledged by suppliers, with a functioning process to assess suppliers and their supply chains.	The company seafood sourcing policy and its processes for assessment are well established, customers know their suppliers' supply chains, and are aware of the work being undertaken within them.	Internal	





3.1 General		Cross-over with GDST	Cross-over with SPSv5	Cross-over with RFVS	Cross-over with APR	Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice	Internal or external question	Rewritten question (if external)
3.3.1.5	Are policies and processes demonstrated to have been communicated throughout the supply chain to, at a minimum, the stage before and the stage after the processor/importer?			Not an RFVS standard requirement for fishing vessels.	2- RP 895.02	Required	A document setting out policies and procedures should be shared within the supply chain. It is good practice to ask suppliers to acknowledge that they have received and understand the policies and procedures, and that this is documented. Clarifications should be provided in the event that suppliers indicate they do not understand policies and/or procedures.	and IUU risk assessment procedures are available and shared with direct	Acknowledgement is received from both suppliers and customers that the company policies and procedures are understood and complied with. Policy and procedures are reviewed on a minimum annual basis and confirmation that they are understood by suppliers is in place.	Purchasing polices and procedures are documented, regularly reviewed and form part of a supplier management process that is independently assessed and demonstrated to work. In addition, purchasing policies are distributed and acnowledged by all stages and actors in the supply chain.	Internal	
3.3.1.6	is the organization able to demonstrate compliance and implementation of all of the required regulations, conventions and standards (dependent on the supply chain and market)?			The RFVS certification audits provide the mechanism through which assurance is provided.		Required	It is the responsibility of any organization to understand and observe the laws and regulations in any territory in which they operate. The recommendations in this PAS help an organization to gain this understanding in relation to the legality of seafood and the working conditions of workers in the seafood supply chain.	desire to understand the pertinent local, national, regional, and international legislation applicable to the seafood, so that in time the legality of the seafood	All seafood supply chains are mapped and the relevant legislation applicable to each of them is known. Sleps assess the qualify of regulations in place and level of implementation is in place, with either consideration being given to government advocacy to encourage the gaps in legislation, or implementation to be filled or already happening Third party certification such as RFVS is being used to warrant vessel legality.	Legistation applicable to each source of seafood is known and if it is not fully implemented, government advocacy is being undertaken to address the regulation issues, or steps have already been agreed to ensure full regulation implementation will occur in a known timescale. RFVS certification of vessels is widely adopted within the supply chain.		
3.3.2 Due dili	gence through risk assessments											
3.3.2.1	which it sources and be able to demonstrate that	implementation of GDST standards facilitates risk assessments as it helps to gather information to determine the level of risk.	9.1.4 The procedures and records shall clearly show controls and traceability at ALL steps: chain of custody evidence from the outsourced entity (country of origin, for example), on the way to the outsourced entity, during handling, production, labeling or storage at the outsourced entity, and during transport away from the outsourced entity, and during transport away from the outsourced entity.  3.6.1 The facility shall have a documented food fraud vulnerability assessment procedure (VACCP Vulnerability Assessment Critical Control Points) in place to identify potential vulnerability and prioritize food fraud mitigation measures.		5.3- RP B95.02	Required	A company should complete due diligence through risk assessment on all of its supply chains. The level of risk in supply chains can be reduced by identifying and taking mitigation actions or measures such as mandating future requirements or engaging in improvement processes with the supply chain. A company should prioritize its use of each supply chain according to the findings of the risk assessments.  *Ranking and assigning metrics that will evaluate results against factors such as the level of risk, volume and importance of the supply chain to the business, is subject to the needs of an individual company.  *The risk assessment system should demonstrate and document that for each supply chain, an assessment and any required actions have been applied. For example, if a supply chain is identified as higher risk, it will require additional verification for the company to assure its integrity)  *Risk assessments should be reviewed on a regular basis e.g. monthly, annually, biannually	supply sources can be identified and then risk assessed, has been communicated to suppliers. This communication should include a timeframe within which this task should be completed. Using the BRC advisory note, the company has begun to determine what risks it finds acceptable within supply chains and is formulating a	All seafood supply chains have been mapped, risk assessments have been completed for all, with risk categorisations made and in the case of high risk sources, improvement plans agreed. Consideration to volume of seafood purchased from an individual source, and confidence in regulation and of the supply chain, will inform the metrics of the risk assessment, as well as mitigation and improvements steps that can be taken.	All seafood supply chains have been risk assessed on numerous occasions, all previously assessed high risk sources have either been mitigated or are no longer supplying, leaving minimal medium risk and the majority of sources being considered low risk.		
3.3.2.2	Does the organization prioritize its use of each supply chain from which it sources according to the findings of the risk assessments?				5.3- RP B95.02	Required	Companies should conduct risk analyses to help minimize and miligate the risk of IUU fish entering their supply chains, importantly aiming for assured traceability to legal origin. See example risk assessment to determine appropriate action. Where the risk assessment produces a moderate to high risk of IUU or information is missing, the sourcing decision should reflect the level of risk.	statement that the company endeavours to purchase seafood from low risk/low impact sources and aims to move its	Improvement plans for all high risk sources are in place. Government and industry advocacy is happening (and which you are following and engaging in where practical) for high risk sources, and plans are being developed for low and moderate risk sources where improvements need to be made. Where risk assessments have been completed on numerous occasions or improvement plans are not yielding the desired change, the company can demonstrate that these factors influence ongoing buying decisions by communicating to the governments and relevant supply chail actors, that continued inaction could lead to a reduction in volume of purchases, or in extreme cases the cessation of buying allogether - whether individually, or as part of a government led trade sanction.	having been addressed through completion of their improvement plans, or are able to demonstrate continued commitment to change. Where improvement plans have been shown to not yield change, the company can show that purchasing volumes have been		
3.3.2.3	Does the risk assessment system demonstrate and document that for each supply chain an assessment and any required actions have been applied, that are appropriate according to the results of the risk assessments and prioritization exercises?				ANNEX C- RP B95.01 & RP B95.02	Required		statement that the company endeavours to purchase seafood from low risk/low impact sources and aims to move its	Improvement plans for all high risk sources are in place. Government and industry advocacy is happening (and which you are following and engaging in where practical) for high risk sources, and plans are being developed for low and moderate risk sources where improvements need to be made. Where risk assessments have been completed on numerous occasions or improvement plans are not yielding the desired change, the company can demonstrate that these factors influence ongoing buying decisions by communicating to the governments and relevant supply chain actors, that continued inaction could lead to a reduction in volume of purchases, or in extreme cases the cessation of buying allogether - whether individually, or as part of a government led trade sanction.	having been addressed through completion of their improvement plans or are able to demonstrate continued commitment to change. Where improvements plans have been shown to not yield change, the company can show that purchasing volumes have been		
3.3.2.4	Are risk assessments reviewed on a regular basis (e.g. monthly, annually, bi-annually, etc.) depending on the level of risk, or if something changes? The risk assessments should be completed at a minimum annually, and then at least six-monthly for supply chains identified as higher risk.		3.6.2 The food fraud plan and risk assessment shall be reviewed, at minimum, annually.		7- RP 995.01 5.3, 5.4- RP B95.02	Required		statement that the company endeavours to purchase seafood from low risk/low impact sources and aims to move its sources and buying over time to achieve this. The sourcing policy has been	Improvement plans for all high risk sources are in place and risk assessments undertaken on a six or 12-month basis dependent upon the level of risk identified. Government and industry advocacy is happening (and which you are following and engaging in where practical) for high risk sources, and plans are being developed for low and moderate risk sources where improvements need to be made. Where risk assessments have been completed on numerous occasions or improvement plans are not yielding the desired change, the company can demonstrate that these factors influence ongoing buying decisions by communicating to the governments and relevant supply chain actors, that continued inaction could lead to a reduction in volume of purchases, or in extreme cases the cessation of buying altogether.	over time, and with established advocacy activity, high and moderate risk source issues having been addressed, giving transition to low risk outcomes through completion of their improvement plans, or are able to demonstrate continued commitment to	Internal	
3.3.3 Decent	working conditions											
3.3.3.1	Has the organization established and uses policies, practices and confidential reporting and assurance systems at every worker facility in all countries where fisheries products are sourced? This should allow all workers to have the ability to report labour infringements, unfair working conditions or associated unlewful treatment as necessary.	information where such policies along their supply chains exist and where gaps	5.8.4 There shall be a written worker grievance process, made available to all workers, that allows for the anonymous reporting of grievances to management without fear of retaliation.	displayed in a crew-accessible location on board the vessel.	Not an APR requirement yet- Next version UNE 195006	Required		The company recognises and understands the need for decent working conditions, it is mapping its supply chains to identify where its policies need to apply, and has policies in place that outline this ambition and those policies have been communicated to suppliers one step down the supply chain.	The policies are communicated to second and third tier suppliers with assessments being undertaken either in-house or through third parties.	actors known and proactively participating in policy implementation, assessment and remedy. Confidential reporting mechanisms have been made available to all employees within the supply chain and demonstrable steps able to be shown that remedy issues found.	Internal	
3.3.3.2	is each of these systems supported by a transparent process available upon request as part of supply chain audits, and be equally applicable for workers with or without union representation?	_	5.8.4 There shall be a written worker grievance process, made available to all workers, that allows for the anonymous reporting of grievances to management without fear of retaliation.	The grievance system for the RFVS is covered in the requirements of Clauses 2.17 - 2.20. These will be audited on an annual basis by a Certification Body. Any non-compliances will be raised in the audit report.	requirement Collective Bargaining: ANNEX E- UNE 195006	Risk assessment consideration	A company should be able to request and view the processes in place at any point along the supply chain, which ensure that workers have the ability to report labour infringements, unfair working conditions, unlawful treatment, etc.  Where the company is not able to obtain evidence of such processes, this lack of information should result in the company receiving a higher risk rating and mitigating measures undertaken.	and make that data available for inspection by the buyer or the buyer's representative agents, so that decent working conditions of people within the supply chain can be assessed.	uninhibited access to an established system in which workers within the supply chain are able to highlight without risk of sanction, where labour infringements etc. are happening. Further to the reporting mechanism, mitigating measures are being taken to remedy any issues found.	that can remedy any issues as they are highlighted.		
3.3.3.3	Are confidential reporting processes established and maintained with associated policies and practices embedded throughout the corporate culture led at senior board level?		5.8.1 Facilities shall respect the rights of workers to associate, organize, and bargain collectively (or refrain from doing so) without the need of prior authorization from management. Facilities shall not interfere with, restrict, or prevent such activities and shall not discriminate against or retaliate against workers exercising their right to representation in accordance with international labor standards.	Clause 2.19 requires a policy and procedure shall be adopted by the skipper/owner that shall prohibit any form of bullying or physical abuse of a crew member.	Not an APR requirement yet	Requirement		The company policies and processes should at a minimum establish the ambition that confidential reporting processes should be put in place where supply chain mapping and interrogation highlights that they are not already there.	Confidential reporting processes are established and maintained in all tier one supply chains and work is ongoing it tier two and three suppliers to achieve this.		Internal	



3.1 General		Cross-over with GDST	Cross-over with SPSv5	Cross-over with RFVS	Cross-over with APR	Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice	Internal or external question	Rewritten question (if external)
3.3.3.4	Are all complaints from workers dealt with objectively and confidentially through independent and impartial reviews leading to a remedy where applicable? These remedies should end the infringement, unfair working condition or associated unleaful treatment and provide retrospective financial compensation to the worker and referral to legal authorities where individuals have broken the law. Complaints and associated remedies should be documented and available for external scrutiny, with safeguards taken to protect the identity of victims.			Clause 2.17 States that There shall be effective crew grievance and disciplinary procedures in place, governing how investigations relating to crew grievances shall be conducted, including the process of how investigation outcomes shall be clearly communicated to affected crew member(s).	Not an APR requirement yet	Requirement		The company policies and processes should at a minimum establish the ambition that confidential reporting processes should be put in place where supply chain mapping and interrogation highlights that they are not already there.	Complaints from workers can be shown to be dealt with objectively and confidentially.	Confidential reporting processes are established and maintained in all suppliers within the company' supply chains, redress is an ongoing practice where required, and evidence to support what action has been taken can be provided.	Internal	
3.3.3.5	Is social responsibility addressed explicitly in the policies and processes of the organization, by including as a minimum?  • freedom of association; • the right of workers to organize; • forced labour; • minimum age of workers; • child labour; • equal remuneration; and • discrimination.		5.8 Freedom of Association and Collective Bargaining 5.4 Forced, Bonded, Indentured, Trafficked and Prison Labor 5.5 Child Labor and Young Workers 5.7 Discrimination, Discipline, Abuse and Harassment	All covered in Core Principle 2 of the RFVS, except requirement for equal remuneration.	5 & ANNEX E- UNE 195006	Requirement					Internal	
3.4 Traceal	ility											
3.4.1	whether or not a product originates from a source where reliable evidence of legality (e.g. registration, licensing, catch documentation and compliance records) is available? If it is not possible to trace to the origin of the seafood, this should trigger an investigation and the completion of steps to remedy the situation.	(including vessel registration, rathanshipment vessel registration), catch data (including catch area, fishery improvement project, vessel trip date(s), date(s) of capture, gear type, production method), cerification and licenses (including fishing authorization, harvest certification, harvest certification chain of custody, transhipment authorization, landing authorization of GDST standards enables traceability to the origin of the seafood to further verify claims of legality.	9.1.2 Proper identification shall be maintained for each lot, for each wild-caught and farmraised source, on all documents and at each step of the process flow from raw material receiving, handling, processing, packaging, storage and dispatch. Records shall be maintained to ensure product identity and demonstrate that products from wild-caught and aquaculture sources and those from certified and non-certified sources are not mixed.  9.3.1 Wild-Caught Raw Material - The facility shall keep an up-to-date list of all wild-caught raw material suppliers, including the quantity supplied by each lain documented farm data for all farm deliveries received from all BAP certified and non-certified farm suppliers include the below information  9.2.3 Where a facility's traceability system consists of	information to be recorded during the trip and available at the point of landing.	ANNEX D- RP 895.02	Required  Risk assessment consideration	Towards-Seafood-Traceability.pdf  This guide links to useful resources including a comprehensive compilation of key data elements (KDEs) across certification schemes, governmental organizations, industries, etc.:	The company has a seafood sourcing policy that establishes the need for traceability of its seafood products on a lot or batch basis, to aid its control and assessment of food safety, sustainability, labour and associated environmental impacts, including avoidance of IUU by warranting that it is caught legally.  The company has a seafood sourcing	Suppliers are providing lot or batch traceability information that allows the sourcing company to assess and verify the credentials of the seafood it is buying. The information supplied should be provided in a format that conforms to the GDST KDEs. For IUU catch documentation, the links and references within this document should be consulted.	A fully digitised e-traceability system is in place, giving secure, ond-to-end traceability of the KDEs in a format compliant with the GDST standard.  A fully digitised e-traceability system is in		Do you have the following records to support that a product originates from a legal source:  vessel registration  vessel license  -catch documentation  -compliance records  What other records or documents do you keep that  support claims of legality of a source?
G. N.E	system) verification exercises to verify the authenticity of data entering the traceability	Basic Universal List of KDEs helps to verify data by indicating the source of validity of the KDE information.	paper records, separate documents forms, notebooks and/or fles, this information shall be transferred to a computer database or spreadsheet to allow for transmission and verification of electronic data. P.2.4 Where a facility's traceability system uses an online system or computer database, the facility shall keep copies of the documents or records that were used to transfer the data to the electronic system in order to allow verification of the information in the electronic system.	would be verified at each RFVS audit.	ANNEX C- RP 895 01 & 02 ANNEX D- RP 895.02			policy that establishes the need for traceability of its seaflood products on a lot or batch basis, to add its control and assessment of food safety, sustainability, labour and associated environmental impacts, including avoidance of IUU by warranting that it is caught legally.		place, giving secure, and-to-end traceability of the KDEs in a format compliant with the GDST standard.		
3.4.3	processed on traceability enable full chain traceability to be assured transparently?		easily accessible, data of all wild-caught and farm-raised	n/a - this would depend on the supply- chains sourcing from RFVS vessels. It is not explicit in the RFVS standard how key traceability data (see clause 1.26) will be captured but will ensure it is available if the supply requires it.	3.3, 6.1 & ANNEX J.3,9. UNE 195006 ANNEX C. P. P. 985 01 & 02 ANNEX D- RP B95.02	Risk assessment consideration		The company has a seafood sourcing policy that establishes the need for traceability of its seafood products on a tor or batch basis, to ald its control and assessment of food safety, sustainability, labour and associated environmental impacts, including avoidance of IUU by warranting that it is caught legally.	Through a combination of routine and spot-check traceability audits, the company is able to verify the accuracy and authenticity of some, if not all of the data provided by its suppliers, and its actively exploring how this information can be automatically captured and shared with its customers or other stakeholders.	place, giving secure, end-to-end traceability of the KDEs in a format	Internal	
3.4.4		Implementation of GDST standards requires digital storage of traceability data which facilitates accessibility of data for verification and audits.		Yes - they would be verified on an annual basis through certification and then surveillance audits.	3.3, 6.1 & ANNEX J.3.9. UNE 195006 ANNEX C- RP B95 01 & 02 ANNEX D- RP B95.02	Risk assessment consideration	Traceability can be defined as "the systematic ability to access any or all information relating to a food under consideration, throughout its entire life cycle, by means of recorded identifications" (WWF traceability principles, 2015). It is important to note that this is different to transparency, which focuses on what information is shared, with which stakeholders, and at what frequency.  The Global Dialogue on Seafood Traceability (GDST) Standard 1.0 provides guidelines on enhancing interoperability of traceability systems to help enable full chain traceability and improve data verifiability: <a href="https://braceability-dialogue.org/core-documents/gdst-1-0-materials/">https://braceability-dialogue.org/core-documents/gdst-1-0-materials/</a>	claims and sourcing credentials is in place or under development.	There is a formal documented process in place for assessing claims. Third party guidance is used as the basis for making voluntary claims beyond the legally required consumer information. Such guidance could be in the form of third party certification logo/brand guidelines, or via pre-competitive collaborations, e.g. Sustainable Seafood Coalition, Seafood Task Force.	warrant the in-house assessment of claims being made. Full transparency of	External	How frequently are traceability systems, and all claims based on them, subject to external verification and independent audits?  How is traceability data made accessible during verification checks and audits e.g. use of an electronic system?
3.4.5	vessels that caught the seafood?	data, including for transhipments if applicable Implementation of GDST standards	raw material suppliers. The facility shall maintain documented records and quantities for all finished product production lots to include the below information: • Name of the flag of the harvesting vessel	requirements that all RFVS vessels must	ANNEX C- RP B95 01 & 02 ANNEX D- RP B95.02	Risk assessment consideration	Traceback exercises can be conducted to test if traceability is provided by the vessel or group of vessels that caught the seafood. Companies should already have a range of traceability or tesses in place, to which additional aspects relating to IUU can be added. Where barriers exist, for example data loss due to auction sales or lack of transparency from certain vessels, the risk of IUU products should be considered elevated. It is recognised that not all supply chains may be fully traceable, and companies may want to work with their suppliers to improve this. Some companies may choose, for example, to work with suppliers to develop traceability improvement projects or initiatives with time-bound deliverables. There are links to publicly available traceability standards and guidelines included in the PAS 1550, which can help to fulfil requirements and risk assessment considerations, and inform an improvement project or initiative. More are included in the "shared resources" section.  The Global Dialogue on Seafood Traceability (GDST) Standard 1.0, provides guidelines on enhancing interoperability of traceability systems to help enable full chain traceability, improve data verifiability and ease data sharing: <a href="https://traceability-dialogue.org/core-documents/doi/1-1-0-materiable/">https://traceability-dialogue.org/core-documents/doi/1-1-0-materiable/</a>	and one down traceability but includes a requirement that all fish and seafood is traceable back to the source vessel or group of vessels that it comes from. The policy may include an ambition that all KDEs within GDST will be provided by a future date by suppliers. Mapping of	Supply chains are fully mapped, traceability back to supply vessel or group of vessels (including transhipment vessels) is in place and can be demonstrated within a reasonable timeframe, taking into account variables such as global time differences, public holidays, weekends etc. COST KDEs are being collected and are available to the buyer. Action plans are agreed with supply chains where required traceability information is missing. Vessel lists include UVIs for all vessels. Additional data such as ports of fanding, beneficial owners of vessels etc. is being collected, but may not always be present.	involved in transhipment) are present on government registers and the global record. Beneficial owners are known, and traceability can be demonstrated on every occasion within 4 hours.	External	How is traceability provided to the vessel or group of vessels (e.g. catch certificate) that caught the seafcod?  What processes, e.g. traceback exercises, are used to demonstrate traceability to a vessel or group of vessels?  Have you adopted any traceability standards, e.g. ISO 12875, as part of traceability compliance, and if so which ones?  If you have undertaken a traceability improvement project or initiative, can you please provide details of this i.e. time-bound deliverables?
3.4.6	Are traceback exercises carried out at a frequency based on risk assessment and in a timescale that is appropriate for the origin of the seafood?		2.10.3 The supplier approval program shall include all suppliers described under 2.10.1. The program shall also include criteria for approval, and the facility's policy and/or procedure for temporary use of unapproved suppliers. Examples of criteria for approval.  - Suppliers must have traceability systems in place to allow trace-backs to vessel or wholesafer for wild-caught or individual farm for farmed species.		ANNEX D 13 to 18- RP B95.02	Risk assessment consideration	DNA testing of fish can be used to support claims of legality, inform risk assessments, and support traceback exercises to seafood origin. Seafish has produced a comprehensive guide on the uses of DNA testing seafood that includes a list of well-established DNA databases: https://www.seafish.org/media/publications/SeafishGuidetoDNATestingofSeafood_201312.pd L.	the source fishery/fishing vessel(s). The	The buyer conducts regular traceback exercises to ensure that product purchased can be reliably traced back to the source fishery/fishing vessel(s). The frequency of traceback exercises is based on an in-depth risk assessment, taking into account detailed supply chain information derived from supplier inspections, audits or SAQs.	basis through electronic supply chain	Internal	
3.4.7	Does the organization complete random traceback exercises that are able to verify full traceability from point of sale to source within 48 hours?		A3 3.2 Once the lots are selected by the auditor for tracing, the results for all of them combined shall be achieved in no more than one half-day (6 hours).		Yes, actually those exercises have to be ready in less than 6 hours	Risk assessment consideration		the source fishery/fishing vessel(s). The frequency of traceback exercises is based on a risk assessment, taking into account publicly known risk factors for each specific supply chain.	The buyer conducts regular traceback exercises to ensure that product purchased can be reliably traced back to the source fishery/fishing vessel(s). The frequency of traceback exercises is based on an in-depth risk assessment, taking into account detailed supply chain information derived from supplier inspections, audits or SAQs.	The origin of seafood supplied should be consistently demonstrated to the seafood company within 48 hours of such a request being made. Companies that have suppliers with BRC Global Standard/IFS or a GSSI recognised chain of custody in place, will be able to deliver this expectation whilst those without such certification will have built this capability into their own supply chain.	Internal	





3.1 General		Cross-over with GDST	Cross-over with SPSv5	Cross-over with RFVS	Cross-over with APR	Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice	Internal or external question	Rewritten question (if external)
4.8	Are sales transactions between actors in the supply chain accompanied and traced by unit or batch numbers on or accompanying invoices? To allow effective tracking of products, all buyers and sellers should be able to match sales transactions between them.	Implementation of GDST standards enables to match sales transactions. Prurchase orders and other information can be included in EPCIS. Batch/lots should be able to be traced to transactions, but this isn't explicitly spoken to in the standard.	9.1.2 Proper identification shall be maintained for each lot, for each wild-caught and farmraised source, on all documents and at each step of the process flow from raw material receiving, handling, processing, packaging, storage and dispatch. Records shall be maintained to ensure product identity and demonstrate that products from wild-caught and aquaculture sources and those from certified and non-certified sources are not mixed.		ANNEX D 22,23- <b>RP B95.02</b>	Risk assessment consideration		The buyer is able to correlate physical stock components with the associated paperwork through simple accounting tools such as invoice numbers or lot codes.	Batch and lot number are detailed on purchase documents and these facilitate traceability back to source fishery and supply vessels for product at all stages of manufacture, storage or distribution.	Product is traced at all stages of manufacture, storage and distribution, through a comprehensive end-to-end e- traceability tool.	External	Are sales transactions accompanied and traced by unit or batch numbers on, or accompanying invoices?  Where are unit or batch numbers captured?  Are you able to match sales transactions with buyer or sellers?
	Does the organization cooperate with the relevant competent authorities (that conduct active and effective regulatory oversight and verification) by using effective compliance and enforcement mechanisms?		1.0 Regulatory Management	This is explicit for many RFVS requirements (e.g. catch documentation, crew lists etc).	This is explicit for many APR requirements (e.g. catch documentation, crew lists etc).	Risk assessment consideration		The company has an "open door and cooperation policy" for domestic government and enforcement agencies.	Company hosts visits (or demonstrates a willingness to host visits) from domestic government compliance authorities and cooperates to any reasonable request by supplying information in a timely manner. Either directly or via industry associations/trade bodies or other collaborations, the company demonstrates its willingness to provide input to consultations, meet with government officials and support government policy implementation, where relevant to its seafood sourcing.	it complies with all government interactions, advocates for improved	Internal	
	associated with the products?  vessel identity (home port, name, flag and call sign), registration and, where issued IMO or other UVI number; location of catch [e.g. GPS coordinates, specific location of fishery, FAO codes, EEZ's ISO country code, relevant Regional Fisheries Management Organization (RFMO)]; fishing license and validity; species (FAO alpha 3 code), product name and code; fishing method used;	identity data (i.e. product owner and information provider) which is necessary for the proper documentation of individua EPCIS events—is treated separately EPCIS 'technical data'.  GDST Standard 1.0 KDEs: all vessel data, all catch data, all transhipment data, all landing data, certifications and illennesse (including fishing authorization, harvest certification, chair of cut of the control of	Supplier name and address including country     Species of fish, both scientific name and common or     commercial name     Product form at the time of landing including quantity and     weight     Date harvested/production date (process date or date     code)     FAO statistical area of harvest     Country of first landing     Country of origin	Clause 1.26 requires the following traceability information to be captured;  vessel identifier,  -species name and stock,  -sea area code of capture,  -flag State,  -flag State,  -flag identifier,  -clause including landing  date),  -Declared retained catch data  -quantity and product form in box, batch  or tank,  -fishing method and gear,  -frans-shipment dates, name of carrier,  dates and catch consignment details	3.3, 6.1 & ANNEX J3,9- UNE 195006	Risk assessment consideration		the next stage of the supply chain, for the products it buys. The basis of the minimum information derives from EU	The seafood company is able to demonstrate: vessel identify (home port, name, flag), registration, and where issued. IMO or other UVI number location of catch [e.g. specific location of fishery, FAO codes, EEZe ISO country code, relevant Regional Fisheries Management Organization (RFMO) fishing license and validity species (FAO alpha 3 code), product name and code fishing method used fishing method used fishing dates of capture quantities (in (g.) of catch date/area/position/estimated weight/call sign and declaration of any transhipment at sea transhipment information will include the receiving vessel name, and where applicable, the IMO number or other UVI number  Not all of this information will accompany the product at every stage, but the information should be maintained and available on request.	-quantities (in kg) of catch -person/enterprise with custody and ownership after landing. Not all of this information will accompany the product at every stage, but the information should be maintained and available on request.	External	Which of the following data is available for collection upon request and associated with products?  vessel identity (home port, name, flag and call sign) registration, and where is sued, IMO or other UVI number  location of fishery, FAO codes, EEZ's ISO country code, relevant Regional Fisheries Management Organization (RFMO))  *Ishing Icense and validity  *species (FAO alpha 3 code), product name and code  *Ishing method used  *Ishing method used  *Ishing dates of capture  *quantities (in kg) of catch  *date/area/position/estimated weight/call sign and  declaration of any transhipment at sea. This will  include the receiving vessel name and where  applicable, the IMO number or other UVI number  *person/enterprise with custody and ownership after  landing.  What other information is associated with products?
4.11	Is information relating to the products maintained in an electronic system? As a minimum the key data should be held in the system, and other documentation such as EU Catch Certificates attached electronically or a record noting their physical location attached.	The GDST Standard 1.0 provides guidance on how to maintain key data elements (KDEs) digitally and allow interoperably between traceability systems.	9.2.3 Where a facility's traceability system consists of paper records, separate documents, forms, notebooks and/or files, this information shall be transferred to a computer database or spreadsheet to allow for transmission and verification of electronic data. 9.2.4 Where a facility's traceability system uses an online system or computer database, the facility shall keep copies of the documents or records that were used to transfer the data to the electronic system in order to allow verification of the information in the electronic system.	Not an explicit requirement of the RFVS	ANNEX B- UNE 195006	Risk assessment consideration	The FAO technical paper "Seafood traceability for fisheries compliance: Country-level support for catch documentation schemes," lists recommendations for traceability mechanisms based on the evaluation of different countries' catch documentation schemes (CDS) and key data elements (KDEs): <a href="http://www.fao.org/publications/cardien/c/1701be4c-eb83-4b0f-97e5-b6d11d1c7c55/">http://www.fao.org/publications/cardien/c/1701be4c-eb83-4b0f-97e5-b6d11d1c7c55/</a> .	related policies detail the company ambition that product specific information (whether to enable IUU risk	The company sourcing policies are understood and acknowledged by all actors in the supply chain and the company is able to demonstrate that some of the product specific information that it requires is being submitted electronically and that there is a time-bound commitment by which all of this information will be provided electronically.	Product is traced at all stages of manufacture, storage and distribution, through a comprehensive end-to-end e- traceability tool.	External	What key data relating to products (refer to question X) at a minimum, are maintained in an electronic system?  Is other documentation such as EU Catch Certificates attached electronically, or is a record noting their physical location attached?
Informatio	n verification and transparency											
5.1	Does the organization work with other actors in the supply chain to agree levels of information required and share it to ensure a level of transparency that is appropriate to enable regulatory visibility across the entire supply chain?	Implementation of GDST standards requires to work with supply chain actors on a standardised set of information shared along the supply chain.		Whilst full chain transparency would be desirable, this is not a specific requirement of the RFVS, as long as key regulatory requirements are being met. This would depend on the co-operation of actors within RFVS supply-chains. The GSA Seafood Processing Standard, outlines specific requirements around the transfer of KDEs.	This is not a specific requirement of AENOR APR	Required	Transparency and Traceability can be confused with one another; Transparency refers to how and what information is disclosed to certain stakeholders, while Traceability refers to information on a certain product or batch from origin to end-use.  The "GS1 Foundation for Fish, Seafood and Aquaculture Traceability Guideline" provides consistent business practices for effectively managing traceability and enhancing transparency across supply chains:  https://www.gs1.org/slandards/fraceability/guidhttps://www.gs1.org/slass/default/files/docs/traceability/GS1 Foundation for Fish Seafood Aquaculture Traceability Guideline.pdf	A transparency policy that details what information is needed from the supply chain is formulated and communicated to each supply chain actor.	The transparency policy is understood by all actors in the supply chain and supply chain transparency is able to be demonstrated upon request by regulators and stakeholders, whilst being routinely audited for compliance in-house.	Transparency is institutionalised within the company and its supply chains to such an extent, that public reporting satisfies regulatory regimes and external stakeholders, without the need to ask for supply chain information.	Internal	
	Does the organization engage with other actors in the supply chains to resolve any barriers that prevent this from being possible?			As above	This is not a specific requirement of AENOR APR	Required		The transparency policy states that where barriers exist to achieving supply chain transparency, the seafood buyer will work collaboratively with its suppliers to address them.	Proactive engagement with suppliers to overcome transparency barriers can be demonstrated with successes having already been achieved.	All barriers to supply chain transparency of existing supply chains have been overcome. It is a pre-requisite to supply, that future supply chains must achieve the same level of transparency prior to supply commencing.	Internal	
	When assessing the impact on decent working conditions, is engagement with those potentially affected (in this case, workers) undertaken? If any information is unavailable during a traceback exercise then this should be investigated.		5.0 Social Accountability Requirements 6.0 Employee Health and Safety (EHS) For subcontractors: 2.10.1 The facility shall exercise proper control over any outsourced supplier or service that may have an impact on food safety, legality, quality, traceability and social responsibility. There shall be a policy statement that normaly disallows the use of unapproved outsourced supplier or service provider.	There will be crew interviews using APSCA registered auditors.	YES. 5, 6.4- UNE 195006	Required	A company should establish and use policies, practices and confidential reporting and assurance systems, to ensure that decent working conditions protect workers in facilities in all countries where seafood products are sourced. A company should conduct inspections, audits and/or site visits to check for aspects of decent working conditions.	The transparency policy states that where barriers exist to achieving supply chain transparency, the seafood buyer will work collaboratively with its suppliers to address them.	The company is able to demonstrate that engagement with workers who are likely to be impacted by the lack of decent working conditions, is able to be made to all intent and purpose at will.	There is sufficient supply chain transparency that if so desired, the seafood sourcing company when it is assessing decent working conditions, is able to engage directly with any workers potentially affected by the lack of decent working conditions.	External	Can you assess the impact of decent working conditions through a verifiable traceback exercise across your supply chains within 48 hours from the time the request is made? A traceback exercise involves gathering information or documenting event from the point of origin or source. If any information is unavailable during a traceback exercise, a further multi-part question should be asked, such as:  Can you access information or furnish evidence related to freedom of association, right of workers to organize, forced abour, minimum age of workers, child labour, equal remuneration or discrimination?
.5.4	Are all stages in the supply chain available for inspections, audits and/or site visits upon request?			For an RFVS certification claim to be made, Chain of Custody must be able to be demonstrated - which would require hird-party audits linked through the SPS standard.	RP B95.02	Required	All stages in the supply chain should be available for inspections, audits and/or site visits upon request. Additionally, DNA testing is an emerging technology applicable in spot checks.			audited, with remote technology such as electronic monitoring routinely employed	External	As a company, are you able to conduct inspections, audits and/or site visits to check for aspects of legatily, traceability and decent working conditions? How often do you conduct site visits? What information are you able to obtain from the site visits to help verify legatily of seafood products and decent working conditions from the point of origin?
	Are the commitments, expectations and standards of the organization documented and available to other actors in the supply chain within 48 hours of the request?		2.2.1 The facility shall have an appropriate Quality Manual which incorporates Food Safety that is readily available to all personnel involved in quality management. The Quality Manual shall include controls that address all requirements of the SPS Standard, including the Annexes. Copies may be a printed or electronic version.	Not an explicit requirement of the RFVS, though would be expected that the standard holder is responsive to information requests.	YES, both RP	Required	The commitments, expectations and standards of a company should be documented and available to actors in the supply chain within 48 hours of the request.	A requirement to be able to undertake traceability exercises within 48 hours is detailed within the company policy.	Traceability exercises are able to be undertaken and completed for all supply chains within the 48 hour timeframe, taking into account weekend, public and religious holiday restrictions.	Traceability systems are so developed with information captured in real time, that full supply chain traceability is able to be demonstrated in real time through the employment of e-traceability platforms.	Internal	



3.1 General	Cross-over with GDST	Cross-over with SPSv5	Cross-over with RFVS	Cross-over with APR	Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice	Internal or external question	Rewritten question (if external)
3.5.6	Is first-, second- and third-party verification of information allowed at any point in the supply chain? Access should be granted to those conducting inspections, audits and/or site visits on behalf of those in the supply chain to check for aspects of fegality, traceability and decent working conditions. Random spot checks and unannounced audits should be permitted.		RFVS is a third-party certification programme.	Yes, but not for unannounced audits	Required	First, second and third-party verification of information should be allowed at any point in the supply chain.  **Access should be granted to those conducting inspections, audits and/or site visits on behalf of those in the supply chain, to check for aspects of legality, traceability and decent working conditions.  **Fandom spot checks and unannounced audits should be permitted.  **DNA testing to verify species is an emerging technology used in spot checks  **Third-party auditors help to ensure that inspections are conducted without jeopardizing necessary business confidentiality	The company policies establish its intent to be able to verify information provided to it by its supply chain at will, whether using 1st, 2nd or 3rd party audit processes.			External	As a company, can you obtain third-party verification of information at any point in the supply chain?  Do you have designated access to conduct inspections, audits and/or site visits on behalf of those in the supply chain?  Can you conduct random spot checks, and are you permitted to conduct unannounced audits?
	packaging written in plain language and correct according to the source of the product? This includes all claims made about the origin of the product.	9.3.4 Finished Product – Facilities shall have a system in place that ensures up-to-date, and easily accessible, data of all wild-caught and farm-raised raw material suppliers. Accurate labelling: for the above and all other required information		8- RP B95.02	Required	All products should be properly labelled in plain language, and be correct according to the source of the product. This includes country of originary in the product is good practice for voluntary information beyond mandatory legal requirements to be clear, unambiguous and verifiable.  - Attention is drawn to Regulation (EU) 1379/2013 as well as the Sustainable Seafood Coalition's Code of Conduct on Environmental Claims.	Policies are in place that detail how product labelling and packaging is checked to ensure compliance with legal requirements and clarity of labelling.			External	Are all products property and visibly labelled and written in plain language, including correct source of the product and country of origin? If so, please supply examples of labelling where relevant, for all seaflood supplied in this contract. See link for information on labelling as a resource: <a href="https://linke.eu/poa.eu/doc/lip/idocs/2014/decembe/t/radoc_152941.pdf">https://linke.eu/poa.eu/doc/lip/idocs/2014/decembe/t/radoc_152941.pdf</a> .
	Fisheries and fishing operations										
4.1 Managem	nent of fisheries										
	In a risk assessment, is seafood assessed as higher risk if sourced from a fishery that is either regarded as overfished or for which there is neither sufficient data to ensure it is not overfished nor a plan in place to collect such data?			n/a	Risk assessment consideration	In a risk assessment, seafood should be assessed as higher risk if sourced from a fishery that is regarded as overfished, or for which there is neither sufficient data to ensure it is not overfished, nor a plan in place to collect such data.  There is no one list that expresses the State of all of the different fisheries, yet various competent authorities at global and national levels, assess whether fisheries are in an overfished State.  It is good practice for seafood to be sourced from fisheries with a peer reviewed assessment that demonstrates that the fishery is not fished in excess of the maximum sustainable yield (MSY). Stock statuses can be accessed on RFMO webpages, although they may not be current. The following map of RFMOs may be useful here: https://ec.europa.eu/oceans-and-fisheries/index.en	Seafood supply chains are being mapped and at a minimum the information with which to determine whether as ouver feither in soverfished, unregulated or has problems with under- reporting (high risk) is being collated.	All source fisheries have been identified, information to determine the status of the stock has been collected, and a risk assessment has determined the stock status. Fisheries determined to be overfished, data-deficient or without a management plan, are classified as high risk unless a justification is made to the contrary.	All source fisheries are either classified as fished at or below MSY or have a credible fishery improvement process in place that is able to demonstrate on the water improvement.	Internal	
	risk of IUU fishing, or if the species is assessed to be of higher risk, does the organization consider this seafood to be higher risk?	2.12.1 The facility shall prepare and implement standard operating procedures, quality procedures, food safety management procedures, social accountability procedures, and work instructions for all processes and operations having an effect on product safety, legality and quality.  See 9.3.4 requirements  Species of fish, both scientific name and common or commercial name  Date harvested/production date (process date or date code)  FAO statistical area of harvest  Country of first landing  Country of first landing  Country of origin  Date landed  Name of entity to which the fish was first landed or delivered including; name, telephone, and email address of contact person  Name of the flag of the harvesting vessel  Vessel permit or ilcense number  Unique vessel identifier (such as vessel name or registration number)	Taken into account in Section 4 Vessel License to Operate, and Stated in high level objectives of the RFVS "Comply with the regulatory controls of the country or RFMO which controls the fishery, if operating in fisheries under the jurisdiction of countries where they are not registered;"	n/a	Required	When procuring higher risk seafood, e.g. seafood originating from a fishery identified with high levels of risk of IUU fishing, extra measures should be taken to ensure full traceability, maximum transparency, and the trustworthiness of the supply chain. This includes at minimum, completing risk assessments or audits at least once every six months, with steps taken to mitigate risks. Extra measures might include certification verification such as Marine Stewardship council (MSC), including the associated Chain of Custody certification where applicable, to mitigate the higher risk presented by the fishery.	assessed to determine whether any are high risk.	Mapping and assessment of all fisheries has been completed, with steps being taken to address stocks that are classified as high risk.	High risk sources have an agreed improvement plan in place with steps actively being taken to address the sisues highlighted. Low and medium risk fisheries have also been assessed, with a regular review being undertaken to ensure that this risk level is being maintained or improved where deficiency is identified.	Internal	
	When procuring higher risk seafood, are extra measures taken to exare full traceability, maximum transparency, and the trustworthiness of the supply chain, roulding by as a minimum completing risk assessments or audits at least once every six months with steps taken to mitigate risks?		n/a for vessels	n/a	Risk assessment consideration		6-monthly reviews of high risk fishery sources is happening, with supply chain feedback of results communicated.	Proactive engagement of the buyer is occuring, and tangible improvement and advocacy is being practised.	High risk sources are now medium or low risk, with a sourcing policy that prohibits high risk seafood being bought without an improvement and advocacy plan already established.	Internal	
4.2 Fisheries	access control										
4.2.1	Where seafood and marine ingredients are identified as originating from a vessel that is flagged to a State, or that fishes in the territorial or EEZ waters of a coastal State, that does not have a transparent register of authorized vessels, does the organization ensure that there is full chain traceability and that independent audits are completed at least every 12 months?	Clause 9.3.4 requires the following:  Name of the flag of the harvesting vessel  Vessel permit or license number	RFVS vessels require a license to operate, and IMO identification number if one has been issued, if not must have a visible vessel identifier.		Required	Where 12 monthly audits are not possible but obtainable, the company should factor this information into the risk assessment. Would audits on a less frequent basis elevate the risk to a level where sourcing is not responsible?  It is also recognised that conducting audits every 12 months is not always possible. In this case, companies can request that suppliers provide copies of vessel licenses, registrations, etc. annually, to check that fish come from legal sources and help companies realize potential risks. Companies should also consider advocating the relevant State to compile and publish a transparent list of vessels. It should consider whether the State shares vessel information with RFMOs and/or the FAO Global Record, in absence of its own transparent register.	desire to know the flag State of the fishing vessels supplying, so that a full list of supply vessels can be compiled.	All flag States are known, comprehensive vessel lists are available to the supply chain owner, and vessel registries are either public or there is ongoing advocacy for this to happen. Utilising the mapping exercise for vessels, an assessment of the flag State controls in place may be undertaken, so that an understanding of the monitoring, control and surveillance, as well as their compliance regime is understood, or at a minimum being explored.	public registries and on the global record. f Independent third party certification and n audits of fishing and transhipment	Internal	
	Where fish products are sourced from high seas fisheries or from any stock subject to the sirsdiction of an RFMO or other international management arrangement, the organization should only source from vessels:  a) operating in fisheries governed by RFMOs or other international arrangements that:  1) have fishing quotas or other seasonal, temporal or technical catch restrictions that are operated in a transparent manner, meaning that they are publically available for instance on a website;  2) apply sanctions or require flag States to apply sanctions to fishing vessels that are sufficient to deter IUU fishing, meaning that fries are in the order of at least five times the value of the catch caught by the vessel during the period IUU activity took place;  3) operate sanctions or require flag States to apply sanctions on fishing vessels for IUU fishing in a transparent manner, meaning they are published on a publically available website; and  b) are operating under the flag of States that comply fully, and ensure that vessels operating under the flag of states that comply fully, and ensure that vessels operating under the flag comply fully, with all conditions and measures required by the international rules and or submyt responsible for meanaging or setting the norms of management for the fishery		RFVS vessels fishing in RFMO waters would have to provide evidence that they are in full compliance with RFMO regulations. This is also captured in the RFVS eligibility orderia which are prerequesites requirements for vessels wishing to participate in the program and also remain in the program concertified. If they do not meet these requirements they will be barred from applying for the program for a period of 12 months.		Required	The company can use these conditions to assess the risk of the fishery. For example, it can check whether these conditions are in place by searching the relevant RFMO(other international arrangements website and reading their conservation and management measures, as well as their resolutions and recommendations.  Importantly, the company can check if a vessel is on any IUU lists and/or is blacklisted. If so the company should not source from this vessel.  RFMO websites often contain lists of vessels which have previously carried out IUU fishing. These lists can be useful to cross-check the vessels used within the company's supply chains.  Some examples include: ICCAT's IUU vessel list: <a href="https://www.iccat.int/en/IUUIst.html">https://www.iccat.int/en/IUUIst.html</a> EUs IUU vessel list: <a href="https://www.iccat.int/en/IUUIst.html">https://www.iccat.int/en/IUUIst.html</a> EUs IUU vessel list: <a href="https://www.iccat.int/en/IUIIst.html">https://www.iccat.int/en/IUIIst.html</a> EUs IUU vessel list:					





3.1 General		Cross-over with GDST	Cross-over with SPSv5	Cross-over with RFVS	Cross-over with APR	Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice	Internal or external question	Rewritten question (if external)
4.3.2.1	Does the organization complete due diligence on their supply chains related to MCS? When undertaking due diligence on a new supplier or product (or when repeating due diligence for an existing supplier or product), the organization should assess and record the following factors relating to flag States, coastal States and RFMOs responsible for MCS of a supplying vessel.		9.3.4 Finished Product – Facilities shall have a system in place that ensures up-to-date, and easily accessible, data of all wild-caught and farm-raised raw material suppliers.  Name of the flag of the harvesting vessel  Vessel permit or license number	a vessel is compliant with MCS requirements.		Requirement		The first steps of gathering data on source fisheries, which is a step toward assessing MCS requirements, has begun.	A policy is in place that recognises the importance of effectively implemented monitoring, control and surveillance (MCS) within fisheries. All supply chains are mapped back to the source fishery, the status of each MCS regime has been compiled, and a gap analysis has been compileted for each fishery, with steps being taken to advocate for improved implementation by government, or compliance by the fleet within the supply chain.	chain, and a process for sanction is in place, which means that the likelihood of being caught undertaking IUU activities outweighs the benefit of carrying them out.	Internal	
4.3.2.1.a	Monitoring systems: Does the organization research whether or not industrial fishing vessels in the supply chain are required by flag State authorities to have an installed vessel monitoring system (VMS) transponder, automatic identification system (AIS) transponder or other tracking technology onboard? These systems where required should be continuously transmitting in accordance with any national programmes or requirements and those which have been sub-regionally, regionally or globally agreed among the States concerned. Those responsible for tracking schemes that are required should be able to track the movements of these vessels continuously from port to port.			This is not an explicit requirement of the RFVS (due to the range of types and sizes of vessel that will be open to entering the scheme). However clause 1.30.1 States "If an automatic identification system (AIS) or vessel monitoring system (VMS) is fitted, it will fully operational and be turned on whilst at sea."	3.2, 3.4 & ANNEX B- UNE 195006	Risk assessment consideration	Vessel tracking requirements are increasingly required by flag and coastal States, as well as RFMos. The most secure form of tracking is through VMS, though in most cases this information is proprietary rather than public. Some States have also required the use of AlS, which is publicly available but easier for vessels to manipulate. Whether or not vessels are tracked by the States and RFMOs that regulate their behaviour, is an important consideration when considering risk.  If vessels are not monitored, this significantly increases the risk that they may be operating itegally in areas that they are not authorised to be in (whether in EEZs, RFMOs or protected areas). As part of this risk assessment, businesses should also consider what is known about the State that is undertaking the monitoring, for example, are they subject to a 'yellow card' from the European Union. To inform this risk assessment, organizations should ask companies supplying them to explain what vessel tracking requirements are in the jurisdictions they operate in. These should be easily evidenced by supplying copies of license conditions or other communications from competent authorities to vessel owners, setting out their vessel tracking requirements.  Technical guidance relating to electronic monitoring from WWF and EFCA are provided in "shared resources".	policy that aims to map its supply chains and identify the vessels or group of vessels that supplies it with seafood. This policy forms the foundation from which further supply chain insight can be determined and steps to understand	A questionnaire has been developed which is being used to capture what data the source fisheries MCS regimes is capturing, as well as the method by which it is captured. Where AIS is mandatory, then checks should be made to understand whether this data is being broadcast and is accurate. Where VMS is mandated, discussions as to whether this information can be shared with supply chain owners should be happening. Where AIS and VMS is used within the fishery compliance regime, the controls are understood by the seafood buyer and protocols are in place which ensure that when they are not operational, the vessels stop fishing and return to port. In addition, data sharing with third-parties so that assessment of vessel activity can be monitored and assessed is being encouraged along the supply chain. Where AIS and VMS is not used, then advocacy for its adoption and use is either happening or being considered.	AIS and VMS are an effectively implemented element of the flag State MCS. AIS and VMS is being routinely shared with independent third parties who are able to undertake and publish to the government assessments of the fishing activity and levels of compliance.	External	What requirements are in place for vessels to have Vessel Monitoring Systems (VMS)?  What requirements are in place for vessels to operate Automatic Identification Systems (AIS)?  Are there any other vessel tracking requirements in place for vessels?
4.3.2.1.b	Logbooks: Does the organization research whether or not MCS authorities require that vessels demonstrate they have met the requirements for recording and timely reporting of vessel position, cathor if target and non-target species, fishing effort and other relevant fisheries data in accordance with coastal State or other sub-regional, regional and global standards for collection of such data?				3.3 & ANNEX B, J3- UNE 195006	Risk assessment consideration	For States to effectively regulate fishing vessels, they need information on the location and content of their catch. If competent authorities are not requiring this information, it not on suggests that fishing is not being reported, but also significantly increases the risk that the authority is not regulating access to the fishery, or monitoring the activities of vessels to determine whether or not they are operating liegally. Logbook requirements should be easily evidenced, by supplying copies of license conditions or other communications from competent authorities to vessel owners, setting out their vessel tracking requirements.	and identify the vessels or group of vessels that supplies it with seafood. This policy forms the foundation from	The company is actively and demonstrably investigating whether or not McS authorities have effective implementation folg-books as a means of monitoring fishing activities. For example: a questionnaire has been developed that is being used to capture what data the source fishery's McS regime is capturing, as well as the method by which it is captured. Where the use of logbooks is mandatory, then checks should be made to understand whether this data is being completed and is accurate. Where logbooks are not used, then advocacy for their adoption and use is either happening or being considered.	that reasonably concludes that the use of logbooks is an effectively implemented element of the flag State MCS. Logbook data is being routinely used by the fisheries management enforcement d authorities, or shared with independent	External	What requirements are in place to provide data on vessel position, catch of target and non-target species and fishing effort to the following: the vessel's flag State? the vessel's coastal State (if applicable)? the Regional Fisheries Management Organization where the vessel fishes (if applicable) What other data requirements are in place of fishing activity by vessels that supply seafood in this contract?
4.3.2.1.c	At sea inspections: Does the organization research whether or not vessels in the supply chain are subject to a regime of inspections by MCS authorities? Vessels should give information to the relevant coastal State or duly authorized RFMO inspecting authority regarding vessel position, catches, fishing ear, fishing operations and related activities. The appropriate authority should be allowed to inspect the vessel, its license, gear, equipment, records, facilities, fish and fish products and any relevant documents necessary to verify compliance with coastal State rules and regulations or relevant RFMO conservation and management measures.				NOT DEFINED	Risk assessment consideration	Al-sea inspections are an important means to determine whether or not vessels are complying with fisheries laws and regulations. For example, actual catch can be compared with logbooks to verify the information, the fishing gear can be inspected, and the catch checked for the presence of endangered species and signs of shark firming. The tack of such inspections increases the risk that vessels are operating lighaght. States often publicise fisheries patrols to increase their deterrent effect. Vessel companies can also be requested to share post-inspection reports when organizations are seeking to verify whether or not they take place.	policy that aims to map its supply chains and identify the vessels or group of vessels that supply it with seafood. This policy forms the foundation from which further supply chain insight can be determined, along with steps to	Supply chains are mapped and knowledge of whether at-sea inspections are taking place is known for all source fisheries. Where at-sea inspections are happening, details are known about what information is being collected, i.e. logbook checks, fishing gear and inspection of catch, as well as inspections of the crew and labour conditions onboard. Where at-sea inspections are not happening, or they do not include any of the above, then advocacy should be happening or planned to occur.	the source fisheries within the buye'rs supply chains. Evidence of the inspection regime and findings are routinely published by the flag State and advocacy to address deficiencies is	External	At what frequency are vessels in the supply chain subject to at-sea vessel inspections by the coastal State, by parties to RFMOs in the high sea?  Can you share any post-inspection reports?
4.3.2.1.d	Observers: Does the organization research and ask for evidence that seafood is sourced from fisheries where observer programmes, whether electronic or human, or alternative measures have been implemented through national, subregional and regional observer programs in which the flag State is a participant? Information on observer coverage levels, or alternative measures such as increased inspections where observer schemes are not possible, should be obtained from an RFMO (where relevant) or coastal State.			Observers may be present on RFVS certified vessels in regions where there is high IUU risk. Though this is not a requirement of the RFVS programme.		Risk assessment consideration	To date, RFMOs have reled on human observers to monitor vessels at sea, collecting essential data for effective management. At many RFMOs, purse seine vessels require full observer coverage, while longine vessels require only 5 percent observer coverage. This minimal observer coverage increases the risk of IUU fishing going undetected. However, human observer schemes can be problemate due to the isolation of observers and the potential for corruption or intimidation. Although the presence of observers reduces IUU risk, this method should only form part of the risk assessment. Information on RFMO schemes related to observer coverage are sometimes published on the RFMO website, but this information tends to be limited and inconsistent.  In order to establish whether or not a coastal State scheme exists, organizations should request observer reports verifying vessel catch. These may also be evidenced by supplying copies of coastal State Icense conditions or other communications from competent authorities, such as regional observer program promisms.  As managers, scientists and stakeholders recognize that more observer coverage is needed to ensure a sustainable seafood supply chain, electronic monitoring (EMI) has proven to be a vehicle to increase oversight. EMI uses technology (cameras, OFS, gear sensors) to increase transparency and accountability of fishing activities, by collecting timely and verifiable catch information.  The organization should advocate for the development of electronic monitoring programs at RFMOs and for the adoption of standards and the appropriate infrastructure to integrate EM with existing observer programs.  Additional information on electronic monitoring program design and implementation can be found here: https://www.pewtrusts.org/en/research-and-analysis/fisue-birels/2019/09/electronic-monitoring-a-key-tool-for-global-fisheries	and identify the vessels or group of vessels that supply it with seafood. This policy forms the foundation from which further supply chain insight can be determined on whether the observation is human or electronic.	Information on the flag State requirements for onboard observation is being collected for all source fisheries. As part of this mapping and data collection process, information on whether the observation is human or electronic, the protocol against which the observations are happening is being determined, and controls or lack of are being understood and risk assessed. The frequency of observation onboard specific vessels and the wider fleet at large are assessed and compared with the relevant legislation in force. Protocols that detail what should be recorded, the frequency of recording, the steps taken if issues are found, along with who pays and monitors the observers and ensures their findings are understood. Where deficiencies are identified, advocacy is planned or happening to address these issues and in the place of human observers onboard boats, adequate safeguards and communication protocols are in place to guarantee their safety and confidence to carry out their tasks without fear of reprisal.	regime of observation that is human, a electronic or a mix. Data collected from these observations is routinely anonymised and shared publicly, so that seaflood buyers are able to proactively monitor and verify for themselves the effectiveness of this element of the MCS whilst also providing a deterrent to those vithin the fleet that might decide to flout the rules.		What requirements are in place by the flag State, coastal State or RFMO for human observers to be the vessel(s)?  What electronic monitoring measures are in place of the vessel and what authorities have access to the records?
4.3.2.1.e		supports this due diligence requirement. It ensures full chain traceability and provides information on vessel	9.3.4 Finished Product – Facilities shall have a system in place that ensures up-to-date, and easily accessible, data of all wild-caught and farm-raised raw material suppliers.  Name of the flag of the harvesting vessel  Vessel permit or license number	into account for the certification	5.3-RP B95.02	Requirement	If 4, 3,2.1.d determines the vessel is not subject to an observer programme, this risk miligation should be put in place. See 3.4 for details on full chain traceability	The company operates a seafood sourcing policy that requires regular (at least annual) supply chain traceability exercises to be conducted.	A risk assessment to determine the risks of not having onboard observations (whether human or electronic) is either in process or completed. In addition, discussions with the supply chain about low-costs observation may be happening	are employing an observation	Internal	
4.3.2.2	Where it is known that seafood or marine ingredients are sourced from vessels flagged to a State that is different than the State of nationality of their beneficial owner, is this regarded as increasing the risk of supplying illegal products?			As above.	5.3-RP B95.02	Risk assessment consideration	Although there are many reasons why a vessel owner of one nationality may use the flag of a different nationality (such as access to quota or a genuine joint venture), the use of flags from another State increases risk. In some cases, "Bags of convenience" are used to avoid more stringent flag State controls exercised by the owner's State. As effective flag State controls are a key means of reducing the risk of a vessel fishing lagelay, avoiding them increases risk. In addition, if an owner is based in a different jurisdiction from the flag, it can be more difficult to apply sanctions in the case of IUU fishing or human rights abuses. This reduces the deterrent effect of sanctions.	policy that aims to map its supply chains and identify the vessels or group of vessels that supply it with seafood. This policy forms the foundation from which further supply chain insight can be	The beneficial ownership of all vessels supplying fish and seafood is known, their background is being researched, an where concerns such as different domicile status of owner to flag State is present, the reasons for this is being understood	d supplying seafood is known, the vessels are listed along with this information on	External	What is the flag State of the vessel(s) supplying seafood under this contract?  What is the nationality of the vessel(s)' beneficial owner?
.3.3 Market	controls											





3.1 General		Cross-over with GDST	Cross-over with SPSv5	Cross-over with RFVS	Cross-over with APR	Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice	Internal or external question	Rewritten question (if external)
4.3.3.1	Does the organization undertake analysis of its supply chains and implement a system to enable it to identify the carding status of its supply chains?		2.9.8 Specifications for outsourced processes as described in 2.9 shall be developed by the facility and included as part of a signed contract or service agreement between the facility and and the provider. These specifications shall include compliance criteria associated with food safety, quality, legality, traceability and social responsibility. (See also 2.10 "Supplier Approval and Performance Monitoring").		5.3 & ANNEX D- <b>RP B95.02</b>	Required	Market controls can help to establish the legal origin of seafood products. An example of a market control scheme to curb IUU fishing is the EU IUU Regulation 1005/2008.  - Under this regulation, non-EU countries identified as having inadequate measures in place to prevent and deter IUU fishing may be issued with a formal warning, or a yellow card to improve efforts, or a red card for failure to curb IUU fishing.  - A company should implement a system to identify the carding status of its supply chains by first accessing IUU Watch, an aggregated source of information for EU carding decisions by country. For more information, including countries and their carding status, follow:				External	What flag States, coastal States and processing States have responsibility for seafood caught in this supply chain?  Are any of the above States subject to an EU yellow card or red card? See: http://www.luuwatch.eu/map- of-eu-carding-decisions/
4.3.3.2	Does the organization require that vessels in the supply chain are not flagged to or licensed to fish by States that have been issued a red card by the EU?	supports this due diligence requirement	2.9.8 Specifications for outsourced processes as described in 2.9 shall be developed by the facility and included as part of a signed contract or service agreement between the facility and and the provider. These specifications shall include compliance criteria associated with food safety, quality, legality, traceability and social responsibility. (See also 2.10 — "Supplier Approval and Performance Monitoring").	Vessels registered to States that have been red-carded by the EU would still be able to apply to the RFVs, though they would need to provide robust evidence that they are operating legally. The audit will reflect this increased level of scrutiny through out their certificate and is picked up at the country/region risk assessment.	3.1 , Annex A, I, J1 - UNE 195006	Required	A company should require that vessels it sources from in the supply chain are not flagged or licensed to fish by States that have been issued a red card. To determine if the vessel is flagged to a State that has been issued a red card, a company can request the following information from their supply chains:  -Request catch certificate information in accordance with the EU IUU Regulations, including fishing vessel name, flag State, vessel or IMO number, for example  -Review and verify information on the catch certificate to determine compliance. This may include requesting physical inspection reports of consigned seafood products carried out by third country authorities  -Reject consignments of seafood products if the vessel is determined to be flagged to a State that has been issued a red card. See www.iuuwatch.eu for more information.				Internal	
4.3.3.3	Are purchases made from fishing vessels flagged to States that have not notified a competent authority to the EU under the EU IUU Regulation?			Not an explicit requirement in the RFVS	Not an requirement in APR	Risk assessment consideration	A company should check that the flag State of the vessel(s) supplying them (already notified in other questions) are on the list of countries that have notified the EU (to be used as a proxy for non-EU countries) of their competent authority and been accepted: https://ec.europa.eu/fisheries/cfp/illegal_fishing/info				Internal	
	Where fish is sourced from vessels flagged to a State given a yellow card by the EU or fishing in a coastal State given a yellow card by the EU, is the organization able to demonstrate that there is a system that enables full chain traceability and that audits are completed at a minimum once every 12 months?	supports this due diligence requirement. It ensures full chain traceability and provides information on vessel		As above	Not an requirement in APR	Requirement					Internal (using answers from previous question)	
4.3.3.5	If sourcing from these countries, does the organization research the reasons for the yellow card and, where it has access, record (and, where possible, support) efforts by the yellow- carded State to address these reasons?			As above	Not an requirement in APR	Requirement	Seafood from a country that has been given an EU yellow card is at inherently higher risk, as tess reliance can be placed on efforts by the relievant government to manage fisheries. If organizations decide to continue taking supplies from them, and reliance is placed on government fisheries management measures to mitigate the risk of ITUI Shing, then it is important to understand the reasons for the EU yellow card and the efforts being taken by the State to address those reasons. The EU publishes Statements when yellow cards are issued to explain the concerns that led to the cardings. In addition, organizations can contact NGOs and other stakeholders active in those countries, to gain an insight into what progress is being made.  If is also recommended that suppliers in the yellow carded country are contacted to discuss the reasons from the yellow card, to ascertain what is being done by the government to address the situation, and whether or not the supplier is playing are lein supporting any reforms. Organizations may also choose to individually or in partnership with their suppliers and/or NGOs, contact the authorities in the yellow carded country is authorities contact the authorities in the yellow carded or to the yellow carded country.  Through the above, a view can be formed regarding whether or not the yellow carded country's authorities ere engaging procucitively to address the issues that led to the card. This in turn can inform the organization's view on whether it is advisable to continue to supply from the country or if new sources need to be sought.  The following map, maintained by NGOs, lists current and former cards: http://www.isuwatch.eu/map-of-eu-carding-decisions/	policy that aims to map its supply chains and identify the coastal State that supplies it with seafood. This policy forms the foundation from which further supply chain insight can be determined of the EU card status.	The source country/fishery should be determined for all SKUs and the reasons for any current red, yellow or green status of the supply source is understood, so that engagement with the third country government and the supply chain can be planned. The reasons for any current or previous EU cards are understood, and engagement with the third country government is happening, either directly or via the supply chain, so that support is provided to address the issues raised. In addition, for countries that are supplying the EU, there is an understanding of their fishery management systems and controls against which an assessment of the risk of EU sanction can be made.	addition, there is a mechanism/protocol in place that allows the suppliers within the supply chain to engage with the third	(however, may choose to contact supplier to obtain information on measures being taken by flag State in reaction	
4.4 Source fi	shing vessels											
4.4.1	Seafood should not be sourced from any vessel(s) that appear on any recognized blacklist (those established by RFMOs). Is there a system in place to verify whether vessels appear on any of the available blacklists? Other blacklists exist, but RFMO blacklists are the only ones recommended here.		9.3.4 Finished Product – Facilities shall have a system in place that ensures up-to-date, and easily accessible, data of all wild-caught and farm-raised raw material suppliers.  Name of the flag of the harvesting vessel  Vessel permit or license number	Requirement of clause 1.28, vessels must have a license to operate.	3.1, 6.1- UNE 195006	Required	A company should not source seafood from vessels that appear on recognized blacklists established by RFMOs. To determine whether or not a fishing vessel is listed, follow: https://fuu-vessels.org/	Mapping of supply chains is underway and a full list of all fishing, transhipment and support vessels is being developed. Whilst the sources of supply are being mapped, information about fishing icences and authorization details begin to be collated and cross-referenced.			External	As a company, can you confirm that none of the vessels in this supply chain appears on a regional IUU black list. See: <a href="https://iuu-vessels.org/">https://iuu-vessels.org/</a> .
4.4.2	State EEZs and territorial waters or, where on the high seas, by the relevant RFMO?		9.3.4 Finished Product – Facilities shall have a system in place that ensures up-to-date, and easily accessible, data of all witd-caught and farm-raised raw material suppliers.  Name of the flag of the harvesting vessel  Vessel permit or license number  Unique vessel identifier (such as vessel name or registration number)	Requirement of clause 1.28, vessels must have a license to operate.	3.1, 6.1- UNE 195006	Required	The FAO Global Record of Fishing Vessels, Refrigerated Cargo Vessels and Supply Vessels, maintains a record of fishing vessels, including their identity, history and authorizations to fish and tranship and, in the future, will also have a record of non-compliance for that vessel. This tool is intended to support risk assessment. Follow this link for more information or a list of vessels: http://www.fao.org/global-record/en/ Another useful database for searching if EU vessels fishing in the waters of a non-EU State have an agreement with that State is: http://www.whofishesfar.org/	Mapping of supply chains is underway and a full list of all fishing, transhipment and support vessels is being developed. Whist the sources of supply are being mapped, information about fishing licences and authorization details begin to be collated and cross-referenced.			Internal	
4.4.3.a	latest version of Circular Letter 1886) in their supply chain have a unique vessel identifier (UVI) issued by IHSM&T on behalf of the IMO	GDST standards require IMO number for all qualifying fishing vessels	9.3.4 Finished Product – Facilities shall have a system in place that ensures up-to-date, and	Clause 1.29 States 1.29 The applicant shall have a clearly visible Unique Vessel (dentifier (UVI) (e.g. IMO number, vessel reference number).	6.2- UNE 195006	Risk assessment consideration	Unique vessel identifiers (UVIs) such as IMO ship numbers, are an identification number that is unique to each ship, and is never reassigned to another vessel. This means that vessel name, ownership, records of non-compliance lect, can be recorded using these numbers. Once allocated, these numbers should be included on all relevant documentation including licences and authorizations, transhipment reports, landing requests/reports etc., is improved transparency of the supply chain. Difficulty arises where a specific country or RFMO does not enforce the use of UVIs or where auctions result in UVI number changes. Suppliers should request UVI records and if not available, consider that the supply-chain is of higher risk.  Companies should advocate for the inclusion of vessels on public registers. This increases transparency and reduces the risk of IUU seafood entering supply chains.	and a full list of all fishing, transhipment and support vessels is being developed, which includes their length and weight,	All vessels within the supply chain are known, they are on public vessel registers and the Global Record, along with any relevant RFMO. The vessels that qualify have IMO numbers in place, and those that do not, have been provided with UVIs by their flag State. Vessel ownership is known and checks are undertaken to ensure that all licences and authorizations are up to date with no non-compliance.	on the global record, and flagged to s countries that routinely update their submission of information to Global		Do all qualifying fishing vessels have a unique vessel identifier (UVI) issued by IHSM&T on behalf of the IMO?  Where is this information captured, e.g. catch certificate, registration?  Can this information be made available upon request?
4.4.3.b	number have an alternative internationally or nationally recognised UVI. Such UVIs should remain the same for the entire life of the vessel, be marked on the vessel and appear on all	all qualifying fishing vessels	9.3.4 Finished Product – Facilities shall have a system in place that ensures up-to-date, and easily accessib, date of all wide-aught and farm-raised raw material suppliers.  Name of the flag of the harvesting vessel  Vessel permit or license number  Unique vessel identifier (such as vessel name or registration number)	As above	6.2 & ANNEX F- UNE 195006	Risk assessment consideration	IMO numbers can be searched here: <a href="https://monumbers.ihs.com/">https://monumbers.ihs.com/</a> .  Some countries do not enforce the use of IMO numbers or they may not be enforced on vessels below a certain size. Therefore, alternative unique vessel identifiers (UVIs) may be required. Examples include CartbShip Unique Numberring Schemes, tuna RFMO vessel lists, High Seas Vessel Authorization Record, among others. Suppliers should request that a UVI and not just an IMO number, is included within the catch documentation.  The UVI should be collected for all vessels in the supply chain, such as when a transhipmen occurs. The Global Dialogue on Seafood Traceability (GDST) Standard 1.0 includes these as key data elements (ROEs) to collect as part of establishing full chain traceability. The Core Normative Standards can be accessed here: <a href="https://traceability-dialogue.org/coredocuments/adst-1-0-materials/">https://traceability-dialogue.org/coredocuments/adst-1-0-materials/</a>	and a full list of all fishing, transhipment and support vessels is being developed, which includes their length and weight, type of fishing gear and whether they have a UVI and are on a publicly available vessel register maintained by their flag State or RFMO where relevant. In addition, as vessel details are	qualify for an IMO number and their UVI is not included on official documents such as logbooks and landing records the company is able to demonstrate their their supply chain checks for the presence of UVIs on these documents and	Following advocacy for an extension to the existing IMO numbering scheme, all vessels, irrespective of size are included within the IMO number scheme and all official fishery management documentation cross-references and uses the IMO number as a matter of routine.		Do those fishing vessels not qualifying for an IMO number have an alternative internationally or nationally recognised unique vessel identifier (UVI)? If so, what alternative UVI is used and can this information be made available upon request? What assurance or evidence exists to support that UVIs remain the same for the entire life of the vessel?





3.1 General		Cross-over with GDST	Cross-over with SPSv5	Cross-over with RFVS	Cross-over with APR	Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice	Internal or external question	Rewritten question (if external)
4.4.3.c	Evidence that all fishing vessels in their supply chain have up-to-date authorizations and fishing licences issued by the relevant competent authorities. It should be possible to request this information from the suppliers and receive the information within 14 days	and licenses): fishing authorization,	9.3.4 Finished Product – Facilities shall have a system in place that ensure up-to-date, and easily accessible, data of all wild-caught and farm-raised raw material suppliers.  Name of the flag of the harvesting vessel – Vessel permit or license number – Unique vessel identifier (such as vessel name or registration number)		.1, 6.1- UNE 195006	Risk assessment consideration	Depending on which State a vessel is flagged to, i.e. registered with, certain fishing licences will be applicable, and are mandatory for the vessel to be able to fish. It is expected that a supplier would be able to secure details of such licences from the vessel operators within 14 days. If the vessel operator is unable to provide such evidence, the vessel should be considered at higher risk of IUU due to the lack of transparency.  The Global Record of Vessels is an FAO initiative that aims to centralise information on vessels by pairing IMO numbers and fishing authorizations, among other data. As this database is developed, it has the potential to be a powerful tool for improving vessel transparency: http://www.fao.org/global-record/information-system/en/	and a full list of all fishing, transhipment and support vessels is being developed. Whilst the sources of supply are being mapped, information about fishing licences and authorization details, whether vessels have a UVI and are on a publicly available vessel register maintained by their flag State or RFMO, are being collated and cross-referenced. At a minimum PAS 1550 should be referred to in supplier communication so that they are aware of the desire to assess IUU risk.	ensure that all licences and authorizations are up to date with no non-compliance. Where there is no evidence of licences and authorizations, these should be able to be provided within 14 days of a request being made. If evidence is not able to be provided, an option to suspend buying until the issue can be addressed is considered.	databases, on the Global Record, and their fishing authorizations, current and historical, are available to be checked at will.		Do all fishing vessels in your supply chain have up-to- date authorizations and fishing licences issued by the relevant competent authorities? How often are authorizations and fishing licenses reviewed/renewed? If requested, could this information be provided within 14 days?
4.4.3.d	Evidence that vessel operators obtain confirmation directly from the coastal State and/or RFMO that authorizations and fishing licences have been issued and the dates they are valid for, and make this information available upon request			Not explicit, though vessels would have 3. to provide evidence to confirm that they have the valid permissions / license to operate.	.1 & ANNEX A- UNE 195006	Risk assessment consideration	This ensures that the vessel operators have used the correct procedures to obtain the authorizations or fishing licenses, and supports legality claims, if the company does not obtain this evidence, the risk of IUU fish entering their supply chain will be higher.  Where possible, this and other documents that support legality should be digitized and accessible to relevant supply chain actors and stakeholders. The GDST Standard 1.0 is an exemplar for how to digitize data to ease data sharing and increase interoperability between traceability systems. https://traceability-dialogue.org/core-documents/gdst-1-0-materials/	chain mapping process, with the details	present on publicly available vessel registers such as the Global Record. Where this information is not available, advocacy is planned or ongoing, encouraging this to happen.	authorization information is contained on the Global Record and publicly available vessel registers maintained by the flag State. Copies of licences and	External	Do vessel operators obtain confirmation directly from the coastal State and/or RFM Or that authorizations and fishing licences have been issued and the dates they are valid for?  Is there evidence to support this and can this information be made available upon request?
4.4.3.e	Evidence that vessel operators have obtained and documented a full list of all of the conditions of fishing licences and authorizations directly from coastal State authorities and/or RFMOs; including locations where fishing is restricted, gear use, crew requirements, observer requirements and any other conditions			Covered in clause 1.28. The vessel shall 3 have all of the required legal documents to fish, including:  • Fishing license from their flag State;  • Fishing license from the country where they are fishing, if different to their flag State:  • Ship registration certificate from their flag State; and  • Safety certificate issued by their flag State (e.g. MCA certificate).		Risk assessment consideration	This should be available upon request from the catch sector, who should hold licenses and authorizations together with their conditions. If catch vessels are not maintaining such records, there is a risk that they do not understand the laws and regulations they are meant to complying with, increasing the likelihood of them engaging in IUU. This should be factored in to risk assessments as the vessel is considered at higher risk.	communicated by a specified time in the future, or that RFVS certification is in place for all supply vessels. At a minimum, PAS 1550 should be referred to in supplier communication, so that they are aware of the need to comply with licensing requirements.	Supply chain has provided license conditions for supplying vessels and these have been documented.	Suppliers are able to demonstrate to the company purchasing the seafood that the fishing vessel owners comply with the legal requirements, or RFVS certification is held for all supply vessels.		Have vessel operators obtained and documented a full list of all of the conditions of fishing licences and authorizations directly from coastal State authorities and/or RFMOs, including locations where fishing is restricted, gear use, crew requirements, observer requirements and any other conditions?  Is there evidence to support this and can this information be made available upon request?
4.4.3.f	Evidence that fishing vessels and the companies that own them pay their license fees to State bank accounts and not to agents, and that they provide documentation and evidence of this to the processor/importer if requested			requirement	lot an requirement in APR	Risk assessment consideration	This reduces the risk of a fraudulent license being used, as it avoids the possibility of obtaining a license from an unauthorized agency or corrupt official.  Evidence of paying license fees to a State bank can be in various forms, for example, receipts or bank Statements. Where vessels or the companies who own them are unable to supply such information, the vessel should be considered at higher risk of fishing illegally.	and support vessels is being developed. Whilst the sources of supply are being mapped, information about fishing	Fishing licences and authorizations are being collected for each vessel in the supply chain and questions about who pays for them and who issues them are being asked to determine whether agents and middlemen, rather than direct dealings with government bodies, is happening. The process through which vessel scences and authorizations are issued for the area in which the vessel is licenced and authorized to fish is known, and information on who is involved in the process is understood, as the presence of unauthorised agents/brokers and middlemen increase the risk of fals/fied documents.	authorizations are issued by a		Who do fishing vessels and the companies that own them pay their license fees to?  Do they provide documentation and evidence of this to the processor/importer if requested?
4.4.3.g	Evidence that fishing vessels have a vessel monitoring system (VMS), automatic identification system (AIS) or other vessel tracking technologies that are continuously engaged while at sea and actively monitored by the coastal or flag State	GDST Standard 1.0 KDEs (vessel data): availability of catch coordinates, satellite vessel tracking authority.		For vessels where AIS / VMS applicable 3. clause 1.30.1 States "If an automatic identification system (AIS) or vessel monitoring system (VMS) is fitted, it will fully operational and be turned on whilst at sea."	.2, 3.4 & ANNEX B- UNE 195006	Risk assessment consideration	The company should ask suppliers if these systems are in place on board vessels, the percentage of vessels covered, and the percentage of this data which is monitored. If possible, evidence of this data and monitoring by a third party should be requested. Where vessel tracking technologies are not used or authorities will not release this information, the supply chain should be considered at higher risk of IUU fishing.	vessels supplying fish and seafood is happening, and as part of this process, information is being collected to understand what the rules of the flag and	are being assessed to determine whether they are sufficient to provide supply chain assurance that fishing activity is being carried out legally and in compliance with licences and authorizations.	publicly available. In the event that data	External	Do all fishing vessels have a vessel monitoring system (VMS), automatic identification system (AIS) or other vessel tracking technologies?  If not, what percentage of vessels have these systems and what percentage of this data is monitored?  Are these systems and technologies continuously engaged while at sea and actively monitored by the coastal or flag State?  Can this information be made available upon request?
	Evidence that the vessels are in compliance with inspection regimes. This includes evidence that the vessel management:  1) accept and facilitate the prompt and safe at sea boarding by relevant coastal State inspectors or duly authorized RFMO inspecting authority; 2) cooperate with and assist in the inspection of the vessel conducted pursuant to an authorized at-sea inspection; 3) do not obstruct, intimidate or otherwise interfere with relevant coastal State inspectors or duly authorized RFMO inspecting authority in the performance of their duties; and 4) allow the relevant coastal State inspectors or duly authorized RFMO inspecting authority in the communicate with the authorities of the flag State of the vessel and the relevant coastal State output of the vessel and the relevant coastal State output of the vessel and the relevant coastal State output of the vessel and the relevant coastal State output of the vessel and the relevant coastal State output of the vessel and the relevant coastal State output of the vessel and the relevant coastal State output of the vessel and the relevant coastal State output of the vessel and the relevant coastal State output of the vessel and the relevant coastal State output of the vessel and the relevant coastal State output of the vessel and the relevant coastal State output of the vessel output of the vessel output of the vessel of the vessel output output of the vessel output			The vessel would have to demonstrate they are legally compliant with inspection regimes. This could also be verified by the auditor reaching out to the RFMO for clarification. As part of the RFVS Certification Requirements, an IUU risk assessment would be undertaken to inform audit scope.		Risk assessment consideration	Records of inspection regimes or inspection results can be used here to confirm whether or not these conditions are met. Inspections may include the following:  Document checks  * Logbook  * Logbook  * Licence, variations and permits  * Fishroom plan  * Certificate of Registry  Fishroom  * Assessment of catch  * Comparison with logbook  * Check weighing  Working conditions  Gear  All gear in use should be inspected for compliance, and appropriate mesh sizes and dimensions checked, including some gear that is not in use.  It is recognised that this information may be difficult to obtain in some countries. Where this information cannot be obtained, catch vessels should be asked to document why the evidence does not exist (either vessels are not inspected or the inspecting State does not issue inspections do not take pleace or their results are not documented, vessels should be considered at higher risk. A company can check that the flag State of the vesse(s) supplying them are on the list of countries that have notified the EU (to be used as a proxy for non-EU countries) of their competent authority and have been accepted:	desire to be able to review evidence that wessels are complying with any relevant inspection regimes, has been communicated to the suppliers and stakeholders with influence in the supply chain to make this happen. Ideally the communication includes details of the types of evidence that would be necessary to prove this, i.e. the information detailed within the guidance notes.	recognition of the value that vessel inspections bring, and that information is being collected, reviewed and assessed for vessels within the supply chain, to determine the validity and engagement with the inspection regimes. Where information is not available from either the flag State or vessel, the supply chain actors and stakeholders are advocating to the flag State that legal compliance regimes and engagement information should be shared with seafood buyers, and ideally publicly.	compliance regimes, and which vessels are cooperating with them and which are not. Supply chains can demonstrate that the vessels they are buying from are cooperating with the published inspection regime and are able to demonstrate evidence of this when required.		What evidence is available to support that vessels are in compliance with inspection regimes?  Is there evidence to support that the vessel management:  **Accept and facilitate the prompt and safe at sea boarding by relevant coastal State inspectors or duly authorised RFMO inspecting authority cooperate with and assist in the inspection of the vessel conducted pursuant to an authorized at-sea inspection of onto obstruct, intimidate or otherwise interfere with relevant coastal State inspectors or duly authorized RFMO inspecting authority in the performance of their duties are supported to the relevant coastal State inspectors or duly authorized RFMO inspecting authority to communicate with the authories of the flag State of the vessel and the relevant coastal State during the boarding and inspection?  Where this information or evidence is not available, can you document why it does not exist, e.g. vessels are not inspected, inspecting State does not issue inspection reports?
4.4.3.i	Evidence that fishing vessels engage crew in decent conditions.  Attention is drawn to ILO Convention C188 which sets minimum international levels for crew conditions on fishing vessels. The Convention will come into force on 16 November 2017	the existence of human welfare policies		Core objective of the RFVS is to demonstrate that crew have a decent working environment (Section 2 of the RFVS).	- UNE 195006	Risk assessment consideration	ILO Convention C188 sets out minimum standards for crew working conditions. For vessels tagged to a country that has sipend and implemented ILO C188, risk of crew not having decent working conditions is decreased, as governments are bound by the convention to verify that vessel conditions and crew contracts are in line with its provisions. Where flag States have not adopted ILO C188, organizations can still request evidence that conditions and contracts are at the same standard. Information supplied by the UK to support UK operators complying with ILO C188 can be used as a reference for organizations seeking to compare conditions and contracts to the provisions of ILO C188. See: https://www.gov.uk/government/collections/lio-work-in-fishing-convention	exercise, information on whether the flag State has ratified and implemented ILO C188 is being collected and the review of employment contracts and evidence of decent working conditions is required by	The flag State has ratified ILO C188, employment contracts stating the employment and working conditions are in place for all vessel crew, and independent evidence of working conditions and employment is provided by 3rd party certification. Where this is not fully in place, advocacy is planned or underway to achieve the aim.	Flag States have ratified and implemented ILO C188, employment contracts are available for each crew member, and decent working conditions have been confirmed through 1st, 2nd or 3rd party audits and certification such as the responsible fishing vessel scheme.		What minimum standards are required for worker contracts and vessel conditions for vessels supplying seafood under this contract?  What labour inspections do vessels supplying seafood under this contract face by government authorities?
4.4.3.j	Evidence that suppliers (e.g. fishing vessel companies) have checked the references and background of vessel captains before they were hired			Not an explicit requirement. However in the eligibility clause if they have been frosecuted for breaching any of these clauses in the previous 6 months they cannot apply. If they breach once certified this will exclude the skipper from applying for the RFVS for a period of 12 months.	lot a requirement, but ANNEX C4- UNE 95006	Risk assessment consideration	Organizations should ask suppliers what checks they undertake on the background of captains they employ. Where it is found that no checks are made on their background, including previous convictions for IUU fishing or human rights abuses, this significantly increases the risk of supplying from those vessels. It can be recommended that suppliers undertake these checks going forward to reduce risks associated with the seaflood they are supplying in the future. Where a supplier undertakes checks on the background of captains, these can be verified on a sample basis during audit processes.			An independent third party audit shows full compliance with this policy.	External	What checks are undertaken on the professional background of capitains employed?



3.1 General		Cross-over with GDST	Cross-over with SPSv5	Cross-over with RFVS	Cross-over with APR	Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice	Internal or external question	Rewritten question (if external)
4.4.3.k	Evidence that captains who have been found guilty of IUU fishing on more than one occasion are not engaged and that those convicted on a single occasion receive extra supervision and audit			Not an explicit requirement, however covered in the eligibility clauses see above.	Not defined APR	Risk assessment consideration	See notes for 4.4.3, above. Where suppliers have a process in place to check the background of captains before they are hired, they should also have a policy setting out that captains with a history of multiple IUU infractions are not engaged, and those with a history of a single IUU infraction may be engaged but with extra supervision. The absence of such a policy increases the risk of seafood supplied by that supplier.	of point in the future, (if not already	On request, vessel owners/managers are able to demonstrate that they are in compliance with the policy, providing evidence of background checks performed such as references from previous employers and searches of compliance histories of previous vessels captained.	An independent third party audit shows full compliance with this policy.	External	Are captains hired if they have been found to have been guilty of IUU infractions?  Are any additional corporate risk mitigation measure put in place if such captains are hired?
4.4.3.1	Evidence that captains or other persons are not engaged if checks find they have been found responsible for any previous human rights abuses			Not an explicit requirement, however covered in the eligibility clauses see above.	Not defined APR	Risk assessment consideration	Where suppliers have a process in place to check the background of captains before they are hired, they should also have a policy setting out that captains found to have previously committed a human rights abuse are not engaged. The absence of such a policy increases the risk of seafood supplied by that supplier	As above	As above	As above	External	Are captains hired if they have been found to have a history of human rights abuses?
4.4.3.m	Evidence that suppliers are not procured from if checks find they have been found responsible for any previous human rights abuses			Vessels will be suspended from the RFVS scheme if human rights abuse allegations are raised, and certificate withdrawn if allegations are verified to be true.	Not defined APR	Risk assessment consideration	See 4.4.4 below	Policy communicated to suppliers explaining a zer tolerance approach to supplying seafood from companies convicted of IUU fishing or human rights abuses.	Policy position is underprined by internal due diligence processes, using information obtained through McS information gathered in supply chain mapping, including searches for previous convictions relating to vessels owned by suppliers. Where compliance histories of companies are not available due to a lack of public information, this should be documented and advocacy to relevant States undertaken to publish information relating to compliance.	associated with IUU fishing or human e rights abuses. This is reviewed through	External	What measures are put in place to make sure that seafood is not purchased from suppliers that have been found to have been associated with human rights abuses?
4.4.4	Where any of the above checks find evidence of IUU fishing or illegal working conditions, fish should not be sourced from those suppliers. Where suppliers are unable to supply one or more of the above areas of evidence, does the organization document as part of the risk assessment, the decision of whether or not to supply and what mitigating actions are to be taken?			If previously certified RFVS vessels are found to be engang in illegal activities, there certifiate will be withdrawn, and they will not able to reapply for a minimum period of 12 months.	6.3, 8.2, 9.2, 12- RP B95.01	Requirement	Organizations should have a policy of not buying seafood from a supplying company that has been found to have engaged in human rights abuses or IUU fishing. This information can be found through the due diligence process, including information requests to suppliers, third party audits, internal audits, internal searches and meetings with NGOs active in countries relevant to their supply chains. The due diligence process should also document where information or policies recommended above are not available and set out what mitigating measures, such as third party audits, internal audits, information requests from NGOs etc. are sought.  For example:  - ICCAT's IUU vessel list: <a href="https://www.iccat.in/fent/UUlist.html">https://www.iccat.in/fent/UUlist.html</a> - EU's IUU vessel	n explaining a zero tolerance approach to d supplying seafood from companies	Policy position is underpinned by internal due diligence processes, using information obtained through MCs information gathered in supply chain mapping, including searches for previous convictions relating to vessels owned by suppliers. Where compliance histories of companies are not available due to a lack of public information, this should be documented and advocacy to relevant States undertaken to publish information relating to compliance.	associated with IUU fishing or human rights abuses. This is reviewed through	1	
4.4.5	Does the organization research vessels, companies and their beneficial owners from which it is outcring seafood? This research should include verifying the IMO numbers for any new vessels entering a supply chain	Implementation of GDST standards supports this due diligence requirement at it provides information on IMO numbers for all qualifying fishing vessels.			5.3 & ANNEX D- RP B95.02	Requirement	Organizations should request that suppliers provide a complete list of vessels that supply to them, including their full names, IMO numbers and beneficial owners. This information can bused to research vessel histories on online databases (see APPENDIX). Where a large fleet of small-scale vessels are used by suppliers, and depending on the level of risk assessed in the supply chain, organizations may decide to use a sample-based approach to verifying vessel identities and histories through online databases.	e exercise, information is being compiled t that not only includes the vessel name, UVI, flag State, fishing gear used and	Information on the first tier owners of fishing vessels is either fully available and included on the company's vessel sist, or included in the Global Record, which when fully populated will provide details of operator, owner, beneficial owner and IMO number if applicable. Online databases are being used to check the history and background of the first tier owners of fishing boats, so that finks to IUU or human rights abuse can be identified.	vessels that supply all seafood are known, even if they are second or third tier owners identified through shell and holding companies. The ownership structure of all vessels is included within		Provide a complete list of all vessels used to supply seafood under this contract, including full names, IMO numbers and the beneficial owner of the vessel.
4.4.6	Does the organization source seafood where this research finds evidence of vessels, companies or beneficial owners with a history of engaging in illegal activity?				No, it doesn't. (above and F90)	Requirement	See 4.4.4	Policy communicated to suppliers explaining a zero tolerance approach to supplying seafood from companies convicted of IUU fishing or human rights abuses.	Policy position is underpinned by internal due diligence processes, using information obtained through MCs information adhered in supply chain mapping, including searches for previous convictions relating to vessels owned by suppliers. Where compliance histories of companies is no available due to a lack of public information, this should be documented and advocacy to relevant States undertaken to publish information relating to compliance.			
4.4.7	Is the organization able to provide copies of the flag State fishing authorizations granted to fishing vessels when/if requested by any actor or relevant party? Evidence should be maintained in the supply chain about the use of VMS and a fisheries logbook by the flag State to monitor vessel activities	authorization number. This information should enable the organization to have			ANNEX J9- UNE 195006	Requirement	Organizations should ask that suppliers maintain evidence of their fishing authorizations issued by relevant flag and coastal States, as well as relevant RFMOs. In the case of RFMOs and an increasing number of States, these can be verified by the organization through checking online lists of authorised vessels. In the future, the FAO Global Record will also be a resource where this information can be verified. Where these are not shared by States online, on a sample basis, organizations should ask that suppliers provide evidence, including licenses issued by flag and coastal States. Where the supply chain or competent authority are assessed as being high risk but organizations wish to continue to supply from them, then they should consider contacting governments directly to verify the validity of authorizations.	Whilst the sources of supply are being mapped, information about fishing licence and authorization details begin to be collated and cross-referenced.	The company has the ability to access flag State fishing authorizations, or has them to hand so that it can assess whether the fishing vessel/company is complying with the authorization conditions.	Flag State fishing authorizations are available for all vessels within its supply chain and these authorizations are held electronically, which enables the company to interrogate and validate them at will.	External	Please provide copies of flag State authorizations for supplying fishing vessels.
4.5 Tranship												
Does the orga	independent observer programme appropriate to the fishery?	The GDST standards require collection of transhipment information (date, location, vessel name, UVI) which provide the basis to investigate all use diligence requirements listed in chapter 4.5.		Clause 1.26 requires transhipment dates, name of carrier, dates and catch consignment details.	3.3, 6.1 & ANNEX J3,9- UNE 195006	Required	Unmonitored al-sea transhipments are a potential avenue for IUU-caught seafood products to enter the supply chain. There are currently different protocols for transhipment activity, each with differing levels of documentary evidence and observer presence required. The FAG is developing transhipment best practises, and organizations should be aware of their development, adopt them when completed, and encourage their supply chains to use them to all consistent implementation. To ensure better reporting and more complete, uniform information, a company should request from relevant authorities throughout their supply chain, the following information: -Require all transhipment events be reported to the relevant flag, coastal, port State and RFMO Socretariat -Require 100 percent observer coverage (human, electronic or combination) -Require 100 percent observer coverage (human, electronic or combination) -Require for the supplement of the relevant authorities (other ways to ensure coverage?)	including identifying whether transhipment is present and a necessar part of the supply chain. Included within	is taking place, which includes the needs for 100% observation of transhipment and data sharing.	chain have access to transhipment data as they need it.		What practices are in place to ensure transhipments in their supply chain are recorded, monitored and covered by independent observer programs appropriate to the fishery?
4.5.1.b	If a transhipment is licensed (and therefore permitted) then the vessel is checked to see if it is on the relevant authorized register for fish carriers?			Not an explicit requirement	3.3, 6.1 & ANNEX J3,9- UNE 195006	Required		Supply chains are being mapped to determine whether transhipment is happening and the vessels involved with it.	Transhipment vessels are present on authorized vessel lists and their flag State is known or steps are being taken to achieve this.	All transhipment vessels are known and fully comply with their vessel authorizations.	External	Are all transhipments at sea relating to supply authorized?
4.5.1.c	Both vessels in the transhipment have uninterrupted VMS, AIS or other vessel tracking technology operating?			Not an explicit requirement	3.3, 6.1 & ANNEX J3,9- UNE 195006	Required		Information on whether AIS or VMS is used by vessels transhipping catch is either known or being collated.	AlS and VMS is used on both vessels transhipping seafood within the supply chains, and where their use is not continuous, it is being actively advocated for.	All vessels involved in at sea transhipment use AlS and VMS that is transmitted continuously. In the event of transmission interruptions, vessels are shown to meet the internationally agreed protocols of what to do in such an event.		Do both vessels involved in the landing and transhipping of fish operate VMS/AIS or vessel tracking technology?
4.5.2	is all of the information regarding any at sea transhipments made available to the end purchaser of the seafood in the supply chain (e.g. restaurant, brand)?	The GDST standards require collection of transhipment information (date, location, vessel name, UVI) which enables information-sharing to the endpurchaser.			6.1 & ANNEX J3,9- UNE 195006 5.3- RP B95.02	Required		Communication to the supply chain is present which clearly states there is an ambition that where transhipment is present in the supply chain, that it is known and documented.	Transhipment in the supply chain is understood and information is either being routinely passed to consumers or can be upon request.	Supply chains are transparent enough that information on the use of transhipment is known by the end buyer and they have confidence that transhipment is being carried out as required by their authorization and meets internationally agreed protocols.		
4.5.3	required documentation and authorizations	transhipment vessel data (including transhipment vessel name, UVI,	9.4.1 Products shall be packed in bags, boxes or master cartons, britestack pallets (i.e. atmost) that are properly labeled with all information, including allergens, as required by local legislation and legislation of the country of destination.	The RFVS certificate holder would need to declare if their vessel has all the necessary document in place to ensure hay are legal at the pigint of anding or leaving the vessel including trans shipment activities.	6.1 & ANNEX J3.9- UNE 195006 5.3- RP B95.02	Required	A company should request the following information on transhipments: -!stof vessels involved in transhipments -Details of transhipment e.g. date, area, position -dulthorization of transhipment -Details of transhipment object, e.g. species, weight, product form -Whether an observer program is in place to monitor the transhipments, as well as number of inspections and percentage conducted at random -Independent observer report  These documents should be collected and scrutinised by importers and processors. Information pertaining to transhipments is contained on section 6 of EU catch certificates.  The GDST Standard 1.0 lists key data elements that should be collected for any transhipments. See Core Normative Standards here: <a href="https://traceability-deloque.org/core-documents/odst-1-0-materials/">https://traceability-deloque.org/core-documents/odst-1-0-materials/</a>	A policy is adopted that requires transhipments to be mapped in the supply chain and communicated to suppliers.	Supply chain mapping is complete for all seafood sources and the need or use of transhipment within the supply chains has been established. The details described in the implementation notes and SDST are either collected and available to the supply chain owner, or are being collected and reviewed.	All of the GDST KDEs and items listed in the implementation notes are available for all supply chains that employ transhipment within them.	Internal	





i.1 General		Cross-over with GDST	Cross-over with SPSv5	Cross-over with RFVS	Cross-over with APR	Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice	Internal or external question	Rewritten question (if external)
6 Landing a	t port											
6.1 General 6.1.1		on landing location and landing date which provide the basis to investigate all due diligence requirements listed in	facility shall maintain documented records and quantities for all finished product production lots to include the below information, as applicable: - Country of first landing	of scope of the RFVS standard,	6.2.2, 7- RP B95.01	Required	What measures can a company take to obtain landing procedures and determine the level of port controls? As a first step, a company can show preference for ports in States that are party to the FAO Port State Measures Agreement (PSMA), as these are associated with a lower level of risk of being entry points for liligeal catch. A company should ask if the designated port in the port State is a party to the PSMA. If not a party to the PSMA, a company should ask what is preventing the port State from joining.  A company should ask if records of port entry requests, denials, documentary checks and inspections are kept. If so, additional questions that a company should ask are:	determine all of the ports where fish and seafood is landed, what controls, documents and systems each of the ports requires of a vessel when it lands, and whether the port State is party to the port State measures agreement and the ports used to land are designated within it. At a minimum, PAS 1550 should be	being carried out, who they share this data with, and that the	implemented checks at port that are sufficient to eliminate IUU fish being landed. The regime used to check landings are publicised, as is a summary of the checks and their findings. Risk assessments routinely show the ports of	External	What landing procedures are in place to determine the level of port controls?
			<ul> <li>Name of entity to which the fish was first landed or delivered including: name, telephone, and email address of contact person</li> <li>Evidence of chain of custody from harvest to export to USA, where applicable</li> </ul>				-Are the records public?  Is there a protocol to notify foreign port authorities of such information?  Is an electronic information system used to collect, store and share this information?  How can companies and relevant stakeholders obtain copies of this information and landing procedures and controls at the port of landing?  A company should also request:  the requirements for vessels, particularly foreign-flagged vessels, in requesting access to port  the processes by which authorities determine which vessels should be granted/denied entry into port or be selected for documentary checks and/or inspections  the standards for documentary checks and physical inspections	referred to in supplier communication so that they are aware of the desire to assess IUU risk.	level of IUU they encounter is routinely reported.	landing have a low risk of IUU fish being landed through them, and independent third party inspections of the ports have verified this.		
oes the organ	ization assess and record whether or not ports in	their supply chain meet the following crite	ria and include the information as part of their risk assessme	nt:								
.6.1.2.a	The port State competent authorities have resources that use a risk-based targeting approach to control					Risk assessment consideration	A company should ask if there is an IUU-related risk-based procedure for controls on vessels that request entry into port to land or tranship fish. A company should ask if the risk- based procedure is documented and if it is made publically available.	seafood is landed. At a minimum, PAS 1550 should be referred to in supplier communication, so that they are aware	Ports of landing are being determined, and information on the procedures, protocols and checks that are undertaken by the port authorities prior to and during landing, is being collected and assessed. Information on the landing procedures is known for each port of landing, the checks are risk based, and advocacy is happening or planned if these procedures are not made publicly available to third parties.	available, with summaries of the landing checks and their findings routinely being published and shared, so that other flag, port and market States along with		What are the procedures for controls on vessels that request entry into port to land or tranship fish? Are the procedures documented? Are the procedures publicly available? If not, why are the procedures not documented and available?
.6.1.2.b	The control systems in the port are appropriate for the volume of cargo and vessels				ANNEX C- UNE 195006	Risk assessment consideration	A company should ask if the port is operating under or over its capacity. One way of assessing port capacity is to ask what percentage of vessels that land or tranship fish are subject to documentary checks or physical inspections.	seafood is landed. At a minimum, PAS 1550 should be referred to in supplier communication, so that they are aware of the desire to assess IUU risk.		number of landings that it receives, the findings of its inspections, and with whom		What percentage of vessels that land or tranship fish are subject to documentary checks or physical inspections in port?  How are selections made for which vessels to check/inspect?  How were the vessels your company sources from selected for documentary checks/inspections?  Which of the following are covered by checks and inspections?  vessel identification, construction and registration documentation  **license and authorizations to fish or tranship  **each and by catch documentation  *processing and transhipment reports  **WMS/MS systems in use  **type of fishing gear used  **type and volume of fish species  **crew documentation
	There are enough inspectors provided at the port to be able to inspect the volume of cargo and vessels that the port handles				Not defined the amount of inspectors in APR	Risk assessment consideration	While there is no standard measure or guideline, a determination can be made by weighing the volume or port's capacity for cargo with the number of inspectors on staff. A company should ask if there is a sufficient number of inspectors for the volume of cargo and vessels. There is no standard measure or guideline, sufficiency is determined by the port State. Wher determining sufficiency, consideration needs to be given to the monitoring, control and compliance regime found in the source fishery, confidence level that the controls in the fishery are being met, the level of corruption within the port State, and technology employed that assists in targeting the inspection regime.	determine all of the ports where fish and seafood is landed. At a minimum, PAS 1550 should be referred to in supplier	are being undertaken at port and consideration given to	3	External	How many inspectors are available to inspect the volume of cargo and vessels that the port handles?
.6.1.2.d	The port State competent authorities are able to demonstrate that they operate in an effective and transparent manner				ANNEX G- RP B95.01 ANNEX J- UNE 195006	Risk assessment consideration	A company can request if landing procedures, standards for documentary checks and physical inspections and records are public, and ask to obtain copies. A good resource on import controls and landing procedures that may be of use can be found here: <a href="https://leu.oceana.or/elen/bublications/reports/comparative-study-key-data-elements-import-control-schemes-simed-tackling.">https://leu.oceana.or/elen/bublications/reports/comparative-schudy-key-data-elements-import-control-schemes-simed-tackling. It includes a list of key data elements that should be collected as part of a robust import control scheme. In addition, whether the country has signed to be a member of the Fisheries Transparency Initiative may be an indicator of risk.</a>	seafood is landed. At a minimum, PAS 1550 should be referred to in supplier communication, so that they are aware of the desire to assess IUU risk.	Companies have knowledge of all landing procedures for each port into which their seafood is landed.	Landing procedures have been assessed and where deficiencies highlighted, a request to the port authorities to improveladdress the deficiency has been made, OR all ports in the supply chain share their landings procedures publicly, each port's system has been rated, and its implementation assessed and shown to meet the FAO PSM requirements, which include public reporting of landing assessment summaries.		Are landing procedures, standards for documentally checks and inspection reports publicly available upon request from the port State through the supply chain
	All records relating the port State control are well- maintained and available upon request to the relevant authorities or actors requesting information				ANNEX J- UNE 195006	Risk assessment consideration	A company should ask if records of port entry requests, denials, documentary checks and inspections are kept, if so, additional questions that a company should ask are:  -lare the records public?  -ls there a protocol to notify foreign port authorities of such information?  -ls an electronic information system used to collect, store and share this information?  -How can companies and relevant stakeholders obtain copies of this information and landing procedures and controls at the port of landing?  This information should be available and therefore be furnished upon request.	determine all of the ports where fish and seafood is landed. At a minimum, PAS 1550 should be referred to in supplier communication, so that they are aware of the desire to assess IUU risk.	port and flag States so that the necessary information is available to them to take action on IUU where necessary.	flag and port States and there is an established public reporting of all landing findings summarised and routinely published.		Are all records relating to the port State control available to the relevant authorities and supply chain actors upon request within a given timeframe?
	The port State verifies the catch documentation and maintains organized documentation and files/records				ANNEX C- RP 895.01 ANNEX J- UNE 195006	Risk assessment consideration	A company should ask for catch documentation for landing or transhipment of fish from a vessel that can be verified through transhipment reports. Where these documents are not currently shared with purchasing companies, then a request should be made to both the flag and port State asking for it to happen.	determine all of the ports where fish and seafood is landed. At a minimum, PAS 1550 should be referred to in supplier communication, so that they are aware of the desire to assess IUU risk.		electronically to flag and port States and there is regular public reporting of the summarised findings.		Is catch documentation available and verified and reported by the port State authorities?
.6.1.2.g	There are no recorded instances of bribery and any personnel found guilty of this are not permitted to work in the port				ANNEX J- UNE 195006	Risk assessment consideration	A company should ask if any instances of bribery or corruption have been identified or reported, how they were resolved or if they were made public. The bribery and corruption risk of each port or flag State country within the supply chain should be considered when assessing this risk.	that if not already happening, at some	Using information from MCS questionnaires and enquiries to ports, the bribery and corruption risk of each port or flag State country is included within determination of risk levels fo each supply chain.	relating to supply States is publicly	External	Is there evidence of any recorded instances of bribery through enquiry or public documents includir press?  Is there evidence of any personnel found guilty of bribery through public documents including press?
.6.2.1	te Measures Agreement Does the organization check whether the port(s) at which the seafood that they are purchasing is landed is located in a State party to the PSMA? If not, then the ports should be considered to be higher risk in the due diligence process.	on landing location which provides the basis to investigate the due diligence	Country of first landing	PSMA ratification will be taken into account in IUU risk assessment to determine RFVS audit requirements.	NOT DEFINED FOR PSMA	Required	Check the Pew website for PSMA status and also check the accession documentation to determine whether the ports of landing used within the supply chain are actually included within the PSM ratification documents. If they are included, then they can be considered at lower risk, but if they are not included, then consider them at higher risk and ask the port State to include them. For more information about PSMA, visit; pewtrusts.org/osma or <a href="https://www.fao.org/oort-State-measures/resources/detail/en/c/1111616/">https://www.fao.org/oort-State-measures/resources/detail/en/c/1111616/</a> .	company within its seafood sourcing	All ports of landing within the supply chain are mapped, the landing controls are understood, and where PSM ratification is desirable, then advocacy for this to happen is taking place	have ratified and implemented PSMA, are		Is the port State a party to the FAO Port State Measures Agreement (PSMA)?





3.1 General		Cross-over with GDST	Cross-over with SPSv5	Cross-over with RFVS	Cross-over with APR	Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice	Internal or external question	Rewritten question (if external)
4.6.2.2	As part of the risk assessment process, does the organization seek evidence on whether or not the PSMA requirements are being implemented by the contracting party of the PSMA in which the port found in the supply chain is located? Evidence of non-compliance or lack of evidence of compliance should be treated as an increased risk of fish passing through the port being illegal			implementation of the PSMA would not be taken into account.	NOT DEFINED FOR PSMA	Both	A company should ask if the port State is party to the PSMA and/or what is preventing them from joining. A company should ask whether the port State has designated ports for access by foreign-flaged vessels, whether they have been publicized (or check here: <a ?loc.ale='n8.acton=gny"' fshery="" href="http://www.fao.org/fshery/port-State-measures/psmaapp/?loc.ale=n8.acton=gny) and confirm that it does not allow foreign-flagged vessels into any non-designated ports.  A company should ask whether requests to enter port and inspection reports include the information detailed in Annexes A and C of the PSMA. The FAO also has a database of designated ports: &lt;a href=" http:="" port-state-measures="" psmaapo="" www.fao.org="">http://www.fao.org/fshery/port-State-measures/psmaapo/?loc.ale=n8.acton=gny</a> .  Risk assessment consideration:  "States that are party to the PSMA are associated with a lower level of risk of being entry points for illegally-cought fish."	requested from suppliers, and the suppliers have acknowledged the importance of having ports designated, and robust and documented checks	Suppliers have knowledge of the checks that are being undertaken at port, as well as the regime of checks that have been risk assessed to make sure they are sufficient in quantity and quality to capture IUU fish if presented for landing. Where the assessment deems checks are insufficient, advocacy is required to improve them or for the port to be officially designated under the PSMA, and notified through the FAO system.	Information on compliance by relevant port States with the PSMA is publicly available.	External	Does the port State have designated ports for access by foreign-flagged vessels?  Are your ports of landing included in the list of PSMA designated ports?
4.6.3 Vessel i	in port											
Does the orga 4.6.3.a	nization require that?  Crew on fishing vessels it sources from are free		5.0 Social Accountability Requirements	The RFVS requirements would align with	The APR requirements would align with	Required	A company can ask if crew are granted shore leave access in accordance with immigration	Suppliers have been written to advising	Port visits and independent assessments verify that crew or	e Ports are used that allow crew the shillful	External	Are crew granted shore leave access in accordance
	to leave port when vessels dock, as far as is permitted by the immigration laws of the port State		oo coom recomment y requirement	the requirments of local immigration laws.			taws of the port State.	them that at a specified point of time they will be asked to report on the immigration laws of relevant port States and how they relate to the ability of crew to leave vessels in port.	able to leave vessels in countries where this is permitted. In countries where this is not permitted, advocacy is undertaken to address this.	to leave vessels when at port to access health, religious and recreational services.		with laws of the port State?  How is this verified?
4.6.3.b	All crew are verified as present as per the crew its provided to the port State inspector, are in possession of their own work contracts and identification documents and are available for confidential interview if a request is made by the port State authorities			Clause 1.12 requires At the commencement of each fishing trip, an updated crew list shall be produced and kept on board, and a copy shall either be lodged with the regulatory authorities or with an authorized person based on shore.	J.S. S. ANNEX JOUNE 199000	Required	In some countries, port in/port out inspections have been put in place to ensure there is no littlic incidence or swapping of crew whilst at sac. When the PSMAILO 188 and Cape Town Agreement are all in force, ratified and effectively implemented, there can be joint inspections that will verify this. If these 3 UN agreements are not in force for each of the supply chains flag or port States, then advocate for their implementation. A company should ask for crew documentation provided by the port State inspector.	requiring that crew are in possession of work contracts and are available for	Port visits and independent assessments verify that crew are in possession of work contracts and are available for port inspections. Where port inspections including confidential interviews are not being undertaken, advocacy is undertaken to call for this from the relevant State.	work documents and are checked on departure and arrival from ports. A		Are all crew verified as per the crew list provided to the port State inspector?  Do you verify if crew are in possession of their work contracts?
4.6.3.c	The captain is available at the port inspection and is able to provide all documentation and enquiries required at the port State inspection			Not explicit requirement for the RFVS	ANNEX J-UNE 195006	Required	Pre-notification of arrival and landing should be made by vessels or flag States so that document inspection can be undertaken and outcome recorded. Suppliers should request a copy of these records relevant to their purchase from the vessel owner/supplier. Where they are not available, then a time-bound request for this information should be made to the supplier and also to the flag State of the vessel, asking that this is mandated as a customary practice. A company should request inspection reports that include vessel identification, construction, registration documentation, leense to fish or tranship, catch and bycatch documentation, processing and transhipment reports, vessel monitoring systems, and/or automatic identification systems, fishing gear, fish species and quantities, safety certifications and crew documentation.	notification of landing is recognised as ar important step to address IUU, either within a company policy or the buying	registration documents, by-catch, transhipment and other criteria contained within the GDST KDEs or the specific buyers requirements.	Pre-notification of arrival and landing is routine at all ports of landing within the supply chain, and these records are available for timely sharing with interested stakeholders, other flag and port States and they contain accurate information on all of the attributes detailed within the PAS guidance notes.	External	is the captain of the vessel able to provide all documentation requested by port State inspectors?  How would a company obtain this information?
4.7.1	orking conditions in the fishing sector  Does the organization include in its policies and require from its suppliers that all of the major issues that are identified in ILO Convention C188 are addressed by source fisheries? These are essential to providing decent work conditions on board fishing vessels			Covered in the requirements of Core Principle 2, Section 1 requirements.	5.3- UNE 195006	Required	See 4.4.3.i				Internal	
4.7.2	Wherever possible and relevant, does the organization demonstrate that it supports the ratification of the ILO Convention C188?			The management systems related to crew treatment to demonstrate that, at minimum, they comply with the International Labour Organization's C188 Work in Fishing Convention, 2007 (ILO C188).	5.3, 5.4 & ANNEX J8- UNE 195006	Required					Internal	
4.7.3	enable businesses with a turnover of over £36	Traceability down to the vessel is enabled through implementation of GDST standards	2.10.3 Suppliers must have traceability systems in place to allow trace-backs to vessel or wholesaler for wild-caught		5.3, 5.4 & ANNEX J8- UNE 195006 ANNEX C- RP B95.01	Required in UK	See 3.4.5. An overview of the traceability system can be set out in reporting issued under the Modern Slavery Act	3			Internal	
4.7.4	Has the organization developed and made public protocols that guide how and when it will inform statutory agencies of human rights infractions identified during audits, risk assessments and other internal reviews?	of internationally recognized Human Welfare standards to which policy on a	5.4 Forced, Bonded, Indentured, Trafficked and Prison Labor		NOT DEFINED	Required					Internal	
4.7.5	Have industrial fishing vessels had a social and ethical responsibility policy/standard that includes the points in 3.3.3?			The RFVS would cover these requirements.	GRIEVANCE MECHANISMS TO BE INCLUDED IN NEXT VERSION OF UNE 195006	Required	See 3.3.3	out the requirement for vessels to have a policy/standard setting out working	Vessel policy/standard obtained and documented for all svessels in the supply chain. These require conditions in line with ILO C188, or where there is a departure from these requirements, it is clearly documented and incorporated into the risk assessment.	people are employed within the supply	External	Please supply the policies and procedures relating to the treatment of crew members on fishing vessels supply seafood to this contract.
4.7.6 Section 5. Factor 5.	Do inspections, audits and checks include, where possible, in-preson interviews with the relevant workers or crew, which are conducted in a neutral and safe environment, guaranteeing the security and anonymity of the interviewees?			RFVS audits will require crew interviews using APSCA registered auditors.	GRIEVANCE MECHANISMS TO BE INCLUDED IN NEXT VERSION OF UNE 195006	Required where possible	Vessel inspections and audits are a developing area, so the PAS indicates that this is a requirement where possible. Importers/processors placing reliance on these in their due diligence systems should seek assurance of the following labour and interview standards for inspections, audits and checks:  'There is evidence of a standard operating procedure for inspections that includes worker interviews  'This SOP should be in accordance with international standards and follow a victim centred approach  'Inspectors should receive accredited or government/ILO approved training in conducting labour inspections/interviews/worker interactions. Certificates of completed training should be provided to the importer/processor  'Inspectors should be conducted both on a scheduled but also unannounced basis in order to identify potential cases of FL & HT  'Inspectors records including number, type and nature of the inspections, should be provided to the importer/processor on a quarterly basis  'Inspectors should use an interview questionnaire that is designed to identify indicators of forced labour and human trafficking as defined by the ILO  'Importers/processors should be provided with examples of completed questionnaires as part of baseline measurements  'Inspectors should use an interview questionnaire shot schedules are also as a specific passeline measurements.'  Inspectors/landitors agree to importers or processors conducting unannounced spot checks of inspection/interview procedures	State inpsectors or other experts on request.	Audits and port visits include confidential interviews with crev in a neutral and safe environment, guaranteeing the security and anonymity of the interviewees.		External	Please set out in detail what measures are in place to interview crew from vessels supplying seafcool to this contract, to determine whether or not crew have experienced human rights abuses, violations of labour laws or any other legal violations.
5.1 Informati	ion Is the organization able to demonstrate that		2.2.3 The Quality Manual shall clearly define all of the	In supply chains supplying RFVS	5.3- RP B95.02 (GRIEVANCE	Required					External	Please set out what reporting mechanisms are in
0.1.1	processing factories in its supply chains comply with the policies and specifications of the organizations which they supply (see 3.3.3).		quality attributes for all raw material received, and finished products produced, that shall be monitored and controlled to ensure conformance to legal requirements and customer and facility specifications.	certified seafood, processing requirements would be covered by the GSA Seafood Processing Standard / or a	5.3- RP B95.0Z (GRIEVANUE MECHANISMS NOT INCLUDED)	r roquii Gu					Atterited	Please set out what reporting mechanisms are in place for workers in factories processing seaflood for this contract to report labour infringements, unfair working conditions or associated unlawful treatment. Have any specifications or codes of practice been agreed to cover these areas, and if yes, please share these.
5.1.2	the supply chain on the legality and traceability of	of traceability information which enables	A3 3.2 Once the lots are selected by the auditor for tracing, the results for all of them combined shall be achieved in no more than one half-day (6 hours)		in our case, the traceability excercise has to be done in a maximum of 6h RP B95.02	Required	Processors should be able to provide details on the following:  "goods receipt documentation traceability/batch code "traceability records back to vessel "product specs "product specs "product specs "product specs "product specs "product specs "mass balance reconciliation, i.e. where the original catch outlined in the catch certificate has been split up and catch certificates have been photocopied  Is this information easily accessible and are actors willing to share this information? An example of a guideline on how to increase coherence and interoperability of information systems and therefore help ease data sharing is the GDST Standard 1.0. https://traceability- dialogue.org/core-documents/odst-1-0-materials/				External	What information can be provided to any other actor in the supply chain to support the legality and traceability of a product, e.g., goods receipt, batch code, traceability records back to vessel? Can this information be provided within a maximum of four hours?



3.1 General		Cross-over with GDST	Cross-over with SPSv5	Cross-over with RFVS	Cross-over with APR	Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice	Internal or external question	Rewritten question (if external)
5.1.3	Is there a designated person(s) at the factory that is responsible for ensuring that information relating to legality and traceability is compiled, stored, reviewed managed and available for checks (e.g. audits)?		2.4.3 The facility shall clearly identify the Staff Member accountable for the maintenance of the Quality Management System and for the company meeting and adhering to all of the requirements of the Seafood Processing Standard.	For the vessel this would be the responsibility of the skipper.	The company has to have a Quality or Food Safety Manager as usual, to provide the information requested in ANNEX D- RP B95.02	Required					External	Is there a designated person(s) at the factory responsible for ensuring that information relating to legality and traceability is compiled, stored, reviewed managed and available for checks (e.g. audits)?
<u>5.2 Process</u> 5.2.1	Control  Its the production process defined, controlled and documented to ensure that the product meets the specifications and produces products that are compliant with the expectations of the end product users?		2.12.1 The facility shall prepare and implement standard operating procedures, quality procedures, dood safety management procedures, social accountability procedures, and work instructions for all processes and operations having an effect on product safety, legality and quality.  4.1.1 The facility shall document and implement appropriate Product Release Procedures that identify processes and testing procedures that shall be performed. These Procedures shall identify the responsible person or persons authorized to release product and include food safety, quality and legal specifications that shall be verified as having been met prior to release.		5.3 & ANNEX D- RP B95.02	Required					Internal	
5.2.2	Are product specifications, batch specifications, process monitoring, product testing, manufacturing site cleaning, and other quality control measures documented?	ingredients in processing are handled in the traceability data. These pedigree files	3.1.1 All elements of the facility's Food Safety Management System (e.g. the HACCP, GMP, Hyglene, SSOP, Food Defense Plan, and other related plans) shall be documented, implemented, maintained and continually improved.		5.3 & ANNEX C, D- RP B95.02	Required					Internal	
5.2.3	Spot purchases without any knowledge of the vendor should be avoided and therefore not present in supply chains. The organization should ensure that all subcontractors meet all laws and are included in traceability documentation	Widespread adoption of GDST standards can facilitate the universal request for pedigree files such as in the case of spot transactions.	2.10.2 The facility shall have a supplier approval program which includes a list of approved suppliers and service providers as described in 2.9 above. This list shall be kept up-todate and reviewed, at a minimum, annually.		2- RP B95.02	Required					Internal	
5.2.4	These should be completed at regular intervals throughout the year, at a rate appropriate according to the results of the risk assessment and to satisfy internal due diligence but at a minimum of once per year. Accurate conversions ratios from production line should be used to make sure that the mass-balance is accurate	GDST standards were developed to allow for mass balance checks.	9.6 Mass Balance		5.3 & ANNEX D- RP B95.02						Internal	
5.3 Ethics a	nd labour.  Does the organization have a policy that addresses social and ethical responsibility (see 3.3.3., a) to g) for what to include in the policy)?	the existence of human welfare policies for staff in processing facilities. The	5.1.1 Facilities shall operate in compliance with this standard and all local, national, and international conventions, rules and regulations, whichever provides the highest protection to the worker. The facility shall have in place policies and procedures pertaining to, but not limited to: worker health and safety and compliance with requirements regarding wages, benefits, hours, hiring practices, minimum age, status of workers, and good employee relations that provide the highest protection to the workers.	Section 1 of the RFVS states the requirements for Management Policies and Procedures for the vessel (or vessel group management organization).	6.4- UNE 195006 (GRIEVANCE MECHANISMS TO BE INCLUDED IN THE NEXT REVIEW)	Required		mapping of the seafood supply chain and	Supply chains are fully mapped and suppliers at all levels have communicated their understanding of what is trying to be achieved with 1st, 2rd and 3rd party audits being targeted to those areas of the supply chain that are assessed to be o high and medium risk.		Internal (though entails a requirement to share the organization's policy and its through the supply chain)	
5.3.2	Does the organization apply this policy not only to the buildings and operations that it owns but also communicate that the behaviours outlined in the policy are expected of all the actors in its supply chain, from supplier to vessel operations?		2.9.1 The facility shall exercise proper control over any entity that is used to outsource any processes that may have an impact on food safety, legality, quality, traceability and social responsibility.	As above	6.4- UNE 195006 ANNEX D.2- RP B95.02	Required	Policies that address social and ethical responsibility should be communicated to all actors along the supply chain. Where this cannot be communicated, (e.g., on some occasions suppliers do not know who they will supply from in advance, efforts should be made to communicate these policies as soon as the supply chain is established.  There should be a mechanism in place that allows communication of these policies and standards to the potential suppliers of seafood from new sources. This can help inform a company's sourcing decision and it helps the supplier determine if it can meet requirements now and in the future.	supply chains that are seasonal or have short lead times before supply to be mapped as soon as time allows, but that	A system is established that deals with seasonal variance in supply chains by exception, employs a risk-based approach to assessment to allow supply to occur, but outside of that the supply chain is understood and a demonstrable management system for assessment, mitigation and remediation is happening.	Supply chain is well mapped and the policy has been in place for a sufficiently long time that 3rd party audits and certification of all supply chain options are known and understood, irrespective of volume and value being sourced.	Internal	
5.3.3	Does the organization ensure that at any of its factories, a review of its ethical and labour policy and systems is completed at least once per year to ensure that it is addressing current industry concerns and that it complies with any changes to the industry and supply chain requirements?		5.1.1 Facilities shall operate in compliance with this standard and all local, national, and international conventions, rules and regulations, whichever provides the highest protection to the worker		ANNEX D.2- RP B95.02	Required					Internal	
5.3.4	Is there a designated person(s) at each factory to ensure that workers are being treated ethically and that labour rights are being upheld?  Translation services should be provided for migrant workers to facilitate effective communication		2.4.3 The facility shall clearly identify the Staff Member accountable for the maintenance of the Quality Management System and for the company meeting and adhering to all of the requirements of the Seafood Processing Standard		Not defined	Required					Internal	
5.3.5	Are grievance mechanisms in place that allow workers to report issues and any cases of abuse annoymously without being put at risk of negative repercussions? Any grevance report should be investigated as a priority, in a fully transparent manner and by including the relevant union representatives — or in cases where this does not apply — by knowling NGO representatives in the review process		5.4.5 Information regarding hotlines, competent authorities, and other resources for victims of labor rights abuse must be on display to workers in the facility.  5.7.6 The facility must have in place an established complaints and remediation system to handle cases and allegations of sexual abuse/harassment, bullying or discriminatory practices. This must, at a minimum, include a confidential reporting mechanism, information on any hotlines or other outside support services available and the possibility of calling in independent assessment/arbitration.	grievance being raised.	INCLUDED IN NEXT VERSION OF UNE 195006	Required					Internal	
5.3.6	Does the organization promote robust labour standards with respective governments in the form of legislative frameworks that support workers – local or migrant labour – in their right to organize and collective bargaining?		5.8.1 Facilities shall respect the rights of workers to associate, organize, and bargain collectively (or refrain from doing so) without the need of prior authorization from management. Facilities shall not interfere with, restrict, or prevent such activities and shall not discriminate against or retalate against workers exercising their right to representation in accordance with international labor standards. 5.8.2 Where the right to freedom of association and collective bargaining is prohibited or restricted under local law, the facility shall not prevent alternative means to facilitate worker representation and negotiation. (For example, the election of one or more employees by the workers to represent them to management).	place that respects the rights of every crew member to be able to have freedom of association and the right to collective bargaining.	15.3 & ANNEX E- UNE 195006	Required					Internal	
<u>5.4. Product</u> 5.4.1	tracking and transformation Where a fish product, unit, or batch of fish products, originates from multiple source fishing activities or fisheries, is there identification and tracking of products from each source that enable products at final sale to be traceable to a single source and activity? The fish product or batch identification should be grouped or associated in ways to allow verification of legal compliance and of claims related to sustainability or fishing methods	Implementation of standards requires unique unit identifiers.	9.1.1 Facilities that source raw material from both wild- caught and farm-raised sources shall properly identify, segregate and label products from different wild-caught and/or aquaculture sources and shall indicate any relevant certifications. 9.1.2 Proper identification shall be maintained for each lot, for each wild-caught and farmaised source, on all documents and at each step of the process flow from raw material receiving, handling, processing, packaging, storage and dispatch. Records shall be maintained to ensure product identity and demonstrate that products from wild-caught and aquaculture sources and those from certified and non- certified sources are not mixed	Traceability requirements for the RFVS are covered in Section 3 Catch Traceability Management. Supply chain requirements will be covered in the GSA Seafood Processing Standard.		Required	Seafish lists UK regulations pertaining to labelling, marketing and more: https://www.seafish.org/trade-and-regulation/seafood-traceability-and-labelling-togulations/fish-traceability-regul/rements/.					Are there any fish products, units, or batches that originate from multiple source fishing activities or fisheries?  How are these products traced, e.g. electronic traceability system, from a single source and activity, e.g. vessel, to final sale?  Is this information subject to external verification or regular independent audits?





3.1 General	Cross-over with GDST	Cross-over with SPSv5	Cross-over with RFVS	Cross-over with APR	Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice	Internal or external question	Rewritten question (if external)
5.4.2	Are unique unit identifiers present at each level of interest the packaging hierarchy (e.g., from a pallet, a case or a consumer item)?  GDST standards allow for aggreg and deaggregation based on pare identifiers.  GDST Standard 1.0 KDEs (traces object information):  Item/SKU/UPC/GTIN, linking KDE (batch, ibc, or serial number).	appropriate traceability procedures and systems to include identification of batches of raw material, ingredients, in-process products, rework, outsourced processing, packaging, additives, and final	Standard.	ANNEX C, D22,23- RP B95.02	Required					External	Are unique unit identifiers present and consistent at each level of the packaging hisrarchy, e.g. from a pallet, a case or a consumer item?  How are these unique unit identifiers documented an tracked, e.g. electronic traceability system?
5.4.3	When a product is combined with other material/ implementation of standards allow products, processed, reconfigured, or repackaged, does the new product have its own unique product identifier? the product identifier? the product identifier is the product identifier is the product identifier is the product, including cominging core to the GDST standards.	all production lots that records the below information, as applicable, for each BAP star category (1, 2, 3, and 4-star) and for wild-caught species the facility is eligible to		ANNEX C, D25:29- <b>RP B95.02</b>	Required					External	When a product is combined with other material/ products, processed, reconfigured or re-packaged, does the new product have its own unique product identifier?  How are these unique product identifiers documente and tracked, e.g. electronic traceability system?
5.4.4	Is the linkage (auditable function) maintained between this new product and its original inputs to maintain traceability? For example, a label, linked to the lot identification of the traceable input item, remains on the packaging until that entire traceable unit has reached the final point of sale		Standard.	ANNEX C, D- <b>RP B95.02</b>	Required					External	Is the linkage maintained between a new product at final point of sale (refer to 5.4.3) and its original inputs, e.g. ind identification of original input?  How is this linkage documented to maintain traceability?  Is this documentation available for external verification or independent audit?



Section 3. Ma	nayement					
General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Internal or external question	Rewritten question (if external)
1.1	Does the organization have systems in place to manage critical aspects of legality? These should comply with requirements such as the EU IUU Regulation, relevant policy, standards and labour conventions. These systems should include traceability, processes, information verification and transparency.	Required	A company should have systems in place to manage critical aspects of legality, that comply with EU IUU Regulation, relevant policy, standards and labor conventions. These systems should include:  *Traceability - third party management system certification such as BRC/IFS will help to ensure a management system is in place, as will MSC chain of custody, although these do not specifically cover aspects for IUU *Processes *Information verification *Transparency	A company sourcing policy explicitly stating its desire to avoid buying IUU fish - which also makes reference to the Modern Slavery Act if UK based - or other relevant statutory due diligence requirements is written and available. The policy includes the desire to engage with the supply chain to transition/improve supply chains that have been risk assessed and identified as in need of improvement. The policy is communicated to all suppliers, and basic procedures to check product, supply chain (including EU IUU Regulation catch certificates), vessels, and suppliers are legal as far as it is practical to check.	Internal	
1.2	Do the managers of the organization engage on improvement work with other suppliers or actors in the supply chain (e.g. audits, reviews, site visits, etc.)?	Risk assessment consideration	Company managers should engage on improvement work with other suppliers or actors in the supply chain by:  -Conducting audits and reviews  -Conducting regular site visits, engaging in fishery or aquaculture improvement projects that specifically tackle IUU relevant issues, supporting research, and advocating for legislation adoption and effective implementation	A list containing all products and stock keeping units/SKUs is available within the business, which details basic information of source fishery and supply chain. Sufficient information is collected to warrant that the seafood being purchased is legally caught, and that when sold, is labelled accurately. All suppliers have received copies of company policies and internal risk assessment processes are either being considered, are in the process of being developed, or an existing mechanism is adopted, so that where needed, supply chain improvements can be identified.	Internal	
1.3	Where improvement work identifies corrective actions that can be completed to satisfy the organization's standards/policies, is support (e.g. approval/verbal, finances, time, meetings, etc.) given to the supplier or actor?	Risk assessment consideration	Support in the form of approval/verbal, finances, time, meetings, etc. should be given to the supplier or supply chain actor in need in need of corrective actions, in order to satisfy the organization's standards/policies. Evidence of this support should be able to be provided upon request.	As above	Internal	
1.4	Is all seafood in the supply chain of the organization addressed using the same systems and level of scrutiny? Traceability and legality should be a minimum requirement for all seafood.	Required		A process is in place which is actively trying to achieve the same level of traceability, based on a risk assessed basis, for all sources of seafood that are within the scope of the policy. The scope might initially be limited, so that the process and practices of mapping and supply chain interrogation are being established. When defining the scope of the sourcing policy, consideration of volume of trade and potential influence on the supply chain should be made.	Internal	
! The IUU R	Regulation					
.2.1	Does the organization document which of the products they sell are covered by the EU IUU Regulation?	Required	A company should document which of the seafood products they sell are covered by the EU IUU Regulation within their buying specifications and their supplier approval lists. These include:  *All imports of fresh and frozen, wild marine capture fishery products, both whole and processed  *Imports into the EU including catches made by non-EU vessels landed directly in an EU port, or landed in a third country port and subsequently exported to the EU, whether processed or not processed  *Imports into the EU including catches made by EU vessels, landed and imported in a third country and from there imported in the EU, whether processed or not  *Exports from EU, including those with a catch certificate if required by a third country  More information on the EU IUU Regulation can be found at:  http://www.iuuwatch.eu/new-background-to-the-iuu-regulation/	A system is established that is gathering data on the supply chains of the company so that within as short a time as possible they know which products fall under the EU IUU Regulation. This will have all legally required information such as: species name, fishing gear/method, sea area of capture, date of catch and landing available to them, so that ultimately they can determine which regulations apply to the products.	Internal	
3.2.2	Does the organization have management systems in place covering the requirements of the EU IUU Regulation (if sold)?	Required	A company should have management systems in place that cover the requirements of the EU IUU Regulation if it sells any of the products covered by this Regulation. Management systems will include traceability system and policy, incoming raw material lot assessment, and performance reporting which specifically covers IUU related topics such as ports of landing, timely presentation of catch certificates, cross checking UVIs.	Full supply chain traceability is desired and stated within a sourcing policy that is communicated to suppliers. Information on both seafood sources and people involved within the supply chain should begin to be collected either by the buyer or its supplier, with a system being developed to manage and assess the information being collected.	Internal	







3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Internal or external question	Rewritten question (if external)
3.3 Policies a	nd Processes					
3.3.1 General						
3.3.1.1	Are documented policies and processes in place that provide requirements for full chain traceability to be ensured?		The PAS 1550 defines full chain traceability as the "linkage from the point of capture to the consumer of one stage of production at a time, from any stage of production to any other point along the entire supply chain (often through documentation)". In other words, capturing product information that tracks it at every stage of the supply chain from vessel to retailer.  Full chain traceability policies and processes should outline but are not limited to: how risk is assessed, type of data required, methodology of data collection, frequency of data collection, audit schedule, and response to gaps in data.  The co-mingling of seafood from different sources can pose challenges to achieving full chain traceability. As such, companies may use a combination of recognised traceability standards and schemes to inform full chain traceability policies and processes. Some examples include the British Retail Consortium Global Standard (BRCGS) for food safety and the Global Dialogue on Seafood Traceability (GDST) standard.	of vessel identifiers, species name, FAO stock and sub area of capture, flag State, fishing trip dates, including landing date, being collected. The fact that this information is required to be collected is stated in a company sourcing policy or specification that has been communicated to all suppliers.	Internal and external	What policies and processes are in place that provide requirements for full chain traceability to be ensured?  Can traceback exercises be conducted from end point (i.e. retailer) to start point (i.e. vessel), to support full chain traceability claims?
	Are policies and processes audited and have the contents reviewed on, at a minimum, an annual basis in case changes or amendments are required to be made?	Required		A seafood sourcing policy is in place that makes reference to the company ambition that both it, and its implementation, will be reviewed and audited on an annual basis.	Internal	
	Are reports produced (at least annually) on the implementation and monitoring of the policies and processes that are in place to address risks?	Required		As above	Internal	
	Are policies and processes available upon request and made available to other actors in the supply chain within seven days of such a request being made?	Required		The company has a seafood sourcing policy that is communicated to suppliers and available to customers upon request, with basic processes to assess suppliers.	Internal	
3.3.1.5	Are policies and processes demonstrated to have been communicated throughout the supply chain to, at a minimum, the stage before and the stage after the processor/importer?		A document setting out policies and procedures should be shared within the supply chain. It is good practice to ask suppliers to acknowledge that they have received and understand the policies and procedures, and that this is documented. Clarifications should be provided in the event that suppliers indicate they do not understand policies and/or procedures.	Evidence that seafood sourcing policies and IUU risk assessment procedures are available and shared with direct suppliers and customers can be shown.	Internal	
	Is the organization able to demonstrate compliance and implementation of all of the required regulations, conventions and standards (dependent on the supply chain and market)?		It is the responsibility of any organization to understand and observe the laws and regulations in any territory in which they operate. The recommendations in this PAS help an organization to gain this understanding in relation to the legality of seafood and the working conditions of workers in the seafood supply chain.	Supply chain is being mapped for all seafood sources, which includes the desire to understand the pertinent local, national, regional, and international legislation applicable to the seafood, so that in time the legality of the seafood harvesting and employment practices being employed can be warranted.	Internal	
•	gence through risk assessments					
	Does the organization conduct risk assessments on all of the supply chains from which it sources and be able to demonstrate that it does so? The level of risk in supply chains can be reduced by identifying and taking mitigation actions or measures. Attention is drawn to the BRC Advisory Note for the UK Supply Chain on How to Avoid IUU Fishery		A company should complete due diligence through risk assessment on all of its supply chains. The level of risk in supply chains can be reduced by identifying and taking mitigation actions or measures such as mandating future requirements or engaging in improvement processes with the supply chain. A company should prioritize its use of each supply chain according to the findings of the risk assessments.  Ranking and assigning metrics that will evaluate results against factors such as the level of risk, volume and importance of the supply chain to the business, is subject to the needs of an individual company  The risk assessment system should demonstrate and document that for each supply chain, an assessment and any required actions have been applied. For example, if a supply chain is identified as higher risk, it will require additional verification for the company to assure its integrity  Risk assessments should be reviewed on a regular basis e.g. monthly, annually, biannually	The need for supply chains to be mapped back to vessel or group of vessels, so that the IUU risk of individual supply sources can be identified and then risk assessed, has been communicated to suppliers. This communication should include a timeframe within which this task should be completed. Using the BRC advisory note, the company has begun to determine what risks if finds acceptable within supply chains and is formulating a risk assessment matrix with which to assess the information being collected from its supply chains.	Internal	





3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Internal or external question	Rewritten question (if external)
3.3.2.2	Does the organization prioritize its use of each supply chain from which it sources according to the findings of the risk assessments?	Required	Companies should conduct risk analyses to help minimize and mitigate the risk of IUU fish entering their supply chains, importantly aiming for assured traceability to legal origin.  See example risk assessment to determine appropriate action.  Where the risk assessment produces a moderate to high risk of IUU or information is missing, the sourcing decision should reflect the level of risk.		Internal	
3.3.2.3	Does the risk assessment system demonstrate and document that for each supply chain an assessment and any required actions have been applied, that are appropriate according to the results of the risk assessments and prioritization exercises?	Required		The seafood sourcing policy includes a statement that the company endeavours to purchase seafood from low risk/low impact sources and aims to move its sources and buying over time to achieve this. The sourcing policy has been communicated to the company's suppliers.	Internal	
3.3.2.4	Are risk assessments reviewed on a regular basis (e.g. monthly, annually, bi-annually, etc.) depending on the level of risk, or if something changes? The risk assessments should be completed at a minimum annually, and then at least six-monthly for supply chains identified as higher risk.	Required		The seafood sourcing policy includes a statement that the company endeavours to purchase seafood from low risk/low impact sources and aims to move its sources and buying over time to achieve this. The sourcing policy has been communicated to the company's suppliers.	Internal	
3.3.3 Decent	l working conditions					
3.3.3.1	Has the organization established and uses policies, practices and confidential reporting and assurance systems at every worker facility in all countries where fisheries products are sourced? This should allow all workers to have the ability to report labour infringements, unfair working conditions or associated unlawful treatment as necessary.	Required		The company recognises and understands the need for decent working conditions, it is mapping its supply chains to identify where its policies need to apply, and has policies in place that outline this ambition and those policies have been communicated to suppliers one step down the supply chain.	Internal	
3.3.3.2	Is each of these systems supported by a transparent process available upon request as part of supply chain audits, and be equally applicable for workers with or without union representation?	Risk assessment consideration	A company should be able to request and view the processes in place at any point along the supply chain, which ensure that workers have the ability to report labour infringements, unfair working conditions, unlawful treatment, etc.  Where the company is not able to obtain evidence of such processes, this lack of information should result in the company receiving a higher risk rating and mitigating measures undertaken.	Processes are in place that collect data and make that data available for inspection by the buyer or the buyer's representative agents, so that decent working conditions of people within the supply chain can be assessed.	Internal	
3.3.3.3	Are confidential reporting processes established and maintained with associated policies and practices embedded throughout the corporate culture led at senior board level?	Requirement		The company policies and processes should at a minimum establish the ambition that confidential reporting processes should be put in place where supply chain mapping and interrogation highlights that they are not already there.	Internal	
3.3.3.4	Are all complaints from workers dealt with objectively and confidentially through independent and impartial reviews leading to a remedy where applicable? These remedies should end the infringement, unfair working condition or associated unlawful treatment and provide retrospective financial compensation to the worker and referral to legal authorities where individuals have broken the law. Complaints and associated remedies should be documented and available for external scrutiny, with safeguards taken to protect the identity of victims.	Requirement		The company policies and processes should at a minimum establish the ambition that confidential reporting processes should be put in place where supply chain mapping and interrogation highlights that they are not already there.	Internal	





3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Internal or external question	Rewritten question (if external)
3.3.3.5	Is social responsibility addressed explicitly in the policies and processes of the organization, by including as a minimum?  • freedom of association; • the right of workers to organize; • forced labour; • minimum age of workers; • child labour; • equal remuneration; and • discrimination.	Requirement			Internal	
3.4 Traceabili	ity					
3.4.1	Are records of traceability kept that demonstrate whether or not a product originates from a source where reliable evidence of legality (e.g. registration, licensing, catch documentation and compliance records) is available? If it is not possible to trace to the origin of the seafood, this should trigger an investigation and the completion of steps to remedy the situation.	Required	Center and WWF, developed a preliminary guide for industry working towards full-chain traceability: https://fishwise.org/wp-content/uploads/2018/03/OSMI-Trace-Collab_Taking-the-First-Steps-	The company has a seafood sourcing policy that establishes the need for traceability of its seafood products on a lot or batch basis, to aid its control and assessment of food safety, sustainability, labour and associated environmental impacts, including avoidance of IUU by warranting that it is caught legally.	External	Do you have the following records to support that a product originates from a legal source:  •vessel registration  •vessel license  •catch documentation  •compliance records  What other records or documents do you keep that support claims of legality of a source?
3.4.2	Does the organization complete data (or data system) verification exercises to verify the authenticity of data entering the traceability system?	Risk assessment consideration		The company has a seafood sourcing policy that establishes the need for traceability of its seafood products on a lot or batch basis, to aid its control and assessment of food safety, sustainability, labour and associated environmental impacts, including avoidance of IUU by warranting that it is caught legally.	Internal	
3.4.3	Does information gathered, stored and processed on traceability enable full chain traceability to be assured transparently?	Risk assessment consideration		The company has a seafood sourcing policy that establishes the need for traceability of its seafood products on a lot or batch basis, to aid its control and assessment of food safety, sustainability, labour and associated environmental impacts, including avoidance of IUU by warranting that it is caught legally.	Internal	
3.4.4	Are all traceability systems, and all claims based on them, subject to external verification mechanisms and regular independent audits? Traceability data should be accessible during verification checks and audits.	Risk assessment consideration	Traceability can be defined as "the systematic ability to access any or all information relating to a food under consideration, throughout its entire life cycle, by means of recorded identifications" (WWF traceability principles, 2015). It is important to note that this is different to transparency, which focuses on what information is shared, with which stakeholders, and at what frequency.  The Global Dialogue on Seafood Traceability (GDST) Standard 1.0 provides guidelines on enhancing interoperability of traceability systems to help enable full chain traceability and improve data verifiability: <a href="https://traceability-dialogue.org/core-documents/qdst-1-0-materials/">https://traceability-dialogue.org/core-documents/qdst-1-0-materials/</a>	A policy and process for assessing claims and sourcing credentials is in place or under development.	External	How frequently are traceability systems, and all claims based on them, subject to external verification and independent audits?  How is traceability data made accessible during verification checks and audits e.g. use of an electronic system?









3.1 General		Required or Risk	Implementation Notes (for areas where industry feedback requested	Base practice	Internal or	Rewritten question (if external)
		Assessment Consideration	further detail)		external question	
3.4.5	Is traceability provided by the vessel or group of vessels that caught the seafood?	Risk assessment consideration	aspects relating to IUU can be added. Where barriers exist, for example		External	How is traceability provided to the vessel or group of vessels (e.g. catch certificate) that caught the seafood?  What processes, e.g. traceback exercises, are used to demonstrate traceability to a vessel or group of vessels?  Have you adopted any traceability standards, e.g. ISO 12875, as part of traceability compliance, and if so which ones?  If you have undertaken a traceability improvement project or initiative, can you please provide details of this i.e. time-bound deliverables?
	Are traceback exercises carried out at a frequency based on risk assessment and in a timescale that is appropriate for the origin of the seafood?	Risk assessment consideration	has produced a comprehensive guide on the uses of DNA testing seafood that includes a list of well-established DNA databases:	The buyer conducts regular traceback exercises to ensure that product purchased can be reliably traced back to the source fishery/fishing vessel(s). The frequency of traceback exercises is based on a risk assessment, taking into account publicly known risk factors for each specific supply chain.	Internal	
3.4.7	Does the organization complete random traceback exercises that are able to verify full traceability from point of sale to source within 48 hours?	Risk assessment consideration	Random traceback exercises to verify traceability are typically conducted for food safety reasons. Some examples of food safety standards that require this include the BRC Global Standard (BRCGS) for Food Safety, IFS Food Standard 6.1, and GSA Seafood Processing Standards. As such, information relevant to IUU can be collected, e.g. through commercial transaction process, and stored alongside food safety information.  If traceback exercises cannot be conducted for certain supply chains or products, this should be taken into consideration when conducting a risk assessment, and companies should consider working with their supply chains to improve traceability. Refer to the "shared resources" section for common traceability guidelines and standards that can serve as a basis for traceability improvement projects or initiatives.	The buyer conducts regular traceback exercises to ensure that product purchased can be reliably traced back to the source fishery/fishing vessel(s). The frequency of traceback exercises is based on a risk assessment, taking into account publicly known risk factors for each specific supply chain.	Internal	
	Are sales transactions between actors in the supply chain accompanied and traced by unit or batch numbers on or accompanying invoices? To allow effective tracking of products, all buyers and sellers should be able to match sales transactions between them.	Risk assessment consideration		The buyer is able to correlate physical stock components with the associated paperwork through simple accounting tools such as invoice numbers or lot codes.	External	Are sales transactions accompanied and traced by unit or batch numbers on, or accompanying invoices?  Where are unit or batch numbers captured?  Are you able to match sales transactions with buyers or sellers?
3.4.9	Does the organization cooperate with the relevant competent authorities (that conduct active and effective regulatory oversight and verification) by using effective compliance and enforcement mechanisms?	Risk assessment consideration		The company has an "open door and cooperation policy" for domestic government and enforcement agencies.	Internal	









3.1 General		Required or Risk	Implementation Notes (for areas where industry feedback requested	Base practice	Internal or	Rewritten question (if external)
3.1 General		Assessment Consideration	further detail)	Base practice	external question	Rewritten question (il external)
3.4.10	In order to ensure consistency in the requests for information in supply chains, is the following information collected (via request) and associated with the products?  * vessel identity (home port, name, flag and call sign), registration and, where issued IMO or other UVI number;  * location of catch [e.g. GPS coordinates, specific location of fishery, FAO codes, EEZ's ISO country code, relevant Regional Fisheries Management Organization (RFMO)];  * fishing license and validity;  * species (FAO alpha 3 code), product name and code;  * fishing method used;  * fishing dates of capture;  * quantities (in kg) of catch;  * date/area/position/estimated weight/call sign and declaration of any transhipment at sea. This will include the receiving vessel name and where applicable the IMO number or other UVI number; and  * person/enterprise with custody and ownership after landing.  * Not all of this information will accompany the product at every stage, but the information should be maintained and available on request.	Risk assessment consideration		The company seafood sourcing policy builds on the need for traceability by noting the minimum set of information it expects to be collected and available to the next stage of the supply chain, for the products it buys. The basis of the minimum information derives from EU IUU/US SIMP and GDST KDEs, and this ambition is communicated within the sourcing policy or product specification to its seafood suppliers.	External	Which of the following data is available for collection upon request and associated with products?  vessel identity (home port, name, flag and call sign), registration, and where issued, IMO or other UVI number  location of catch (e.g. GPS coordinates, specific location of fishery, FAO codes, EEZ's ISO country code, relevant Regional Fisheries Management Organization (RFMO))  fishing license and validity  species (FAO alpha 3 code), product name and code  fishing method used  fishing dates of capture  quantities (in kg) of catch  value/area/position/estimated weight/call sign and declaration of any transhipment at sea. This will include the receiving vessel name and where applicable, the IMO number or other UVI number  *person/enterprise with custody and ownership after landing.  What other information is associated with products?
3.4.11	Is information relating to the products maintained in an electronic system? As a minimum the key data should be held in the system, and other documentation such as EU Catch Certificates attached electronically or a record noting their physical location attached.		The FAO technical paper "Seafood traceability for fisheries compliance: Country-level support for catch documentation schemes," lists recommendations for traceability mechanisms based on the evaluation of different countries' catch documentation schemes (CDS) and key data elements (KDEs): <a href="http://www.fao.org/publications/card/en/c/1701be4c-eb83-4b0f-97e5-b6d11d1c7c55/">http://www.fao.org/publications/card/en/c/1701be4c-eb83-4b0f-97e5-b6d11d1c7c55/</a>	The company seafood sourcing or other related policies detail the company ambition that product specific information (whether to enable IUU risk assessments to be undertaken routinely or not) will need to be available electronically at some time in the future.	External	What key data relating to products (refer to question X) at a minimum, are maintained in an electronic system?  Is other documentation such as EU Catch Certificates attached electronically, or is a record noting their physical location attached?
3.5 Information	n verification and transparency					
3.5.1	Does the organization work with other actors in the supply chain to agree levels of information required and share it to ensure a level of transparency that is appropriate to enable regulatory visibility across the entire supply chain?		or batch from origin to end-use.  The "GS1 Foundation for Fish, Seafood and Aquaculture Traceability Guideline" provides consistent business practices for effectively managing traceability and enhancing transparency across supply chains: https://www.qs1.org/standards/traceability/quidhttps://www.qs1.org/standards/traceability/quidhttps://www.qs1.org/standards/traceability/GS1 Foundation for Fish Seafood Aquaculture Traceability Guideline.pdf		Internal	
3.5.2	Does the organization engage with other actors in the supply chains to resolve any barriers that prevent this from being possible?		It is recognised that full chain traceability may not always be achieved. In such cases, a programme or process to improve traceability is needed. There are resources and guidelines available in the "shared resources" section of this guide to assist companies in taking steps towards full chain traceability.	The transparency policy states that where barriers exist to achieving supply chain transparency, the seafood buyer will work collaboratively with its suppliers to address them.	Internal	







3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Internal or external question	Rewritten question (if external)
3.5.3	When assessing the impact on decent working conditions, is engagement with those potentially affected (in this case, workers) undertaken? If any information is unavailable during a traceback exercise then this should be investigated.	Required	A company should establish and use policies, practices and confidential reporting and assurance systems, to ensure that decent working conditions protect workers in facilities in all countries where seafood products are sourced. A company should conduct inspections, audits and/or site visits to check for aspects of decent working conditions.	The transparency policy states that where barriers exist to achieving supply chain transparency, the seafood buyer will work collaboratively with its suppliers to address them.	External	Can you assess the impact of decent working conditions through a verifiable traceback exercise across your supply chains within 48 hours from the time the request is made? A traceback exercise involves gathering information or documenting events from the point of origin or source. If any information is unavailable during a traceback exercise, a further multi-part question should be asked, such as:  Can you access information or furnish evidence related to freedom of association, right of workers to organize, forced labour, minimum age of workers, child labour, equal remuneration or discrimination?
3.5.4	Are all stages in the supply chain available for inspections, audits and/or site visits upon request?	Required	All stages in the supply chain should be available for inspections, audits and/or site visits upon request. Additionally, DNA testing is an emerging technology applicable in spot checks.	1st, 2nd and 3rd party inspection and auditing of all stages in the supply chain is an ambition within the company's sourcing policy.	External	As a company, are you able to conduct inspections, audits and/or site visits to check for aspects of legality, traceability and decent working conditions?  How often do you conduct site visits?  What information are you able to obtain from the site visits to help verify legality of seafood products and decent working conditions from the point of origin?
3.5.5	Are the commitments, expectations and standards of the organization documented and available to other actors in the supply chain within 48 hours of the request?	Required	The commitments, expectations and standards of a company should be documented and available to actors in the supply chain within 48 hours of the request.	A requirement to be able to undertake traceability exercises within 48 hours is detailed within the company policy.	Internal	
3.5.6	Is first-, second- and third-party verification of information allowed at any point in the supply chain? Access should be granted to those conducting inspections, audits and/or site visits on behalf of those in the supply chain to check for aspects of legality, traceability and decent working conditions. Random spot checks and unannounced audits should be permitted.	Required	First, second and third-party verification of information should be allowed at any point in the supply chain.  **Access should be granted to those conducting inspections, audits and/or site visits on behalf of those in the supply chain, to check for aspects of legality, traceability and decent working conditions.  **Random spot checks and unannounced audits should be permitted.  **DNA testing to verify species is an emerging technology used in spot checks  **Third-party auditors help to ensure that inspections are conducted without jeopardizing necessary business confidentiality	The company policies establish its intent to be able to verify information provided to it by its supply chain at will, whether using 1st, 2nd or 3rd party audit processes.	External	As a company, can you obtain third-party verification of information at any point in the supply chain?  Do you have designated access to conduct inspections, audits and/or site visits on behalf of those in the supply chain?  Can you conduct random spot checks, and are you permitted to conduct unannounced audits?
3.5.7	Is all of the text on the final product labelling and packaging written in plain language and correct according to the source of the product? This includes all claims made about the origin of the product.	Required	All products should be properly labelled in plain language, and be correct according to the source of the product. This includes country of origin.  It is good practice for voluntary information beyond mandatory legal requirements to be clear, unambiguous and verifiable.  Attention is drawn to Regulation (EU) 1379/2013 as well as the Sustainable Seafood Coalition's Code of Conduct on Environmental Claims.	Policies are in place that detail how product labelling and packaging is checked to ensure compliance with legal requirements and clarity of labelling.	External	Are all products properly and visibly labelled and written in plain language, including correct source of the product and country of origin? If so, please supply examples of labelling where relevant, for all seafcod supplied in this contract. See link for information on labelling as a resource: <a href="https://trade.ec.europa.eu/doclib/docs/2014/december/tradoc_152941.pdf">https://trade.ec.europa.eu/doclib/docs/2014/december/tradoc_152941.pdf</a>
	heries and fishing operations					
4.1 Managem	ent of fisheries	Risk assessment	In a rick accomment, confood should be accommed as higher rick if	Specifical cumply chains are being manned and at a minimum the	Internal	
4.1.1	In a risk assessment, is seafood assessed as higher risk if sourced from a fishery that is either regarded as overfished or for which there is neither sufficient data to ensure it is not overfished nor a plan in place to collect such data?	Hisk assessment consideration	In a risk assessment, seafood should be assessed as higher risk if sourced from a fishery that is regarded as overfished, or for which there is neither sufficient data to ensure it is not overfished, nor a plan in place to collect such data.  There is no one list that expresses the State of all of the different fisheries, yet various competent authorities at global and national levels, assess whether fisheries are in an overfished State.  It is good practice for seafood to be sourced from fisheries with a peer reviewed assessment that demonstrates that the fishery is not fished in excess of the maximum sustainable yield (MSY). Stock statuses can be accessed on RFMO webpages, although they may not be current. The following map of RFMOs may be useful here: https://ec.europa.eu/oceansand-fisheries/index_en	Seafood supply chains are being mapped and at a minimum the information with which to determine whether a source fishery is overfished, unregulated or has problems with under-reporting (high risk) is being collated.	internal	



3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Internal or external question	Rewritten question (if external)
4.1.2	Where seafood originates or might originate from a fishery where RFMOs, intergovernmental organizations, States (including EU Member States) and NGOs have identified high levels of risk of I/U fishing, or if the species is assessed to be of higher risk, does the organization consider this seafood to be higher risk?	Required	When procuring higher risk seafood, e.g. seafood originating from a fishery identified with high levels of risk of IUU fishing, extra measures should be taken to ensure full traceability, maximum transparency, and the trustworthiness of the supply chain. This includes at minimum, completing risk assessments or audits at least once every six months, with steps taken to mitigate risks. Extra measures might include certification verification such as Marine Stewardship Council (MSC), including the associated Chain of Custody certification where applicable, to mitigate the higher risk presented by the fishery.	Source fisheries are being mapped and assessed to determine whether any are high risk.	Internal	
4.1.3	When procuring higher risk seafood, are extra measures taken to ensure full traceability, maximum transparency, and the trustworthiness of the supply chain, including by as a minimum completing risk assessments or audits at least once every six months with steps taken to mitigate risks?	Risk assessment consideration		6-monthly reviews of high risk fishery sources is happening, with supply chain feedback of results communicated.	Internal	
4.2 Fisheries	access control					
4.2.1	Where seafood and marine ingredients are identified as originating from a vessel that is flagged to a State, or that fishes in the territorial or EEZ waters of a coastal State, that does not have a transparent register of authorized vessels, does the organization ensure that there is full chain traceability and that independent audits are completed at least every 12 months?	Required	Where 12 monthly audits are not possible but obtainable, the company should factor this information into the risk assessment. Would audits on a less frequent basis elevate the risk to a level where sourcing is not responsible?  It is also recognised that conducting audits every 12 months is not always possible. In this case, companies can request that suppliers provide copies of vessel licenses, registrations, etc. annually, to check that fish come from legal sources and help companies realize potential risks. Companies should also consider advocating the relevant State to compile and publish a transparent list of vessels. It should consider whether the State shares vessel information with RFMOs and/or the FAO Global Record, in absence of its own transparent register.	Supply chains are being mapped with the desire to know the flag State of the fishing vessels supplying, so that a full list of supply vessels can be compiled.	Internal	
4.2.2	Where fish products are sourced from high seas fisheries or from any stock subject to the jurisdiction of an RFMO or other international management arrangement, the organization should only source from vessels:  a) operating in fisheries governed by RFMOs or other international arrangements that:  1) have fishing quotas or other seasonal, temporal or technical catch restrictions that are operated in a transparent manner, meaning that they are publically available for instance on a website;  2) apply sanctions or require flag States to apply sanctions to fishing vessels that are sufficient to deter IUU fishing, meaning that fines are in the order of at least five times the value of the catch caught by the vessel during the period IUU activity took place;  3) operate sanctions or require flag States to apply sanctions on fishing vessels for IUU fishing in a transparent manner, meaning they are published on a publically available website; and b) are operating under the flag of States that comply fully, and ensure that vessels operating under their flag comply fully, with all conditions and measures required by the international rules and/or authority responsible for managing or setting the norms of management for the fishery		The company can use these conditions to assess the risk of the fishery. For example, it can check whether these conditions are in place by searching the relevant RFMO/other international arrangements website and reading their conservation and management measures, as well as their resolutions and recommendations.  Importantly, the company can check if a vessel is on any IUU lists and/or is blacklisted. If so, the company should not source from this vessel.  RFMO websites often contain lists of vessels which have previously carried out IUU fishing. These lists can be useful to cross-check the vessels used within the company's supply chains.  Some examples include: ICCAT's IUU vessel list: <a href="https://www.iccat.int/en/IUUlist.html">https://www.iccat.int/en/IUUlist.html</a> .  EU's IUU vessel list: <a href="https://www.icuat.int/en/IUUlist.html">https://www.icuat.int/en/IUUlist.html</a> .  EU's Lituational fishing. The substanting is the substanting	Source fisheries are known or are being mapped and an assessment of the sustainability status of the fishery being exploited is planned to be determined. Where vessel lists/registries are available, vessel assessment work is being planned to ensure none are engaged in IUU practice and this has been communicated to the supply chain.	Internal	
4.3 Monitoring	g, control and surveillance					
	- advisory only					
4.3.2 Due dili	gence					







3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	·	Internal or external question	Rewritten question (if external)
4.3.2.1	Does the organization complete due diligence on their supply chains related to MCS? When undertaking due diligence on a new supplier or product (or when repeating due diligence for an existing supplier or product), the organization should assess and record the following factors relating to flag States, coastal States and RFMOs responsible for MCS of a supplying vessel.	Requirement		The first steps of gathering data on source fisheries, which is a step toward assessing MCS requirements, has begun.	Internal	
4.3.2.1.a	Monitoring systems: Does the organization research whether or not industrial fishing vessels in the supply chain are required by flag State authorities to have an installed vessel monitoring system (VMS) transponder, automatic identification system (AIS) transponder or other tracking technology onboard? These systems where required should be continuously transmitting in accordance with any national programmes or requirements and those which have been sub-regionally, regionally or globally agreed among the States concerned. Those responsible for tracking schemes that are required should be able to track the movements of these vessels continuously from port to port.			supply chains and identify the vessels or group of vessels that supplies it with seafood. This policy forms the foundation from which further supply chain insight can be determined and steps to understand VMS/AIS use can be taken.	External	What requirements are in place for vessels to have Vessel Monitoring Systems (VMS)?  What requirements are in place for vessels to operate Automatic Identification Systems (AIS)?  Are there any other vessel tracking requirements in place for vessels?
4.3.2.1.b		Risk assessment consideration	For States to effectively regulate fishing vessels, they need information on the location and content of their catch. If competent authorities are not requiring this information, it not only suggests that fishing is not being reported, but also significantly increases the risk that the authority is not regulating access to the fishery, or monitoring the activities of vessels to determine whether or not they are operating illegally. Logbook requirements should be easily evidenced, by supplying copies of license conditions or other communications from competent authorities to vessel owners, setting out their vessel tracking requirements.	The company has a seafood sourcing policy that aims to map its supply chains and identify the vessels or group of vessels that supplies it with seafood. This policy forms the foundation from which further supply chain insight can be determined and steps to understand logbook use can be taken.	External	What requirements are in place to provide data on vessel position, catch of target and non-target species and fishing effort to the following:  - the vessel's flag State?  - the vessel's coastal State (if applicable)?  - the Regional Fisheries Management Organization where the vessel fishes (if applicable)  What other data requirements are in place of fishing activity by vessels that supply seafood in this contract?
4.3.2.1.6	At sea inspections: Does the organization research whether or not vessels in the supply chain are subject to a regime of inspections by MCS authorities? Vessels should give information to the relevant coastal State or duly authorized RFMO inspecting authority regarding vessel position, catches, fishing gear, fishing operations and related activities. The appropriate authority should be allowed to inspect the vessel, its license, gear, equipment, records, facilities, fish and fish products and any relevant documents necessary to verify compliance with coastal State rules and regulations or relevant RFMO conservation and management measures.	consideration	At-sea inspections are an important means to determine whether or not vessels are complying with fisheries laws and regulations. For example, actual catch can be compared with logbooks to verify the information, the fishing gear can be inspected, and the catch checked for the presence of endangered species and signs of shark finning. The lack of such inspections increases the risk that vessels are operating illegally. States often publicise fisheries patrols to increase their deterrent effect. Vessel companies can also be requested to share post-inspection reports when organizations are seeking to verify whether or not they take place.	The company has a seafood sourcing policy that aims to map its supply chains and identify the vessels or group of vessels that supply it with seafood. This policy forms the foundation from which further supply chain insight can be determined, along with steps to understand the use of at-sea inspections within the compliance regime, and next steps as appropriate for the size and scale of the company.	External	At what frequency are vessels in the supply chain subject to at-sea vessel inspections by the coastal State, by parties to RFMOs in the high sea?  Can you share any post-inspection reports?





3.1 General		Required or Risk Assessment	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Internal or external question	Rewritten question (if external)
		Consideration	·			
	Observers: Does the organization research and ask for evidence that seafood is sourced from fisheries where observer programmes, whether electronic or human, or alternative measures have been implemented through national, sub-regional and regional observer programs in which the flag State is a participant? Information on observer coverage levels, or alternative measures such as increased inspections where observer schemes are not possible, should be obtained from an RFMO (where relevant) or coastal State.		require only 5 percent observer coverage. This minimal observer	The company has a seafood sourcing policy that aims to map its supply chains and identify the vessels or group of vessels that supply it with seafood. This policy forms the foundation from which further supply chain insight can be determined on whether the observation is human or electronic.	External	What requirements are in place by the flag State, coastal State or RFMO for human observers to be on the vessel(s)?  What electronic monitoring measures are in place on the vessel and what authorities have access to these records?
4.3.2.1.e	Where fish is identified to originate from a vessel that is flagged to a State or that fishes in the territorial or EEZ waters of a coastal s+M68tate that does not operate a national observer program, does the organization ensure that there is full chain traceability and that independent audits are completed at least every 12 months?		If 4.3.2.1.d determines the vessel is not subject to an observer programme, this risk mitigation should be put in place. See 3.4 for details on full chain traceability	The company operates a seafood sourcing policy that requires regular (at least annual) supply chain traceability exercises to be conducted.	Internal	
	Where it is known that seafood or marine ingredients are sourced from vessels flagged to a State that is different than the State of nationality of their beneficial owner, is this regarded as increasing the risk of supplying illegal products?		Although there are many reasons why a vessel owner of one nationality may use the flag of a different nationality (such as access to quota or a genuine joint venture), the use of flags from another State increases risk. In some cases, 'flags of convenience' are used to avoid more stringent flag State controls exercised by the owner's State. As effective flag State controls are a key means of reducing the risk of a vessel fishing illegally, avoiding them increases risk. In addition, if an owner is based in a different jurisdiction from the flag, it can be more difficult to apply sanctions in the case of IUU fishing or human rights abuses. This reduces the deterrent effect of sanctions.	supply chains and identify the vessels or group of vessels that supply it with seafood. This policy forms the foundation from which	External	What is the flag State of the vessel(s) supplying seafood under this contract?  What is the nationality of the vessel(s)' beneficial owner?
4.3.3 Market					_	
controls 4.3.3.1	December of the control of the contr	Din. d	Manifest controls and halo to extendible the level exists of a 1 1 1		E. da and all	What flag Obstaclass and States a
	Does the organization undertake analysis of its supply chains and implement a system to enable it to identify the carding status of its supply chains?	·	Market controls can help to establish the legal origin of seafood products. An example of a market control scheme to curb IUU fishing is the EU IUU Regulation 1005/2008.  *Under this regulation, non-EU countries identified as having inadequate measures in place to prevent and deter IUU fishing may be issued with a formal warning, or a yellow card to improve efforts, or a red card for failure to curb IUU fishing.  *A company should implement a system to identify the carding status of its supply chains by first accessing IUU Watch, an aggregated source of information for EU carding decisions by country. For more information, including countries and their carding status, follow: <a href="https://www.iuuwatch.eu/">http://www.iuuwatch.eu/</a>		External	What flag States, coastal States and processing States have responsibility for seafood caught in this supply chain?  Are any of the above States subject to an EU yellow card or red card?  See: http://www.iuuwatch.eu/map-of-eu-carding-decisions/



3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Internal or external question	Rewritten question (if external)
4.3.3.2	Does the organization require that vessels in the supply chain are not flagged to or licensed to fish by States that have been issued a red card by the EU?	Required	A company should require that vessels it sources from in the supply chain are not flagged or licensed to fish by States that have been issued a red card. To determine if the vessel is flagged to a State that has been issued a red card, a company can request the following information from their supply chains:  *Request catch certificate information in accordance with the EU IUU Regulations, including fishing vessel name, flag State, vessel or IMO number, for example  *Review and verify information on the catch certificate to determine compliance. This may include requesting physical inspection reports of consigned seafood products carried out by third country authorities  *Reject consignments of seafood products if the vessel is determined to be flagged to a State that has been issued a red card. See www.liuuwatch.eu for more information.		Internal	
4.3.3.3		Risk assessment consideration	A company should check that the flag State of the vessel(s) supplying them (already notified in other questions) are on the list of countries that have notified the EU (to be used as a proxy for non-EU countries) of their competent authority and been accepted: https://ec.europa.eu/fisheries/cfp/illegal_fishing/info		Internal	
4.3.3.4	Where fish is sourced from vessels flagged to a State given a yellow card by the EU or fishing in a coastal State given a yellow card by the EU, is the organization able to demonstrate that there is a system that enables full chain traceability and that audits are completed at a minimum once every 12 months?				Internal (using answers from previous question)	
4.3.3.5	If sourcing from these countries, does the organization research the reasons for the yellow card and, where it has access, record (and, where possible, support) efforts by the yellow-carded State to address these reasons?	Requirement	Seafood from a country that has been given an EU yellow card is at inherently higher risk, as less reliance can be placed on efforts by the relevant government to manage fisheries. If organizations decide to continue taking supplies from them, and reliance is placed on government fisheries management measures to mitigate the risk of IUU fishing, then it is important to understand the reasons for the EU yellow card and the efforts being taken by the State to address those reasons. The EU publishes Statements when yellow cards are issued to explain the concerns that led to the cardings. In addition, organizations can contact NGOs and other stakeholders active in those countries, to gain an insight into what progress is being made.  If is also recommended that suppliers in the yellow carded country are contacted to discuss the reasons from the yellow card, to ascertain what is being done by the government to address the situation, and whether or not the supplier is playing a role in supporting any reforms. Organizations may also choose to individually or in partnership with their suppliers and/or NGOs, contact the authorities in the yellow carded country to encourage them to make relevant reforms, in order to ensure they can continue to supply from the country.  Through the above, a view can be formed regarding whether or not the yellow carded country's authorities are engaging proactively to address the issues that led to the card. This in turn can inform the organization's view on whether it is advisable to continue to supply from the country or if new sources need to be sought.		Internal (however, may choose to contact supplier to obtain information on measures being taken by flag State in reaction to EU yellow card)	
4.4 Source fishing vessels						







3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Internal or external question	Rewritten question (if external)
4.4.1	Seafood should not be sourced from any vessel(s) that appear on any recognized blacklist (those established by RFMOs). Is there a system in place to verify whether vessels appear on any of the available blacklists?  Other blacklists exist, but RFMO blacklists are the only ones recommended here.	Required	A company should not source seafood from vessels that appear on recognized blacklists established by RFMOs. To determine whether or not a fishing vessel is listed, follow: <a href="https://iuu-vessels.org/">https://iuu-vessels.org/</a>	Mapping of supply chains is underway and a full list of all fishing, transhipment and support vessels is being developed. Whilst the sources of supply are being mapped, information about fishing licences and authorization details begin to be collated and cross-referenced.		As a company, can you confirm that none of the vessels in this supply chain appears on a regional IUU black list. See: https://iuu-vessels.org/
4.4.2	Does the organization only source from fishing vessels that appear on authorized vessel lists where these are available for relevant coastal State EEZs and territorial waters or, where on the high seas, by the relevant RFMO?	Required	The FAO Global Record of Fishing Vessels, Refrigerated Cargo Vessels and Supply Vessels, maintains a record of fishing vessels, including their identity, history and authorizations to fish and tranship and, in the future, will also have a record of non-compliance for that vessel. This tool is intended to support risk assessment. Follow this link for more information or a list of vessels: http://www.fao.org/global-record/en/  Another useful database for searching if EU vessels fishing in the waters of a non-EU State have an agreement with that State is: http://www.whofishesfar.org/	Mapping of supply chains is underway and a full list of all fishing, transhipment and support vessels is being developed. Whilst the sources of supply are being mapped, information about fishing licences and authorization details begin to be collated and cross-referenced.	Internal	
Does the organ	nization request the following information from suppliers to info	rm their due diligence	risk assessments?			
44.3.a	Evidence that all qualifying fishing vessels (under IMO adopted resolution A.1078(28) and the latest version of Circular Letter 1886) in their supply chain have a unique vessel identifier (UVI) issued by IHSM&T on behalf of the IMO	Risk assessment consideration	Unique vessel identifiers (UVIs) such as IMO ship numbers, are an identification number that is unique to each ship, and is never reassigned to another vessel. This means that vessel name, ownership, records of noncompliance etc., can be recorded using these numbers. Once allocated, these numbers should be included on all relevant documentation including licences and authorizations, transhipment reports, landing requests/reports etc., to improve transparency of the supply chain. Difficulty arises where a specific country or RFMO does not enforce the use of UVIs or where auctions result in UVI number changes. Suppliers should request UVI records and if not available, consider that the supply chain is of higher risk.  Companies should advocate for the inclusion of vessels on public registers. This increases transparency and reduces the risk of IUU seafood entering supply chains.	transhipment and support vessels is being developed, which includes their length and weight, fishing gear of operation and whether they have a UVI and are on a publicly available vessel register maintained by their flag State or RFMO where relevant. In addition, as vessel details are being captured they should be assessed to determine whether they qualify for an IMO number and steps are being taken to encourage the supply chain to obtain them where they are missing. At a minimum PAS 1550 should be referred		Do all qualifying fishing vessels have a unique vessel identifier (UVI) issued by IHSM&T on behalf of the IMO?  Where is this information captured, e.g. catch certificate, registration?  Can this information be made available upon request?
4.4.3.b	Evidence that those not qualifying for an IMO number have an alternative internationally or nationally recognised UVI. Such UVIs should remain the same for the entire life of the vessel, be marked on the vessel and appear on all related documentation including the catch documentation	Risk assessment consideration	IMO numbers can be searched here: <a href="https://imonumbers.ihs.com/">https://imonumbers.ihs.com/</a> Some countries do not enforce the use of IMO numbers or they may not be enforced on vessels below a certain size. Therefore, alternative unique vessel identifiers (UVIs) may be required. Examples include CaribShip Unique Numbering Schemes, tuna RFMO vessel lists, High Seas Vessel Authorization Record, among others. Suppliers should request that a UVI and not just an IMO number, is included within the catch documentation.  The UVI should be collected for all vessels in the supply chain, such as when a transhipment occurs. The Global Dialogue on Seafood Traceability (GDST) Standard 1.0 includes these as key data elements (KDEs) to collect as part of establishing full chain traceability. The Core Normative Standards can be accessed here: <a href="https://traceability-dialogue.org/core-documents/gdst-1-0-materials/">https://traceability-dialogue.org/core-documents/gdst-1-0-materials/</a>	transhipment and support vessels is being developed, which includes their length and weight, type of fishing gear and whether they have a UVI and are on a publicly available vessel register maintained by their flag State or RFMO where relevant. In addition, as vessel details are captured, they are being assessed to determine whether they qualify for an IMO number and steps are being taken to encourage the supply chain to obtain a UVI where vessels do not qualify for an IMO number. At a minimum, PAS 1550		Do those fishing vessels not qualifying for an IMO number have an alternative internationally or nationally recognised unique vessel identifier (UVI)?  If so, what alternative UVI is used and can this information be made available upon request?  What assurance or evidence exists to support that UVIs remain the same for the entire life of the vessel?







3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Internal or external question	Rewritten question (if external)
4.4.3.c	Evidence that all fishing vessels in their supply chain have up-to-date authorizations and fishing licences issued by the relevant competent authorities. It should be possible to request this information from the suppliers and receive the information within 14 days		Depending on which State a vessel is flagged to, i.e. registered with, certain fishing licences will be applicable, and are mandatory for the vessel to be able to fish. It is expected that a supplier would be able to secure details of such licences from the vessel operators within 14 days. If the vessel operator is unable to provide such evidence, the vessel should be considered at higher risk of IUU due to the lack of transparency.  The Global Record of Vessels is an FAO initiative that aims to centralise information on vessels by pairing IMO numbers and fishing authorizations, among other data. As this database is developed, it has the potential to be a powerful tool for improving vessel transparency:  http://www.fao.org/global-record/information-system/en/	Mapping of supply chains is underway and a full list of all fishing, transhipment and support vessels is being developed. Whilst the sources of supply are being mapped, information about fishing licences and authorization details, whether vessels have a UVI and are on a publicly available vessel register maintained by their flag State or RFMO, are being collated and cross-referenced. At a minimum PAS 1550 should be referred to in supplier communication so that they are aware of the desire to assess IUU risk.	External	Do all fishing vessels in your supply chain have up-to-date authorizations and fishing licences issued by the relevant competent authorities?  How often are authorizations and fishing licenses reviewed/renewed?  If requested, could this information be provided within 14 days?
4.4.3.d	Evidence that vessel operators obtain confirmation directly from the coastal State and/or RFMO that authorizations and fishing licences have been issued and the dates they are valid for, and make this information available upon request		This ensures that the vessel operators have used the correct procedures to obtain the authorizations or fishing licences, and supports legality claims If the company does not obtain this evidence, the risk of IUU fish entering their supply chain will be higher.  Where possible, this and other documents that support legality should be digitized and accessible to relevant supply chain actors and stakeholders. The GDST Standard 1.0 is an exemplar for how to digitize data to ease data sharing and increase interoperability between traceability systems. https://traceability-dialogue.org/core-documents/gdst-1-0-materials/	Fishing vessel licences and authorizations are being collected by seafood suppliers as part of the supply chain mapping process, with the details being recorded onto a supply vessel list. Sample copies of authorizations and licences are either being requested or are recognised as being important, so that their dates of issue, dates of expiry and conditions of authorization can be checked. At a minimum, PAS 1550 should be referred to in supplier communication so that they are aware of the desire to assess IUU risk.	External	Do vessel operators obtain confirmation directly from the coastal State and/or RFMO that authorizations and fishing licences have been issued and the dates they are valid for?  Is there evidence to support this and can this information be made available upon request?
4.4.3.e	Evidence that vessel operators have obtained and documented a full list of all of the conditions of fishing licences and authorizations directly from coastal State authorities and/or RFMOs; including locations where fishing is restricted, gear use, crew requirements, observer requirements and any other conditions	Risk assessment consideration	This should be available upon request from the catch sector, who should hold licenses and authorizations together with their conditions. If catch vessels are not maintaining such records, there is a risk that they do not understand the laws and regulations they are meant to complying with, increasing the likelihood of them engaging in IUU. This should be factored in to risk assessments as the vessel is considered at higher risk.	Communication is made to the supply chain requesting that the license conditions for supplying vessels are communicated by a specified time in the future, or that RFVS certification is in place for all supply vessels. At a minimum, PAS 1550 should be referred to in supplier communication, so that they are aware of the need to comply with licensing requirements.	External	Have vessel operators obtained and documented a full list of all of the conditions of fishing licences and authorizations directly from coastal State authorities and/or RFMOs, including locations where fishing is restricted, gear use, crew requirements, observer requirements and any other conditions?  Is there evidence to support this and can this information be made available upon request?
4.4.3.f	Evidence that fishing vessels and the companies that own them pay their license fees to State bank accounts and not to agents, and that they provide documentation and evidence of this to the processor/importer if requested		This reduces the risk of a fraudulent license being used, as it avoids the possibility of obtaining a license from an unauthorized agency or corrupt official.  Evidence of paying license fees to a State bank can be in various forms, for example, receipts or bank Statements. Where vessels or the companies who own them are unable to supply such information, the vessel should be considered at higher risk of fishing illegally.	Mapping of supply chains is underway and a full list of all fishing, transhipment and support vessels is being developed. Whilst the sources of supply are being mapped, information about fishing licences and authorization details begin to be collated and cross-referenced.	External	Who do fishing vessels and the companies that own them pay their license fees to?  Do they provide documentation and evidence of this to the processor/importer if requested?
4.4.3.g	Evidence that fishing vessels have a vessel monitoring system (VMS), automatic identification system (AIS) or other vessel tracking technologies that are continuously engaged while at sea and actively monitored by the coastal or flag State		The company should ask suppliers if these systems are in place on board vessels, the percentage of vessels covered, and the percentage of this data which is monitored. If possible, evidence of this data and monitoring by a third party should be requested.  Where vessel tracking technologies are not used or authorities will not release this information, the supply chain should be considered at higher risk of IUU fishing.	Mapping of supply chains to identify the vessels supplying fish and seafood is happening, and as part of this process, information is being collected to understand what the rules of the flag and authorization State are in relation to the employment of VMS and AIS onboard these vessels. At a minimum PAS 1550 should be referred to in supplier communication so that they are aware of the desire to assess IUU risk.	External	Do all fishing vessels have a vessel monitoring system (VMS), automatic identification system (AlS) or other vessel tracking technologies?  If not, what percentage of vessels have these systems and what percentage of this data is monitored?  Are these systems and technologies continuously engaged while at sea and actively monitored by the coastal or flag State?  Can this information be made available upon request?









3.1 General		Required or Risk	Implementation Notes (for areas where industry feedback requested	Base practice	Internal or	Rewritten question (if external)
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	Evidence that the vessels are in compliance with inspection regimes. This includes evidence that the vessel management:  1) accept and facilitate the prompt and safe at sea boarding by relevant coastal State inspectors or duly authorized RFMO inspecting authority;  2) cooperate with and assist in the inspection of the vessel conducted pursuant to an authorized at-sea inspection;  3) do not obstruct, intimidate or otherwise interfere with relevant coastal State inspectors or duly authorized RFMO inspecting authority in the performance of their duties; and 4) allow the relevant coastal State inspectors or duly authorized RFMO inspecting authority to communicate with the authorities of the flag State of the vessel and the relevant coastal State during the boarding and inspection	Risk assessment consideration	Records of inspection regimes or inspection results can be used here to confirm whether or not these conditions are met. Inspections may include the following: Document checks  Logbook  Licence, variations and permits  Fishroom plan  Certificate of Registry  Fishroom  Assessment of catch  Comparison with logbook  Check weighing  Working conditions  Gear  All gear in use should be inspected for compliance, and appropriate mesh sizes and dimensions checked, including some gear that is not in use.  It is recognised that this information may be difficult to obtain in some countries. Where this information cannot be obtained, catch vessels should be asked to document why the evidence does not exist (either vessels are not inspected or the inspecting State does not issue inspection reports).  Where possible, this explanation should be compared with other vessels or catch companies that operate under the same regulatory regime. In either case, where inspections do not take place or their results are not documented, vessels should be considered at higher risk. A company can check that the flag State of the vessel(s) supplying them are on the list of countries) of their competent authority and have been accepted: https://ec.europa.eu/fisheries/cfp/illegal_fishing/info	evidence that vessels are complying with any relevant inspection regimes, has been communicated to the suppliers and stakeholders with influence in the supply chain to make this happen. Ideally the communication includes details of the types of evidence that would be necessary to prove this, i.e. the information detailed within the guidance notes.	External	What evidence is available to support that vessels are in compliance with inspection regimes?  Is there evidence to support that the vessel management:  *Accept and facilitate the prompt and safe at sea boarding by relevant coastal State inspectors or duly authorised RFMO inspecting authority  *cooperate with and assist in the inspection of the vessel conducted pursuant to an authorized at-sea inspection  *do not obstruct, intimidate or otherwise interfere with relevant coastal State inspectors or duly authorized RFMO inspecting authority in the performance of their duties  *allow the relevant coastal State inspectors or duly authorized RFMO inspecting authority to communicate with the authorities of the flag State of the vessel and the relevant coastal State during the boarding and inspection?  Where this information or evidence is not available, can you document why it does not exist, e.g. vessels are not inspected, inspecting State does not issue inspection reports?
4.4.3.i	Evidence that fishing vessels engage crew in decent conditions.  Attention is drawn to ILO Convention C188 which sets minimum international levels for crew conditions on fishing vessels. The Convention will come into force on 16 November 2017	Risk assessment consideration	ILO Convention C188 sets out minimum standards for crew working conditions. For vessels flagged to a country that has signed and implemented ILO C188, risk of crew not having decent working conditions is decreased, as governments are bound by the convention to verify that vessel conditions and crew contracts are in line with its provisions. Where flag States have not adopted ILO C188, organizations can still request evidence that conditions and contracts are at the same standard. Information supplied by the UK to support UK operators complying with ILO C188 can be used as a reference for organizations seeking to compare conditions and contracts to the provisions of ILO C188. See: https://www.gov.uk/government/collections/ilo-work-in-fishing-convention	the flag State has ratified and implemented ILO C188 is being collected and the review of employment contracts and evidence of decent working conditions is required by the buyer.	External	What minimum standards are required for worker contracts and vessel conditions for vessels supplying seafood under this contract?  What labour inspections do vessels supplying seafood under this contract face by government authorities?
4.4.3.j	Evidence that suppliers (e.g. fishing vessel companies) have checked the references and background of vessel captains before they were hired	Risk assessment consideration	Organizations should ask suppliers what checks they undertake on the background of captains they employ. Where it is found that no checks are made on their background, including previous convictions for IUU fishing or human rights abuses, this significantly increases the risk of supplying from those vessels. It can be recommended that suppliers undertake these checks going forward to reduce risks associated with the seafood they are supplying in the future. Where a supplier undertakes checks on the background of captains, these can be verified on a sample basis during audit processes.	specified point in the future, (if not already happening), the background of captains should be checked before they are engaged, and those with a history of IUU fishing or human rights abuses convictions should not be present in the company's supply	External	What checks are undertaken on the professional background of captains employed?
4.4.3.k	Evidence that captains who have been found guilty of IUU fishing on more than one occasion are not engaged and that those convicted on a single occasion receive extra supervision and audit	Risk assessment consideration	See notes for 4.4.3.j above. Where suppliers have a process in place to check the background of captains before they are hired, they should also have a policy setting out that captains with a history of multiple IIUU infractions are not engaged, and those with a history of a single IIUU infraction may be engaged but with extra supervision. The absence of such a policy increases the risk of seafood supplied by that supplier.	Policy is communicated to vessel owners/managers that at a specified point in the future, (if not already happening), the background of captains should be checked before they are engaged, and those with a history of IUU fishing or human rights abuses convictions should not be present in the company's supply chain or engaged in the future.	External	Are captains hired if they have been found to have been guilty of IUU infractions?  Are any additional corporate risk mitigation measures put in place if such captains are hired?







3.1 General		Required or Risk	Implementation Notes (for areas where industry feedback requested	Base practice	Internal or	Rewritten question (if external)
011 00110141		Assessment Consideration	further detail)	Saco procisio	external question	.com.o. quoton (ii onome,
4.4.3.1	Evidence that captains or other persons are not engaged if checks find they have been found responsible for any previous human rights abuses	Risk assessment consideration	Where suppliers have a process in place to check the background of captains before they are hired, they should also have a policy setting out that captains found to have previously committed a human rights abuse are not engaged. The absence of such a policy increases the risk of seafood supplied by that supplier	As above	External	Are captains hired if they have been found to have a history of human rights abuses?
4.4.3.m	Evidence that suppliers are not procured from if checks find they have been found responsible for any previous human rights abuses	Risk assessment consideration	See 4.4.4 below	Policy communicated to suppliers explaining a zero tolerance approach to supplying seafood from companies convicted of IUU fishing or human rights abuses.	External	What measures are put in place to make sure that seafood is not purchased from suppliers that have been found to have been associated with human rights abuses?
4.4.4	Where any of the above checks find evidence of IUU fishing or illegal working conditions, fish should not be sourced from those suppliers.  Where suppliers are unable to supply one or more of the above areas of evidence, does the organization document as part of the risk assessment, the decision of whether or not to supply and what mitigating actions are to be taken?	Requirement	Organizations should have a policy of not buying seafood from a supplying company that has been found to have engaged in human rights abuses or IUU fishing. This information can be found through the due diligence process, including information requests to suppliers, third party audits, internal audits, internet searches and meetings with NGOs active in countries relevant to their supply chains. The due diligence process should also document where information or policies recommended above are not available and set out what mitigating measures, such as third party audits, internal audits, information requests from NGOs etc. are sought.  For example: - ICCAT's IUU vessel list: https://www.iccat.int/en/IUUlist.html - EU's IUU vessel list: https://ec.europa.eu/fisheries/cfp/filegal_fishing/info > Secondary legislation and official documents > IUU vessel list - TMT's combined IUU vessel list: https://www.iuu-vessels.org/Home/Search	Policy communicated to suppliers explaining a zero tolerance approach to supplying seafood from companies convicted of IUU fishing or human rights abuses.	Internal	
4.4.5	Does the organization research vessels, companies and their beneficial owners from which it is sourcing seafood? This research should include verifying the IMO numbers for any new vessels entering a supply chain	Requirement	Organizations should request that suppliers provide a complete list of vessels that supply to them, including their full names, IMO numbers and beneficial owners. This information can be used to research vessel histories on online databases (see APPENDIX). Where a large fleet of small-scale vessels are used by suppliers, and depending on the level of risk assessed in the supply chain, organizations may decide to use a sample-based approach to verifying vessel identities and histories through online databases.	As part of the supply chain mapping exercise, information is being compiled that not only includes the vessel name, UVI, flag State, fishing gear used and licences, but also the ultimate beneficial owner of the fishing vessel which might not be just the immediate registered owner of the vessel.	External	Provide a complete list of all vessels used to supply seafood under this contract, including full names, IMO numbers and the beneficial owner of the vessel.
4.4.6	Does the organization source seafood where this research finds evidence of vessels, companies or beneficial owners with a history of engaging in illegal activity?	Requirement	See 4.4.4	Policy communicated to suppliers explaining a zero tolerance approach to supplying seafood from companies convicted of IUU fishing or human rights abuses.	Internal	
4.4.7	is the organization able to provide copies of the flag State fishing authorizations granted to fishing vessels when/if requested by any actor or relevant party? Evidence should be maintained in the supply chain about the use of VMS and a fisheries logbook by the flag State to monitor vessel activities	Requirement	Organizations should ask that suppliers maintain evidence of their fishing authorizations issued by relevant flag and coastal States, as well as relevant RFMOs. In the case of RFMOs and an increasing number of States, these can be verified by the organization through checking online lists of authorised vessels. In the future, the FAO Global Record will also be a resource where this information can be verified. Where these are not shared by States online, on a sample basis, organizations should ask that suppliers provide evidence, including licenses issued by flag and coastal States. Where the supply chain or competent authority are assessed as being high risk but organizations wish to continue to supply from them, then they should consider contacting governments directly to verify the validity of authorizations.	Mapping of supply chains is underway, and a full list of all fishing, transhipment and support vessels is being developed. Whilst the sources of supply are being mapped, information about fishing licence and authorization details begin to be collated and cross-referenced.	External	Please provide copies of flag State authorizations for supplying fishing vessels.
4.5 Transhipi	nent					
Does the orga	nization require that?					



3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Internal or external question	Rewritten question (if external)
4.5.1.a	All transhipments in their supply chains are recorded, monitored and covered by an independent observer programme appropriate to the fishery?		Unmonitored at-sea transhipments are a potential avenue for IUU-caught seafood products to enter the supply chain. There are currently different protocols for transhipment activity, each with differing levels of documentary evidence and observer presence required. The FAO is developing transhipment best practises, and organizations should be aware of their development, adopt them when completed, and encourage their supply chains to use them to aid consistent implementation. To ensure better reporting and more complete, uniform information, a company should request from relevant authorities throughout their supply chain, the following information:  -Require all transhipment events be reported to the relevant flag, coastal, port State and RFMO Secretariat  -Require 100 percent observer coverage (human, electronic or combination)  -Require transhipment data-sharing procedures among relevant authorities (other ways to ensure coverage?)	Supply chains are being mapped, including identifying whether transhipment is present and a necessary part of the supply chain. Included within the mapping information on transhipment are requirements of the flag, coastal and RFMO being collected.	External	What practices are in place to ensure transhipments in their supply chain are recorded, monitored and covered by independent observer programs appropriate to the fishery?
	If a transhipment is licensed (and therefore permitted) then the vessel is checked to see if it is on the relevant authorized register for fish carriers?	Required		Supply chains are being mapped to determine whether transhipment is happening and the vessels involved with it.	External	Are all transhipments at sea relating to supply authorized?
4.5.1.c	Both vessels in the transhipment have uninterrupted VMS, AIS or other vessel tracking technology operating?	Required		Information on whether AIS or VMS is used by vessels transhipping catch is either known or being collated.	External	Do both vessels involved in the landing and transhipping of fish operate VMS/AIS or vessel tracking technology?
4.5.2	is all of the information regarding any at sea transhipments made available to the end purchaser of the seafood in the supply chain (e.g. restaurant, brand)?	Required		Communication to the supply chain is present which clearly states there is an ambition that where transhipment is present in the supply chain, that it is known and documented.	Internal	
4.5.3	Does the organization check that EU IUU and other catch certificates provide information about any transhipments that have taken place? All required documentation and authorizations should be validated by appropriate authorities		A company should request the following information on transhipments:  -List of vessels involved in transhipments -Details of transhipment e.g. date, area, position  -Authorization of transhipment -Details of transhipment -Whether an observer program is in place to monitor the transhipments, as well as number of inspections and percentage conducted at random -Independent observer report  These documents should be collected and scrutinised by importers and processors. Information pertaining to transhipments is contained on section 6 of EU catch certificates.  The GDST Standard 1.0 lists key data elements that should be collected for any transhipments. See Core Normative Standards here:  https://traceability-dialogue.org/core-documents/qdst-1-0-materials/	A policy is adopted that requires transhipments to be mapped in the supply chain and communicated to suppliers.	Internal	
4.6 Landing a						
4.6.1 General						







3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Internal or external question	Rewritten question (if external)
	Does the organization request the landing procedures and controls of the port of landing? This information should then be used in the risk assessment and due diligence process. The organization should assess and record whether ports are in States that are party to, and have implemented, the Port State Measures Agreement. Ports with records of noncompliance should be identified as higher risk.	Required	What measures can a company take to obtain landing procedures and determine the level of port controls? As a first step, a company can show preference for ports in States that are party to the FAO Port State Measures Agreement (PSMA), as these are associated with a lower level of risk of being entry points for illegal catch. A company should ask if the designated port in the port State is a party to the PSMA, if not a party to the PSMA if not a party to the PSMA, a company should ask what is preventing the port State from joining.  A company should ask if records of port entry requests, denials, documentary checks and inspections are kept. If so, additional questions that a company should ask are:  -Are the records public?  -Is there a protocol to notify foreign port authorities of such information? -Is an electronic information system used to collect, store and share this information and landing procedures and controls at the port of landing?  A company should also request: -the requirements for vessels, particularly foreign-flagged vessels, in requesting access to port -the processes by which authorities determine which vessels should be granted/denied entry into port or be selected for documentary checks and/or inspections -the standards for documentary checks and physical inspections	Supply chain mapping is underway to determine all of the ports where fish and seafood is landed, what controls, documents and systems each of the ports requires of a vessel when it lands, and whether the port State is party to the port State measures agreement and the ports used to land are designated within it. At a minimum, PAS 1550 should be referred to in supplier communication so that they are aware of the desire to assess IUU risk.	External	What landing procedures are in place to determine the level of port controls?
Does the organ 4.6.1.2.a	nization assess and record whether or not ports in their supply The port State competent authorities have resources that use a risk-based targeting approach to control	chain meet the followi Risk assessment consideration	ng criteria and include the information as part of their risk assessment:  A company should ask if there is an IUU-related risk-based procedure for controls on vessels that request entry into port to land or tranship fish. A	Supply chain mapping is underway to determine all of the ports where fish and seafood is landed. At a minimum, PAS 1550 should	External	What are the procedures for controls on vessels that request entry into port to land or tranship fish?
	aco a non sacca angoing approach to comes.	oonolaaratton	company should ask if the risk-based procedure is documented and if it is made publically available.			Are the procedures documented?
						Are the procedures publicly available?
						If not, why are the procedures not documented and available?
4.6.1.2.b	The control systems in the port are appropriate for the volume of cargo and vessels	Risk assessment consideration	A company should ask if the port is operating under or over its capacity. One way of assessing port capacity is to ask what percentage of vessels that land or tranship fish are subject to documentary checks or physical inspections.	Supply chain mapping is underway to determine all of the ports where fish and seafood is landed. At a minimum, PAS 1550 should be referred to in supplier communication, so that they are aware of the desire to assess IUU risk.	External	What percentage of vessels that land or tranship fish are subject to documentary checks or physical inspections in port?  How are selections made for which vessels to check/inspect?  How were the vessels your company sources from selected for documentary checks/ inspections?  Which of the following are covered by checks and inspections?  *vessel identification, construction and registration documentation *license and authorizations to fish or tranship *catch and bycatch documentation *processing and transhipment reports *VMS/AIS systems in use *type of fishing gear used
						*type and volume of fish species  *crew documentation





3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Internal or external question	Rewritten question (if external)
4.6.1.2.c	There are enough inspectors provided at the port to be able to inspect the volume of cargo and vessels that the port handles	Risk assessment consideration	While there is no standard measure or guideline, a determination can be made by weighing the volume or port's capacity for cargo with the number of inspectors on staff. A company should ask if there is a sufficient number of inspectors for the volume of cargo and vessels. There is no standard measure or guideline, sufficiency is determined by the port State. When determining sufficiency, consideration needs to be given to the monitoring, control and compliance regime found in the source fishery, confidence level that the controls in the fishery are being met, the level of corruption within the port State, and technology employed that assists in targeting the inspection regime.	Supply chain mapping is underway to determine all of the ports where fish and seafcod is landed. At a minimum, PAS 1550 should be referred to in supplier communication, so that they are aware of the desire to assess IUU risk.	External	How many inspectors are available to inspect the volume of cargo and vessels that the port handles?
4.6.1.2.d	The port State competent authorities are able to demonstrate that they operate in an effective and transparent manner	Risk assessment consideration	A company can request if landing procedures, standards for documentary checks and physical inspections and records are public, and ask to obtain copies. A good resource on import controls and landing procedures that may be of use can be found here: <a href="https://eu.oceana.org/en/publications/reports/comparative-study-key-data-elements-import-control-schemes-aimed-tackling,">https://eu.oceana.org/en/publications/reports/comparative-study-key-data-elements-import-control-schemes-aimed-tackling,</a> It includes a list of key data elements that should be collected as part of a robust import control scheme. In addition, whether the country has signed to be a member of the Fisheries Transparency Initiative may be an indicator of risk.	Supply chain mapping is underway to determine all of the ports where fish and seafood is landed. At a minimum, PAS 1550 should be referred to in supplier communication, so that they are aware of the desire to assess IUU risk.	External	Are landing procedures, standards for documentary checks and inspection reports publicly available upon request from the port State through the supply chain?
4.6.1.2.e	All records relating the port State control are well-maintained and available upon request to the relevant authorities or actors requesting information	Risk assessment consideration	A company should ask if records of port entry requests, denials, documentary checks and inspections are kept. If so, additional questions that a company should ask are:  *Are the records public?  *Is there a protocol to notify foreign port authorities of such information?  *Is an electronic information system used to collect, store and share this information?  *How can companies and relevant stakeholders obtain copies of this information and landing procedures and controls at the port of landing?  This information should be available and therefore be furnished upon request.	Supply chain mapping is underway to determine all of the ports where fish and seafood is landed. At a minimum, PAS 1550 should be referred to in supplier communication, so that they are aware of the desire to assess IUU risk.	External	Are all records relating to the port State control available to the relevant authorities and supply chain actors upon request within a given timeframe?
4.6.1.2.f	The port State verifies the catch documentation and maintains organized documentation and files/ records	Risk assessment consideration	A company should ask for catch documentation for landing or transhipment of fish from a vessel that can be verified through transhipment reports. Where these documents are not currently shared with purchasing companies, then a request should be made to both the flag and port State asking for it to happen.	Supply chain mapping is underway to determine all of the ports where fish and seafcod is landed. At a minimum, PAS 1550 should be referred to in supplier communication, so that they are aware of the desire to assess IUU risk.	External	Is catch documentation available and verified and reported by the port State authorities?
	There are no recorded instances of bribery and any personnel found guilty of this are not permitted to work in the port	Risk assessment consideration	A company should ask if any instances of bribery or corruption have been identified or reported, how they were resolved or if they were made public. The bribery and corruption risk of each port or flag State country within the supply chain should be considered when assessing this risk.	Communication to the company's suppliers has been made, which says that if not already happening, at some point in the future enquiries should be made to determine whether or not there are any instances of bribery or corruption in port administration relevant to fisheries controls.	External	Is there evidence of any recorded instances of bribery through enquiry or public documents including press?  Is there evidence of any personnel found guilty of bribery through public documents including press?
	e Measures Agreement					
	Does the organization check whether the port(s) at which the seafood that they are purchasing is landed is located in a State party to the PSMA? If not, then the ports should be considered to be higher risk in the due diligence process.	Required	Check the Pew website for PSMA status and also check the accession documentation to determine whether the ports of landing used within the supply chain are actually included within the PSM ratification documents. If they are included, then they can be considered at lower risk, but if they are not included, then consider them at higher risk and ask the port State to include them. For more information about PSMA, visit: <a href="mailto:pewtrusts.org/psma">pewtrusts.org/psma</a> or <a href="http://www.fao.org/port-State-measures/resources/detail/en/c/1111616/">http://www.fao.org/port-State-measures/resources/detail/en/c/1111616/</a>	The value of PSMA is recognised by the company within its seafood sourcing policy or specification, as is the fact that robust port controls based on PSMA should be correctly implemented.	External	Is the port State a party to the FAO Port State Measures Agreement (PSMA)?



3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Internal or external question	Rewritten question (if external)
4.6.2.2	As part of the risk assessment process, does the organization seek evidence on whether or not the PSMA requirements are being implemented by the contracting party of the PSMA in which the port found in the supply chain is located? Evidence of non-compliance or lack of evidence of compliance should be treated as an increased risk of fish passing through the port being illegal		A company should ask if the port State is party to the PSMA and/or what is preventing them from joining. A company should ask whether the port State has designated ports for access by foreign-flagged vessels, whether they have been publicized (or check here: <a href="http://www.fao.org/fisherv/port-State-measures/psmaapp?/locale=en&amp;action=gry">http://www.fao.org/fisherv/port-State-measures/psmaapp?/locale=en&amp;action=gry</a> and confirm that it does not allow foreign-flagged vessels into any non-designated ports.  A company should ask whether requests to enter port and inspection reports include the information detailed in Annexes A and C of the PSMA. The FAO also has a database of designated ports: <a href="https://www.fao.org/fisherv/port-State-measures/psmaapp?locale=en&amp;action=gry">https://www.fao.org/fisherv/port-State-measures/psmaapp?locale=en&amp;action=gry</a> Risk assessment consideration:  -States that are party to the PSMA are associated with a lower level of risk of being entry points for illegally-caught fish.		External	Does the port State have designated ports for access by foreign-flagged vessels?  Are your ports of landing included in the list of PSMA designated ports?
4.6.3 Vessel in	n port					
4.6.3.a	ization require that? Crew on fishing vessels it sources from are free to leave port when vessels dock, as far as is permitted by the immigration laws of the port State	Required	A company can ask if crew are granted shore leave access in accordance with immigration laws of the port State.	Suppliers have been written to, advising them that at a specified point of time they will be asked to report on the immigration laws of relevant port States and how they relate to the ability of crew to leave vessels in port.	External	Are crew granted shore leave access in accordance with laws of the port State?  How is this verified?
4.6.3.b	All crew are verified as present as per the crew list provided to the port State inspector, are in possession of their own work contracts and identification documents and are available for confidential interview if a request is made by the port State authorities	·	In some countries, port in/port out inspections have been put in place to ensure there is no illicit incidence or swapping of crew whilst at sea. When the PSMA/ILO 188 and Cape Town Agreement are all in force, ratified and effectively implemented, there can be joint inspections that will verify this. If these 3 UN agreements are not in force for each of the supply chains flag or port States, then advocate for their implementation. A company should ask for crew documentation provided by the port State inspector.	A policy is communicated to suppliers requiring that crew are in possession of work contracts and are available for confidential interview by inspectors.	External	Are all crew verified as per the crew list provided to the port State inspector?  Do you verify if crew are in possession of their work contracts?
4.6.3.c	The captain is available at the port inspection and is able to provide all documentation and enquiries required at the port State inspection		Pre-notification of arrival and landing should be made by vessels or flag States so that document inspection can be undertaken and outcome recorded. Suppliers should request a copy of these records relevant to their purchase from the vessel owner/supplier. Where they are not available, then a time-bound request for this information should be made to the supplier and also to the flag State of the vessel, asking that this is mandated as a customary practice. A company should request inspection reports that include vessel identification, construction, registration documentation, license to fish or tranship, catch and bycatch documentation, processing and transhipment reports, vessel monitoring systems, and/or automatic identification systems, fishing gear, fish species and quantities, safety certifications and crew documentation.	recognised as an important step to address IUU, either within a company policy or the buying specification. This recognition has been communicated to seafood suppliers of fish and seafood, whether or not they are landed to States party to PSMA.	External	Is the captain of the vessel able to provide all documentation requested by port State inspectors?  How would a company obtain this information?
4.7 Decent w	orking conditions in the fishing sector					
4.7.1	Does the organization include in its policies and require from its suppliers that all of the major issues that are identified in ILO Convention C188 are addressed by source fisheries? These are essential to providing decent work conditions on board fishing vessels	Required	See 4.4.3.i		Internal	
4.7.2	Wherever possible and relevant, does the organization demonstrate that it supports the ratification of the ILO Convention C188?	Required			Internal	
4.7.3	Is traceability ensured down to vessel level to enable businesses with a turnover of over £36 million to produce their annual slavery and human trafficking Statement that covers what is being done in the supply chain to address the issue.	Required in UK	See 3.4.5. An overview of the traceability system can be set out in reporting issued under the Modern Slavery Act		Internal	









responsibility policy/standard that includes the points in 3.3.3?  4.7.6 Do inspections, audits and checks include, where possible, in-person interviews with the relevant workers or crew, which are conducted in a neutral and safe environment, guaranteeing the security and anonymity of the interviewees?  Wessel inspections and audits are a developing area, so the PAS indicates that this is a requirement where possible. Importers/processors placing relance on these in their due displace systems should seek assurance of the following labour and interview standards for inspections, audits and checks:  *There is evidence of a standard operating procedure for inspections that includes worker interview.  *This SOP should be provided to the importer/processor.  *Certificates of completed training should be provided but also unamounced basis in order to identify indicators of forced labour and human trafficking as defined by the LLO.  *Importers/processors should be provided with examples of completed questionnaires as part of baseline measurements inspectors conducting !  *Inspectors should use an interview questionnaire say part to have been expected in the processor conducting electron processor on a quarterly basis inspectors should use an interview questionnaire that is designed to identify indicators or forced labour and human trafficking as defined by the LLO.  *Importers/processor should be provided with examples of completed questionnaires as part of baseline measurements inspectors conducting !	y the policies and procedures relating to the treatment of rs on fishing vessels supply seafood to this contract.  ut in detail what measures are in place to interview crew supplying seafood to this contract, to determine whether have experienced human rights abuses, violations of or any other legal violations.
responsability policy/standard that includes the points in 3.3.3?  4.7.6 Do inspections, audits and checks include, where possible, in-person interviews with the relevant workers or crew, which are conducted in a neutral and safe environment, guaranteeing the security and anonymity of the interviewees?  Vessel inspections and audits are a developing area, so the PAS indicates that this is a requirement where possible. Importers/processors placing relance on these in their due diligence systems should seek assurance of the following labour inspectors, audits and checks:  There is evidence of a standard operating procedure for inspections, audits and checks:  There is evidence of a standard operating procedure for inspections that includes worker interviews  This SOP should be in accordance with international standards and follow a victim centred approach inspectors should to receive accredited or government/ILO approved training in conducting labour inspections/interview/worker interactions.  Certificates of completed training should be provided to the importer/processor or a quarterly basis inspectors should use an interview questionnaire that is designed to identify indicators of forced labour and human traffiching as defined by the ILO  Importer/processors should be provided to government/ILO approved training inconducting a both or a scheduled but also unamnounced basis in order to identify potential cases of FL & HT  Hispections records including number, type and nature of the inspections, should be provided to the importer/processor or an aquarterly basis inspectors should use an interview questionnaire that is designed to identify indicators of forced labour and human traffiching as defined by the ILO  Importers/processors should be provided in a provided with examples of completed questionnaires as part of baseline measurements  Inspectors accordance with interview and the provided of importers or processors conducting	rs on fishing vessels supply seafood to this contract.  ut in detail what measures are in place to interview crew supplying seafood to this contract, to determine whether have experienced human rights abuses, violations of
in-person interviews with the relevant workers or crew, which are conducted in a neutral and safe environment, guaranteeing the security and anonymity of the interviewees?  There is evidence of a standard operating procedure for inspections, audits and checks:  There is evidence of a standard operating procedure for inspections that includes worker interviews  This SOP should be in accordance with international standards and follow a victim centred approach  Inspectors should receive accredited or government/ILO approved training in conducting labour inspections/interviews/worker interactions.  Certificates of completed training should be provided to the importer/processor  Inspections should be conducted both on a scheduled but also unamounced basis in order to identify potential cases of FL & HT  Inspection records including number, type and nature of the inspections, should be provided to the importer/processor on a quarterly basis  Inspectors should use an interview was forced to the inspections, should be provided to the importer/processor on a quarterly basis  Inspectors should use an interview questionnaire that is designed to identify indicators of forced labour and human trafficking as defined by the ILO  Importers/processors should be provided with examples of completed questionnaire as a part of baseline measurements  Inspectors/auditors agree to importers or processors conducting	supplying seafood to this contract, to determine whether have experienced human rights abuses, violations of
unannounced spot checks of inspection/interview procedures	
Section 5. Factories	
5.1 Information	
factories in its supply chains comply with the policies and specifications of the organizations which they supply (see infringements, u 3.3.3).	ut what reporting mechanisms are in place for workers in cessing seafood for this contract to report labour s, unfair working conditions or associated unlawful ave any specifications or codes of practice been agreed se areas, and if yes, please share these.
chain on the legality and traceability of a product within a goods receipt documentation traceability/batch code  *goods receipt documentation traceability/batch code  *traceability records back to vessel  *product specs	tition can be provided to any other actor in the supply bort the legality and traceability of a product, e.g., goods in code, traceability records back to vessel? rmation be provided within a maximum of four hours?
responsible for ensuring that information relating to legality that information	signated person(s) at the factory responsible for ensuring on relating to legality and traceability is compiled, stored, naged and available for checks (e.g. audits)?
5.2 Process Control	



3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Internal or external question	Rewritten question (if external)
	Is the production process defined, controlled and documented to ensure that the product meets the specifications and produces products that are compliant with the expectations of the end product users?	Required			Internal	
	Are product specifications, batch specifications, process monitoring, product testing, manufacturing site cleaning, and other quality control measures documented?	Required			Internal	
	Spot purchases without any knowledge of the vendor should be avoided and therefore not present in supply chains. The organization should ensure that all subcontractors meet all laws and are included in traceability documentation	Required			Internal	
	Does the organization complete mass balance checks at their factory for its supply chains? These should be completed at regular intervals throughout the year; at a rate appropriate according to the results of the risk assessment and to satisfy internal due diligence but at a minimum of once per year. Accurate conversions ratios from production line should be used to make sure that the mass-balance is accurate				Internal	
5.3 Ethics and	d labour					
	Does the organization have a policy that addresses social and ethical responsibility (see 3.3.3, a) to g) for what to include in the policy)?	Required		A policy is in place that requires the full mapping of the seafood supply chain and includes an ambition for social and ethical responsibility and working conditions to be afforded to everyone working within it.	Internal (though entails a requirement to share the organization's policy and its requirements through the supply chain)	
	Does the organization apply this policy not only to the buildings and operations that it owns but also communicate that the behaviours outlined in the policy are expected of all the actors in its supply chain, from supplier to vessel operations?		Policies that address social and ethical responsibility should be communicated to all actors along the supply chain. Where this cannot be communicated, (e.g. on some occasions suppliers do not know who they will supply from in advance, efforts should be made to communicate these policies as soon as the supply chain is established.  There should be a mechanism in place that allows communication of these policies and standards to the potential suppliers of seafood from new sources. This can help inform a company's sourcing decision and it helps the supplier determine if it can meet requirements now and in the future.	The policy includes an allowance for new supply chains that are seasonal or have short lead times before supply to be mapped as soon as time allows, but that all regular supply chains are to be mapped at the earliest opportunity.	Internal	
	Does the organization ensure that at any of its factories, a review of its ethical and labour policy and systems is completed <b>at least once per year</b> to ensure that it is addressing current industry concerns and that it complies with any changes to the industry and supply chain requirements?	Required			Internal	
5.3.4	Is there a designated person(s) at each factory to ensure that workers are being treated ethically and that labour rights are being upheld? Translation services should be provided for migrant workers to facilitate effective communication	Required			Internal	





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3.1 General		Required or Risk	Implementation Notes (for areas where industry feedback requested	Base practice	Internal or	Rewritten question (if external)
		Assessment Consideration	further detail)		external question	
5.3.5	Are grievance mechanisms in place that allow workers to report issues and any cases of abuse anonymously without being put at risk of negative repercussions? Any grievance report should be investigated as a priority, in a fully transparent manner and by including the relevant union representatives — or in cases where this does not apply — by involving NGO representatives in the review process	Required			Internal	
5.3.6	Does the organization promote robust labour standards with respective governments in the form of legislative frameworks that support workers – local or migrant labour – in their right to organize and collective bargaining?	Required			Internal	
5.4 Product to	racking and transformation					
	Where a fish product, unit, or batch of fish products, originates from multiple source fishing activities or fisheries, is there identification and tracking of products from each source that enable products at final sale to be traceable to a single source and activity? The fish product or batch identification should be grouped or associated in ways to allow verification of legal compliance and of claims related to sustainability or fishing methods	Required	Seafish lists UK regulations pertaining to labelling, marketing and more: https://www.seafish.org/trade-and-regulation/seafood-traceability-and- labelling-regulations/fish-traceability-requirements/		External	Are there any fish products, units, or batches that originate from multiple source fishing activities or fisheries?  How are these products traced, e.g. electronic traceability system, from a single source and activity, e.g. vessel, to final sale?  Is this information subject to external verification or regular independent audits?
	Are unique unit identifiers present at each level of the packaging hierarchy (e.g. from a pallet, a case or a consumer item)?	Required			External	Are unique unit identifiers present and consistent at each level of the packaging hierarchy, e.g. from a pallet, a case or a consumer item?  How are these unique unit identifiers documented and tracked, e.g. electronic traceability system?
5.4.3	When a product is combined with other material/ products, processed, reconfigured, or re-packaged, does the new product have its own unique product identifier?	Required			External	When a product is combined with other material/ products, processed, reconfigured or re-packaged, does the new product have its own unique product identifier?  How are these unique product identifiers documented and tracked, e.g. electronic traceability system?
5.4.4	Is the linkage (auditable function) maintained between this new product and its original inputs to maintain traceability? For example, a label, linked to the lot identification of the traceable input item, remains on the packaging until that entire traceable unit has reached the final point of sale	Required			External	Is the linkage maintained between a new product at final point of sale (refer to 5.4.3) and its original inputs, e.g. lot identification of original input?  How is this linkage documented to maintain traceability?  Is this documentation available for external verification or independent audit?



Section 3. Ma	nagament						
3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Internal or external question	Rewritten question (if external)
3.1.1	Does the organization have systems in place to manage critical aspects of legality? These should comply with requirements such as the EU IUU Regulation, relevant policy, standards and labour conventions. These systems should include traceability, processes, information verification and transparency.	Required	A company should have systems in place to manage critical aspects of legality, that comply with EU IUU Regulation, relevant policy, standards and labor conventions. These systems should include:  -Traceability - third party management system certification such as BRC/IFS will help to ensure a management system is in place, as will MSC chain of custody, although these do not specifically cover aspects for IUU  -Processes -Information verification -Transparency	A company sourcing policy explicitly stating its desire to avoid buying IUU fish - which also makes reference to the Modern Slavery Act if UK based - or other relevant statutory due diligence requirements is written and available. The policy includes the desire to engage with the supply chain to transition/improve supply chains that have been risk assessed and identified as in need of improvement. The policy is communicated to all suppliers, and basic procedures to check product, supply chain (including EU IUU Regulation catch certificates), vessels, and suppliers are legal as far as it is practical to check.	A management system is in place that includes processes to manage information verification and traceability. Where practical, a 3rd party audit of management system (e.g. BRC, IFS or GSA) or processing standard are in place, to ensure traceability. The company is a member of GDST and is working with suppliers to capture the relevant KDEs.	Internal	
3.1.2	Do the managers of the organization engage on improvement work with other suppliers or actors in the supply chain (e.g. audits, reviews, site visits, etc.)?	Risk assessment consideration	Company managers should engage on improvement work with other suppliers or actors in the supply chain by:  •Conducting audits and reviews •Conducting regular site visits, engaging in fishery or aquaculture improvement projects that specifically tackle IUU relevant issues, supporting research, and advocating for legislation adoption and effective implementation	A list containing all products and stock keeping units/SKUs is available within the business, which details basic information of source fishery and supply chain. Sufficient information is collected to warrant that the seafood being purchased is legally caught, and that when sold, is labelled accurately. All suppliers have received copies of company policies and internal risk assessment processes are either being considered, are in the process of being developed, or an existing mechanism is adopted, so that where needed, supply chain improvements can be identified.	having either written and agreed improvement plans, or are working to have agreed plans within an agreed timeframe. Audits of high risk supply chains are taking	Internal	
3.1.3	Where improvement work identifies corrective actions that can be completed to satisfy the organization's standards/policies, is support (e.g. approval/verbal, finances, time, meetings, etc.) given to the supplier or actor?	Risk assessment consideration	Support in the form of approval/verbal, finances, time, meetings, etc. should be given to the supplier or supply chain actor in need in need of corrective actions, in order to satisfy the organization's standards/policies. Evidence of this support should be able to be provided upon request.	As above	As above	Internal	
3.1.4	Is all seafood in the supply chain of the organization addressed using the same systems and level of scrutiny? Traceability and legality should be a minimum requirement for all seafood.	Required		A process is in place which is actively trying to achieve the same level of traceability, based on a risk assessed basis, for all sources of seafood that are within the scope of the policy. The scope might initially be limited, so that the process and practices of mapping and supply chain interrogation are being established. When defining the scope of the sourcing policy, consideration of volume of trade and potential influence on the supply chain should be made.	The established policy has been expanded to include all sources of seafood whether for direct human consumption, as a marine ingredient, or other route to market.	Internal	
3.2 The IUU F							
3.2.1	Does the organization document which of the products they sell are covered by the EU IUU Regulation?	Required	A company should document which of the seafood products they sell are covered by the EU IUU Regulation within their buying specifications and their supplier approval lists. These include:  *All imports of fresh and frozen, wild marine capture fishery products, both whole and processed *Imports into the EU including catches made by non-EU vessels landed directly in an EU port, or landed in a third country port and subsequently exported to the EU, whether processed or not processed *Imports into the EU including catches made by EU vessels, landed and imported in a third country and from there imported in the EU, whether processed or not *Exports from EU, including those with a catch certificate if required by a third country More information on the EU IUU Regulation can be found at: <a href="http://www.luuwatch.eu/new-background-to-the-iuu-regulation/">http://www.luuwatch.eu/new-background-to-the-iuu-regulation/</a> .	A system is established that is gathering data on the supply chains of the company so that within as short a time as possible they know which products fall under the EU IUU Regulation. This will have all legally required information such as: species name, fishing gear/method, sea area of capture, date of catch and landing available to them, so that ultimately they can determine which regulations apply to the products.	All base information is being routinely collected without any gaps in data, along with additional catch information such as bycatch and total catch of vessel during trip, plus list of all vessels used to supply, vessel identifiers, flag, landing port/s, and details of any transhipment.	Internal	





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3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Internal or external question	Rewritten question (if external)
3.2.2	Does the organization have management systems in place covering the requirements of the EU IUU Regulation (if sold)?	Required	A company should have management systems in place that cover the requirements of the EU IUU Regulation if it sells any of the products covered by this Regulation. Management systems will include traceability system and policy, incoming raw material lot assessment, and performance reporting which specifically covers IUU related topics such as ports of landing, timely presentation of catch certificates, cross checking UVIs.	Full supply chain traceability is desired and stated within a sourcing policy that is communicated to suppliers. Information on both seafood sources and people involved within the supply chain should begin to be collected either by the buyer or its supplier, with a system being developed to manage and assess the information being collected.	and process through which the seafood passes or is handled, as well as collating catch certificates for species	Internal	
3.3 Policies ar	nd Processes						
3.3.1 General							
3.3.1.1	Are documented policies and processes in place that provide requirements for full chain traceability to be ensured?	Required	The PAS 1550 defines full chain traceability as the "linkage from the point of capture to the consumer of one stage of production at a time, from any stage of production to any other point along the entire supply chain (often through documentation)". In other words, capturing product information that tracks it at every stage of the supply chain from vessel to retailer.  Full chain traceability policies and processes should outline but are not limited to: how risk is assessed, type of data required, methodology of data collection, frequency of data collection, audit schedule, and response to gaps in data.  The co-mingling of seafood from different sources can pose challenges to achieving full chain traceability. As such, companies may use a combination of recognised traceability standards and schemes to inform full chain traceability schemes and schemes to inform f	stock and sub area of capture, flag State, fishing trip dates, including landing date, being collected. The fact that this information is required to be collected is stated in a company sourcing policy or specification that has been communicated to all suppliers.	all purchases, supply chains are fully mapped and declared, including retained catch data quantity, and product form in box, batch or tank, plus fishing method and gear, Transhipment dates, name of carrier, dates		What policies and processes are in place that provide requirements for full chain traceability to be ensured?  Can traceback exercises be conducted from end point (i.e. retailer) to start point (i.e. vessel), to support full chain traceability claims?
3.3.1.2	Are policies and processes audited and have the contents reviewed on, at a minimum, an annual basis in case changes or amendments are required to be made?	Required		A seafood sourcing policy is in place that makes reference to the company ambition that both it, and its implementation, will be reviewed and audited on an annual basis.	Policies and processes are audited annually to ensure that the assessment of IUU risk within the supply chain is sufficient to manage risk.	Internal	
3.3.1.3	Are reports produced (at least annually) on the implementation and monitoring of the policies and processes that are in place to address risks?	Required		As above		Internal	
3.3.1.4	Are policies and processes available upon request and made available to other actors in the supply chain within seven days of such a request being made?	Required		The company has a seafood sourcing policy that is communicated to suppliers and available to customers upon request, with basic processes to assess suppliers.	The company seafood sourcing policy is communicated to and acknowledged by suppliers, with a functioning process to assess suppliers and their supply chains.	Internal	
3.3.1.5	Are policies and processes demonstrated to have been communicated throughout the supply chain to, at a minimum, the stage before and the stage after the processor/importer?	Required	A document setting out policies and procedures should be shared within the supply chain. It is good practice to ask suppliers to acknowledge that they have received and understand the policies and procedures, and that this is documented. Clarifications should be provided in the event that suppliers indicate they do not understand policies and/or procedures.	Evidence that seafood sourcing policies and IUU risk assessment procedures are available and shared with direct suppliers and customers can be shown.	Acknowledgement is received from both suppliers and customers that the company policies and procedures are understood and complied with. Policy and procedures are reviewed on a minimum annual basis and confirmation that they are understood by suppliers is in place.	Internal	
3.3.1.6	Is the organization able to demonstrate compliance and implementation of all of the required regulations, conventions and standards (dependent on the supply chain and market)?	Required	It is the responsibility of any organization to understand and observe the laws and regulations in any territory in which they operate. The recommendations in this PAS help an organization to gain this understanding in relation to the legality of seafood and the working conditions of workers in the seafood supply chain.	local, national, regional, and international legislation applicable to the seafood, so that in time the legality of the seafood harvesting and employment practices being employed can be warranted.	All seafood supply chains are mapped and the relevant legislation applicable to each of them is known. Steps to assess the quality of regulations in place and level of implementation is in place, with either consideration being given to government advocacy to encourage the gaps in legislation, or implementation to be filled or already happening. Third party certification such as RFVS is being used to warrant vessel legality.	Internal	
3.3.2 Due dilic	ence through risk assessments						







3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Internal or external question	Rewritten question (if external)
3.3.2.1	Does the organization conduct risk assessments on all of the supply chains from which it sources and be able to demonstrate that it does so? The level of risk in supply chains can be reduced by identifying and taking mitigation actions or measures. Attention is drawn to the BRC Advisory Note for the UK Supply Chain on How to Avoid IUU Fishery	Required	A company should complete due diligence through risk assessment on all of its supply chains. The level of risk in supply chains can be reduced by identifying and taking mitigation actions or measures such as mandating future requirements or engaging in improvement processes with the supply chain. A company should prioritize its use of each supply chain according to the findings of the risk assessments.  Ranking and assigning metrics that will evaluate results against factors such as the level of risk, volume and importance of the supply chain to the business, is subject to the needs of an individual company  The risk assessment system should demonstrate and document that for each supply chain, an assessment and any required actions have been applied. For example, if a supply chain is identified as higher risk, it will require additional verification for the company to assure its integrity  Risk assessments should be reviewed on a regular basis e.g. monthly, annually, biannually	supply sources can be identified and then risk assessed, has been communicated to suppliers. This	assessments have been completed for all, with risk categorisations made and in the case of high risk sources, improvement plans agreed. Consideration to volume of seafood purchased from an individual source, and confidence in regulation and of the supply chain, will inform the metrics of the risk assessment, as well as	Internal	
3.3.2.2	Does the organization prioritize its use of each supply chain from which it sources according to the findings of the risk assessments?	Required	Companies should conduct risk analyses to help minimize and mitigate the risk of IUU fish entering their supply chains, importantly aiming for assured traceability to legal origin.  See example risk assessment to determine appropriate action.  Where the risk assessment produces a moderate to high risk of IUU or information is missing, the sourcing decision should reflect the level of risk.	risk/low impact sources and aims to move its sources and buying over time to achieve this. The sourcing policy has been communicated to the company's suppliers.	Government and industry advocacy is happening (and which you are following and engaging in where practical)	Internal	
3.3.2.3	Does the risk assessment system demonstrate and document that for each supply chain an assessment and any required actions have been applied, that are appropriate according to the results of the risk assessments and prioritization exercises?	Required		has been communicated to the company's suppliers.	Improvement plans for all high risk sources are in place. Government and industry advocacy is happening (and which you are following and engaging in where practical) for high risk sources, and plans are being developed for low and moderate risk sources where improvements need to be made. Where risk assessments have been completed on numerous occasions or improvement plans are not yielding the desired change, the company can demonstrate that these factors influence ongoing buying decisions by communicating to the governments and relevant supply chain actors, that continued inaction could lead to a reduction in volume of purchases, or in extreme cases the cessation of buying altogether - whether individually, or as part of a government led trade sanction.	Internal	



3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Internal or external question	Rewritten question (if external)
3.3.2.4	Are risk assessments reviewed on a regular basis (e.g. monthly, annually, bi-annually, etc.) depending on the level of risk, or if something changes? The risk assessments should be completed at a minimum annually, and then at least six-monthly for supply chains identified as higher risk.	Required		The seafood sourcing policy includes a statement that the company endeavours to purchase seafood from low risk/low impact sources and aims to move its sources and buying over time to achieve this. The sourcing policy has been communicated to the company's suppliers.	Improvement plans for all high risk sources are in place and risk assessments undertaken on a six or 12-month basis dependent upon the level of risk identified. Government and industry advocacy is happening (and which you are following and engaging in where practical) for high risk sources, and plans are being developed for low and moderate risk sources where improvements need to be made. Where risk assessments have been completed on numerous occasions or improvement plans are not yielding the desired change, the company can demonstrate that these factors influence ongoing buying decisions by communicating to the governments and relevant supply chain actors, that continued inaction could lead to a reduction in volume of purchases, or in extreme cases the cessation of buying altogether - whether individually, or as part of a government led trade sanction.	Internal	
	working conditions						
3.3.3.1	Has the organization established and uses policies, practices and confidential reporting and assurance systems at every worker facility in all countries where fisheries products are sourced? This should allow all workers to have the ability to report labour infringements, unfair working conditions or associated unlawful treatment as necessary.	Required		The company recognises and understands the need for decent working conditions, it is mapping its supply chains to identify where its policies need to apply, and has policies in place that outline this ambition and those policies have been communicated to suppliers one step down the supply chain.	house or through third parties.	Internal	
3.3.3.2	Is each of these systems supported by a transparent process available upon request as part of supply chain audits, and be equally applicable for workers with or without union representation?	Risk assessment consideration	A company should be able to request and view the processes in place at any point along the supply chain, which ensure that workers have the ability to report labour infringements, unfair working conditions, unlawful treatment, etc.  Where the company is not able to obtain evidence of such processes, this lack of information should result in the company receiving a higher risk rating and mitigating measures undertaken.	Processes are in place that collect data and make that data available for inspection by the buyer or the buyer's representative agents, so that decent working conditions of people within the supply chain can be assessed.	The buyer or the buyer's representative agent has uninhibited access to an established system in which workers within the supply chain are able to highlight without risk of sanction, where labour infringements etc. are happening. Further to the reporting mechanism, mitigating measures are being taken to remedy any issues found.	Internal	
3.3.3.3	Are confidential reporting processes established and maintained with associated policies and practices embedded throughout the corporate culture led at senior board level?	Requirement		The company policies and processes should at a minimum establish the ambition that confidential reporting processes should be put in place where supply chain mapping and interrogation highlights that they are not already there.	Confidential reporting processes are established and maintained in all tier one supply chains and work is ongoing in tier two and three suppliers to achieve this.	Internal	
3.3.3.4	Are all complaints from workers dealt with objectively and confidentially through independent and impartial reviews leading to a remedy where applicable? These remedies should end the infringement, unfair working condition or associated unlawful treatment and provide retrospective financial compensation to the worker and referral to legal authorities where individuals have broken the law. Complaints and associated remedies should be documented and available for external scrutiny, with safeguards taken to protect the identity of victims.	Requirement		The company policies and processes should at a minimum establish the ambition that confidential reporting processes should be put in place where supply chain mapping and interrogation highlights that they are not already there.	Complaints from workers can be shown to be dealt with objectively and confidentially.	Internal	
3.3.3.5	Is social responsibility addressed explicitly in the policies and processes of the organization, by including as a minimum?  * freedom of association;  * the right of workers to organize;  * forced labour;  * minimum age of workers;  * child labour;  * equal remuneration; and  * discrimination.	Requirement				Internal	







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3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Internal or external question	Rewritten question (if external)
3.4.1	Are records of traceability kept that demonstrate whether or not a product originates from a source where reliable evidence of legality (e.g. registration, licensing, catch documentation and compliance records) is available? If it is not possible to trace to the origin of the seafood, this should trigger an investigation and the completion of steps to remedy the situation.	Required	The Future of Fish, in collaboration with FishWise, Global Food Traceability Center and WWF, developed a preliminary guide for industry working towards full-chain traceability: https://fishwise.org/wp-content/uploads/2018/03/OSMI-Trace-Collab_Taking-the-First-Steps-Towards-Seafood-Traceability.pdf  This guide links to useful resortes including a comprehensive compilation of key data elements (KDEs) across certification schemes, governmental organizations, industries, etc.: https://fishwise.org/wp-content/uploads/2018/03/2017.05.25 KDEs-for-Seafood-Compilation-of-Resources-Final -1-1.pdf  An example of traceability compliance can be found in the ISO standard document 'Traceability of finfish products' (12875:2011): https://www.iso.org/standard/52084.html	establishes the need for traceability of its seafood products on a lot or batch basis, to aid its control and assessment of food safety, sustainability, labour and	Suppliers are providing lot or batch traceability information that allows the sourcing company to assess and verify the credentials of the seafood it is buying. The information supplied should be provided in a format that conforms to the GDST KDEs. For IUU catch documentation, the links and references within this document should be consulted.	External	Do you have the following records to support that a product originates from a legal source:  •vessel registration  •vessel license  •catch documentation  •compliance records  What other records or documents do you keep that support claims of legality of a source?
3.4.2	Does the organization complete data (or data system) verification exercises to verify the authenticity of data entering the traceability system?	Risk assessment consideration		The company has a seafood sourcing policy that establishes the need for traceability of its seafood products on a lot or batch basis, to aid its control and assessment of food safety, sustainability, labour and associated environmental impacts, including avoidance of IUU by warranting that it is caught legally.		Internal	
3.4.3	Does information gathered, stored and processed on traceability enable full chain traceability to be assured transparently?	Risk assessment consideration			Through a combination of routine and spot-check traceability audits, the company is able to verify the accuracy and authenticity of some, if not all of the data provided by its suppliers, and it is actively exploring how this information can be automatically captured and shared with its customers or other stakeholders.	Internal	
3.4.4	Are all traceability systems, and all claims based on them, subject to external verification mechanisms and regular independent audits? Traceability data should be accessible during verification checks and audits.	Risk assessment consideration	Traceability can be defined as "the systematic ability to access any or all information relating to a food under consideration, throughout its entire life cycle, by means of recorded identifications" (WWF traceability principles, 2015). It is important to note that this is different to transparency, which focuses on what information is shared, with which stakeholders, and at what frequency. The Global Dialogue on Seafood Traceability (GDST) Standard 1.0 provides guidelines on enhancing interoperability of traceability systems to help enable full chain traceability and improve data verifiability: <a href="https://traceability-dialogue.org/core-documents/adst-1-0-materials/">https://traceability-dialogue.org/core-documents/adst-1-0-materials/</a> .		There is a formal documented process in place for assessing claims. Third party guidance is used as the basis for making voluntary claims beyond the legally required consumer information. Such guidance could be in the form of third party certification logo/brand guidelines, or via pre-competitive collaborations, e.g. Sustainable Seafood Coalition, Seafood Task Force.	External	How frequently are traceability systems, and all claims based on them, subject to external verification and independent audits?  How is traceability data made accessible during verification checks and audits e.g. use of an electronic system?



3.1 General		Required or	Implementation Notes (for areas where industry	Base practice	Implementation of PAS/ PAS Compliant	Internal or	Rewritten question (if external)
		Risk Assessment Consideration	feedback requested further detail)			external question	
3.4.5	Is traceability provided by the vessel or group of vessels that caught the seafood?	Risk assessment consideration	Traceback exercises can be conducted to test if traceability is provided by the vessel or group of vessels that caught the seafood. Companies should already have a range of traceability processes in place, to which additional aspects relating to IUU can be added. Where barriers exist, for example data loss due to auction sales or lack of transparency from certain vessels, the risk of IUU products should be considered elevated. It is recognised that not all supply chains may be fully traceable, and companies may want to work with their suppliers to improve this. Some companies may choose, for example, to work with suppliers to develop traceability improvement projects or initiatives with time-bound deliverables. There are links to publicly available traceability standards and guidelines included in the PAS 1550, which can help to fulfil requirements and risk assessment considerations, and inform an improvement project or initiative. More are included in the "shared resources" section.  The Global Dialogue on Seafood Traceability (GDST) Standard 1.0, provides guidelines on enhancing interoperability of traceability systems to help enable full chain traceability, improve data verifiability and ease data sharing: https://traceability-dialogue.org/coredocuments/qdst-1-0-materials/.	of vessels that it comes from. The policy may include an ambition that all KDEs within GDST will be provided by a future date by suppliers. Mapping of supply chains is taking place, along with the creation of vessel lists.	Supply chains are fully mapped, traceability back to supply vessel or group of vessels (including transhipment vessels) is in place and can be demonstrated within a reasonable timeframe, taking into account variables such as global time differences, public holidays, weekends etc. GDST KDEs are being collected and are available to the buyer. Action plans are agreed with supply chains where required traceability information is missing. Vessel lists include UVIs for all vessels. Additional data such as ports of landing, beneficial owners of vessels etc. is being collected, but may not always be present.		How is traceability provided to the vessel or group of vessels (e.g. catch certificate) that caught the seafood?  What processes, e.g. traceback exercises, are used to demonstrate traceability to a vessel or group of vessels?  Have you adopted any traceability standards, e.g. ISO 12875, as part of traceability compliance, and if so which ones?  If you have undertaken a traceability improvement project or initiative, can you please provide details of this i.e. time-bound deliverables?
3.4.6	Are traceback exercises carried out at a frequency based on risk assessment and in a timescale that is appropriate for the origin of the seafood?	Risk assessment consideration	DNA testing of fish can be used to support claims of legality, inform risk assessments, and support traceback exercises to seafood origin. Seafish has produced a comprehensive guide on the uses of DNA testing seafood that includes a list of well-established DNA databases: https://www.seafish.org/media/publications/SeafishGuidetoDNATestingofSeafood 201312.pdf	The buyer conducts regular traceback exercises to ensure that product purchased can be reliably traced back to the source fisheryfishing vessel(s). The frequency of traceback exercises is based on a risk assessment, taking into account publicly known risk factors for each specific supply chain.	The buyer conducts regular traceback exercises to ensure that product purchased can be reliably traced back to the source fishery/fishing vessel(s). The frequency of traceback exercises is based on an indepth risk assessment, taking into account detailed supply chain information derived from supplier inspections, audits or SAQs.	Internal	
3.4.7	Does the organization complete random traceback exercises that are able to verify full traceability from point of sale to source within 48 hours?	Risk assessment consideration	Random traceback exercises to verify traceability are typically conducted for food safety reasons. Some examples of food safety standards that require this include the BRC Global Standard (BRCGS) for Food Safety, IFS Food Standard 6.1, and GSA Seafood Processing Standards. As such, information relevant to IUU can be collected, e.g. through commercial transaction process, and stored alongside food safety information.  If traceback exercises cannot be conducted for certain supply chains or products, this should be taken into consideration when conducting a risk assessment, and companies should consider working with their supply chains to improve traceability. Refer to the "shared resources" section for common traceability guidelines and standards that can serve as a basis for traceability improvement projects or initiatives.	The buyer conducts regular traceback exercises to ensure that product purchased can be reliably traced back to the source fishery/fishing vessel(s). The frequency of traceback exercises is based on a risk assessment, taking into account publicly known risk factors for each specific supply chain.	The buyer conducts regular traceback exercises to ensure that product purchased can be reliably traced back to the source fishery/fishing vessel(s). The frequency of traceback exercises is based on an indepth risk assessment, taking into account detailed supply chain information derived from supplier inspections, audits or SAQs.	Internal	
		Risk assessment consideration		The buyer is able to correlate physical stock components with the associated paperwork through simple accounting tools such as invoice numbers or lot codes.			Are sales transactions accompanied and traced by unit or batch numbers on, or accompanying invoices?  Where are unit or batch numbers captured?  Are you able to match sales transactions with buyers or sellers?







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3.1 General		Required or	Implementation Notes (for areas where industry	Base practice	Implementation of PAS/ PAS Compliant	Internal or	Rewritten question (if external)
J.1 General		Risk Assessment Consideration	feedback requested further detail)	Dase placifice	implementation of PAS PAS Compliant	external question	Newmen question (il external)
3.4.9	Does the organization cooperate with the relevant competent authorities (that conduct active and effective regulatory oversight and verification) by using effective compliance and enforcement mechanisms?	Risk assessment consideration		The company has an "open door and cooperation policy" for domestic government and enforcement agencies.	Company hosts visits (or demonstrates a willingness to host visits) from domestic government compliance authorities and cooperates to any reasonable request by supplying information in a timely manner. Either directly or via industry associations/trade bodies or other collaborations, the company demonstrates its willingness to provide input to consultations, meet with government officials and support government policy implementation, where relevant to its seafood sourcing.	Internal	
3.4.10	In order to ensure consistency in the requests for information in supply chains, is the following information collected (via request) and associated with the products?  * vessel identity (home port, name, flag and call sign), registration and, where issued IMO or other UVI number;  * location of catch [e.g. GPS coordinates, specific location of fishery, FAO codes, EEZ's ISO country code, relevant Regional Fisheries Management Organization (RFMO)];  * fishing license and validity;  * species (FAO alpha 3 code), product name and code;  * fishing method used;  * fishing dates of capture;  * quantities (in kg) of catch;  * date/area/position/estimated weight/call sign and declaration of any transhipment at sea. This will include the receiving vessel name and * person/enterprise with custody and ownership after landing.  * Not all of this information will accompany the product at every stage, but the information should be maintained and available on request.	consideration		The company seafood sourcing policy builds on the need for traceability by noting the minimum set of information it expects to be collected and available to the next stage of the supply chain, for the products it buys. The basis of the minimum information derives from EU IUU/US SIMP and GDST KDEs, and this ambition is communicated within the sourcing policy or product specification to its seafood suppliers.	-vessel identity (home port, name, flag), registration, and where issued, IMO or other UVI number vlocation of catch [e.g. specific location of fishery, FAO codes, EEZ's ISO country code, relevant Regional Fisheries Management Organization (RFMO) fishing license and validity species (FAO alpha 3 code), product name and code fishing method used fishing method used fishing atless of capture quantities (in kg) of catch date/area/position/estimated weight/call sign and declaration of any transhipment at sea stranshipment information will include the receiving vessel name, and where applicable, the IMO number or other UVI number  Not all of this information will accompany the product at every stage, but the information should be maintained and available on request.	External	Which of the following data is available for collection upon request and associated with products?  vessel identity (home port, name, flag and call sign), registration, and where issued, IMO or other UVI number location of catch (e.g. GPS coordinates, specific location of fishery, FAO codes, EEZ's ISO country code, relevant Regional Fisheries Management Organization (RFMO)) -fishing license and validity -species (FAO alpha 3 code), product name and code -fishing method used -fishing dates of capture -quantities (in kg) of catch -date/area/position/estimated weight/call sign and -declaration of any transhipment at sea. This will include the receiving vessel name and where applicable, the IMO -number or other UVI number -person/enterprise with custody and ownership after -landing.  What other information is associated with products?
3.4.11	Is information relating to the products maintained in an electronic system? As a minimum the key data should be held in the system, and other documentation such as EU Catch Certificates attached electronically or a record noting their physical location attached.	Risk assessment consideration	The FAO technical paper "Seafood traceability for fisheries compliance: Country-level support for catch documentation schemes," lists recommendations for traceability mechanisms based on the evaluation of different countries' catch documentation schemes (CDS) and key data elements (KDEs): <a href="https://www.fao.org/publications/card/en/c/1701be4c-eb834b0f-97e5-b6d11d1c7c55/">https://www.fao.org/publications/card/en/c/1701be4c-eb834b0f-97e5-b6d11d1c7c55/</a>	The company seafood sourcing or other related policies detail the company ambition that product specific information (whether to enable IUU risk assessments to be undertaken routinely or not) will need to be available electronically at some time in the future.	The company sourcing policies are understood and acknowledged by all actors in the supply chain and the company is able to demonstrate that some of the product specific information that it requires is being submitted electronically and that there is a time-bound commitment by which all of this information will be provided electronically.	External	What key data relating to products (refer to question X) at a minimum, are maintained in an electronic system?  Is other documentation such as EU Catch Certificates attached electronically, or is a record noting their physical location attached?
3.5 Information	on verification and transparency	Poguirod	Transparancy and Transphility can be confused with an	A transparance policy that datails what information is	The transparency policy is understood by all asters in the	Internal	
J.J. 1	Does the organization work with other actors in the supply chain to agree levels of information required and share it to ensure a level of transparency that is appropriate to enable regulatory visibility across the entire supply chain?	Required	Transparency and Traceability can be confused with one another; Transparency refers to how and what information is disclosed to certain stakeholders, while Traceability refers to information on a certain product or batch from origin to end-use.  The "GS1 Foundation for Fish, Seafood and Aquaculture Traceability Guideline" provides consistent business practices for effectively managing traceability and enhancing transparency across supply chains: <a href="https://www.gs1.org/standards/traceability/quidhttps://www.gs1.org/standards/traceability/quidhttps://www.gs1.org/standards/traceability/quidhttps://www.gs1.org/standards/traceability/quidhttps://www.gs1.org/standards/traceability/quidhttps://www.gs1.org/standards/traceability/quidhttps://www.gs1.org/standards/traceability/quidhttps://gs1.Foundation.for Fish Seafood Aquaculture Traceability Guide ine.pdf&lt;/td&gt;&lt;td&gt;A transparency policy that details what information is needed from the supply chain is formulated and communicated to each supply chain actor.&lt;/td&gt;&lt;td&gt;The transparency policy is understood by all actors in the supply chain and supply chain transparency is able to be demonstrated upon request by regulators and stakeholders, whilst being routinely audited for compliance in-house.&lt;/td&gt;&lt;td&gt;met nat&lt;/td&gt;&lt;td&gt;&lt;/td&gt;&lt;/tr&gt;&lt;tr&gt;&lt;td&gt;3.5.2&lt;/td&gt;&lt;td&gt;Does the organization engage with other actors in the supply chains to resolve any barriers that prevent this from being possible?&lt;/td&gt;&lt;td&gt;Required&lt;/td&gt;&lt;td&gt;It is recognised that full chain traceability may not always&lt;br&gt;be achieved. In such cases, a programme or process to&lt;br&gt;improve traceability is needed. There are resources and&lt;br&gt;guidelines available in the " of<br="" resources"="" section="" shared="">this guide to assist companies in taking steps towards full chain traceability.</a>	buyer will work collaboratively with its suppliers to address them.	Proactive engagement with suppliers to overcome transparency barriers can be demonstrated with successes having already been achieved.	Internal	







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3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Internal or external question	Rewritten question (if external)
3.5.3	When assessing the impact on decent working conditions, is engagement with those potentially affected (in this case, workers) undertaken? If any information is unavailable during a traceback exercise then this should be investigated.	Required	A company should establish and use policies, practices and confidential reporting and assurance systems, to ensure that decent working conditions protect workers in facilities in all countries where seafood products are sourced. A company should conduct inspections, audits and/or site visits to check for aspects of decent working conditions.	The transparency policy states that where barriers exist to achieving supply chain transparency, the seafood buyer will work collaboratively with its suppliers to address them.	The company is able to demonstrate that engagement with workers who are likely to be impacted by the lack of decent working conditions, is able to be made to all intent and purpose at will.	External	Can you assess the impact of decent working conditions through a verifiable traceback exercise across your supply chains within 48 hours from the time the request is made? A traceback exercise involves gathering information or documenting events from the point of origin or source. If any information is unavailable during a traceback exercise, a further multi-part question should be asked, such as:  Can you access information or furnish evidence related to freedom of association, right of workers to organize, forced labour, minimum age of workers, child labour, equal remuneration or discrimination?
3.5.4	Are all stages in the supply chain available for inspections, audits and/or site visits upon request?	Required	All stages in the supply chain should be available for inspections, audits and/or site visits upon request. Additionally, DNA testing is an emerging technology applicable in spot checks.	1st, 2nd and 3rd party inspection and auditing of all stages in the supply chain is an ambition within the company's sourcing policy.	1st, 2nd and 3rd party inspection and auditing of all stages within the supply chain happens for all high risk sources, with pilot electronic monitoring either in place or planned, and a plan to achieve the same for moderate and low risk supply chains is in place.	External	As a company, are you able to conduct inspections, audits and/or site visits to check for aspects of legality, traceability and decent working conditions?  How often do you conduct site visits?  What information are you able to obtain from the site visits to help verify legality of seafood products and decent working conditions from the point of origin?
3.5.5	Are the commitments, expectations and standards of the organization documented and available to other actors in the supply chain within 48 hours of the request?	Required	The commitments, expectations and standards of a company should be documented and available to actors in the supply chain within 48 hours of the request.	A requirement to be able to undertake traceability exercises within 48 hours is detailed within the company policy.	Traceability exercises are able to be undertaken and completed for all supply chains within the 48 hour timeframe, taking into account weekend, public and religious holiday restrictions.	Internal	
3.5.6	Is first-, second- and third-party verification of information allowed at any point in the supply chain? Access should be granted to those conducting inspections, audits and/or site visits on behalf of those in the supply chain to check for aspects of legality, traceability and decent working conditions. Random spot checks and unannounced audits should be permitted.	Required	First, second and third-party verification of information should be allowed at any point in the supply chain.  *Access should be granted to those conducting inspections, audits and/or site visits on behalf of those in the supply chain, to check for aspects of legality, traceability and decent working conditions.  *Random spot checks and unannounced audits should be permitted.  *DNA testing to verify species is an emerging technology used in spot checks  *Third-party auditors help to ensure that inspections are conducted without jeopardizing necessary business confidentiality	The company policies establish its intent to be able to verify information provided to it by its supply chain at will, whether using 1st, 2nd or 3rd party audit processes.			As a company, can you obtain third-party verification of information at any point in the supply chain?  Do you have designated access to conduct inspections, audits and/or site visits on behalf of those in the supply chain?  Can you conduct random spot checks, and are you permitted to conduct unannounced audits?
3.5.7	Is all of the text on the final product labelling and packaging written in plain language and correct according to the source of the product? This includes all claims made about the origin of the product.	Required	All products should be properly labelled in plain language, and be correct according to the source of the product. This includes country of origin.  It is good practice for voluntary information beyond mandatory legal requirements to be clear, unambiguous and verifiable.  Attention is drawn to Regulation (EU) 1379/2013 as well as the Sustainable Seafood Coalition's Code of Conduct on Environmental Claims.	Policies are in place that detail how product labelling and packaging is checked to ensure compliance with legal requirements and clarity of labelling.		External	Are all products properly and visibly labelled and written in plain language, including correct source of the product and country of origin? If so, please supply examples of labelling where relevant, for all seafood supplied in this contract. See link for information on labelling as a resource: <a href="https://trade.ec.europa.eu/doclib/docs/2014/december/tradoc.152941.pdf">https://trade.ec.europa.eu/doclib/docs/2014/december/tradoc.152941.pdf</a>
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3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Internal or external question	Rewritten question (if external)
4.1.1	from a fishery that is either regarded as overfished or for which	Risk assessment consideration	In a risk assessment, seafood should be assessed as higher risk if sourced from a fishery that is regarded as overfished, or for which there is neither sufficient data to ensure it is not overfished, nor a plan in place to collect such data.  There is no one list that expresses the State of all of the different fisheries, yet various competent authorities at global and national levels, assess whether fisheries are in an overfished State.  It is good practice for seafood to be sourced from fisheries with a peer reviewed assessment that demonstrates that the fishery is not fished in excess of the maximum sustainable yield (MSY). Stock statuses can be accessed on RFMO webpages, although they may not be current. The following map of RFMOs may be useful here: https://ec.europa.eu/oceans-and-fisheries/index_en	a source fishery is overflished, unregulated or has problems with under-reporting (high risk) is being collated.	All source fisheries have been identified, information to determine the status of the stock has been collected, and a risk assessment has determined the stock status. Fisheries determined to be overfished, data-deficient or without a management plan, are classified as high risk unless a justification is made to the contrary.	Internal	
4.1.2	Where seafood originates or might originate from a fishery where RFMOs, intergovernmental organizations, States (including EU Member States) and NGOs have identified high levels of risk of IUU fishing, or if the species is assessed to be of higher risk, does the organization consider this seafood to be higher risk?	Required	When procuring higher risk seafood, e.g. seafood originating from a fishery identified with high levels of risk of IUU fishing, extra measures should be taken to ensure full traceability, maximum transparency, and the trustworthiness of the supply chain. This includes at minimum, completing risk assessments or audits at least once every six months, with steps taken to mitigate risks. Extra measures might include certification verification such as Marine Stewardship Council (MSC), including the associated Chain of Custody certification where applicable, to mitigate the higher risk presented by the fishery.		Mapping and assessment of all fisheries has been completed, with steps being taken to address stocks that are classified as high risk.	Internal	
4.1.3	When procuring higher risk seafood, are extra measures taken to ensure full traceability, maximum transparency, and the trustworthiness of the supply chain, including by as a minimum completing risk assessments or audits at least once every six months with steps taken to mitigate risks?	Risk assessment consideration		6-monthly reviews of high risk fishery sources is happening, with supply chain feedback of results communicated.	Proactive engagement of the buyer is occuring, and tangible improvement and advocacy is being practised.	Internal	
	access control						
4.2.1	Where seafood and marine ingredients are identified as originating from a vessel that is flagged to a State, or that fishes in the territorial or EEZ waters of a coastal State, that does not have a transparent register of authorized vessels, does the organization ensure that there is full chain traceability and that independent audits are completed at least every 12 months?	Required	Where 12 monthly audits are not possible but obtainable, the company should factor this information into the risk assessment. Would audits on a less frequent basis elevate the risk to a level where sourcing is not responsible?  It is also recognised that conducting audits every 12 months is not always possible. In this case, companies can request that suppliers provide copies of vessel licenses, registrations, etc. annually, to check that fish come from legal sources and help companies realize potential risks. Companies should also consider advocating the relevant State to compile and publish a transparent list of vessels. It should consider whether the State shares vessel information with RFMOs and/or the FAO Global Record, in absence of its own transparent register.	the flag State of the fishing vessels supplying, so that a full list of supply vessels can be compiled.	All flag States are known, comprehensive vessel lists are available to the supply chain owner, and vessel registries are either public or there is ongoing advocacy for this to happen. Utilising the mapping exercise for vessels, an assessment of the flag State controls in place may be undertaken, so that an understanding of the monitoring, control and surveillance, as well as their compliance regime is understood, or at a minimum being explored.	Internal	



3.1 General		Required or	Implementation Notes (for areas where industry	Base practice	Implementation of PAS/ PAS Compliant	Internal or	Rewritten question (if external)
3.1 General		Risk	feedback requested further detail)	Base practice	implementation of PAS/ PAS Compilant	external	Rewritten question (il external)
		Assessment	recubuck requested further detail)			question	
		Consideration				question	
4.2.2	Where fish products are sourced from high seas fisheries or from		The company can use these conditions to assess the	Source fisheries are known or are being mapped and an	All source fisheries are known and their stock status has	Internal	
	any stock subject to the jurisdiction of an RFMO or other		risk of the fishery. For example, it can check whether	assessment of the sustainability status of the fishery	been assessed and classified. Where stocks are	IIICIIIai	
	international management arrangement, the organization should only		these conditions are in place by searching the relevant	being exploited is planned to be determined. Where	deemed medium and high risk, improvement plans are in		
	source from vessels:		RFMO/other international arrangements website and	vessel lists/registries are available, vessel assessment	place to address concerns. Vessel registers are routinely		
	a) operating in fisheries governed by RFMOs or other international		reading their conservation and management measures,	work is being planned to ensure none are engaged in IUU	assessed to ensure that there is no activity from vessels		
	arrangements that:  1) have fishing quotas or other		as well as their resolutions and recommendations.	practice and this has been communicated to the supply	on IUU lists, the monitoring, compliance and enforcement		
	seasonal, temporal or technical catch restrictions that are operated	i '	as well as their resolutions and recommendations.	chain.	regimes of the fisheries are understood, and		
	in a transparent manner, meaning that they are publically available	i '	Importantly, the company can check if a vessel is on any		improvements are in place to address deficiencies. Tools		
	for instance on a website:		IUU lists and/or is blacklisted. If so, the company should		such as SFP Catch Check are being employed.		
	apply sanctions or require flag States to apply sanctions to		not source from this vessel.		Such as SEF Calch Check are being employed.		
	fishing vessels that are sufficient to deter IUU fishing, meaning that	i '	not source nom this vessel.				
	fines are in the order of at least five times the value of the catch	i '	RFMO websites often contain lists of vessels which have				
	caught by the vessel during the period IUU activity took place;		previously carried out IUU fishing. These lists can be				
	operate sanctions or require flag States to apply sanctions on		useful to cross-check the vessels used within the				
	fishing vessels for IUU fishing in a transparent manner, meaning		company's supply chains.				
	they are published on a publically available website; and	i '	company's supply chains.				
	b) are operating under the flag of States that comply fully, and	i '	Some examples include:				
	ensure that vessels operating under their flag comply fully, with all		ICCAT's IUU vessel list:				
	conditions and measures required by the international rules and/or	i '	https://www.iccat.int/en/IUUlist.html				
	authority responsible for managing or setting the norms of	i '	EU's IUU vessel list:				
	management for the fishery	i '	https://ec.europa.eu/fisheries/cfp/illegal_fishing/info				
	management for the listlery	i '	TMT's combined IUU vessel list: https://www.iuu-				
		i '	vessels.org/Home/Search				
		i '	vessels.org/Home/ocaren				
		i '	The Sustainable Fisheries Partnership (SFP) has				
			developed a tool called "Catch Check", available from				
			August 2021, that will provide risk assessment				
			recommendations on a species basis.				
		i '	recommendations on a species basis.				
4.2 Monitorin	a. control and surveillance						
4.3 Monitoring							
4.3.1 General							
	Does the organization complete due diligence on their supply chains	Requirement		The first steps of gathering data on source fisheries,	A policy is in place that recognises the importance of	Internal	
	related to MCS? When undertaking due diligence on a new supplier	1 Coquil of Herit		which is a step toward assessing MCS requirements,	effectively implemented monitoring, control and	internal	
	or product (or when repeating due diligence for an existing supplier	1		has begun.	surveillance (MCS) within fisheries. All supply chains are		
	or product), the organization should assess and record the following	·		nas begun.	mapped back to the source fishery, the status of each		
	factors relating to flag States, coastal States and RFMOs	·			MCS regime has been compiled, and a gap analysis has		
	responsible for MCS of a supplying vessel.	1			been completed for each fishery, with steps being taken		
	responsible for Mico of a supplying vessel.	1			to advocate for improved implementation by government,		
		1			or compliance by the fleet within the supply chain.		
		1			от сотприалье ву иле неек милит иле ѕирріу спатт.		
		1					
				•			





3.1 General		Required or	Implementation Notes (for areas where industry	Base practice	Implementation of PAS/ PAS Compliant	Internal or	Rewritten question (if external)
		Risk Assessment Consideration	feedback requested further detail)			external question	
4.3.2.1.a	industrial fishing vessels in the supply chain are required by flag	Risk assessment consideration	Vessel tracking requirements are increasingly required by flag and coastal States, as well as RFMOs. The most secure form of tracking is through VMS, though in most cases this information is proprietary rather than public. Some States have also required the use of AIS, which is publicly available but easier for vessels to manipulate. Whether or not vessels are tracked by the States and RFMOs that regulate their behaviour, is an important consideration when considering risk.  If vessels are not monitored, this significantly increases the risk that they may be operating illegally in areas that they are not authorised to be in (whether in EEZs, RFMOs or protected areas). As part of this risk assessment, businesses should also consider what is known about the State that is undertaking the monitoring, for example, are they subject to a 'yellow card' from the European Union. To inform this risk assessment, organizations should ask companies supplying them to explain what vessel tracking requirements are in the jurisdictions they operate in. These should be easily evidenced by supplying copies of license conditions or other communications from competent authorities to vessel owners, setting out their vessel tracking requirements.  Technical guidance relating to electronic monitoring from WWF and EFCA are provided in "shared resources".	map its supply chains and identify the vessels or group of vessels that supplies it with seafood. This policy forms the foundation from which further supply chain insight can be determined and steps to understand VMS/AIS use can be taken.	to capture what data the source fisheries MCS regimes is capturing, as well as the method by which it is captured. Where AIS is mandatory, then checks should be made to		What requirements are in place for vessels to have Vessel Monitoring Systems (VMS)?  What requirements are in place for vessels to operate Automatic Identification Systems (AIS)?  Are there any other vessel tracking requirements in place for vessels?
4.3.2.1.b	Logbooks: Does the organization research whether or not MCS authorities require that vessels demonstrate they have met the requirements for recording and timely reporting of vessel position, catch of target and non-target species, fishing effort and other relevant fisheries data in accordance with coastal State or other sub-regional, regional and global standards for collection of such data?	Risk assessment consideration	For States to effectively regulate fishing vessels, they need information on the location and content of their catch. If competent authorities are not requiring this information, it not only suggests that fishing is not being reported, but also significantly increases the risk that the authority is not regulating access to the fishery, or monitoring the activities of vessels to determine whether or not they are operating illegally. Logbook requirements should be easily evidenced, by supplying copies of license conditions or other communications from competent authorities to vessel owners, setting out their vessel tracking requirements.	map its supply chains and identify the vessels or group of vessels that supplies it with seafood. This policy forms the foundation from which further supply chain insight can be determined and steps to understand logbook use can be taken.	whether or not MCS authorities have effective implementation of log-books as a means of monitoring		What requirements are in place to provide data on vessel position, catch of target and non-target species and fishing effort to the following:  +the vessel's flag State?  +the vessel's coastal State (if applicable)?  +the Regional Fisheries Management Organization  where the vessel fishes (if applicable)  What other data requirements are in place of fishing  activity by vessels that supply seafood in this contract?
4.3.2.1.c	At sea inspections: Does the organization research whether or not vessels in the supply chain are subject to a regime of inspections by MCS authorities? Vessels should give information to the relevant coastal State or duly authorized RFMO inspecting authority regarding vessel position, catches, fishing gear, fishing operations and related activities. The appropriate authority should be allowed to inspect the vessel, its license, gear, equipment, records, facilities, fish and fish products and any relevant documents necessary to verify compliance with coastal State rules and regulations or relevant RFMO conservation and management measures.	Risk assessment consideration	At-sea inspections are an important means to determine whether or not vessels are complying with fisheries laws and regulations. For example, actual catch can be compared with logbooks to verify the information, the fishing gear can be inspected, and the catch checked for the presence of endangered species and signs of shark finning. The lack of such inspections increases the risk that vessels are operating illegally. States often publicise fisheries patrols to increase their deterrent effect. Vessel companies can also be requested to share post-inspection reports when organizations are seeking to verify whether or not they take place.	map its supply chains and identify the vessels or group of vessels that supply it with seafood. This policy forms the doundation from which further supply chain insight can be determined, along with steps to understand the use of atsea inspections within the compliance regime, and next steps as appropriate for the size and scale of the company.	sea inspections are taking place is known for all source fisheries. Where at-sea inspections are happening, details are known about what information is being		At what frequency are vessels in the supply chain subject to at-sea vessel inspections by the coastal State, by parties to RFMOs in the high sea?  Can you share any post-inspection reports?







3.1 General		Required or	Implementation Notes (for areas where industry	Base practice	Implementation of PAS/ PAS Compliant	Internal or	Rewritten question (if external)
		Risk Assessment Consideration	feedback requested further detail)			external question	, , , , , , , , , , , , , , , , , , , ,
	Observers: Does the organization research and ask for evidence that seafood is sourced from fisheries where observer programmes, whether electronic or human, or alternative measures have been implemented through national, sub-regional and regional observer programs in which the flag State is a participant? Information on observer coverage levels, or alternative measures such as increased inspections where observer schemes are not possible, should be obtained from an RFMO (where relevant) or coastal State.	Risk assessment consideration	To date, RFMOs have relied on human observers to monitor vessels at sea, collecting essential data for effective management. At many RFMOs, purse seine vessels require full observer coverage, while longline vessels require only 5 percent observer coverage. This minimal observer coverage increases the risk of IUU fishing going undetected. However, human observer schemes can be problematic due to the isolation of observers and the potential for corruption or intimidation. Although the presence of observers reduces IUU risk, this method should only form part of the risk assessment. Information on RFMO schemes related to observer coverage are sometimes published on the RFMO website, but this information tends to be limited and inconsistent.  In order to establish whether or not a coastal State scheme exists, organizations should request observer reports verifying vessel catch. These may also be evidenced by supplying copies of coastal State Icense conditions or other communications from competent authorities, such as regional observer program providers.  As managers, scientists and stakeholders recognize that more observer coverage is needed to ensure a sustainable seafood supply chain, electronic monitoring (EM) has proven to be a vehicle to increase oversight.	vessels that supply it with seafood. This policy forms the foundation from which further supply chain insight can be determined on whether the observation is human or electronic.	Information on the flag State requirements for onboard observation is being collected for all source fisheries. As part of this mapping and data collection process, information on whether the observation is human or electronic, the protocols against which the observations are happening is being determined, and controls or lack of are being understood and risk assessed. The frequency of observation onboard specific vessels and the wider fleet at large are assessed and compared with the relevant legislation in force. Protocols that detail what should be recorded, the frequency of recording, the steps taken if issues are found, along with who pays and monitors the observers and ensures their findings are understood. Where deficiencies are identified, advocacy is planned or happening to address these issues and in the place of human observers onboard boats, adequate safeguards and communication protocols are in place to guarantee their safety and confidence to carry out their tasks without fear of reprisal.		What requirements are in place by the flag State, coastal State or RFMO for human observers to be on the vessel(s)?  What electronic monitoring measures are in place on the vessel and what authorities have access to these records?
	Where fish is identified to originate from a vessel that is flagged to a State or that fishes in the territorial or EEZ waters of a coastal s+M68tate that does not operate a national observer program, does the organization ensure that there is full chain traceability and that independent audits are completed at least every 12 months?	Requirement	If 4.3.2.1.d determines the vessel is not subject to an observer programme, this risk mitigation should be put in place. See 3.4 for details on full chain traceability	exercises to be conducted.	A risk assessment to determine the risks of not having onboard observations (whether human or electronic) is either in process or completed. In addition, discussions with the supply chain about low-costs observation may be happening.	Internal	
	Where it is known that seafood or marine ingredients are sourced from vessels flagged to a State that is different than the State of nationality of their beneficial owner, is this regarded as increasing the risk of supplying illegal products?	Risk assessment consideration	Although there are many reasons why a vessel owner of one nationality may use the flag of a different nationality (such as access to quota or a genuine joint venture), the use of flags from another State increases risk. In some cases, 'flags of convenience' are used to avoid more stringent flag State controls exercised by the owner's State. As effective flag State controls are a key means of reducing the risk of a vessel fishing illegally, avoiding them increases risk. In addition, if an owner is based in a different jurisdiction from the flag, it can be more difficult to apply sanctions in the case of IUU fishing or human rights abuses. This reduces the deterrent effect of sanctions.	vessels that supply it with seafood. This policy forms the	The beneficial ownership of all vessels supplying fish and seafood is known, their background is being researched, and where concerns such as different domicile status of owner to flag State is present, the reasons for this is being understood.		What is the flag State of the vessel(s) supplying seafood under this contract?  What is the nationality of the vessel(s)' beneficial owner?
4.3.3 Market o	poes the organization undertake analysis of its supply chains and implement a system to enable it to identify the carding status of its supply chains?	Required	Market controls can help to establish the legal origin of seafood products. An example of a market control scheme to curb IUU fishing is the EU IUU Regulation 1005/2008.  *Under this regulation, non-EU countries identified as having inadequate measures in place to prevent and deter IUU fishing may be issued with a formal warning, or a yellow card to improve efforts, or a red card for failure to curb IUU fishing.  *A company should implement a system to identify the carding status of its supply chains by first accessing IUU Watch, an aggregated source of information for EU carding decisions by country. For more information, including countries and their carding status, follow: <a href="https://www.luuwatch.eu/">http://www.luuwatch.eu/</a> .				What flag States, coastal States and processing States have responsibility for seafood caught in this supply chain?  Are any of the above States subject to an EU yellow card or red card? See: http://www.iuuwatch.eu/map-of-eu-carding-decisions/







3.1 General		Required or Risk Assessment	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Internal or external question	Rewritten question (if external)
		Consideration				•	
	Does the organization require that vessels in the supply chain are not flagged to or licensed to fish by States that have been issued a red card by the EU?	Required	A company should require that vessels it sources from in the supply chain are not flagged or licensed to fish by States that have been issued a red card. To determine if the vessel is flagged to a State that has been issued a red card, a company can request the following information from their supply chains:  Request catch certificate information in accordance with the EU IUU Regulations, including fishing vessel name, flag State, vessel or IMO number, for example  Review and verify information on the catch certificate to determine compliance. This may include requesting physical inspection reports of consigned seafood products carried out by third country authorities  Reject consignments of seafood products if the vessel is determined to be flagged to a State that has been issued a red card. See www.iuuwatch.eu for more information.			Internal	
	Are purchases made from fishing vessels flagged to States that have not notified a competent authority to the EU under the EU IUU Regulation?	Risk assessment consideration	A company should check that the flag State of the vessel(s) supplying them (already notified in other questions) are on the list of countries that have notified the EU (to be used as a proxy for non-EU countries) of their competent authority and been accepted: https://ec.europa.eu/fisheries/cfp/illegal_fishing/info			Internal	
	Where fish is sourced from vessels flagged to a State given a yellow card by the EU or fishing in a coastal State given a yellow card by the EU, is the organization able to demonstrate that there is a system that enables full chain traceability and that audits are completed at a minimum once every 12 months?					Internal (using answers from previous question)	
	If sourcing from these countries, does the organization research the reasons for the yellow card and, where it has access, record (and, where possible, support) efforts by the yellow-carded State to address these reasons?		Seafood from a country that has been given an EU yellow card is at inherently higher risk, as less reliance can be placed on efforts by the relevant government to manage fisheries. If organizations decide to continue taking supplies from them, and reliance is placed on government fisheries management measures to mitigate the risk of IUU fishing, then it is important to understand the reasons for the EU yellow card and the efforts being taken by the State to address those reasons. The EU publishes Statements when yellow cards are issued to explain the concerns that led to the cardings. In addition, organizations can contact NGOs and other stakeholders active in those countries, to gain an insight into what progress is being made.  If is also recommended that suppliers in the yellow carded country are contacted to discuss the reasons from the yellow card, to ascertain what is being done by the government to address the situation, and whether or not the supplier is playing a role in supporting any reforms. Organizations may also choose to individually or in partnership with their suppliers and/or NGOs, contact the authorities in the yellow carded country to encourage them to make relevant reforms, in order to ensure they can continue to supply from the country.  Through the above, a view can be formed regarding whether or not the yellow carded country's authorities are engaging proactively to address the issues that led to the		The source country/fishery should be determined for all SKUs and the reasons for any current red, yellow or green status of the supply source is understood, so that engagement with the third country government and the supply chain can be planned. The reasons for any current or previous EU cards are understood, and engagement with the third country government is happening, either directly or via the supply chain, so that support is provided to address the issues raised. In addition, for countries that are supplying the EU, there is an understanding of their fishery management systems and controls against which an assessment of the risk of EU sanction can be made.	Internal (however, may choose to contact supplier to obtain information on measures being taken by flag State in reaction to EU yellow card)	
4.4 Source fis							
	Seafood should not be sourced from any vessel(s) that appear on any recognized blacklist (those established by RFMOs). Is there a system in place to verify whether vessels appear on any of the available blacklists?  Other blacklists exist, but RFMO blacklists are the only ones recommended here.	Required	A company should not source seafood from vessels that appear on recognized blacklists established by RFMOs. To determine whether or not a fishing vessel is listed, follow: <a href="https://iuu-vessels.org/">https://iuu-vessels.org/</a>	Mapping of supply chains is underway and a full list of all fishing, transhipment and support vessels is being developed. Whilst the sources of supply are being mapped, information about fishing licences and authorization details begin to be collated and cross-referenced.		External	As a company, can you confirm that none of the vessels in this supply chain appears on a regional IUU black list. See: https://iuu-vessels.org/





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3.1 General 4.4.2	Does the organization only source from fishing vessels that appear on authorized vessel lists where these are available for relevant coastal State EEZs and territorial waters or, where on the high seas, by the relevant RFMO?		Implementation Notes (for areas where industry feedback requested further detail)  The FAO Global Record of Fishing Vessels, Refrigerated Cargo Vessels and Supply Vessels, maintains a record of fishing vessels, including their identity, history and authorizations to fish and tranship and, in the future, will also have a record of non-compliance for that vessel. This tool is intended to support risk assessment. Follow this link for more information or a list of vessels: http://www.fao.org/global-record/en/  Another useful database for searching if EU vessels fishing in the waters of a non-EU State have an agreement with that State is: http://www.hofishesfar.org/	Mapping of supply chains is underway and a full list of all fishing, transhipment and support vessels is being developed. Whilst the sources of supply are being mapped, information about fishing licences and authorization details begin to be collated and cross-referenced.	Implementation of PAS/ PAS Compliant	Internal or external question	Rewritten question (if external)
Does the organ		Risk assessment consideration	assessments?  Unique vessel identifiers (UVIs) such as IMO ship numbers, are an identification number that is unique to each ship, and is never reassigned to another vessel. This means that vessel name, ownership, records of noncompliance etc., can be recorded using these numbers. Once allocated, these numbers should be included on all relevant documentation including licences and authorizations, transhipment reports, landing requests/reports etc., to improve transparency of the supply chain. Difficulty arises where a specific country or RFMO does not enforce the use of UVIs or where auctions result in UVI number changes. Suppliers should request UVI records and if not available, consider that the supply chain is of higher risk.  Companies should advocate for the inclusion of vessels on public registers. This increases transparency and reduces the risk of IUU seafood entering supply chains.	Mapping of supply chains is underway and a full list of all fishing, transhipment and support vessels is being developed, which includes their length and weight, fishing gear of operation and whether they have a UVI and are on a publicly available vessel register maintained by their flag State or RFMO where relevant. In addition, as vessel details are being captured they should be assessed to determine whether they qualify for an IMO number and steps are being taken to encourage the supply chain to obtain them where they are missing. At a minimum PAS 1550 should be referred to in supplier communication so that they are aware of the desire to assess IUU risk.	All vessels within the supply chain are known, they are on public vessel registers and the Global Record, along with any relevant RFMO. The vessels that qualify have IMO numbers in place, and those that do not, have been provided with UVIs by their flag State. Vessel ownership is known and checks are undertaken to ensure that all licences and authorizations are up to date with no noncompliance.		Do all qualifying fishing vessels have a unique vessel identifier (UVI) issued by IHSM&T on behalf of the IMO? Where is this information captured, e.g. catch certificate, registration? Can this information be made available upon request?
4.4.3.b	Evidence that those not qualifying for an IMO number have an alternative internationally or nationally recognised UVI. Such UVIs should remain the same for the entire life of the vessel, be marked on the vessel and appear on all related documentation including the catch documentation		IMO numbers can be searched here:  https://imonumbers.ihs.com/_ Some countries do not enforce the use of IMO numbers or they may not be enforced on vessels below a certain size. Therefore, alternative unique vessel identifiers (UVIs) may be required. Examples include CaribShip Unique Numbering Schemes, tuna RFMO vessel lists, High Seas Vessel Authorization Record, among others. Suppliers should request that a UVI and not just an IMO number, is included within the catch documentation.  The UVI should be collected for all vessels in the supply chain, such as when a transhipment occurs. The Global Dialogue on Seafood Traceability (GDST) Standard 1.0 includes these as key data elements (KDEs) to collect as part of establishing full chain traceability. The Core Normative Standards can be accessed here: https://traceability-dialogue.org/core-documents/gdst-1-0-materials/	fishing, transhipment and support vessels is being	IMO numbers are in place for all qualifying vessels and logbooks and official fishery management documents and authorizations have mention of it. Where vessels do not qualify for an IMO number and their UVI is not included on official documents such as logbooks and landing records the company is able to demonstrate their their supply chain checks for the presence of UVIs on these documents and advocates for their inclusion and use when not present		Do those fishing vessels not qualifying for an IMO number have an alternative internationally or nationally recognised unique vessel identifier (UVI)?  If so, what alternative UVI is used and can this information be made available upon request?  What assurance or evidence exists to support that UVIs remain the same for the entire life of the vessel?







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3.1 General		Required or Risk Assessment	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Internal or external question	Rewritten question (if external)
4.4.3.c	Evidence that all fishing vessels in their supply chain have up-to-date authorizations and fishing licences issued by the relevant competent authorities. It should be possible to request this information from the suppliers and receive the information within 14 days	Consideration Risk assessment consideration	Depending on which State a vessel is flagged to, i.e. registered with, certain fishing licences will be applicable, and are mandatory for the vessel to be able to fish. It is expected that a supplier would be able to secure details of such licences from the vessel operators within 14 days. If the vessel operator is unable to provide such evidence, the vessel should be considered at higher risk of IUU due to the lack of transparency.  The Global Record of Vessels is an FAO initiative that aims to centralise information on vessels by pairing IMO numbers and fishing authorizations, among other data. As this database is developed, it has the potential to be a powerful tool for improving vessel transparency: http://www.fao.org/global-record/information-system/en/	fishing, transhipment and support vessels is being	All vessels within the supply chain are known, they are on public vessel registers and the Global Record, along with any relevant RFMO. The vessels' registers are checked to ensure that all licences and authorizations are up to date with no non-compliance. Where there is no evidence of licences and authorizations, these should be able to be provided within 14 days of a request being made. If evidence is not able to be provided, an option to suspend buying until the issue can be addressed is considered.	External	Do all fishing vessels in your supply chain have up-to-date authorizations and fishing licences issued by the relevant competent authorities?  How often are authorizations and fishing licenses reviewed/renewed?  If requested, could this information be provided within 14 days?
4.4.3.d	Evidence that vessel operators obtain confirmation directly from the coastal State and/or RFMO that authorizations and fishing licences have been issued and the dates they are valid for, and make this information available upon request	Risk assessment consideration	This ensures that the vessel operators have used the correct procedures to obtain the authorizations or fishing licences, and supports legality claims. If the company does not obtain this evidence, the risk of IUU fish entering their supply chain will be higher.  Where possible, this and other documents that support legality should be digitized and accessible to relevant supply chain actors and stakeholders. The GDST Standard 1.0 is an exemplar for how to digitize data to ease data sharing and increase interoperability between traceability systems. https://traceability-dialogue.org/coredocuments/gdst-1-0-materials/	Fishing vessel licences and authorizations are being collected by seafood suppliers as part of the supply chain mapping process, with the details being recorded onto a supply vessel list. Sample copies of authorizations and licences are either being requested or are recognised as being important, so that their dates of issue, dates of expiry and conditions of authorization can be checked. At a minimum, PAS 1550 should be referred to in supplier communication so that they are aware of the desire to assess IUU risk.	present on supply chain vessel lists, they are being routinely audited to verify validity, and the key information they contain is present on publicly available vessel registers such as the Global Record. Where this information is not available, advocacy is planned or	External	Do vessel operators obtain confirmation directly from the coastal State and/or RFMO that authorizations and fishing licences have been issued and the dates they are valid for?  Is there evidence to support this and can this information be made available upon request?
4.4.3.e	Evidence that vessel operators have obtained and documented a full list of all of the conditions of fishing licences and authorizations directly from coastal State authorities and/or RFMOs; including locations where fishing is restricted, gear use, crew requirements, observer requirements and any other conditions	Risk assessment consideration	This should be available upon request from the catch sector, who should hold licenses and authorizations together with their conditions. If catch vessels are not maintaining such records, there is a risk that they do not understand the laws and regulations they are meant to complying with, increasing the likelihood of them engaging in IUU. This should be factored in to risk assessments as the vessel is considered at higher risk.	Communication is made to the supply chain requesting that the license conditions for supplying vessels are communicated by a specified time in the future, or that RFVS certification is in place for all supply vessels. At a minimum, PAS 1550 should be referred to in supplier communication, so that they are aware of the need to comply with licensing requirements.	Supply chain has provided license conditions for supplying vessels and these have been documented.		Have vessel operators obtained and documented a full list of all of the conditions of fishing licences and authorizations directly from coastal State authorities and/or RFMOs, including locations where fishing is restricted, gear use, crew requirements, observer requirements and any other conditions?  Is there evidence to support this and can this information be made available upon request?
4.4.3.f		Risk assessment consideration	This reduces the risk of a fraudulent license being used, as it avoids the possibility of obtaining a license from an unauthorized agency or corrupt official.  Evidence of paying license fees to a State bank can be in various forms, for example, receipts or bank Statements. Where vessels or the companies who own them are unable to supply such information, the vessel should be considered at higher risk of fishing illegally.	developed. Whilst the sources of supply are being mapped, information about fishing licences and authorization details begin to be collated and cross-referenced.	Fishing licences and authorizations are being collected for each vessel in the supply chain and questions about who pays for them and who issues them are being asked to determine whether agents and middlemen, rather than direct dealings with government bodies, is happening. The process through which vessel licences and authorizations are issued for the area in which the vessel is licenced and authorised to fish is known, and information on who is involved in the process is understood, as the presence of unauthorised agents/brokers and middlemen increase the risk of falsified documents.	External	Who do fishing vessels and the companies that own them pay their license fees to?  Do they provide documentation and evidence of this to the processor/importer if requested?







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3.1 General 4.4.3.g	Evidence that fishing vessels have a vessel monitoring system	Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)  The company should ask suppliers if these systems are	Base practice  Mapping of supply chains to identify the vessels		Internal or external question	Rewritten question (if external)  Do all fishing vessels have a vessel monitoring system
	(VMS), automatic identification system (AIS) or other vessel tracking technologies that are continuously engaged while at sea and actively monitored by the coastal or flag State		in place on board vessels, the percentage of vessels covered, and the percentage of this data which is monitored. If possible, evidence of this data and monitoring by a third party should be requested. Where vessel tracking technologies are not used or authorities will not release this information, the supply chain should be considered at higher risk of IUU fishing.		fish and seafood are understood, as is the requirement for the adoption of VMS/ AIS. In addition to this, the protocols for VMS/ AIS use is known and the polling rates and protocols are being assessed to determine whether they are sufficient to provide supply chain assurance that fishing activity is being carried out legally and in compliance with licences and authorizations.		(VMS), automatic identification system (AIS) or other vessel tracking technologies?  If not, what percentage of vessels have these systems and what percentage of this data is monitored?  Are these systems and technologies continuously engaged while at sea and actively monitored by the coastal or flag State?  Can this information be made available upon request?
4.4.3.h	Evidence that the vessels are in compliance with inspection regimes. This includes evidence that the vessel management: 1) accept and facilitate the prompt and safe at sea boarding by relevant coastal State inspectors or duly authorized RFMO inspecting authority; 2) cooperate with and assist in the inspection of the vessel conducted pursuant to an authorized at-sea inspection; 3) do not obstruct, intimidate or otherwise interfere with relevant coastal State inspectors or duly authorized RFMO inspecting authority in the performance of their duties; and 4) allow the relevant coastal State inspectors or duly authorized RFMO inspecting authority to communicate with the authorities of the flag State of the vessel and the relevant coastal State during the boarding and inspection	Risk assessment consideration	Records of inspection regimes or inspection results can be used here to confirm whether or not these conditions are met. Inspections may include the following: Document checks  Logbook  Logbook  Licence, variations and permits  Fishroom plan  Certificate of Registry Fishroom  Assessment of catch  Comparison with logbook  Check weighing Working conditions Gear  All gear in use should be inspected for compliance, and appropriate mesh sizes and dimensions checked, including some gear that is not in use.  It is recognised that this information may be difficult to obtain in some countries. Where this information cannot be obtained, catch vessels should be asked to document why the evidence does not exist (either vessels are not inspected or the inspecting State does not issue inspection reports). Where possible, this explanation should be compared with other vessels or catch companies that operate under the same regulatory regime. In either case, where inspections do not take place or their results are not documented, vessels should be considered at higher risk. A company can check that	communication includes details of the types of evidence that would be necessary to prove this, i.e. the information detailed within the guidance notes.	recognition of the value that vessel inspections bring, and that information is being collected, reviewed and assessed for vessels within the supply chain, to determine the validity and engagement with the inspection regimes. Where information is not available from either	External	What evidence is available to support that vessels are in compliance with inspection regimes?  Is there evidence to support that the vessel management: -Accept and facilitate the prompt and safe at sea boarding by relevant coastal State inspectors or duly authorised RFMO inspecting authority -cooperate with and assist in the inspection of the vessel conducted pursuant to an authorized at-sea inspection -do not obstruct, intimidate or otherwise interfere with relevant coastal State inspectors or duly authorized RFMO inspecting authority in the performance of their duties -allow the relevant coastal State inspectors or duly authorized RFMO inspecting authority to communicate with the authorities of the flag State of the vessel and the relevant coastal State during the boarding and inspection?  Where this information or evidence is not available, can you document why it does not exist, e.g. vessels are not inspected, inspecting State does not issue inspection reports?
4.4.3.i	Evidence that fishing vessels engage crew in decent conditions. Attention is drawn to ILO Convention C188 which sets minimum international levels for crew conditions on fishing vessels. The Convention will come into force on 16 November 2017	Risk assessment consideration	ILO Convention C188 sets out minimum standards for crew working conditions. For vessels flagged to a country that has signed and implemented ILO C188, risk of crew not having decent working conditions is decreased, as governments are bound by the convention to verify that vessel conditions and crew contracts are in line with its provisions. Where flag States have not adopted ILO C188, organizations can still request evidence that conditions and contracts are at the same standard. Information supplied by the UK to support UK operators complying with ILO C188 can be used as a reference for organizations seeking to compare conditions and contracts to the provisions of ILO C188. See: https://www.gov.uk/government/collections/ilo-work-in-fishing-convention		The flag State has ratified ILO C188, employment contracts stating the employment and working conditions are in place for all vessel crew, and independent evidence of working conditions and employment is provided by 3rd party certification. Where this is not fully in place, advocacy is planned or underway to achieve the aim.	External	What minimum standards are required for worker contracts and vessel conditions for vessels supplying seafood under this contract?  What labour inspections do vessels supplying seafood under this contract face by government authorities?



3.1 General		Required or Risk	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Internal or external	Rewritten question (if external)
		Assessment Consideration				question	
4.4.3.j	Evidence that suppliers (e.g. fishing vessel companies) have checked the references and background of vessel captains before they were hired	Risk assessment consideration	Organizations should ask suppliers what checks they undertake on the background of captains they employ. Where it is found that no checks are made on their background, including previous convictions for IUU fishing or human rights abuses, this significantly increases the risk of supplying from those vessels. It can be recommended that suppliers undertake these checks going forward to reduce risks associated with the seafood they are supplying in the future. Where a supplier undertakes checks on the background of captains, these can be verified on a sample basis during audit processes.		On request, vessel owners/managers are able to demonstrate that they are in compliance with the policy, providing evidence of background checks performed such as references from previous employers and searches of compliance histories of previous vessels captained.	External	What checks are undertaken on the professional background of captains employed?
4.4.3.k	Evidence that captains who have been found guilty of IUU fishing on more than one occasion are not engaged and that those convicted on a single occasion receive extra supervision and audit	Risk assessment consideration	See notes for 4.4.3.j above. Where suppliers have a process in place to check the background of captains before they are hired, they should also have a policy setting out that captains with a history of multiple IUU infractions are not engaged, and those with a history of a single IUU infraction may be engaged but with extra supervision. The absence of such a policy increases the risk of seafood supplied by that supplier.	Policy is communicated to vessel owners/managers that at a specified point in the future, (if not already happening), the background of captains should be checked before they are engaged, and those with a history of IUU fishing or human rights abuses convictions should not be present in the company's supply chain or engaged in the future.	On request, vessel owners/managers are able to demonstrate that they are in compliance with the policy, providing evidence of background checks performed such as references from previous employers and searches of compliance histories of previous vessels captained.	External	Are captains hired if they have been found to have been guilty of IUU infractions?  Are any additional corporate risk mitigation measures put in place if such captains are hired?
4.4.3.1	Evidence that captains or other persons are not engaged if checks find they have been found responsible for any previous human rights abuses	Risk assessment consideration	background of captains before they are hired, they should also have a policy setting out that captains found to have previously committed a human rights abuse are not engaged. The absence of such a policy increases the risk of seafood supplied by that supplier	As above	As above	External	Are captains hired if they have been found to have a history of human rights abuses?
4.4.3.m	Evidence that suppliers are not procured from if checks find they have been found responsible for any previous human rights abuses	Risk assessment consideration	See 4.4.4 below	Policy communicated to suppliers explaining a zero tolerance approach to supplying seafood from companies convicted of IUU fishing or human rights abuses.	Policy position is underpinned by internal due diligence processes, using information obtained through MCS information gathered in supply chain mapping, including searches for previous convictions relating to vessels owned by suppliers. Where compliance histories of companies are not available due to a lack of public information, this should be documented and advocacy to relevant States undertaken to publish information relating to compliance.	External	What measures are put in place to make sure that seafood is not purchased from suppliers that have been found to have been associated with human rights abuses?
4.4.4	Where any of the above checks find evidence of IUU fishing or illegal working conditions, fish should not be sourced from those suppliers. Where suppliers are unable to supply one or more of the above areas of evidence, does the organization document as part of the risk assessment, the decision of whether or not to supply and what mitigating actions are to be taken?	Requirement	Organizations should have a policy of not buying seafood from a supplying company that has been found to have engaged in human rights abuses or IUU fishing. This information can be found through the due diligence process, including information requests to suppliers, third party audits, internal audits, internet searches and meetings with NGOs active in countries relevant to their supply chains. The due diligence process should also document where information or policies recommended above are not available and set out what mitigating measures, such as third party audits, information requests from NGOs etc. are sought.  For example: - ICCAT's IUU vessel list: https://www.iccat.int/en/IUUist.html - EU's IUU vessel list: https://ec.euroa.eu/fisheries/cfp/illeqal_fishing/info> Secondary legislation and official documents > IUU vessel list: - TMT's combined IUU vessel list: https://www.iuu-vessels.org/Home/Search		Policy position is underpinned by internal due diligence processes, using information obtained through MCS information gathered in supply chain mapping, including searches for previous convictions relating to vessels owned by suppliers. Where compliance histories of companies are not available due to a lack of public information, this should be documented and advocacy to relevant States undertaken to publish information relating to compliance.	Internal	



3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Internal or external question	Rewritten question (if external)
	Does the organization research vessels, companies and their beneficial owners from which it is sourcing seafood? This research should include verifying the IMO numbers for any new vessels entering a supply chain	Requirement	Organizations should request that suppliers provide a complete list of vessels that supply to them, including their full names, IMO numbers and beneficial owners. This information can be used to research vessel histories on online databases (see APPENDIX). Where a large fleet of small-scale vessels are used by suppliers, and depending on the level of risk assessed in the supply chain, organizations may decide to use a sample-based approach to verifying vessel identities and histories through online databases.	As part of the supply chain mapping exercise, information is being compiled that not only includes the vessel name, UVI, flag State, fishing gear used and licences, but also the ultimate beneficial owner of the fishing vessel which might not be just the immediate registered owner of the vessel.	Information on the first tier owners of fishing vessels is either fully available and included on the company's vessel list, or included in the Global Record, which when fully populated will provide details of operator, owner, beneficial owner and IMO number if applicable. Online databases are being used to check the history and background of the first tier owners of fishing boats, so that links to IUU or human rights abuse can be identified.	External	Provide a complete list of all vessels used to supply seafood under this contract, including full names, IMO numbers and the beneficial owner of the vessel.
	Does the organization source seafood where this research finds evidence of vessels, companies or beneficial owners with a history of engaging in illegal activity?	Requirement	See 4.4.4	Policy communicated to suppliers explaining a zero tolerance approach to supplying seafood from companies convicted of IUU fishing or human rights abuses.	Policy position is underpinned by internal due diligence processes, using information obtained through MCS information gathered in supply chain mapping, including searches for previous convictions relating to vessels owned by suppliers. Where compliance histories of companies is not available due to a lack of public information, this should be documented and advocacy to relevant States undertaken to publish information relating to compliance.	Internal	
	is the organization able to provide copies of the flag State fishing authorizations granted to fishing vessels when/if requested by any actor or relevant party? Evidence should be maintained in the supply chain about the use of VMS and a fisheries logbook by the flag State to monitor vessel activities	Requirement	Organizations should ask that suppliers maintain evidence of their fishing authorizations issued by relevant flag and coastal States, as well as relevant RFMOs. In the case of RFMOs and an increasing number of States, these can be verified by the organization through checking online lists of authorised vessels. In the future, the FAO Global Record will also be a resource where this information can be verified. Where these are not shared by States online, on a sample basis, organizations should ask that suppliers provide evidence, including licenses issued by flag and coastal States. Where the supply chain or competent authority are assessed as being high risk but organizations wish to continue to supply from them, then they should consider contacting governments directly to verify the validity of authorizations.	Mapping of supply chains is underway, and a full list of all fishing, transhipment and support vessels is being developed. Whilst the sources of supply are being mapped, information about fishing licence and authorization details begin to be collated and cross-referenced.	The company has the ability to access flag State fishing authorizations, or has them to hand so that it can assess whether the fishing vessel/company is complying with the authorization conditions.		Please provide copies of flag State authorizations for supplying fishing vessels.
4.5 Transhipn	nent						
	ization require that?						
4.5.1.a	All transhipments in their supply chains are recorded, monitored and covered by an independent observer programme appropriate to the fishery?  If a transhipment is licensed (and therefore permitted) then the	Required	Unmonitored at-sea transhipments are a potential avenue for IUU-caught seafood products to enter the supply chain. There are currently different protocols for transhipment activity, each with differing levels of documentary evidence and observer presence required. The FAO is developing transhipment best practises, and organizations should be aware of their development, adopt them when completed, and encourage their supply chains to use them to aid consistent implementation. To ensure better reporting and more complete, uniform information, a company should request from relevant authorities throughout their supply chain, the following information: Require all transhipment events be reported to the relevant flag, coastal, port State and RFMO Secretariat Require 100 percent observer coverage (human, electronic or combination) Require transhipment data-sharing procedures among relevant authorities (other ways to ensure coverage?)	Supply chains are being mapped, including identifying whether transhipment is present and a necessary part of the supply chain. Included within the mapping information on transhipment are requirements of the flag, coastal and RFMO being collected.	There is an understanding of transhipment within all source fisheries and the status of monitoring, control and enforcement in each. Advocacy to governments and RFMOs is taking place, which includes the needs for 100% observation of transhipment and data sharing.	External	What practices are in place to ensure transhipments in their supply chain are recorded, monitored and covered by independent observer programs appropriate to the fishery?  Are all transhipments at sea relating to supply
4.0.1.0	If a transhipment is licensed (and therefore permitted) then the vessel is checked to see if it is on the relevant authorized register for fish carriers?	nequired		supply chains are being mapped to determine whether transhipment is happening and the vessels involved with it.	lists and their flag State is known or steps are being taken to achieve this.	External	Are all transhipments at sea relating to supply authorized?





3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Internal or external question	Rewritten question (if external)
4.5.1.c	Both vessels in the transhipment have uninterrupted VMS, AIS or other vessel tracking technology operating?	Required		Information on whether AIS or VMS is used by vessels transhipping catch is either known or being collated.	AIS and VMS is used on both vessels transhipping seafood within the supply chains, and where their use is not continuous, it is being actively advocated for.	External	Do both vessels involved in the landing and transhipping of fish operate VMS/AIS or vessel tracking technology?
4.5.2	Is all of the information regarding any at sea transhipments made available to the end purchaser of the seafood in the supply chain (e.g. restaurant, brand)?	Required		Communication to the supply chain is present which clearly states there is an ambition that where transhipment is present in the supply chain, that it is known and documented.	Transhipment in the supply chain is understood and information is either being routinely passed to consumers or can be upon request.	Internal	
4.5.3	Does the organization check that EU IUU and other catch certificates provide information about any transhipments that have taken place? All required documentation and authorizations should be validated by appropriate authorities	Required	A company should request the following information on transhipments: -list of vessels involved in transhipments -list of vessels involved in transhipments -leatils of transhipment e.g. date, area, position -Authorization of transhipment -Details of transhipment -Details of transhipped object, e.g. species, weight, product form -Whether an observer program is in place to monitor the transhipments, as well as number of inspections and percentage conducted at random -Independent observer report  These documents should be collected and scrutinised by importers and processors. Information pertaining to transhipments is contained on section 6 of EU catch certificates.  The GDST Standard 1.0 lists key data elements that should be collected for any transhipments. See Core Normative Standards here: https://traceability-dialogue.org/core-documents/adst-1-0-materials/		Supply chain mapping is complete for all seafood sources and the need or use of transhipment within the supply chains has been established. The details described in the implementation notes and GDST are either collected and available to the supply chain owner, or are being collected and reviewed.	Internal	
4.6 Landing at	t port						
4.6.1 General							
4.6.1.1	Does the organization request the landing procedures and controls of the port of landing? This Information should then be used in the risk assessment and due diligence process. The organization should assess and record whether ports are in States that are party to, and have implemented, the Port State Measures Agreement. Ports with records of non-compliance should be identified as higher risk.	Required	What measures can a company take to obtain landing procedures and determine the level of port controls? As a first step, a company can show preference for ports in States that are party to the FAO Port State Measures Agreement (PSMA), as these are associated with a lower level of risk of being entry points for illegal catch. A company should ask if the designated port in the port State is a party to the PSMA. If not a party to the PSMA, a company should ask what is preventing the port State from joining.  A company should ask if records of port entry requests, denials, documentary checks and inspections are kept. If so, additional questions that a company should ask are:  "Are the records public?  "Is there a protocol to notify foreign port authorities of such information?  "Is an electronic information system used to collect, store and share this information?  How can companies and relevant stakeholders obtain copies of this information and landing procedures and controls at the port of landing?  A company should also request:  "The requirements for vessels, particularly foreign-flagged vessels, in requesting access to port	documents and systems each of the ports requires of a vessel when it lands, and whether the port State is party to the port State measures agreement and the ports used to land are designated within it. At a minimum, PAS 1550 should be referred to in supplier communication so that they are aware of the desire to assess IUU risk.	known, where relevant the ports are located within States that are party to the Agreement on Port State Measures (PSMA), and the company's suppliers understand what	External	What landing procedures are in place to determine the level of port controls?
			regiger vessels, in requesting access to port the processes by which authorities determine which vessels should be granted/denied entry into port or be selected for documentary checks and/or inspections				







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3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Internal or external question	Rewritten question (if external)
4.6.1.2.a	The port State competent authorities have resources that use a risk- based targeting approach to control	Risk assessment consideration		Supply chain mapping is underway to determine all of the ports where fish and seafood is landed. At a minimum, PAS 1550 should be referred to in supplier communication, so that they are aware of the desire to assess IUU risk.	Ports of landing are being determined, and information on the procedures, protocols and checks that are undertaken by the port authorities prior to and during landing, is being collected and assessed. Information on the landing procedures is known for each port of landing, the checks are risk based, and advocacy is happening or planned if these procedures are not made publicly available to third parties.		What are the procedures for controls on vessels that request entry into port to land or tranship fish?  Are the procedures documented?  Are the procedures publicly available?  If not, why are the procedures not documented and available?
4.6.1.2.b		Risk assessment consideration	A company should ask if the port is operating under or over its capacity. One way of assessing port capacity is to ask what percentage of vessels that land or tranship fish are subject to documentary checks or physical inspections.	Supply chain mapping is underway to determine all of the ports where fish and seafood is landed. At a minimum, PAS 1550 should be referred to in supplier communication, so that they are aware of the desire to assess IUU risk.	Whilst collecting data on the ports of landing and the controls they employ to check for IUU, a dialogue within the supply chain and the ports being used should be instigated, to assess a port's capacity to adequately cope with the volume of inspections required.		What percentage of vessels that land or tranship fish are subject to documentary checks or physical inspections in port?  How are selections made for which vessels to check/inspect?  How were the vessels your company sources from selected for documentary checks/ inspections?  Which of the following are covered by checks and inspections?  "vessel identification, construction and registration documentation documentation elicense and authorizations to fish or tranship eact ch and bycatch documentation processing and transhipment reports  "VMS/AIS systems in use "type of fishing gear used type and volume of fish species "crew documentation"
4.6.1.2.c	There are enough inspectors provided at the port to be able to inspect the volume of cargo and vessels that the port handles	Risk assessment consideration	While there is no standard measure or guideline, a determination can be made by weighing the volume or port's capacity for cargo with the number of inspectors on staff. A company should ask if there is a sufficient number of inspectors for the volume of cargo and vessels. There is no standard measure or guideline, sufficiency is determined by the port State. When determining sufficiency, consideration needs to be given to the monitoring, control and compliance regime found in the source fishery, confidence level that the controls in the fishery are being met, the level of corruption within the port State, and technology employed that assists in targeting the inspection regime.	ports where fish and seafood is landed. At a minimum, PAS 1550 should be referred to in supplier communication, so that they are aware of the desire to assess IUU risk.	Enquiries should be being made to determine what checks are being undertaken at port and consideration given to assess whether there is sufficient diligence being made to IUU checks. The port check protocol regime is documented, publicly available, and considered to be sufficient to inspect enough landings to deter and pick up any IUU fish and seafood. Consideration given to RFMO Conservation Management Measures (SMMs) which may have more specific requirements, e.g. a percentage of vessels that need to be inspected. These requirements have to be at least met to be considered a sufficient level.	External	How many inspectors are available to inspect the volume of cargo and vessels that the port handles?
4.6.1.2.d	The port State competent authorities are able to demonstrate that they operate in an effective and transparent manner	Risk assessment consideration	A company can request if landing procedures, standards for documentary checks and physical inspections and records are public, and ask to obtain copies. A good resource on import controls and landing procedures that may be of use can be found here:  https://eu.ocana.org/en/publications/reports/comparative_study-key-data-elements-import-control-schemes-aimed-tackling. It includes a list of key data elements that should be collected as part of a robust import control scheme. In addition, whether the country has signed to be a member of the Fisheries Transparency Initiative may be an indicator of risk.	Supply chain mapping is underway to determine all of the ports where fish and seafood is landed. At a minimum, PAS 1550 should be referred to in supplier communication, so that they are aware of the desire to assess IUU risk.	Companies have knowledge of all landing procedures for each port into which their seafood is landed.	External	Are landing procedures, standards for documentary checks and inspection reports publicly available upon request from the port State through the supply chain?







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3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Internal or external question	Rewritten question (if external)
4.6.1.2.e	All records relating the port State control are well-maintained and available upon request to the relevant authorities or actors requesting information	Risk assessment consideration	A company should ask if records of port entry requests, denials, documentary checks and inspections are kept. If so, additional questions that a company should ask are:  "Are the records public?  "Is there a protocol to notify foreign port authorities of such information?  "Is an electronic information system used to collect, store and share this information?  "How can companies and relevant stakeholders obtain copies of this information and landing procedures and controls at the port of landing?  This information should be available and therefore be furnished upon request.	Supply chain mapping is underway to determine all of the ports where fish and seafood is landed. At a minimum, PAS 1550 should be referred to in supplier communication, so that they are aware of the desire to assess IUU risk.	Ports routinely share the data of their landing inspections with port and flag States so that the necessary information is available to them to take action on IUU where necessary.	External	Are all records relating to the port State control available to the relevant authorities and supply chain actors upon request within a given timeframe?
4.6.1.2.f	The port State verifies the catch documentation and maintains organized documentation and files/ records	Risk assessment consideration	A company should ask for catch documentation for landing or transhipment of fish from a vessel that can be verified through transhipment reports. Where these documents are not currently shared with purchasing companies, then a request should be made to both the flag and port State asking for it to happen.	Supply chain mapping is underway to determine all of the ports where fish and seafood is landed. At a minimum, PAS 1550 should be referred to in supplier communication, so that they are aware of the desire to assess IUU risk.	Ports routinely share data on their verification process of catch documentation undertaken as part of inspections (see also above).	External	Is catch documentation available and verified and reported by the port State authorities?
4.6.1.2.g	There are no recorded instances of bribery and any personnel found guilty of this are not permitted to work in the port	Risk assessment consideration	A company should ask if any instances of bribery or corruption have been identified or reported, how they were resolved or if they were made public. The bribery and corruption risk of each port or flag State country within the supply chain should be considered when assessing this risk.		Using information from MCS questionnaires and enquiries to ports, the bribery and corruption risk of each port or flag State country is included within determination of risk levels for each supply chain.	External	Is there evidence of any recorded instances of bribery through enquiry or public documents including press?  Is there evidence of any personnel found guilty of bribery through public documents including press?
4.6.2 Port Star 4.6.2.1	te Measures Agreement  Does the organization check whether the port(s) at which the seafood that they are purchasing is landed is located in a State party to the PSMA? If not, then the ports should be considered to be higher risk in the due diligence process.	Required	Check the Pew website for PSMA status and also check the accession documentation to determine whether the ports of landing used within the supply chain are actually included within the PSM ratification documents. If they are included, then they can be considered at lower risk, but if they are not included, then consider them at higher risk and ask the port State to include them. For more information about PSMA, visit: pewtrusts.org/psma or http://www.fao.org/port-State-measures/resources/detail/en/c/1111616/	that robust port controls based on PSMA should be	All ports of landing within the supply chain are mapped, the landing controls are understood, and where PSM ratification is desirable, then advocacy for this to happen is taking place.	External	Is the port State a party to the FAO Port State Measures Agreement (PSMA)?
4.6.2.2	As part of the risk assessment process, does the organization seek evidence on whether or not the PSMA requirements are being implemented by the contracting party of the PSMA in which the port found in the supply chain is located? Evidence of non-compliance or lack of evidence of compliance should be treated as an increased risk of fish passing through the port being illegal	Both	A company should ask if the port State is party to the PSMA and/or what is preventing them from joining. A company should ask whether the port State hose designated ports for access by foreign-flagged vessels, whether they have been publicized (or check here: http://www.fao.org/fisherv/port-State-measures/psmaapo/?/locale=en&action=gry) and confirm that it does not allow foreign-flagged vessels into any non designated ports.  A company should ask whether requests to enter port and inspection reports include the information detailed in Annexes A and C of the PSMA. The FAO also has a database of designated ports:  http://www.fao.org/fisherv/port-State-measures/psmaapo/?/locale=en&action=gry.  Risk assessment consideration:  -States that are party to the PSMA are associated with a lower level of risk of being entry points for illegally-caught fish.		Suppliers have knowledge of the checks that are being undertaken at port, as well as the regime of checks that have been risk assessed to make sure they are sufficient in quantity and quality to capture IUU fish if presented for landing. Where the assessment deems checks are insufficient, advocacy is required to improve them or for the port to be officially designated under the PSMA, and notified through the FAO system.	External	Does the port State have designated ports for access by foreign-flagged vessels?  Are your ports of landing included in the list of PSMA designated ports?
<u>"</u>							
4.6.3 Vessel ir	n nort						





3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Internal or external question	Rewritten question (if external)
4.6.3.a	Crew on fishing vessels it sources from are free to leave port when vessels dock, as far as is permitted by the immigration laws of the port State	Required	A company can ask if crew are granted shore leave access in accordance with immigration laws of the port State.	Suppliers have been written to, advising them that at a specified point of time they will be asked to report on the immigration laws of relevant port States and how they relate to the ability of crew to leave vessels in port.	Port visits and independent assessments verify that crew are able to leave vessels in countries where this is permitted. In countries where this is not permitted, advocacy is undertaken to address this.	External	Are crew granted shore leave access in accordance with laws of the port State?  How is this verified?
4.6.3.b	All crew are verified as present as per the crew list provided to the port State inspector, are in possession of their own work contracts and identification documents and are available for confidential interview if a request is made by the port State authorities	Required	In some countries, port in/port out inspections have been put in place to ensure there is no illicit incidence or swapping of crew whilst at sea. When the PSMA/ILO 188 and Cape Town Agreement are all in force, ratified and effectively implemented, there can be joint inspections that will verify this. If these 3 UN agreements are not in force for each of the supply chains flag or port States, then advocate for their implementation. A company should ask for crew documentation provided by the port State inspector.	A policy is communicated to suppliers requiring that crew are in possession of work contracts and are available for confidential interview by inspectors.		External	Are all crew verified as per the crew list provided to the port State inspector?  Do you verify if crew are in possession of their work contracts?
4.6.3.c	The captain is available at the port inspection and is able to provide all documentation and enquiries required at the port State inspection	Required	Pre-notification of arrival and landing should be made by vessels or flag States so that document inspection can be undertaken and outcome recorded. Suppliers should request a copy of these records relevant to their purchase from the vessel owner/supplier. Where they are not available, then a time-bound request for this information should be made to the supplier and also to the flag State of the vessel, asking that this is mandated as a customary practice. A company should request inspection reports that include vessel identification, construction, registration documentation, license to fish or tranship, catch and bycatch documentation, processing and transhipment reports, vessel monitoring systems, and/or automatic identification systems, fishing gear, fish species and quantities, safety certifications and crew documentation.	The need for landing inspections and pre-notification of landing is recognised as an important step to address IUU, either within a company policy or the buying specification. This recognition has been communicated to seafood suppliers of fish and seafood, whether or not they are landed to States party to PSMA.	Improvement steps are being taken to achieve visibility of inspection reports that include checks on vessel ID, registration documents, by-catch, transhipment and other criteria contained within the GDST KDEs or the specific buyers requirements.	External	Is the captain of the vessel able to provide all documentation requested by port State inspectors?  How would a company obtain this information?
4.7 Decent w 4.7.1	Does the organization include in its policies and require from its suppliers that all of the major issues that are identified in ILO Convention C188 are addressed by source fisheries? These are essential to providing decent work conditions on board fishing	Required	See 4.4.3.i			Internal	
4.7.2	vessels  Wherever possible and relevant, does the organization demonstrate that it supports the ratification of the ILO Convention C188?	Required				Internal	
4.7.3	Is traceability ensured down to vessel level to enable businesses with a turnover of over £36 million to produce their annual slavery and human trafficking Statement that covers what is being done in the supply chain to address the issue.	Required in UK	See 3.4.5. An overview of the traceability system can be set out in reporting issued under the Modern Slavery Act			Internal	
4.7.4	Has the organization developed and made public protocols that guide how and when it will inform statutory agencies of human rights infractions identified during audits, risk assessments and other internal reviews?	Required				Internal	
4.7.5	Have industrial fishing vessels had a social and ethical responsibility policy/standard that includes the points in 3.3.3?	Required	See 3.3.3	Communication made to suppliers setting out the requirement for vessels to have a policy/standard setting out working conditions. Reference should be made to the conditions required in ILO ILO C188.		External	Please supply the policies and procedures relating to the treatment of crew members on fishing vessels supply seafood to this contract.





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3.1 General		Required or Risk	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Internal or external	Rewritten question (if external)
		Assessment	,			question	
		Consideration					
4.7.6	Do inspections, audits and checks include, where possible, in- person interviews with the relevant workers or crew, which are	Required where possible	Vessel inspections and audits are a developing area, so the PAS indicates that this is a requirement where	Communication made to suppliers requiring that crew are made available for confidential interviews by relevant		External	Please set out in detail what measures are in place to
	conducted in a neutral and safe environment, guaranteeing the	possible		State inpsectors or other experts on request.	crew in a neutral and safe environment, guaranteeing the security and anonymity of the interviewees.		interview crew from vessels supplying seafood to this contract, to determine whether or not crew have
	security and anonymity of the interviewees?		in their due diligence systems should seek assurance of	otate impossions of other experts offrequest.	security and anonymity of the interviewees.		experienced human rights abuses, violations of labour
	occurry and anonymity of the interviewees.		the following labour and interview standards for				laws or any other legal violations.
			inspections, audits and checks:				
			•There is evidence of a standard operating procedure for				
			inspections that includes worker interviews				
			*This SOP should be in accordance with international standards and follow a victim centred approach				
			Inspectors should receive accredited or				
			government/ILO approved training in conducting labour				
			inspections/interviews/worker interactions. Certificates of				
			completed training should be provided to the				
			importer/processor				
			<ul> <li>Inspections should be conducted both on a scheduled but also unannounced basis in order to identify potential</li> </ul>				
			cases of FL & HT				
			Inspection records including number, type and nature of				
			the inspections, should be provided to the				
			importer/processor on a quarterly basis				
			Inspectors should use an interview questionnaire that is				
			designed to identify indicators of forced labour and				
			human trafficking as defined by the ILO Importers/processors should be provided with				
			examples of completed questionnaires as part of baseline				
			measurements				
			•Inspectors/auditors agree to importers or processors				
			conducting unannounced spot checks of				
Section 5. Fac							
5.1 Information	Is the organization able to demonstrate that processing factories in	Required				External	Please set out what reporting mechanisms are in place
0.1.1	its supply chains comply with the policies and specifications of the	required				External	for workers in factories processing seafood for this
	organizations which they supply (see 3.3.3).						contract to report labour infringements, unfair working
							conditions or associated unlawful treatment. Have any
							specifications or codes of practice been agreed to cover
							these areas, and if yes, please share these.
5.1.2	Can information be provided to any other actor in the supply chain	Required	Processors should be able to provide details on the			External	What information can be provided to any other actor in
	on the legality and traceability of a product within a maximum of		following:				the supply chain to support the legality and traceability of
	four hours?		*goods receipt documentation traceability/batch code     *traceability records back to vessel				a product, e.g., goods receipt, batch code, traceability records back to vessel?
			•product specs				records back to vesser:
			systems in place to verify legality at level of processing				Can this information be provided within a maximum of
			•mass balance reconciliation, i.e. where the original				four hours?
			catch outlined in the catch certificate has been split up				
			and catch certificates have been photocopied				
			Is this information easily accessible and are actors willing				
			to share this information? An example of a guideline on				
			how to increase coherence and interoperability of				
			information systems and therefore help ease data				
			sharing is the GDST Standard 1.0. https://traceability-				
			dialogue.org/core-documents/gdst-1-0-materials/				
5.1.3	Is there a designated person(s) at the factory that is responsible for	Required				External	Is there a designated person(s) at the factory
1	ensuring that information relating to legality and traceability is						responsible for ensuring that information relating to
I	compiled, stored, reviewed managed and available for checks (e.g.						legality and traceability is compiled, stored, reviewed
	audits)?						managed and available for checks (e.g. audits)?
5.2 Process C		Demined				Internal	
5.2.1	Is the production process defined, controlled and documented to ensure that the product meets the specifications and produces	Required				Internal	
	products that are compliant with the expectations of the end product						
	users?						
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3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Internal or external question	Rewritten question (if external)
5.2.2	Are product specifications, batch specifications, process monitoring, product testing, manufacturing site cleaning, and other quality control measures documented?					Internal	
5.2.3	Spot purchases without any knowledge of the vendor should be avoided and therefore not present in supply chains. The organization should ensure that all subcontractors meet all laws and are included in traceability documentation	Required				Internal	
5.2.4	Does the organization complete mass balance checks at their factory for its supply chains? These should be completed at regular intervals throughout the year; at a rate appropriate according to the results of the risk assessment and to satisfy internal due diligence but at a minimum of once per year. Accurate conversions ratios from production line should be used to make sure that the mass-balance is accurate					Internal	
5.3 Ethics and	labour						
5.3.1	Does the organization have a policy that addresses social and ethical responsibility (see 3.3.3, a) to g) for what to include in the policy)?	Required		afforded to everyone working within it.	Supply chains are fully mapped and suppliers at all levels have communicated their understanding of what is trying to be achieved with 1st, 2nd and 3rd party audits being targeted to those areas of the supply chain that are assessed to be of high and medium risk.	Internal (though entails a requirement to share the organization's policy and its requirements through the supply chain)	
5.3.2	Does the organization apply this policy not only to the buildings and operations that it owns but also communicate that the behaviours outlined in the policy are expected of all the actors in its supply chain, from supplier to vessel operations?	Required	Policies that address social and ethical responsibility should be communicated to all actors along the supply chain. Where this cannot be communicated, (e.g. on some occasions suppliers do not know who they will supply from in advance, efforts should be made to communicate these policies as soon as the supply chain is established.  There should be a mechanism in place that allows communication of these policies and standards to the potential suppliers of seafood from new sources. This can help inform a company's sourcing decision and it helps the supplier determine if it can meet requirements now and in the future.		A system is established that deals with seasonal variance in supply chains by exception, employs a risk-based approach to assessment to allow supply to occur, but outside of that the supply chain is understood and a demonstrable management system for assessment, mitigation and remediation is happening.	Internal	
	Does the organization ensure that at any of its factories, a review of its ethical and labour policy and systems is completed <b>at least once per year</b> to ensure that it is addressing current industry concerns and that it complies with any changes to the industry and supply chain requirements?	Required				Internal	
5.3.4	Is there a designated person(s) at each factory to ensure that workers are being treated ethically and that labour rights are being upheld? Translation services should be provided for migrant workers to facilitate effective communication	Required				Internal	
5.3.5	Are grievance mechanisms in place that allow workers to report issues and any cases of abuse anonymously without being put at risk of negative repercussions? Any grievance report should be investigated as a priority, in a fully transparent manner and by including the relevant union representatives — or in cases where this does not apply — by involving NGO representatives in the review process	Required				Internal	
5.3.6	Does the organization promote robust labour standards with respective governments in the form of legislative frameworks that support workers – local or migrant labour – in their right to organize and collective bargaining?  acking and transformation	Required				Internal	







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3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Internal or external question	Rewritten question (if external)
	Where a fish product, unit, or batch of fish products, originates from multiple source fishing activities or fisheries, is there identification and tracking of products from each source that enable products at final sale to be traceable to a single source and activity? The fish product or batch identification should be grouped or associated in ways to allow verification of legal compliance and of claims related to sustainability or fishing methods	Required	Seafish lists UK regulations pertaining to labelling, marketing and more: <a href="https://www.seafish.org/trade-and-regulations/seafood-traceability-and-labelling-regulations/fish-traceability-reguirements/">https://www.seafish.org/trade-and-regulations/seafood-traceability-and-labelling-regulations/fish-traceability-reguirements/</a>				Are there any fish products, units, or batches that originate from multiple source fishing activities or fisheries?  How are these products traced, e.g. electronic traceability system, from a single source and activity, e.g. vessel, to final sale?  Is this information subject to external verification or regular independent audits?
	Are unique unit identifiers present at each level of the packaging hierarchy (e.g. from a pallet, a case or a consumer item)?	Required					Are unique unit identifiers present and consistent at each level of the packaging hierarchy, e.g. from a pallet, a case or a consumer item?  How are these unique unit identifiers documented and tracked, e.g. electronic traceability system?
	When a product is combined with other material/ products, processed, reconfigured, or re-packaged, does the new product have its own unique product identifier?	Required					When a product is combined with other material/ products, processed, reconfigured or re-packaged, does the new product have its own unique product identifier? How are these unique product identifiers documented and tracked, e.g. electronic traceability system?
	Is the linkage (auditable function) maintained between this new product and its original inputs to maintain traceability? For example, a label, linked to the lot identification of the traceable input item, remains on the packaging until that entire traceable unit has reached the final point of sale	Required					Is the linkage maintained between a new product at final point of sale (refer to 5.4.3) and its original inputs, e.g. lot identification of original input?  How is this linkage documented to maintain traceability?  Is this documentation available for external verification or independent audit?

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Section 3. Mar	nagement						
3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Implementation of PAS/ PAS Compliant	Aspirational practice	Internal or external question	Rewritten question (if external)
3.1.1	Does the organization have systems in place to manage critical aspects of legality? These should comply with requirements such as the EU IUU Regulation, relevant policy, standards and labour conventions. These systems should include traceability, processes, information verification and transparency.	Required	A company should have systems in place to manage critical aspects of legality, that comply with EU IUU Regulation, relevant policy, standards and labor conventions. These systems should include:  *Traceability* third party management system certification such as BRC/IFS will help to ensure a management system is in place, as will MSC chain of custody, although these do not specifically cover aspects for IUU  *Processes *Information verification *Transparency	A management system is in place that includes processes to manage information verification and traceability. Where practical, a 3rd party audit of management system (e.g. BRC, IFS or GSA) or processing standard are in place, to ensure traceability. The company is a member of GDST and is working with suppliers to capture the relevant KDEs.	Full supply chain transparency is achieved with public reporting of policy, practices, supply chains. Full supply chain reporting traceability using the SDST data requirements.	Internal	
3.1.2	Do the managers of the organization engage on improvement work with other suppliers or actors in the supply chain (e.g. audits, reviews, site visits, etc.)?	Risk assessment consideration	Company managers should engage on improvement work with other suppliers or actors in the supply chain by:  *Conducting audits and reviews  *Conducting regular site visits, engaging in fishery or aquaculture improvement projects that specifically tackle IUU relevant issues, supporting research, and advocating for legislation adoption and effective implementation	acknowledged by all suppliers. The list of products and suppliers has been risk assessed and categorised into high,	monitoring systems established to maintain this.	Internal	
3.1.3	Where improvement work identifies corrective actions that can be completed to satisfy the organization's standard/sploties, is support (e.g. approval/verbal, finances, time, meetings, etc.) given to the supplier or actor?	Risk assessment consideration	Support in the form of approval/verbal, finances, time, meetings, etc. should be given to the supplier or supply chain actor in need in need of corrective actions, in order to satisfy the organization's standards/policies. Evidence of this support should be able to be provided upon request.	As above	As above	Internal	
3.1.4	Is all seafood in the supply chain of the organization addressed using the same systems and level of scrutiny? Traceability and legality should be a minimum requirement for all seafood.	Required		The established policy has been expanded to include all sources of seafood whether for direct human consumption, as a marine ingredient, or other route to market.	All seafood within the scope of the company's seafood buying is either assessed as being low risk, having been traced back to source, or is within a process, with the aim to be achieved in a time-bound commitment.	Internal	
3.2 The IUU R							
3.2.1	Does the organization document which of the products they sell are covered by the EU IUU Regulation?	Required	A company should document which of the seafood products they sell are covered by the EU IIUU Regulation within their buying specifications and their supplier approval lists. These include:  *All imports of fresh and frozen, wild marine capture fishery products, both whole and processed imports into the EU including catches made by non-EU vessels landed directly in an EU port, or landed in a third country port and subsequently exported to the EU, whether processed or not processed imports into the EU including catches made by EU vessels, landed and imported in a third country and from there imported in the EU, whether processed or not processed or EU, vessels, landed and imported in a third country and from there imported in the EU, whether processed or Texports from EU, including those with a catch certificate if required by a third country More information on the EU IIUU Regulation can be found at: <a href="https://www.kuwatch.eu/new-background-to-the-iuu-regulation/">https://www.kuwatch.eu/new-background-to-the-iuu-regulation/</a>	All base information is being routinely collected without any gaps in data, along with additional catch information such as bycatch and total catch of vessel during trip, plus list of all vessels used to supply, vessel identifiers, flag, landing port/s, and details of any transhipment.	Best practice information is routinely available with additional information documenting declared retained catch data quantity and product form per box, batch or tank, as well as details on beneficial ownership, background of captain, and other elements as explained in detail elsewhere, providing full supply chain transparency.	Internal	
3.2.2	Does the organization have management systems in place covering the requirements of the EU IUU Regulation (if sold)?	Required	A company should have management systems in place that cover the requirements of the EU IUU Regulation if it sells any of the products covered by this Regulation. Management systems will include traceability system and policy, incoming raw material to assessment, and performance reporting which specifically covers IUU related topics such as ports of landing, timely presentation of catch certificates, cross checking UVIs.	Traceability systems capture all steps of people, product and process through which the seafood passes or is handled, as well as collating catch certificates for species covered by the EU IUU Regulation. Verification of this information happens routinely via internal or third party audit, which informs what actions need to be taken to be able to continue sourcing products of high risk.	All products are sourced using an established monitoring system that collects information on the seafood and people involved in the supply chains, with data collected in accordance with GDST KDE principles. All products are classified as low risk for IUU and labour risks by third parties.	Internal	
	nd Processes						
3.3.1 General							

# PAS 1550 Implementation Guide

3.1 General		Required or Risk Assessment	Implementation Notes (for areas where industry feedback	Implementation of PAS/ PAS Compliant	Aspirational practice	Internal or external	Rewritten question (if external)
		Consideration	requested further detail)			question	
3.3.1.1	Are documented policies and processes in place that provide requirements for full chain traceability to be ensured?	Required	The PAS 1550 defines full chain traceability as the "linkage from the point of capture to the consumer of one stage of production at a time, from any stage of production to any other point along the entire supply chain (often through documentation)". In other words, capturing product information that tracks it at every stage of the supply chain from vessel to retailer.  Full chain traceability policies and processes should outline but are not limited to: how risk is assessed, type of data required, methodology of data collection, frequency of data collection, audit schedule, and response to gaps in data.  The co-mingling of seafood from different sources can pose challenges to achieving full chain traceability. As such, companies may use a combination of recognised traceability standards and schemes to inform full chain traceability policies and processes. Some examples include the British Retail Consortum Global Standard (BRCGS) for food safety and the Global Dialogue on Seafood Traceability (GDST) standard.	purchases, supply chains are fully mapped and declared, including retained catch data quantity, and product form in box, batch or tank, plus fishing method and gear, Transhipment dates, name of carrier, dates and catch consignment details	All information required in best practise is provided by supply chain in a timely and transparent manner that fully conforms to the GDST KDE standard. The whole supply chain is transparent with people and seafood interactions fully understood and verification! validation processes are embedded to demonstrate compliance. Digital traceability system is in place providing traceability at will.	Internal and external	What policies and processes are in place that provide requirements for full chain traceability to be ensured?  Can traceback exercises be conducted from end point (i.e. retailer) to start point (i.e. vessel), to support full chain traceability claims?
3.3.1.2	Are policies and processes audited and have the contents reviewed on, at a minimum, an annual basis in case changes or amendments are required to be made?	Required		Policies and processes are audited annually to ensure that the assessment of IUU risk within the supply chain is sufficient to manage risk.		Internal	
3.3.1.3	Are reports produced (at least annually) on the implementation and monitoring of the policies and processes that are in place to address risks?	Required			Policies and processes are audited annually to not only assess the assessment of IUU risk within the supply chain, but also to assess the implementation of the risk mitigation improvement processes.	Internal	
3.3.1.4	Are policies and processes available upon request and made available to other actors in the supply chain within seven days of such a request being made?	Required		The company seafood sourcing policy is communicated to and acknowledged by suppliers, with a functioning process to assess suppliers and their supply chains.	The company seafood sourcing policy and its processes for assessment are well established, customers know their suppliers' supply chains, and are aware of the work being undertaken within them.	Internal	
3.3.1.5	Are policies and processes demonstrated to have been communicated throughout the supply chain to, at a minimum, the stage before and the stage after the processor/importer?	Required	A document setting out policies and procedures should be shared within the supply chain. It is good practice to ask suppliers to acknowledge that they have received and understand the policies and procedures, and that this is documented. Clarifications should be provided in the event that suppliers indicate they do not understand policies and/or procedures.	understood and complied with. Policy and procedures are reviewed on a minimum annual basis and confirmation that	Purchasing polices and procedures are documented, regularly reviewed and form part of a supplier management process that is independently assessed and demonstrated to work. In addition, purchasing policies are distributed and acnowledged by all stages and actors in the supply chain.	Internal	
3.3.1.6	is the organization able to demonstrate compliance and implementation of all of the required regulations, conventions and standards (dependent on the supply chain and market)?	Required	It is the responsibility of any organization to understand and observe the laws and regulations in any territory in which they operate. The recommendations in this PAS help an organization to gain this understanding in relation to the legality of seafood and the working conditions of workers in the seafood supply chain.	legislation applicable to each of them is known. Steps to assess the quality of regulations in place and level of implementation is in place, with either consideration being given to government advocacy to encourage the gaps in legislation,	Legislation applicable to each source of seafood is known and if it is not fully implemented, government advocacy is being undertaken to address the regulation issues, or steps have already been agreed to ensure full regulation implementation will occur in a known timescale. RFVS certification of vessels is widely adopted within the supply chain.	Internal	
3.3.2 Due dif	gence through risk assessments  Does the organization conduct risk assessments on all of the  supply chains from which it sources and be able to demonstrate  that it does so? The level of risk in supply chains can be reduced  by identifying and taking mitigation actions or measures. Attention  is drawn to the BRC Advisory Note for the UK Supply Chain on  How to Avoid IUU Fishery	Required	A company should complete due diligence through risk assessment on all of its supply chains. The level of risk in supply chains can be reduced by identifying and taking mitigation actions or measures such as mandating future requirements or engaging in improvement processes with the supply chain. A company should prioritize its use of each supply chain according to the findings of the risk assessments. Ranking and assigning metrics that will evaluate results against factors such as the level of risk, volume and importance of the supply chain to the business, is subject to the needs of an individual company  1-The risk assessment system should demonstrate and document that for each supply chain, an assessment and any required actions have been applied. For example, if a supply chain is identified as higher risk, it will require additional verification for the company to assure its integrity  1-Risk assessments should be reviewed on a regular basis e.g. monthly, annually, biannually	assessments have been completed for all, with risk categorisations made and in the case of high risk sources, improvement plans agreed. Consideration to volume of seafood purchased from an individual source, and confidence in regulation and of the supply chain, will inform the metrics of	All seafood supply chains have been risk assessed on numerous occasions, all previously assessed high risk sources have either been mitigated or are no longer supplying, leaving minimal medium risk and the majority of sources being considered low risk.	Internal	



3.1 General		Required or Risk Assessment	Implementation Notes (for areas where industry feedback	Implementation of PAS/ PAS Compliant	Aspirational practice	Internal or external	Rewritten question (if external)
General		Consideration	requested further detail)	implementation of PAS/ PAS Compliant	Aspirational practice	question	Rewritten question (if external)
	Does the organization prioritize its use of each supply chain from which it sources according to the findings of the risk assessments?	Required	Companies should conduct risk analyses to help minimize and mitigate the risk of IUU fish entering their supply chains, importantly alming for assured traceability to legal origin. See example risk assessment to determine appropriate action. Where the risk assessment produces a moderate to high risk of IUU or information is missing, the sourcing decision should reflect the level of risk.	Improvement plans for all high risk sources are in place. Government and industry advocacy is happening (and which you are following and engaging in where practical) for high risk sources, and plans are being developed for low and moderate risk sources where improvements need to be made. Where risk assessments have been completed on numerous occasions or improvement plans are not yielding the desired change, the company can demonstrate that these factors influence ongoing buying decisions by communicating to the governments and relevant supply chain actors, that continued inaction could lead to a reduction in volume of purchases, or in extreme cases the cessation of buying altogether - whether individually, or as part of a government led trade sanction.	Advocacy activity is well established with high and moderate risk source issues having been addressed through completion of their improvement plans, or are able to demonstrate continued commitment to change. Where improvement plans have been shown to not yield change, the company can show that purchasing volumes have been reduced or buying suspended.	Internal	
	Does the risk assessment system demonstrate and document that for each supply chain an assessment and any required actions have been applied, that are appropriate according to the results of the risk assessments and prioritization exercises?	Required		Improvement plans for all high risk sources are in place. Government and industry advocacy is happening (and which you are following and engaging in where practical) for high risk sources, and plans are being developed for low and moderate risk sources where improvements need to be made. Where risk assessments have been completed on numerous occasions or improvement plans are not yielding the desired change, the company can demonstrate that these factors influence ongoing buying decisions by communicating to the governments and relevant supply chain actors, that continued inaction could lead to a reduction in volume of purchases, or in extreme cases the cessation of buying altogether - whether individually, or as part of a government led trade sanction.	Advocacy activity is well established with high and moderate risk source issues having been addressed through completion of their improvement plans or are able to demonstrate continued commitment to change. Where improvements plans have been shown to not yield change, the company can show that purchasing volumes have been reduced or buying suspended.	Internal	
	Are risk assessments reviewed on a regular basis (e.g. monthly, annually, bi-annually, etc.) depending on the level of risk, or if something changes? The risk assessments should be completed at a minimum annually, and then at least six-monthly for supply chains identified as higher risk.	Required		Improvement plans for all high risk sources are in place and risk assessments undertaken on a six or 12-month basis dependent upon the level of risk identified. Government and industry advocacy is happening (and which you are following and engaging in where practical) for high risk sources, and plans are being developed for low and moderate risk sources where improvements need to be made. Where risk assessments have been completed on numerous occasions or improvement plans are not yielding the desired change, the company can demonstrate that these factors influence onging buying decisions by communicating to the governments and relevant supply chain actors, that continued inaction could lead to a reduction in volume of purchases, or in extreme cases the cessation of buying altogether - whether individually, or as part of a government led trade sanction.	Risk assessments are able to show that over time, and with established advocacy activity, high and moderate risk source issues having been addressed, giving transition to low risk outcomes through completion of their improvement plans, or are able to demonstrate continued commitment to change. Where improvements plans have been shown to not yield change, the company can show purchasing volumes have been reduced or buying suspended.	Internal	
3.3.1	rorking conditions  Has the organization established and uses policies, practices and confidential reporting and assurance systems at every worker facility in all countries where fisheries products are sourced? This should allow all workers to have the ability to report labour infringements, unfair working conditions or associated unlawful treatment as necessary.	Required		The policies are communicated to second and third tier suppliers with assessments being undertaken either in-house or through third parties.	Company policies are shown to be working properly, with all supply chain actors known and proactively participating in policy implementation, assessment and remedy. Confidential reporting mechanisms have been made available to all employees within the supply chain and demonstrable steps able to be shown that remedy issues found.	Internal	
	Is each of these systems supported by a transparent process available upon request as part of supply chain audits, and be equally applicable for workers with or without union representation?	Risk assessment consideration	A company should be able to request and view the processes in place at any point along the supply chain, which ensure that workers have the ability to report labour infringements, unfair working conditions, unlawful treatment, etc.  Where the company is not able to obtain evidence of such processes, this lack of information should result in the company receiving a higher risk rating and mitigating measures undertaken.		Independent assessment and reporting of the seafood supply chain work places is taking place, with a system in place that can remedy any issues as they are highlighted.	internal	
3.3.4	Are confidential reporting processes established and maintained with associated policies and practices embedded throughout the corporate culture led at senior board level? Are all complaints from workers dealt with objectively and confidentially through independent and impartial reviews leading to a remedy where applicable? These remedies should end the infringement, unfair working condition or associated unlawful	Requirement Requirement		Confidential reporting processes are established and maintained in all tier one supply chains and work is ongoing in tier two and three suppliers to achieve this.  Complaints from workers can be shown to be dealt with objectively and confidentially.	Confidential reporting processes are established and maintained in all suppliers within the company's supply chains and evidence to support this can be provided.  Confidential reporting processes are established and maintained in all suppliers within the company' supply chains, redress is an ongoing practice where required, and evidence to support what action has been taken can be provided.	Internal	
	treatment and provide retrospective financial compensation to the worker and referral to legal authorities where individuals have broken the law. Complaints and associated remedies should be documented and available for external scrutiny, with safeguards taken to protect the identity of victims.						

# PAS 1550 Implementation Guide

3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Implementation of PAS/ PAS Compliant	Aspirational practice	Internal or external question	Rewritten question (if external)
	Is social responsibility addressed explicitly in the policies and processes of the organization, by including as a minimum? freedom of association;  *the right of workers to organize;  *forced labour;  *minimum age of workers;  *ohid labour;  *equal remuneration; and  *discrimination.	Requirement				Internal	
3.4 Traceabilit	ty						
	Are records of traceability kept that demonstrate whether or not a product originates from a source where reliable evidence of legality (e.g. registration, licensing, catch documentation and compliance records) is available? If it is not possible to trace to the origin of the seadood, this should trigger an investigation and the completion of steps to remedy the situation.	Required	The Future of Fish, in collaboration with FishWise, Global Food Traceability Center and WWF, developed a preliminary guide for industry working towards full-chain traceability: https://fishwise.org/wp-content/uploads/2018/03/OSMI-Trace-Collab_Taking-the-First-Steps-Towards-Seafood-Traceability.pdf  This guide links to useful resources including a comprehensive complation of key data elements (KDEs) across certification schemes, governmental organizations, industries, etc.: https://ishwise.org/wp-content/uploads/2018/03/2017.05.25 KDEs-for-Seafood-Complation-of-Resources_Final1_pdf  An example of traceability compliance can be found in the ISO standard document 'Traceability of finfish products' (12875:2011): https://www.lso.org/standard/52084.html	allows the sourcing company to assess and verify the credentials of the seafood it is buying. The information supplied should be provided in a format that conforms to the GDST KDEs. For IUU catch documentation, the links and references within this document should be consulted.	A fully diglitised e-traceability system is in place, giving secure, end-to-end traceability of the KDEs in a format compliant with the GDST standard.	External	Do you have the following records to support that a product originates from a legal source:  vessel registration  vessel license  vatch documentation  voompliance records   What other records or documents do you keep that support  claims of legality of a source?
	Does the organization complete data (or data system) verification exercises to verify the authenticity of data entering the traceability system?	Risk assessment consideration			A fully digitised e-traceability system is in place, giving secure, end-to-end traceability of the KDEs in a format compliant with the GDST standard.	Internal	
3.4.3	•	Risk assessment consideration		Through a combination of routine and spot-check traceability audits, the company is able to verify the accuracy and authenticity of some, if not all of the data provided by its suppliers, and it is actively exploring how this information can be automatically captured and shared with its customers or other stakeholders.	A fully digilised e-traceability system is in place, giving secure, end-to-end traceability of the KDEs in a format compliant with the GDST standard.	Internal	
	Are all traceability systems, and all claims based on them, subject to external verification mechanisms and regular independent audits? Traceability data should be accessible during verification checks and audits.	Risk assessment consideration	Traceability can be defined as "the systematic ability to access any or all information relating to a food under consideration, throughout lits entire life cycle, by means of recorded identifications" (WWF traceability principles, 2015). It is important to note that this is different to transparency, which focuses on what information is shared, with which stakeholders, and at what frequency.  The Global Dialogue on Seafood Traceability (GDST) Standard 1.0 provides guidelines on enhancing interoperability of traceability systems to help enable full chain traceability and improve data verifiability: https://traceability-dialogue.org/coredocuments/gdst-1-0-materials/	certification logo/brand guidelines, or via pre-competitive collaborations, e.g. Sustainable Seafood Coalition, Seafood Task Force.	Third party scrutiny is employed to warrant the in-house assessment of claims being made. Full transparency of all seafood sources is being made public to such an extent that routine verification by independent third parties is possible at will, and the supply chain owner and the supply chain willingly engages to help the verification process.	External	How frequently are traceability systems, and all claims based on them, subject to external verification and independent audits?  How is traceability data made accessible during verification checks and audits e.g. use of an electronic system?

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3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Implementation of PAS/ PAS Compliant	Aspirational practice	Internal or external question	Rewritten question (if external)
3.4.5	is traceability provided by the vessel or group of vessels that caught the seafood?	Risk assessment consideration	Traceback exercises can be conducted to test if traceability is provided by the vessels or group of vessels that caught the seafcod. Companies should already have a range of traceability processes in place, to which additional aspects relating to IUU can be added. Where barriers exist, for	in place and can be demonstrated within a reasonable timeframe, taking into account variables such as global time	GDST KDEs are in use for all supply chains, and all vessels (including any involved in transhipment) are present on government registers and the global record. Beneficial owners are known, and traceability can be demonstrated on every occasion within 4 hours.	External	How is traceability provided to the vessel or group of vessels (e.g. catch certificate) that caught the seafood?  What processes, e.g. traceback exercises, are used to demonstrate traceability to a vessel or group of vessels?  Have you adopted any traceability standards, e.g. ISO 12875, as part of traceability compliance, and if so which ones?  If you have undertaken a traceability improvement project or initiative, can you please provide details of this i.e. time-bound deliverables?
3.4.6	Are traceback exercises carried out at a frequency based on risk assessment and in a timescale that is appropriate for the origin of the seafood?	Risk assessment consideration	DNA testing of fish can be used to support claims of legality, inform risk assessments, and support traceback exercises to seafood origin. Seafish has produced a comprehensive guide on the uses of DNA testing seafood that includes a list of well-established DNA databases:  https://www.seafish.org/media/publications/SeafishGuidetoDN ATestingofSeafood 201312.pdf.	The buyer conducts regular traceback exercises to ensure that product purchased can be reliably traced back to the source fishery/fishing vessel(s). The frequency of traceback exercises is based on an in-depth risk assessment, taking into account detailed supply chain information derived from supplier inspections, audits or SAQs.		Internal	
3.4.7	Does the organization complete random traceback exercises that are able to verify full traceability from point of sale to source within 48 hours?	Risk assessment consideration	Random traceback exercises to verify traceability are typically conducted for food safety reasons. Some examples of food safety standards that require this include the BRC Global Standard (BRCGS) for Food Safety, IFS Food Standard 6.1, and GSA Saedood Processing Standards. As such, information relevant to IUU can be collected, e.g. through commercial transaction process, and stored alongside food safety information.  If traceback exercises cannot be conducted for certain supply chains or products, this should be taken into consideration when conducting a risk assessment, and companies should consider working with their supply chains to improve traceability. Refer to the "shared resources" section for common traceability guidelines and standards that can serve as basis for traceability improvement projects or initiatives.	that product purchased can be reliably traced back to the source fishery/fishing vessel(s). The frequency of traceback exercises is based on an in-depth risk assessment, taking into		Internal	
3.4.8	Are sales transactions between actors in the supply chain accompanied and traced by unit or batch numbers on or accompanying invoices? To allow effective tracking of products, all buyers and sellers should be able to match sales transactions between them.	Risk assessment consideration		Batch and lot number are detailed on purchase documents and these facilitate traceability back to source fishery and supply vessels for product at all stages of manufacture, storage or distribution.	Product is traced at all stages of manufacture, storage and distribution, through a comprehensive end-to-end e-traceability tool.	External	Are sales transactions accompanied and traced by unit or batch numbers on, or accompanying invoices?  Where are unit or batch numbers captured?  Are you able to match sales transactions with buyers or sellers?
3.4.9	Does the organization cooperate with the relevant competent authorities (that conduct active and effective regulatory oversight and verification) by using effective compliance and enforcement mechanisms?	Risk assessment consideration		visits) from domestic government compliance authorities and cooperates to any reasonable request by supplying information	The company is able to demonstrate that it complies with all government interactions, advocates for improved compliance regime implementation and encourages its supply chain to do the same.	Internal	



3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)		Aspirational practice	Internal or external question	Rewritten question (if external)
.10	In order to ensure consistency in the requests for information in supply chains, is the following information collected (via request) and associated with the products?  "vessel identity (home port, name, flag and call sign), registration and, where issued IMO or other UVI number;  location of catch [e.g. GPS coordinates, specific location of fishery, FAO codes, EEZ's ISO country code, relevant Regional Fisheries Management Organization (RFMO)];  "ishing license and validity;  species (FAO alpha 3 code), product name and code;  "ishing method used;  "shinip adtes of capture:  quantities (in kg) of catch;  date/area/position/estimated weight/call sign and declaration of any transhipment at sea. This will include the receiving vessel name and where applicable the IMO number or other UVI number; and  person/enterprise with custody and ownership after landing.  Not all of this information will accompany the product at every stage, but the information should be maintained and available on request.	Risk assessment consideration		The seafood company is able to demonstrate:  vessel identity (home port, name, flag), registration, and  where issued, IMO or other UVI number  location of catch [e.g. specific location of fishery, FAO codes,  EEZ's ISO country code, relevant Regional Fisheries  Management Organization (RFMO)  shishing license and validity  species (FAO alpha 3 code), product name and code  shishing method used  shishing dates of capture  quantities (in kg) of catch  state-farea/position/restimated weight/call sign and declaration  of any transhipment at sea  strainshipment information will include the receiving vessel  strainshipment and where applicable, the IMO number or other UVI  number  Not all of this information will accompany the product at every  stage, but the information should be maintained and available  on request.	In addition to the best practice information, the seafood buyer will also have access to:  *vessel call sign  *GPS coordinates of catch  *quantities (in kg) of catch  *person/enterprise with custody and ownership after landing.  Not all of this information will accompany the product at every stage, but the information should be maintained and available on request.	External	Which of the following data is available for collection upon request and associated with products?  vessel identity (home port, name, flag and call sign), registration, and where issued, IMO or other UVI number i-location of eatch (e.g. GPS coordinates, specific location of flashery, FAO codes, EEZ's ISO country code, relevant Regional Fisheries Management Organization (RFMO)) -fishing license and validity -species (FAO alpha 3 code), product name and code -fishing dates of capture -quantities (in kg) of catch -date/area/position/estimated weight/call sign and declaratio of any transhipment at sea. This will include the receiving vessel name and where applicable, the IMO number or othe UVI number -person/enterprise with custody and ownership after landing What other information is associated with products?
4.11	system? As a minimum the key data should be held in the system, and other documentation such as EU Catch Certificates attached electronically or a record noting their physical location attached.	Risk assessment consideration	The FAO technical paper "Seafood traceability for fisheries compliance: Country-level support for catch documentation schemes," lists recommendations for traceability mechanisms based on the evaluation of different countries' catch documentation schemes (CDS) and key data elements (MDEs): http://www.fao.org/publications/card/en/c/1701be4c=b83-4b0f-97e5-b6d11d1c7c55/.	The company sourcing policies are understood and acknowledged by all actors in the supply chain and the company is able to demonstrate that some of the product specific information that it requires is being submitted electronically and that there is a time-bound commitment by which all of this information will be provided electronically.	Product is traced at all stages of manufacture, storage and distribution, through a comprehensive end-to-end e-traceability tool.	External	What key data relating to products (refer to question X) at a minimum, are maintained in an electronic system?  Is other documentation such as EU Catch Certificates attached electronically, or is a record noting their physical location attached?
5.1	on verification and transparency Does the organization work with other actors in the supply chain to agree levels of information required and share it to ensure a level of transparency that is appropriate to enable regulatory visibility across the entire supply chain?	Required	Transparency and Traceability can be confused with one another; Transparency refers to how and what information is disclosed to certain stakeholders, while Traceability refers to information on a certain product or batch from origin to enduse.  The "GS1 Foundation for Fish, Seafood and Aquaculture Traceability Guideline" provides consistent business practices for effectively managing traceability and enhancing transparency across supply chains: <a guide="" href="https://www.gs1.org/standards/traceability/guidhitps://www.gs1.org/standards/traceability/guidhitps://www.gs1.org/standards/traceability/guidhitps://www.gs1.org/standards/traceability/guidhitps://www.gs1.org/standards/traceability/guidhitps://www.gs1.org/standards/traceability/guidhitps://www.gs1.org/standards/traceability/guideline.pdf&lt;/td&gt;&lt;td&gt;The transparency policy is understood by all actors in the supply chain and supply chain transparency is able to be demonstrated upon request by regulators and stakeholders, whilst being routinely audited for compliance in-house.&lt;/td&gt;&lt;td&gt;Transparency is institutionalised within the company and its supply chains to such an extent, that public reporting satisfies regulatory regimes and external stakeholders, without the need to ask for supply chain information.&lt;/td&gt;&lt;td&gt;Internal&lt;/td&gt;&lt;td&gt;&lt;/td&gt;&lt;/tr&gt;&lt;tr&gt;&lt;td&gt;5.2&lt;/td&gt;&lt;td&gt;Does the organization engage with other actors in the supply&lt;br&gt;chains to resolve any barriers that prevent this from being&lt;br&gt;possible?&lt;/td&gt;&lt;td&gt;Required&lt;/td&gt;&lt;td&gt;It is recognised that full chain traceability may not always be&lt;br&gt;achieved. In such cases, a programme or process to improve&lt;br&gt;traceability is needed. There are resources and guidelines&lt;br&gt;available in the " of="" resources"="" section="" shared="" this="" to<br="">assist companies in taking steps towards full chain traceability.</a>	Proactive engagement with suppliers to overcome transparency barriers can be demonstrated with successes having already been achieved.	All barriers to supply chain transparency of existing supply chains have been overcome. It is a pre-requisite to supply, that future supply chains must achieve the same level of transparency prior to supply commencing.	Internal	
5.3	When assessing the impact on decent working conditions, is engagement with those potentially affected (in this case, workers) undertaken? If any information is unavailable during a traceback exercise then this should be investigated.	Required	A company should establish and use policies, practices and confidential reporting and assurance systems, to ensure that decent working conditions protect workers in facilities in all countries where seaflood products are sourced. A company should conduct inspections, audits and/or site visits to check for aspects of decent working conditions.	The company is able to demonstrate that engagement with workers who are likely to be impacted by the lack of decent working conditions, is able to be made to all intent and purpose at will.	There is sufficient supply chain transparency that if so desired, the seafood sourcing company when it is assessing decent working conditions, is able to engage directly with any workers potentially affected by the lack of decent working conditions.	External	Can you assess the impact of decent working conditions through a verifiable traceback exercise across your supply chains within 48 hours from the time the request is made? A traceback exercise involves gathering information or documenting events from the point of origin or source. If any information is unavailable during a traceback exercise, a further multi-part question should be asked, such as:  Can you access information or furnish evidence related to freedom of association, right of workers to organize, forced labour, minimum age of workers, child labour, equal remuneration or discrimination?
.5.4	Are all stages in the supply chain available for inspections, audits and/or site visits upon request?	Required	All stages in the supply chain should be available for inspections, audits and/or site visits upon request. Additionally, DNA testing is an emerging technology applicable in spot checks.			External	As a company, are you able to conduct inspections, audits and/or site visits to check for aspects of legality, traceability and decent working conditions?  How often do you conduct site visits?  What information are you able to obtain from the site visits to help verify legality of seafood products and decent working conditions from the point of origin?
5.5	Are the commitments, expectations and standards of the organization documented and available to other actors in the supply chain within 48 hours of the request?	Required	The commitments, expectations and standards of a company should be documented and available to actors in the supply chain within 48 hours of the request.	Traceability exercises are able to be undertaken and completed for all supply chains within the 48 hour timeframe, taking into account weekend, public and religious holiday restrictions.	Traceability systems are so developed with information captured in real time, that full supply chain traceability is able to be demonstrated in real time through the employment of etraceability platforms.	Internal	



3.1 General		Required or Risk Assessment	Implementation Notes (for areas where industry feedback	Implementation of PAS/ PAS Compliant	Aspirational practice	Internal or external	Rewritten question (if external)
		Consideration	requested further detail)			question	
3.5.6	Is first., second- and third-party verification of information allowed at any point in the supply chain? Access should be granted to those conducting inspections, audits and/or site visits on behalf of those in the supply chain to check for aspects of legality, traceability and decent working conditions. Random spot checks and unannounced audits should be permitted.	Required	First, second and third-party verification of information should be allowed at any point in the supply chain.  *Access should be granted to those conducting inspections, audits and/or site visits on behalf of those in the supply chain, to check for aspects of legality, traceability and decent working conditions.  *Random spot checks and unannounced audits should be permitted.  *DNA testing to verify species is an emerging technology used in spot checks  *Third-party auditors help to ensure that inspections are conducted without jeopardizing necessary business confidentiality				As a company, can you obtain third-party verification of information at any point in the supply chain?  Do you have designated access to conduct inspections, audits and/or site visits on behalf of those in the supply chain?  Can you conduct random spot checks, and are you permitted to conduct unannounced audits?
3.5.7	Is all of the text on the final product labelling and packaging written in plain language and correct according to the source of the product? This includes all claims made about the origin of the product.	Required	All products should be properly labelled in plain language, and be correct according to the source of the product. This includes country of origin.  It is good practice for voluntary information beyond mandatory legal requirements to be clear, unambiguous and verifiable.  Attention is drawn to Regulation (EU) 1379/2013 as well as the Sustainable Seafood Coalition's Code of Conduct on Environmental Claims.			External	Are all products properly and visibly labelled and written in plair language, including correct source of the product and country of origin? If so, please supply examples of labelling where relevant, for all seafood supplied in this contract. See link for information on labelling as a resource: <a href="https://trade.ec.europa.eu/doclib/docs/2014/december/tradoc152941.pdf">https://trade.ec.europa.eu/doclib/docs/2014/december/tradoc152941.pdf</a> .
	neries and fishing operations						
4.1.1 Managem 4.1.1	ant of fisheries In a risk assessment, is seafood assessed as higher risk if sourced from a fishery that is either regarded as overfished or for which there is neither sufficient data to ensure it is not overfished nor a plan in place to collect such data?	Risk assessment consideration	In a risk assessment, seafood should be assessed as higher risk if sourced from a fishery that is regarded as overfished, or for which there is neither sufficient data to ensure it is not overfished, nor a plan in place to collect such data.  There is no one list that expresses the State of all of the different fisheries, yet various competent authorities at global and national levels, assess whether fisheries are in an overfished State.	All source fisheries have been identified, information to determine the status of the stock has been collected, and a risk assessment has determined the stock status. Fisheries determined to be overfished, data-deficient or without a management plan, are classified as high risk unless a justification is made to the contrary.	All source fisheries are either classified as fished at or below MSY or have a credible fishery improvement process in place that is able to demonstrate on the water improvement.	Internal	
			It is good practice for seafood to be sourced from fisheries with a peer reviewed assessment that demonstrates that the fishery is not fished in excess of the maximum sustainable yield (MSY). Stock statuses can be accessed on RFMO webpages, although they may not be current. The following map of RFMOs may be useful here: https://ec.europa.eu/oceans-and-fisheries/index_en				
4.1.2	Where seafood originates or might originate from a fishery where RFMOs, intergovernmental organizations, States (including EU Member States) and NGOs have identified high levels of risk of IUU fishing, or if the species is assessed to be of higher risk, does the organization consider this seafood to be higher risk?	Required	When procuring higher risk seafood, e.g. seafood originating from a fishery identified with high levels of risk of IUU fishing, extra measures should be taken to ensure full traceability, maximum transparency, and the trustworthiness of the supply chain. This includes at minimum, completing risk assessments or audits at least once every six months, with steps taken to mitigate risks. Extra measures might include certification verification such as Marine Stewardship Council (MSC), including the associated Chain of Custody certification where applicable, to mitigate the higher risk presented by the fishery.	Mapping and assessment of all fisheries has been completed, with steps being taken to address stocks that are classified as high risk.	High risk sources have an agreed improvement plan in place with steps actively being taken to address the issues highlighted. Low and medium risk fisheries have also been assessed, with a regular review being undertaken to ensure that this risk level is being maintained or improved where deficiency is identified.	Internal	
4.1.3	When procuring higher risk seafood, are extra measures taken to ensure full tracebility, maximum transparency, and the trustworthiness of the supply chain, including by as a minimum completing risk assessments or audits at least once every six months with steps taken to militigate risks?	Risk assessment consideration		Proactive engagement of the buyer is occuring, and tangble improvement and advocacy is being practised.	High risk sources are now medium or low risk, with a sourcing policy that prohibits high risk seafood being bought without an improvement and advocacy plan already established.	Internal	
4.2 Fisheries							
42.1	Where seafood and marine ingredients are identified as originating from a vessel that is flagged to a State, or that fishes in the territorial or EEZ waters of a coastal State, that does not have a transparent register of authorized vessels, does the organization ensure that there is full chain traceosibilly and that independent audits are completed at least every 12 months?	Required	Where 12 monthly audits are not possible but obtainable, the company should factor this information into the risk assessment. Would audits on a less frequent basis elevate the risk to a level where sourcing is not responsible?  It is also recognised that conducting audits every 12 months is not always possible. In this case, companies can request that suppliers provide copies of vessel licenses, registrations, etc. annually, to check that fish come from legal sources and help companies realize potential risks. Companies should also consider advocating the relevant State to compile and publish a transparent list of vessels. It should consider whether the State shares vessel information with RFMOs and/or the FAO Global Record, in absence of its own transparent register.	Utilising the mapping exercise for vessels, an assessment of the flag State controls in place may be undertaken, so that an understanding of the monitoring, control and surveillance, as well as their compliance regime is understood, or at a minimum being explored.	Flag States are known, and all vessels within the flag States are contained on public registries and on the global record. Independent third party certification and audits of fishing and transhipment vessels is routine. Flag State assessments have been completed, with high-risk flag States identified and either subjected to an audit or assessment of vessels, or one is planned. Action plans to miligate deficiencies in flag State compliance and enforcement are in place, so that they eventually become assessed as low risk.	Internal	

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1 General	Where fish products are sourced from high seas fisheries or from	Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)  The company can use these conditions to assess the risk of	Implementation of PAS/ PAS Compliant  All source fisheries are known and their stock status has been	Aspirational practice	Internal or external question	Rewritten question (if external)
	any stock subject to the jurisdiction of an RFMO or other international management arrangement, the organization should only source from vessels: a) operating in fisheries governed by RFMOs or other international arrangements that: 1) have fishing quotas or other seasonal, temporal or technical catch restrictions that are operated in a transparent manner, meaning that they are publically available for instance on a website; 2) apply sanctions or require flag States to apply sanctions to fishing vessels that are sufficient to deter IUU fishing, meaning that fines are in the order of at least five times the value of the catch caught by the vessel during the period IUU activity took place; 3) operate sanctions or require flag States to apply sanctions on fishing vessels for IUU fishing in a transparent manner, meaning they are published on a publically available website; and b) are operating under the flag of States that comply fully, and ensure that vessels operating under the flag comply fully, with all conditions and measures required by the international rules and/or authority responsible for managing or setting the norms of management for the fishery		the fishery. For example, it can check whether these conditions are in place by searching the relevant RFMO/other international arrangements website and reading their conservation and management measures, as well as their resolutions and recommendations.  Importantly, the company can check if a vessel is on any IUU lists and/or is blacklisted. If so, the company should not source from this vessel.  RFMO websites often contain lists of vessels which have previously carried out IUU fishing. These lists can be useful to cross-check the vessels used within the company's supply chains.  Some examples include: ICCAT's IUU vessel list: <a href="https://www.iccat.in/len/IUUlist.html">https://www.iccat.in/len/IUUlist.html</a> . EU's IUU vessel list: <a href="https://www.iccat.in/len/IUUlist.html">https</a>	assessed and classified. Where stocks are deemed medium and high risk, improvement plans are in place to address concerns. Vessel registers are routinely assessed to ensure that there is no activity from vessels on IUU lists, the monitoring, compliance and enforcement regimes of the fisheries are understood, and improvements are in place to address deficiencies. Tools such as SFP Catch Check are being employed.	where fishery improvement projects that are able to show tangible improvements over past performance, are supplying the fish. All supply vessels are able to demonstrate that they are routinely complying with all relevant national, regional and international laws that govern where they operate.		
Monitoring	, control and surveillance						
	advisory only						
2 Due dili							
3.2.1	Does the organization complete due diligence on their supply chains related to MCS2 When undertaking due diligence on a new supplier or product (or when repeating due diligence for an existing supplier or product), the organization should assess and record the following factors relating to flag States, coastal States and RFMOs responsible for MCS of a supplying vessel.	Requirement		A policy is in place that recognises the importance of effectively implemented montroing, control and surveillance (MCS) within fisheries. All supply chains are mapped back to the source fishery, the status of each MCS regime has been compiled, and a gap analysis has been compiled for each fishery, with steps being taken to advocate for improved implementation by government, or compliance by the fleet within the supply chain.	All MCS regimes are understood, they are being fully implemented at each stage in the capture and landing supply chain, and a process for sanction is in place, which means that the likelihood of being caught undertaking IUU activities outweighs the benefit of carrying them out.	Internal	
3.2.1.a	Monitoring systems: Does the organization research whether or not industrial fishing vessels in the supply chain are required by flag State authorities to have an installed vessel monitoring system (VMS) transponder, automatic identification system (AIS) transponder or other tracking technology onboard? These systems where required should be continuously transmitting in accordance with any national programmes or requirements and those which have been sub-regionally, regionally or globally agreed among the States concerned. Those responsible for tracking schemes that are required should be able to track the movements of these vessels continuously from port to port.	Risk assessment consideration	Vessel tracking requirements are increasingly required by flag and coastal States, as well as RFMOs. The most secure form of tracking is through VMS, though in most cases this information is proprietary rather than public. Some States have also required the use of AIS, which is publicly available but easier for vessels to manipulate. Whether or not vessels are tracked by the States and RFMOs that regulate their behaviour, is an important consideration when considering risk. If vessels are not monitored, this significantly increases the risk that they may be operating illegally in areas that they are not authorised to be in (whether in EEZs, RFMOs or protected areas). As part of this risk assessment, businesses should also consider what is known about the State that is undertaking the monitoring, for example, are they subject to a 'yellow card' from the European Union. To inform this risk assessment, organizations should ask companies supplying them to explain what vessel tracking requirements are in the pirisdictions they operate in. These should be easily evidenced by supplying copies of license conditions or other communications from competent authorities to vessel owners, setting out their vessel tracking requirements.  Technical guidance relating to electronic monitoring from WWF and EFCA are provided in "shared resources".	capture what data the source fisheries MCS regimes is capturing, as well as the melthod by which it is captured. Where AIS is mandatory, then checks should be made to understand whether this data is being broadcast and is accurate. Where VMS is mandated, discussions as to whether this information can be shared with supply chain owners should be happening. Where AIS and VMS is used within the fishery compliance regime, the controls are understood by the seafood buyer and protocols are in place which ensure that when they are not operational, the vessels stop fishing and return to port. In addition, data sharing with third-parties so that assessment of vessel activity can be monitored and assessed is being encouraged along the supply chain. Where AIS and VMS is not used, then advocacy for its adoption and use is either happening or being considered.		External	What requirements are in place for vessels to have Ves Monitoring Systems (VMS)? What requirements are in place for vessels to operate Automatic identification Systems (AIS)? Are there any other vessel tracking requirements in place seeds?



3.1 General		Required or Risk Assessment	Implementation Notes (for areas where industry feedback	Implementation of PAS/ PAS Compliant	Aspirational practice	Internal or external	Rewritten question (if external)
.3.2.1.b	Logbooks: Does the organization research whether or not MCS	Consideration Risk assessment consideration	requested further detail)  For States to effectively regulate fishing vessels, they need	The company is actively and demonstrably investigating	The company has conducted research that reasonably	question External	What requirements are in place to provide data on vessel
4.3.2.1.0	authorities require that vessels demonstrate they have met the requirements for recording and timely reporting of vessel position, catch of target and non-target species, fishing effort and other relevant fisheries data in accordance with coastal State or other sub-regional, regional and global standards for collection of such data?	risk assessiteti cuisidetaluti	information on the location and content of their catch. If competent authorities are not requiring this information, it not only suggests that fishing is not being reported, but also significantly increases the risk that the authority is not regulating access to the fishery, or monitoring the activities of vessels to determine whether or not they are operating illegally. Logbook requirements should be easily evidenced, by supplying copies of license conditions or other communications from competent authorities to vessel owners, setting out their vessel tracking requirements.	whether or not MCS authorities have effective implementation of log-books as a means of monitoring fishing activities. For example: a questionnaire has been developed that is being used to capture what data the source fishery's MCS regime is capturing, as well as the method by which it is captured. Where the use of logbooks is mandatory, then checks should be made to understand whether this data is being completed and	concludes that the use of logbooks is an effectively implemented element of the flag State MCS. Logbook data is being routinely used by the fisheries management enforcement	External	what requirements are in place to provide data on vessel position, cathor of target and non-target species and fishing effort to the following: -the vessel's flag State? -the vessel's coastal State (if applicable)? -the Regional Fisheries Management Organization where the vessel fishes (if applicable)  What other data requirements are in place of fishing activity by vessels that supply seafood in this contract?
4.3.2.1.c	Al sea inspections: Does the organization research whether or not vessels in the supply chain are subject to a regime of inspections by MCS authorities? Vessels should give information to the relevant coastal State or duly authorized RFMO inspecting authority regrainly vessel position, catches, fishing gear, fishing operations and related activities. The appropriate authority should be allowed to inspect the vessel, its license, gear, equipment, records, facilities, fish and fish products and any relevant documents necessary to verify compliance with coastal State rules and regulations or relevant RFMO conservation and management measures.	Risk assessment consideration	At-sea inspections are an important means to determine whether or not vessels are complying with fisheries laws and regulations. For example, actual catch can be compared with logbooks to verify the information, the fishing gear can be inspected, and the catch checked for the presence of endangered species and signs of shark finning. The lack of such inspections increases the risk that vessels are operating illegally. States often publicise fisheries patrols to increase their determent effect. Vessel companies can also be requested to share post-inspection reports when organizations are seeking to verify whether or not they take place.	Supply chains are mapped and knowledge of whether at-sea inspections are taking place is known for all source fisheries. Where at-sea inspections are happening, details are known about what information is being collected, i.e. togbook checks, fishing gear and inspection of catch, as well as inspections of the crew and labour conditions onboard. Where at-sea inspections are not happening, or they do not include any of the above, then advocacy should be happening or planned to occur.	Al-sea inspections are routine for all of the source fisheries within the buyer's supply chains. Evidence of the inspection regime and findings are routinely published by the flag State and advocacy to address deficiencies is either routine or completed.	External	At what frequency are vessels in the supply chain subject to at- sea vessel inspections by the coastal State, by parties to RFMOs in the high sea?  Can you share any post-inspection reports?
4.3.2.1.d	Observers: Does the organization research and ask for evidence that seafood is sourced from fisheries where observer programmes, whether electronic or human, or alternative measures have been implemented through national, sub-regional and regional observer programs in which the flag State is a participant? Information on observer coverage levels, or alternative measures such as increased inspections where observer schemes are not possible, should be obtained from an RFMO (where relevant) or coastal State.	Risk assessment consideration	To date, RFMOs have relied on human observers to monitor vessels at sea, collecting essential data for effective management. At many RFMOs, purse seine vessels require full observer coverage, while longline vessels require only 5 percent observer coverage. This minimal observer coverage increases the risk of IUU fishing going undetected. However, human observer schemes can be problematic due to the isolation of observers and the potential for corruption or intimidation. Although the presence of observers reduces IUU risk, this method should only form part of the risk assessment. Information on RFMO schemes related to observer coverage are sometimes published on the RFMO website, but this information tends to be limited and inconsistent.  In order to establish whether or not a coastal State scheme exists, organizations should request observer reports verifying copies of coastal State license conditions or other communications from competent authorities, such as regional observer program providers.  As managers, scientists and stakeholders recognize that more observer coverage is needed to ensure a sustainable seafood supply chain, electronic montroing (EM) has proven to be a vehicle to increase oversight. EM uses technology (cameras, GPS, gear sensors) to increase transparency and accountability of fishing activities, by collecting timely and verifiable catch information.	steps taken if issues are found, along with who pays and monitors the observers and ensures their findings are understood. Where deficiencies are identified, advocacy is planned or happening to address these issues and in the place of human observers enboard boats, adequate safeguards and communication protocols are in place to guarantee their safety and confidence to carry out their tasks without fear of reprisal.	Every fishery employed within the supply chain has an effectively implemented regime of observation that is human, electronic or amix. Data collected from these observations is routinely anonymised and shared publicly, so that seafood buyers are able to proactively monitor and verify for themselves the effectiveness of this element of the MCS, whilst also providing a deterrent to those within the fleet that might decide to flout the rules.	External	What requirements are in place by the flag State, coastal State or RFMO for human observers to be on the vessel(s)?  What electronic monitoring measures are in place on the vessel and what authorities have access to these records?
4.3.2.1.e	Where fish is identified to originate from a vessel that is flagged to a State or that fishes in the territorial or EEZ waters of a coastal s-M68tate that does not operate a national observer program, does the organization ensure that there is full chain traceability and that independent audits are completed at least every 12 months?		for details on full chain traceability	onboard observations (whether human or electronic) is either in process or completed. In addition, discussions with the supply chain about low-costs observation may be happening.	Supply chains with no regulatory sanctioned onboard observation protocol are employing an observation mechanism. Advocacy to the regulatory body is ongoing, encouraging the adoption of onboard observation.	Internal	
4.3.2.2	Where it is known that seafood or marine ingredients are sourced from vessels flagged to a State that is different than the State of nationally of their beneficial owner, is this regarded as increasing the risk of supplying illegal products?	Risk assessment consideration	Although there are many reasons why a vessel owner of one nationality may use the flag of a different nationality (such as access to quota or a genuine joint venture), the use of flags from another State increases risk. In some cases, 'lags of convenience' are used to avoid more stringent flag State controls exercised by the owner's State. As effective flag State controls exercised by the owner's State. As effective flag State controls exercised by the owner's State. As effective flag State fishing illegally, avoiding them increases risk. In addition, if an owner is based in a different jurisdiction from the flag, it can be more difficult to apply sanctions in the case of IUU fishing or human rights abuses. This reduces the deterrent effect of sanctions.	The beneficial ownership of all vessels supplying fish and seafood is known, their background is being researched, and where concerns such as different domicile status of owner to flag State is present, the reasons for this is being understood.	The beneficial ownership of all vessels supplying seafood is known, the vessels are listed along with this information on the global record and no evidence has been found that suggests any IUU activity in the past, or if present, is no longer present	External	What is the flag State of the vessel(s) supplying seafood under this contract?  What is the nationality of the vessel(s)' beneficial owner?

# PAS 1550 Implementation Guide

3.1 General		Required or Risk Assessment	Implementation Notes (for areas where industry feedback	Implementation of PAS/ PAS Compliant	Aspirational practice	Internal or external	Rewritten question (if external)
		Consideration	requested further detail)			question	
4.3.3.1	Does the organization undertake analysis of its supply chains and implement a system to enable it to identify the carding status of its supply chains?	Required	Market controls can help to establish the legal origin of seafood products. An example of a market control scheme to curb IUU fishing is the EU IUU Regulation 1005/2008.  Under this regulation, non-EU countries identified as having inadequate measures in place to prevent and deter IUU fishing may be issued with a formal warning, or a yellow card to improve efforts, or a red card for failure to curb IUU fishing. Ac company should implement a system to identify the carding status of its supply chains by first accessing IUU Watch, an aggregated source of information for EU carding decisions by country. For more information, including countries and their carding status, follow: <a href="https://www.luwwatch.eu/">https://www.luwwatch.eu/</a> .			External	What flag States, coastal States and processing States have responsibility for seafood caught in this supply chain?  Are any of the above States subject to an EU yellow card or red card? See: <a href="http://www.iuuwatch.eu/map-of-eu-carding-decisions/">http://www.iuuwatch.eu/map-of-eu-carding-decisions/</a> .
4.3.3.2	Does the organization require that vessels in the supply chain are not flagged to or licensed to fish by States that have been issued a red card by the EU?	Required	A company should require that vessels it sources from in the supply chain are not flagged or licensed to fish by States that have been issued a red card. To determine if the vessel is flagged to a State that has been issued a red card, a company can request the following information from their supply chains: -Request catch certificate information in accordance with the EU IUU Regulations, including fishing vessel name, flag State, vessel or IMO number, for example -Review and verify information on the catch certificate to determine compliance. This may include requesting physical inspection reports of consigned seafood products carried out by third country authorities -Reject consignments of seafood products if the vessel is determined to be flagged to a State that has been issued a red card. See www.iuuwatch.eu for more information.			Internal	
4.3.3.3	Are purchases made from fishing vessels flagged to States that have not notified a competent authority to the EU under the EU IUU Regulation?	Risk assessment consideration	A company should check that the flag State of the vessel(s) supplying them (already notified in other questions) are on the fist of countries that have notified the EU (to be used as a proxy for non-EU countries) of their competent authority and been accepted: https://ec.europa.eu/fisheries/cfp/illegal_fishing/info			Internal	
4.3.3.4	Where fish is sourced from vessels flagged to a State given a yellow card by the EU or fishing in a coastal State given a yellow card by the EU, is the organization able to demonstrate that there is a system that enables full chain traceability and that audits are completed at a minimum once every 12 months.	Requirement				Internal (using answers from previous question)	
4.3.3.5	If sourcing from these countries, does the organization research the reasons for the yellow card and, where it has access, record (and, where possible, support) efforts by the yellow-carded State to address these reasons?	Requirement	Seafood from a country that has been given an EU yellow card is at inherently higher risk, as less relance can be placed on efforts by the relevant government to manage fisheries. If organizations decide to continue taking supplies from them, and reliance is placed on government fisheries management measures to mitigate the risk of IUU fishing, then it is important to understand the reasons for the EU yellow card and the efforts being taken by the State to address those reasons. The EU publishes Statements when yellow cards are issued to explain the concerns that led to the cardings. In addition, organizations can contact NGOs and other stakeholders active in those countries, to gain an insight into what progress is being made.  If is also recommended that suppliers in the yellow carded country are contacted to discuss the reasons from the yellow card, to ascertain what is being done by the government to address the situation, and whether or not the supplier is playing a role in supporting any reforms. Organizations may also choose to individually or in partnership with their suppliers and/or NGOs, contact the authorities in the yellow carded country to encourage them to make relevant reforms, in order to ensure they can continue to supply from the country.  Through the above, a view can be formed regarding whether or not the yellow carded country to encourage them to make relevant reforms, in order to ensure they can continue to supply from the country. Through the above, a view can be formed regarding whether or not the yellow carded country's authorities are engaging proactively to address the sisues that led to the card. This in turn can inform the organization's view on whether it is advisable to continue to supply from the country or if new	and the reasons for any current red, yellow or green status of the supply source is understood, so that engagement with the third country government and the supply chain can be planned. The reasons for any current or previous EU cards are understood, and engagement with the third country	assessed by the EU, and deemed to meet all of the necessary conditions to continue with green or preferred supply country status. In addition, there is a mechanism/protocol in place that allows the suppliers within the supply chain to engage with the	Internal (however, may choose to contact supplier to obtain information on measures being taken by flag State in reaction to EU yellow card)	

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3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Implementation of PAS/ PAS Compliant	Aspirational practice	Internal or external question	Rewritten question (if external)
4.4.1	Seafood should not be sourced from any vessel(s) that appear on any recognized blacklist (those established by RFMOs). Is there a system in place to verify whether vessels appear on any of the available blacklists?  Other blacklists exist, but RFMO blacklists are the only ones recommended here.		A company should not source seafood from vessels that appear on recognized blacklists established by RFMOs. To determine whether or not a fishing vessel is listed, follow: https://iuu-vessels.org/			External	As a company, can you confirm that none of the vessels in this supply chain appears on a regional IUU black list. See: https://iuu-vessels.org/
4.4.2	Does the organization only source from fishing vessels that appear on authorized vessel lists where these are available for relevant coastal State EEZs and territorial waters or, where on the high seas, by the relevant RFMO?	Required	The FAO Global Record of Fishing Vessels, Refrigerated Cargo Vessels and Supply Vessels, maintains a record of fishing vessels, including their identity, history and authorizations to fish and tranship and, in the future, will also have a record of non-compliance for that vessel. This tool is intended to support risk assessment. Follow this link for more information or a list of vessels: http://www.fao.org/global-record/en/  Another useful database for searching if EU vessels fishing in the waters of a non-EU State have an agreement with that State is: http://www.whofishesfar.org/			Internal	
Does the organ	ization request the following information from suppliers to inform the Evidence that all qualifying fishing vessels (under IMO adopted resolution A.1078(28) and the latest version of Circular Letter 1886) in their supply chain have a unique vessel identifier (UVI) issued by IHSM&T on behalf of the IMO	r due diligence risk assessments? Risk assessment consideration	never reassigned to another vessel. This means that vessel name, ownership, records of non-compliance etc., can be recorded using these numbers. Once allocated, these numbers should be included on all relevant documentation including licences and authorizations, transhipment reports, landing requests/reports etc., to improve transparency of the supply chain. Difficulty arises where a specific country or RFMO does not enforce the use of UVIs or where auctions result in UVI number changes. Suppliers should request UVI records and if not available, consider that the supply chain is of higher risk.  Companies should advocate for the inclusion of vessels on	relevant RFMO. The vessels that qualify have IMO numbers in place, and those that do not, have been provided with UVIs by their flag State. Vessel ownership is known and checks are	Supply chains are fully transparent, with all supply vessels on public databases, on the global record, and flagged to countries that routinely update their submission of information to Global Record and RFMOs. Beneficial owners are known and vessels are third party certified to internationally recognised standards. Landings are made to parties of the PSMA or to countries that have a recognised high compliance and well implemented catch controls.	External	Do all qualifying fishing vessels have a unique vessel identifier (UVI) issued by IHSM&T on behalf of the IMO?  Where is this information captured, e.g. catch certificate, registration?  Can this information be made available upon request?
4.4.3.b	Evidence that those not qualifying for an IMO number have an alternative internationally or nationally recognised UVI. Such UVIs should remain the same for the entire life of the vessel, be marked on the vessel and appear on all related documentation including the catch documentation	Risk assessment consideration	public registers. This increases transparency and reduces the risk of IUU seafood entering supply chains.  IMO numbers can be searched here:  IMO numbers can be searched here:  Those for countries do not enforce the use of IMO numbers or they may not be enforced on vessels below a certain size. Therefore, alternative unique vessel identifiers (UVIs) may be required. Examples include CaribShip Unique Numberring Schemes, tuna RFMO vessel lists, High Seas Vessel Authorization Record, among others. Suppliers should request that a UVI and not just an IMO number, is included within the catch documentation.  The UVI should be collected for all vessels in the supply chain, such as when a transhipment occurs. The Global Dialogue on Seafood Tracealitify (GDST) Standard 1.0 includes these as key data elements (KDEs) to collect as part of establishing full chain traceability. The Core Normative Standards can be accessed here: https://traceability-dialogue.org/core-documents/gdst-1-0-materials/	for an IMO number and their UVI is not included on official documents such as bigbooks and landing records the company is able to demonstrate their their supply chain checks for the presence of UVIs on these documents and advocates for their inclusion and use when not present	Following advocacy for an extension to the existing IMO numbering scheme, all vessels, irrespective of size are included within the IMO number scheme and all official fishery management documentation cross-references and uses the IMO number as a matter of routine.	External	Do those fishing vessels not qualifying for an IMO number have an alternative internationally or nationally recognised unique vessel identifier (UVI)?  If so, what alternative UVI is used and can this information be made available upon request?  What assurance or evidence exists to support that UVIs remain the same for the entire life of the vessel?
4.4.3.c	Evidence that all fishing vessels in their supply chain have up-to-date authorizations and fishing licences issued by the relevant competent authorities. It should be possible to request this information from the suppliers and receive the information within 14 days	Risk assessment consideration	supplier would be able to secure details of such licences from		The supply chains are fully transparent, with all supply vessels on public databases, on the Global Record, and their fishing authorizations, current and historical, are available to be checked at will.	External	Do all fishing vessels in your supply chain have up-to-date authorizations and fishing licences issued by the relevant competent authorities?  How often are authorizations and fishing licenses reviewed/renewed?  If requested, could this information be provided within 14 days?



3.1 General		Required or Risk Assessment	Implementation Notes (for areas where industry feedback	Implementation of PAS/ PAS Compliant	Aspirational practice	Internal or external	Rewritten question (if external)
		Consideration	requested further detail)	·		question	
4.4.3.d	Evidence that vessel operators obtain confirmation directly from the coastal State and/or RFM Oth at authorizations and fishing licences have been issued and the dates they are valid for, and make this information available upon request	Risk assessment consideration	This ensures that the vessel operators have used the correct procedures to obtain the authorizations or fishing licences, and supports legality claims. If the company does not obtain this evidence, the risk of IUU fish entering their supply chain will be higher.  Where possible, this and other documents that support legality should be digitized and accessible to relevant supply chain actors and stakeholders. The GDST Standard 1.0 is an exemplar for how to digitize data to ease data sharing and increase interoperability between traceability systems. https://traceability-dialogue.org/core-documents/gdst-1-0-materials/	on supply chain vessel lists, they are being routinely audited to verify validity, and the key information they contain is present on publicly available vessel registers such as the Global Record. Where this information is not available, advocacy is planned or ongoing, encouraging this to happen.	Fishing vessel licencing and authorization information is contained on the Global Record and publicly available vessel registers maintained by the flag State. Copies of licences and authorizations are freely available for inspection by supply chain actors at will, for verification purposes with no evidence of concerns as to their validity being present.	External	Do vessel operators obtain confirmation directly from the coastal State and/or RFMO that authorizations and fishing licences have been issued and the dates they are valid for? Is there evidence to support this and can this information be made available upon request?
4.4.3.e	Evidence that vessel operators have obtained and documented a full list of all of the conditions of fishing licences and authorizations directly from coastal State authorities and/or RFMOs; including locations where fishing is restricted, gear use, crew requirements, observer requirements and any other conditions	Risk assessment consideration	This should be available upon request from the catch sector, who should hold licenses and authorizations together with their conditions. If catch vessels are not maintaining such records, there is a risk that they do not understand the laws and regulations they are meant to complying with, increasing the likelihood of them engaging in IUU. This should be factored in to risk assessments as the vessel is considered at higher risk.	Supply chain has provided license conditions for supplying vessels and these have been documented.	Suppliers are able to demonstrate to the company purchasing the seafood that the fishing vessel owners comply with the legal requirements, or RFVS certification is held for all supply vessels.	External	Have vessel operators obtained and documented a full list of all of the conditions of fishing licences and authorizations directly from coastal State authorities and/or RFMOs, including locations where fishing is restricted, gear use, crew requirements, observer requirements and any other conditions?  Is there evidence to support this and can this information be made available upon request?
4.4.3.f	Evidence that fishing vessels and the companies that own them pay their license fees to State bank accounts and not to agents, and that they provide documentation and evidence of this to the processor/importer if requested	Risk assessment consideration	This reduces the risk of a fraudulent license being used, as it avoids the possibility of obtaining a license from an unauthorized agency or corrupt official.  Evidence of paying license fees to a State bank can be in various forms, for example, receipts or bank Statements. Where vessels or the companies who own them are unable to supply such information, the vessel should be considered at higher risk of fishing illegally.	Fishing licences and authorizations are being collected for each vessel in the supply chain and questions about who pays for them and who issues them are being asked to determine whether agents and middlemen, rather than direct dealings with government bodies, is happening. The process through which vessel licences and authorizations are issued for the area in which the vessel is licenced and authorised to fish is known, and information on who is involved in the process is understood, as the presence of unauthorised agents/brokers and middlemen increase the risk of falsified documents.	Governments that issue licences and authorizations include the information in their submission to the Global Record and also publicise the information on their vessel register. All licences and authorizations are issued by a government body.	External	Who do fishing vessels and the companies that own them pay their license fees to?  Do they provide documentation and evidence of this to the processor/importer if requested?
4.4.3.g	Evidence that fishing vessels have a vessel monitoring system (VMS), automatic identification system (AIS) or other vessel tracking technologies that are continuously engaged while at sea and actively monitored by the coastal or flag State	Risk assessment consideration	The company should ask suppliers if these systems are in place on board vessels, the percentage of vessels covered, and the percentage of this data which is monitored. If possible, evidence of this data and monitoring by a third party should be requested.  Where vessel tracking technologies are not used or authorities will not release this information, the supply chain should be considered at higher risk of IUU fishing.	of VMS/ AIS. In addition to this, the protocols for VMS/ AIS use	supply chain to warrant fishing activity. Independent verification of the VMS and AIS data is being undertaken using data made publicly available. In the event that data is not made public, supply chains should advocate for an opportunity to secure	External	Do all fishing vessels have a vessel monitoring system (VMS), automatic identification system (AIS) or other vessel tracking technologies?  If not, what percentage of vessels have these systems and what percentage of this data is monitored?  Are these systems and technologies continuously engaged while at sea and actively monitored by the coastal or flag State?  Can this information be made available upon request?
4.4.3.h	Evidence that the vessels are in compliance with inspection regimes. This includes evidence that the vessel management: 1) accept and facilitate the prompt and safe at sea boarding by relevant coastal State inspectors or duly authorized RFMO inspecting authority; 2) cooperate with and assist in the inspection of the vessel conducted pursuant to an authorized at-sea inspection; 3) do not obstruct, intimidate or otherwise interfere with relevant coastal State inspectors or duly authorized RFMO inspecting authority in the performance of their dulies; and 4) allow the relevant coastal State inspectors or duly authorized RFMO inspecting authority to communicate with the authorities of the flag State of the vessel and the relevant coastal State during the boarding and inspection	Risk assessment consideration	Records of inspection regimes or inspection results can be used here to confirm whether or not these conditions are met. Inspections may include the following: Document checks Logbook Licence, variations and permits Fishroom plan Certificate of Registry Fishroom Assessment of catch Comparison with logbook Check weighing Working conditions Gear All gear in use should be inspected for compliance, and appropriate mesh sizes and dimensions checked, including some gear that is not in use. It is recognised that this information cannot be obtained, catch vessels should be asked to document why the evidence does not exist (either vessels are not inspected or the inspecting State does not issue inspection reports). Where possible, this explanation should be compared with other vessels or catch companies that operate under the same regulatory regime. In either case, where inspections do not take place or their results are not documented, vessels should be considered at higher risk. A company can check that the logs State of the vessel(s) supplying them are on the list of	All suppliers have confirmed their understanding and recognition of the value that vessel inspections bring, and that information is being collected, reviewed and assessed for vessels within the supply chain, to determine the validity and engagement with the inspection regimes. Where information is not available from either the flag State or vessel, the supply chain actors and stakeholders are advocating to the flag State that legal compliance regimes and engagement information should be shared with seafood buyers, and ideally publicly.	Flag States publicly share their legal compliance regimes, and which vessels are cooperating with them and which are not. Supply chains can demonstrate that the vessels they are buying from are cooperating with the published inspection regime and are able to demonstrate evidence of this when required.	External	What evidence is available to support that vessels are in compliance with inspection regimes?  Is there evidence to support that the vessel management: -Accept and facilitate the prompt and safe at sea boarding by relevant coastal State inspectors or duly authorised RFMO inspecting authority -cooperate with and assist in the inspection of the vessel conducted pursuant to an authorized at-sea inspection -do not obstruct, intimidate or otherwise interfere with relevant coastal State inspectors or duly authorized RFMO inspecting authority to communicate with the authorities of the flag State of the vessel and the relevant coastal State of the vessel and the relevant coastal State of the vessel and the relevant coastal State during the boarding authority to communicate with the authorities of the flag State of the vessel and the relevant coastal State during the boarding authority or evidence is not available, can you document why it does not exist, e.g. vessels are not inspected, inspecting State does not issue inspection reports?

#### **PAS Aspirational Practice**

3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Implementation of PAS/ PAS Compliant	Aspirational practice	Internal or external question	Rewritten question (if external)
4.4.3.i	Evidence that fishing vessels engage crew in decent conditions. Attention is drawn to ILO Convention C188 which sets minimum international levels for crew conditions on fishing vessels. The Convention will come into force on 16 November 2017	Risk assessment consideration	ILO Convention C188 sets out minimum standards for crew working conditions. For vessels flagged to a country that has signed and implemented ILO C188, risk of crew not having decent working conditions is decreased, as governments are bound by the convention to verify that vessel conditions and crew contracts are in line with its provisions. Where flag States have not adopted ILO C188, organizations can still request evidence that conditions and contracts are at the same standard. Information supplied by the UK to support UK operators complying with ILO C188 can be used as a reference for organizations seeking to compare conditions and contracts to the provisions of ILO C188. See:	The flag State has ratified ILO C188, employment contracts stating the employment and working conditions are in place for all vessel crew, and independent evidence of working conditions and employment is provided by 3rd party certification. Where this is not fully in place, advocacy is planned or underway to achieve the aim.	Flag States have ratified and implemented ILO C188, employment contracts are available for each crew member, and decent working conditions have been confirmed through 1st, 2nd or 3rd party audits and certification such as the responsible fishing vessel scheme.	External	What minimum standards are required for worker contracts and vessel conditions for vessels supplying seafood under this contract?  What labour inspections do vessels supplying seafood under this contract face by government authorities?
4.4.3.j	Evidence that suppliers (e.g. fishing vessel companies) have checked the references and background of vessel captains before they were hired	Risk assessment consideration	Organizations should ask suppliers what checks they undertake on the background of captains they employ. Where it is found that no checks are made on their background, including previous convictions for IUU fishing or human rights abuses, this significantly increases the risk of supplying from those vessels. It can be recommended that suppliers undertake these checks going forward to reduce risks associated with the seafood they are supplying in the future. Where a supplier undertakes checks on the background of captains, these can be verified on a sample basis during audit processes.	On request, vessel owners/managers are able to demonstrate that they are in compliance with the policy, providing evidence of background checks performed such as references from previous employers and searches of compliance histories of previous vessels captained.	An independent third party audit shows full compliance with this policy.	External	What checks are undertaken on the professional background of captains employed?
4.4.3.k	Evidence that captains who have been found guilty of IUU fishing on more than one occasion are not engaged and that those convicted on a single occasion receive extra supervision and audit	Risk assessment consideration	See notes for 4.4.3.j above. Where suppliers have a process in place to check the background of captains before they are hired, they should also have a policy setting out that captains with a history of multiple IUU infractions are not engaged, and those with a history of a single IUU infraction may be engaged but with extra supervision. The absence of such a policy increases the risk of seafood supplied by that supplier.	On request, vessel owners/managers are able to demonstrate that they are in compliance with the policy, providing evidence of background checks performed such as references from previous employers and searches of compliance histories of previous vessels captained.	An independent third party audit shows full compliance with this policy.	External	Are captains hired if they have been found to have been guilty of IUU infractions?  Are any additional corporate risk mitigation measures put in place if such captains are hired?
4.4.3.1	Evidence that captains or other persons are not engaged if checks find they have been found responsible for any previous human rights abuses	Risk assessment consideration	Where suppliers have a process in place to check the background of captains before they are hired, they should also have a policy setting out that captains found to have previously committed a human rights abuse are not engaged. The absence of such a policy increases the risk of seafood supplied by that supplier	As above	As above	External	Are captains hired if they have been found to have a history of human rights abuses?
4.4.3.m	Evidence that suppliers are not procured from if checks find they have been found responsible for any previous human rights abuses	Risk assessment consideration	See 4.4.4 below	Policy position is underpinned by internal due diligence processes, using information obtained through MCS information gathered in supply chain mapping, including searches for previous convictions relating to vessels owned by suppliers. Where compliance histories of companies are not available due to a lack of public information, this should be documented and advocacy to relevant States undertaken to publish information relating to compliance.	on supply companies, demonstrating that they have been assessed, and have not been associated with IUU fishing or human rights abuses. This is reviewed through audits.	External	What measures are put in place to make sure that seafood is not purchased from suppliers that have been found to have been associated with human rights abuses?
4.4.4	Where any of the above checks find evidence of IUU fishing or illegal working conditions, fish should not be sourced from those suppliers. Where suppliers are unable to supply one or more of the above areas of evidence, does the organization document as part of the risk assessment, the decision of whether or not to supply and what mitigating actions are to be taken?	Requirement	Organizations should have a policy of not buying seafood from a supplying company that has been found to have engaged in human rights abuses or IUU fishing. This information can be found through the due diligence process, including information requests to suppliers, third party audits, internal audits, internet searches and meetings with NGOs active in countries relevant to their supply chains. The due diligence process should also document where information or policies recommended above are not available and set out what mitigating measures, such as third party audits, internal audits, information requests from NGOs etc. are sought.	Policy position is underpinned by internal due diligence processes, using information obtained through MCS information gathered in supply chain mapping, including searches for previous convictions relating to vessels owned by suppliers. Where compliance histories of companies are not available due to a lack of public information, this should be documented and advocacy to relevant States undertaken to publish information relating to compliance.	Company has documented evidence of due diligence checks on supply companies, demonstrating that they have been assessed, and have not been associated with IUU fishing or human rights abuses. This is reviewed through audits.	Internal	

For example:
- ICCAT's IUU vessel list: https://www.iccat.int/en/IUUlist.html
- EU's IUU vessel list:
- titus://ec.europa.eu/lisheries/cfo/illegal\_fishing/info >
- Secondary legislation and official documents > IUU vessel list
- TMT's combined IUU vessel list: https://www.iuu-

3.1 General		Required or Risk Assessment	Implementation Notes (for areas where industry feedback	Implementation of PAS/ PAS Compliant	Aspirational practice	Internal or external	Rewritten question (if external)
		Consideration	requested further detail)			question	
4.4.5	Does the organization research vessels, companies and their beneficial owners from which it is sourcing seafood? This research should include verifying the IMO numbers for any new vessels entering a supply chain	Requirement	Organizations should request that suppliers provide a complete list of vessels that supply to them, including their full names, IMO numbers and beneficial owners. This information can be used to research vessel histories on online databases (see APPENIDIX). Where a large fleet of small-scale vessels are used by suppliers, and depending on the level of risk assessed in the supply chain, organizations may decide to use a sample-based approach to verifying vessel identities and histories through online databases.	check the history and background of the first tier owners of	The ultimate beneficial owners of fishing vessels that supply all seaflood are known, even if they are second or third tier owners identified through shell and holding companies. The ownership structure of all vessels is included within the flag State public vessel register and where mandated by it, also within the flag State submission to the Global Record.	External	Provide a complete list of all vessels used to supply seafood under this contract, including full names, IMO numbers and the beneficial owner of the vessel.
	Does the organization source seafood where this research finds evidence of vessels, companies or beneficial owners with a history of engaging in illegal activity?	Requirement	See 4.4.4	Policy position is underpinned by internal due diligence processes, using information obtained through MCS information gathered in supply chain mapping, including searches for previous convictions relating to vessels owned by suppliers. Where compliance histories of companies is not available due to a lack of public information, this should be documented and advocacy to relevant States undertaken to publish information relating to compliance.	Company has documented evidence of due diligence checks on supply companies, demonstrating that they have been assessed, and have not been associated with IUU fishing or human rights abuses. This is reviewed through audits.	Internal	
4.4.7	is the organization able to provide copies of the flag State fishing authorizations granted to fishing vessels whenif requested by any actor or relevant party? Evidence should be maintained in the supply chain about the use of VMS and a fisheries logbook by the flag State to monitor vessel activities	Requirement	Organizations should ask that suppliers maintain evidence of their fishing authorizations issued by relevant flag and coastal States, as well as relevant RFMOs. In the case of RFMOs and an increasing number of States, these can be verified by the organization through checking online lists of authorised vessels. In the future, the FAO Global Record will also be a resource where this information can be verified. Where these are not shared by States online, on a sample basis, organizations should ask that suppliers provide evidence, including licenses issued by flag and coastal States. Where the supply chain or competent authority are assessed as being high risk but organizations wish to continue to supply from them, then they should consider contacting governments directly to verify the validity of authorizations.	The company has the ability to access flag State fishing authorizations, or has them to hand so that it can assess whether the fishing vessel/company is complying with the authorization conditions.	Flag State fishing authorizations are available for all vessels within its supply chain and these authorizations are held electronically, which enables the company to interrogate and validate them at will.	External	Please provide copies of flag State authorizations for supplying fishing vessels.
4.5 Transhipm	ient						
	ization require that?						
	All transhipments in their supply chains are recorded, monitored and covered by an independent observer programme appropriate to the fishery?	Required	Unmonitored at-sea transhipments are a potential avenue for IUU-caught seafood products to enter the supply chain. There are currently different protocols for transhipment activity, each with differing levels of documentary evidence and observer presence required. The FAO is developing transhipment best practises, and organizations should be aware of their development, adopt them when completed, and encourage their supply chains to use them to aid consistent implementation. To ensure better reporting and more complete, uniform information, a company should request from relevant authorities throughout their supply chain, the following information: -Require all transhipment events be reported to the relevant flag, coastal, port State and RFMO Secretariat -Require 100 percent observer coverage (human, electronic or combination) -Require transhipment data-sharing procedures among relevant authorities (other ways to ensure coverage?)	fisheries and the status of monitoring, control and enforcement in each. Advocacy to governments and RFMOs is taking place, which includes the needs for 100% observation of transhipment and data sharing.	chain have access to transhipment data as they need it. "	External	What practices are in place to ensure transhipments in their supply chain are recorded, monitored and covered by independent observer programs appropriate to the fishery?
	vessel is checked to see if it is on the relevant authorized register for fish carriers?	Required		and their flag State is known or steps are being taken to achieve this.	All transhipment vessels are known and fully comply with their vessel authorizations.		Are all transhipments at sea relating to supply authorized?
4.5.1.c	Both vessels in the transhipment have uninterrupted VMS, AIS or other vessel tracking technology operating?			AIS and VMS is used on both vessels transhipping seafood within the supply chains, and where their use is not continuous, it is being actively advocated for.	interruptions, vessels are shown to meet the internationally agreed protocols of what to do in such an event.	External	Do both vessels involved in the landing and transhipping of fish operate VMS/AIS or vessel tracking technology?
4.5.2	is all of the information regarding any at sea transhipments made available to the end purchaser of the seafood in the supply chain (e.g. restaurant, brand)?	Required		Transhipment in the supply chain is understood and information is either being routinely passed to consumers or can be upon request.	Supply chains are transparent enough that information on the use of transhipment is known by the end buyer and they have confidence that transhipment is being carried out as required by their authorization and meets internationally agreed protocols.	Internal	

3.1 General		Required or Risk Assessment	Implementation Notes (for areas where industry feedback	Implementation of PAS/ PAS Compliant	Aspirational practice	Internal or external	Rewritten question (if external)
J. I General		Consideration	requested further detail)	implementation of PAS/ PAS compliant	Aspirational practice	question	itewritten question (ii external)
4.5.3	Does the organization check that EU IUU and other catch certificates provide information about any transhipments that have taken place? All required documentation and authorizations should be validated by appropriate authorities	Required	A company should request the following information on transhipments: -list of vessels involved in transhipmentslist of vessels involved in transhipmentsloetalis of transhipment e.g. date, area, positionAuthorization of transhipmentDetalis of transhipmentDetalis of transhipmentDetalis of transhipmentDetalis of transhipmentDetalis of transhipmentDetalis of transhipment	the need or use of transhipment within the supply chains has	All of the GDST KDEs and items listed in the implementation notes are available for all supply chains that employ transhipment within them.	internal	
4.6 Landing a							
4.6.1 General 4.6.1.1	Does the organization request the landing procedures and	Required	What measures can a company take to obtain landing	All ports of landing used within the supply chain are known.	All ports of landing used are in States which are either	External	What landing procedures are in place to determine the level of
	controls of the port of landing? This information should then be used in the risk assessment and due diligence process. The organization should assess and record whether ports are in States that are party to, and have implemented, the Port State Measures Agreement. Ports with records of non-compliance should be identified as higher risk.		procedures and determine the level of port controls? As a first step, a company can show preference for ports in States that are party to the FAO Port State Measures Agreement (PSMA), as these are associated with a lower level of risk of being entry points for illegal catch. A company should ask if the designated port in the port State is a party to the PSMA. If not a party to the PSMA a company should ask if the designated port in the port State is a party to the PSMA. If not a party to the PSMA a company should ask what is preventing the port State from joining.  A company should ask if records of port entry requests, denials, documentary checks and inspections are kept. If so, additional questions that a company should ask are:  "Are the records public?  1s there a protocol to notify foreign port authorities of such information?  1s an electronic information system used to collect, store and share this information?  1s an electronic information system used to collect, store and share this information?  A company should also request:  1the protof landing?  A company should also request:  1the requirements for vessels, particularly foreign-flagged vessels, in requesting access to port  1the processes by which authorities determine which vessels should be granted/denied entry into port or be selected for documentary checks and/or inspections  1the standards for documentary checks and physical	where relevant the ports are located within States that are party to the Agreement on Port State Measures (PSMA), and the company's suppliers understand what checks are being carried out on landings. Where ports are not designated within the PSMA, suppliers should advocate for them to be	members of the PSMA or are deemed by a third party to have implemented checks at port that are sufficient to eliminate IUL fish being landed. The regime used to check landings are publicised, as is a summary of the checks and their findings. Risk assessments routinely show the ports of landing have a low risk of IUU fish being landed through them, and independent third party inspections of the ports have verified this.		port controls?
	nization assess and record whether or not ports in their supply chain						
4.6.1.2.a	The port State competent authorities have resources that use a risk-based targeting approach to control	Risk assessment consideration	A company should ask if there is an IUU-related risk-based procedure for controls on vessels that request entry into port to land or tranship fish. A company should ask if the risk-based procedure is documented and if it is made publically available.	procedures, protocols and checks that are undertaken by the	Landing procedures at ports are publicly available, with summaries of the landing checks and their findings routinely being published and shared, so that other flag, port and market States along with seafood buyers, can assess the risks of buying seafood landed into and through these ports.	External	What are the procedures for controls on vessels that request entry into port to land or tranship fish?  Are the procedures documented?  Are the procedures publicly available?  If not, why are the procedures not documented and available?

3.1 General		Required or Risk Assessment	Implementation Notes (for areas where industry feedback	Implementation of PAS/ PAS Compliant	Aspirational practice	Internal or external	Rewritten question (if external)
4.6.1.2.b	The control systems in the port are appropriate for the volume of	Consideration	requested further detail)  A company should ask if the port is operating under or over its	·		question External	What percentage of vessels that land or tranship fish are
73.120	cargo and vessels	Non basessinan Constant addi	capacity. One way of assessing port capacity is to ask what percentage of vessels that land or tranship fish are subject to documentary checks or physical inspections.	they employ to check for IUU, a dialogue within the supply chain and the ports being used should be instigated, to assess a ports capacity to adequately cope with the volume of inspections required.	it receives, the findings of its inspections, and with whom it transmits and shares its information, so that other flag, port and market States, as well as seafood buyers, can assess the risks of IUU fish and seafood passing through its ports.	Extensión (	subject to documentary checks or physical inspections in port?  How are selections made for which vessels to check/inspect?  How were the vessels your company sources from selected for documentary checks/ inspections?  Which of the following are covered by checks and inspections?  *vessel identification, construction and registration documentation  *license and authorizations to fish or tranship  *catch and bycatch documentation  *processing and transhipment reports  *VMS/AIS systems in use  *type of fishing gear used  *type and volume of fish species  *crew documentation
4.6.1.2.c	There are enough inspectors provided at the port to be able to inspect the volume of cargo and vessels that the port handles	Risk assessment consideration	While there is no standard measure or guideline, a determination can be made by weighing the volume or port's capacity for cargo with the number of inspectors on staff. A company should ask if there is a sufficient number of inspectors for the volume of cargo and vessels. There is no standard measure or guideline, sufficiency is determined by the port State. When determining sufficiency, consideration needs to be given to the monitoring, control and compliance regime found in the source fishery, confidence level that the controls in the fishery are being met, the level of corruption within the port State, and technology employed that assists in targeting the inspection regime.	Enquiries should be being made to determine what checks are being undertaken at port and consideration given to assess whether there is sufficient diligence being made to IUU checks. The port check protocol regime is documented, publicly available, and considered to be sufficient to inspect enough landings to deter and pick up any IUU fish and seafood. Consideration given to RFMO Conservation Management Measures (SMMs) which may have more specific requirements, e.g. a percentage of vessels that need to be inspected. These requirements have to be at least met to be considered a sufficient level.		External	How many inspectors are available to inspect the volume of cargo and vessels that the port handles?
4.6.1.2.d	The port State competent authorities are able to demonstrate that they operate in an effective and transparent manner	Risk assessment consideration	A company can request if landing procedures, standards for documentary checks and physical inspections and records are public, and ask to obtain copies. A good resource on import controls and landing procedures that may be of use can be found here: <a href="https://eu.oceana.org/en/publications/reports/comparative-study-key-data-elements-import-control-schemes-aimed-lackling.">https://eu.oceana.org/en/publications/reports/comparative-study-key-data-elements-import-control-schemes-aimed-lackling.</a> It includes a list of key data elements that should be collected as part of a robust import control scheme. In addition, whether the country has signed to be a member of the Fisheries Transparency Initiative may be an indicator of risk.	Companies have knowledge of all landing procedures for each port into which their seafood is landed.	Landing procedures have been assessed and where deficiencies highlighted, a request to the port authorities to improve/address the deficiency has been made, OR all ports in the supply chain share their landings procedures publicly, each ports system has been rated, and its implementation assessed and shown to meet the FAO PSM requirements, which include public reporting of landing assessment summaries.	External	Are landing procedures, standards for documentary checks and inspection reports publicly available upon request from the port State through the supply chain?
4.6.1.2.e	All records relating the port State control are well-maintained and available upon request to the relevant authorities or actors requesting information	Risk assessment consideration	A company should ask if records of port entry requests, denials, documentary checks and inspections are kept. If so, additional questions that a company should ask are:  *Are the records public?  *Is there a protocol to notify foreign port authorities of such information?  *Is an electronic information system used to collect, store and share this information?  *How can companies and relevant stakeholders obtain copies of this information and landing procedures and controls at the port of landing?  This information should be available and therefore be furnished upon request.	Ports routinely share the data of their landing inspections with port and flag States so that the necessary information is available to them to take action on IUU where necessary.	Landing reports are sent electronically to flag and port States and there is an established public reporting of all landing findings summarised and routinely published.	External	Are all records relating to the port State control available to the relevant authorities and supply chain actors upon request within a given timeframe?
4.6.1.2.f	The port State verifies the catch documentation and maintains organized documentation and files/ records	Risk assessment consideration	A company should ask for catch documentation for landing or transhipment of fish from a vessell that can be verified through transhipment reports. Where these documents are not currently shared with purchasing companies, then a request should be made to both the flag and port State asking for it to happen.	Ports routinely share data on their verification process of catch documentation undertaken as part of inspections (see also above).	Findings summarising the results of catch documentation verification are sent electronically to flag and port States and there is regular public reporting of the summarised findings.	External	is catch documentation available and verified and reported by the port State authorities?
4.6.1.2.g	There are no recorded instances of bribery and any personnel found guilty of this are not permitted to work in the port	Risk assessment consideration		Using information from MCS questionnaires and enquiries to ports, the britery and corruption risk of each port or flag State country is included within determination of risk levels for each supply chain.	Information on bribery and corruption relating to supply States is publicly available, along with commentary on how this has been integrated into the risk assessment process.	External	Is there evidence of any recorded instances of bribery through enquiry or public documents including press? Is there evidence of any personnel found guilty of bribery through public documents including press?
1.6.2 Port Sta	te Measures Agreement	<u> </u>					

3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Implementation of PAS/ PAS Compliant	Aspirational practice	Internal or external question	Rewritten question (if external)
	Does the organization check whether the port(s) at which the seafood that they are purchasing is landed is located in a State party to the PSMAY If not, then the ports should be considered to be higher risk in the due diligence process.	Required	Check the Pew website for PSMA status and also check the accession documentation to determine whether the ports of landing used within the supply chain are actually included within the PSM ratification documents. If they are included, then they can be considered at lower risk, but if they are not included, then consider them at higher risk and ask the port State to include them. For more information about PSMA, visit: openfunds of the port of the	All ports of landing within the supply chain are mapped, the landing controls are understood, and where PSM ratification is desirable, then advocacy for this to happen is taking place.	All ports of landing are in countries that have ratified and implemented PSMA, are included within the ratification documents, or are in State and regional agreements with measures that are at least as effective as the PSMA in ensuring that vessels carrying IUU product cannot access ports.	External	is the port State a party to the FAO Port State Measures Agreement (PSMA)?
1 1	As part of the risk assessment process, does the organization seek evidence on whether or not the PSMA requirements are being implemented by the contracting party of the PSMA in which the port found in the supply chain is located? Evidence of non-compliance or lack of evidence of compliance should be treated as an increased risk of fish passing through the port being illegal	Both		the assessment deems checks are insufficient, advocacy is required to improve them or for the port to be officially	Information on compliance by relevant port States with the PSMA is publicly available.	External	Does the port State have designated ports for access by foreign-flagged vessels?  Are your ports of landing included in the list of PSMA designated ports?
4.6.3 Vessel in	port						
Does the organi	ization require that?					L .	
,	Crew on fishing vessels it sources from are free to leave port when vessels dock, as far as is permitted by the immigration laws of the port State	Required	A company can ask if crew are granted shore leave access in accordance with immigration laws of the port State.	Port visits and independent assessments verify that crew are able to leave vessels in countries where this is permitted. In countries where this is not permitted, advocacy is undertaken to address this.	Ports are used that allow crew the ability to leave vessels when at port to access health, religious and recreational services.	External	Are crew granted shore leave access in accordance with laws of the port State?  How is this verified?
	All crew are verified as present as per the crew list provided to the port State inspector, are in possession of their own work contracts and identification documents and are available for confidential interview if a request is made by the port State authorities	Required	In some countries, port in/port out inspections have been put in place to ensure there is no illicit incidence or swapping of crew whilst at sea. When the PSMA/ILO 188 and Cape Town Agreement are all in force, ratified and effectively implemented, there can be joint inspections that will verify this. If these 3 UN agreements are not in force for each of the supply chains flag or port States, then advocate for their implementation. A company should ask for crew documentation provided by the port State inspector.	Port visits and independent assessments verify that crew are in possession of work contracts and are available for port inspections. Where port inspections including confidential interviews are not being undertaken, advocacy is undertaken to call for this from the relevant State.	All crew are verifiably in possession of work documents and are checked on departure and arrival from ports. A sample of crew are periodically interviewed confidentially by port authorities to verify they are operating in decent working conditions. Verification of the above could also be demonstrated through independent third party audit.	External	Are all crew verified as per the crew list provided to the port State inspector?  Do you verify if crew are in possession of their work contracts?
	The captain is available at the port inspection and is able to provide all documentation and enquiries required at the port State inspection	Required	Pre-notification of arrival and landing should be made by vessels or flag States so that document inspection can be undertaken and outcome recorded. Suppliers should request a copy of these records relevant to their purchase from the vessel owner/supplier. Where they are not available, then a time-bound request for this information should be made to the supplier and also to the flag State of the vessel, asking that this is mandated as a customary practice. A company should request inspection reports that include vessel identification, construction, registration documentation, license to fish or tranship, catch and bycatch documentation, processing and transhipment reports, vessel monitoring systems, and/or automatic identification systems, lishing gear, fish species and quantities, safety certifications and crew documentation.		Pre-notification of arrival and landing is routine at all ports of landing within the supply chain, and these records are available for timely sharing with interested stakeholders, other flag and port States and they contain accurate information on all of the attributes detailed within the PAS guidance notes.	External	is the captain of the vessel able to provide all documentation requested by port State inspectors?  How would a company obtain this information?
	rking conditions in the fishing sector						
; (	Does the organization include in its policies and require from its suppliers that all of the major issues that are identified in ILO Convention C188 are addressed by source fisheries? These are essential to providing decent work conditions on board fishing vessels	Required	See 4.4.3.i			Internal	
	Wherever possible and relevant, does the organization demonstrate that it supports the ratification of the ILO Convention C188?	Required				Internal	
	Is traceability ensured down to vessel level to enable businesses with a turnover of over £36 million to produce their annual slavery and human trafficking Statement that covers what is being done in the supply chain to address the issue.	Required in UK	See 3.4.5. An overview of the traceability system can be set out in reporting issued under the Modern Slavery Act			Internal	





3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Implementation of PAS/ PAS Compliant	Aspirational practice	Internal or external question	Rewritten question (if external)
4.7.4	Has the organization developed and made public protocols that guide how and when it will inform statutory agencies of human rights infractions identified during audits, risk assessments and other internal reviews?	Required				Internal	
4.7.5	Have industrial fishing vessels had a social and ethical responsibility policy/standard that includes the points in 3.3.3?	Required	See 3.3.3	Vessel policy/standard obtained and documented for all vessels in the supply chain. These require conditions in line with ILO C188, or where there is a departure from these requirements, it is clearly documented and incorporated into the risk assessment.	3rd party certification is in place for ports, vessels and other places where people are employed within the supply chain, or the flag and port States have ratified and robustly implemented PSMA/Cape Town Agreement and ILO C188.	External	Please supply the policies and procedures relating to the treatment of crew members on fishing vessels supply seafood to this contract.
	person interviews with the relevant workers or crew, which are conducted in a neutral and safe environment, guaranteeing the security and anonymity of the interviewees?	Required where possible	Vessel inspections and audits are a developing area, so the PAS indicates that this is a requirement where possible. Importers/processors placing reliance on these in their due diligence systems should seek assurance of the following labour and interview standards for inspections, audits and checks:  'There is evidence of a standard operating procedure for inspections that includes worker interviews  'This SOP should be in accordance with international standards and follow a victim centred approach  'Inspectors should receive accredited or government/ILO approved training in conducting labour inspections/interviews/worker interactions. Certificates of completed training should be provided to the importer/processor  'Inspections should be conducted both on a scheduled but also unannounced basis in order to identify potential cases of FL & HT  'Inspection records including number, type and nature of the inspections, should be provided to the importer/processor on a quarterly basis  'Inspectors should use an interview questionnaire that is designed to identify indicators of forced labour and human trafficking as defined by the ILO  'Importers/processors should be provided with examples of completed questionnaires as part of baseline measurements inspectors/auditors agree to importers or processors conducting unannounced spot checks of inspection/interview procedures	Audits and port visits include confidential interviews with crew in a neutral and safe environment, guaranteeing the security and anonymity of the interviewees.	All vessels are subject to inspections under ILO C188 or are subject to a certification or standard that includes periodic crew interviews by trained professionals.	External	Please set out in detail what measures are in place to interview crew from vessels supplying seafood to this contract, to determine whether or not crew have experienced human rights abuses, violations of labour laws or any other legal violations.
Section 5. Fac							
<b>5.1 Informatio 5.1.1</b>		Required				External	Please set out what reporting mechanisms are in place for workers in factories processing seafood for this contract to report labour infringements, unfair working conditions or associated unlawful treatment. Have any specifications or codes of practice been agreed to cover these areas, and if yes, please share these.
5.1.2	Can information be provided to any other actor in the supply chain on the legality and traceability of a product within a maximum of four hours?	Required	Processors should be able to provide details on the following:			External	What information can be provided to any other actor in the supply chain to support the legality and traceability of a product, e.g., goods receipt, batch code, traceability records back to vessel?  Can this information be provided within a maximum of four hours?
5.1.3	for ensuring that information relating to legality and traceability is compiled, stored, reviewed managed and available for checks (e.g. audits)?	Required				External	Is there a designated person(s) at the factory responsible for ensuring that information relating to legality and traceability is compiled, stored, reviewed managed and available for checks (e.g. audits)?
5.2 Process C 5.2.1		Required				Internal	
5.2.2	Are product specifications, batch specifications, process monitoring, product testing, manufacturing site cleaning, and other quality control measures documented?	Required				Internal	

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3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Implementation of PAS/ PAS Compliant	Aspirational practice	Internal or external question	Rewritten question (if external)
5.2.3	Spot purchases without any knowledge of the vendor should be avoided and therefore not present in supply chains. The organization should ensure that all subcontractors meet all laws and are included in traceability documentation	Required	,			Internal	
5.2.4	Does the organization complete mass balance checks at their factory for its supply chains? These should be completed at regular intervals throughout the year; at a rate appropriate according to the results of the risk assessment and to satisfy internal due diligence but at a minimum of once per year. Accurate conversions ratios from production line should be used to make sure that the mass-balance is accurate					Internal	
5.3 Ethics and	I labour  Does the organization have a policy that addresses social and	Required		Supply chains are fully mapped and suppliers at all levels have		Internal (though	
5.5.1	Does the diginization have a policy line aduresses social and with a first expensibility (see 3.3.3, a) to g) for what to include in the policy)?	Required		supply cliatis are timy inapped and supplies at a ria even lave communicated their understanding of what is trying to be achieved with 1st, 2nd and 3rd party audits being targeted to those areas of the supply chain that are assessed to be of high and medium risk.		entals a requirement to share the organization's policy and its requirements through the supply chain)	
5.3.2	Does the organization apply this policy not only to the buildings and operations that it owns but also communicate that the behaviours outlined in the policy are expected of all the actors in its supply chain, from supplier to vessel operations?	Required	Policies that address social and ethical responsibility should be communicated to all actors along the supply chain. Where this cannot be communicated, (e.g. on some occasions suppliers do not know who they will supply from in advance, efforts should be made to communicate these policies as soon as the supply chain is established.  There should be a mechanism in place that allows communication of these policies and standards to the potential suppliers of seafood from new sources. This can help inform a company's sourcing decision and it helps the supplier determine if it can meet requirements now and in the future.	supply chains by exception, employs a risk-based approach to assessment to allow supply to occur, but outside of that the	Supply chain is well mapped and the policy has been in place for a sufficiently long time that 3rd party audits and certification of all supply chain options are known and understood, irrespective of volume and value being sourced.	Internal	
	Does the organization ensure that at any of its factories, a review of its ethical and labour policy and systems is completed at least once per year to ensure that it is addressing current industry concerns and that it comples with any changes to the industry and supply chain requirements.	Required				Internal	
5.3.4	Is there a designated person(s) at each factory to ensure that workers are being treated ethically and that labour rights are being upheld? Translation services should be provided for migrant workers to facilitate effective communication	Required				Internal	
5.3.5	Are grievance mechanisms in place that allow workers to report issues and any cases of abuse anonymously without being put at risk of negative repercussions? Any grievance report should be investigated as a priority, in a fully transparent manner and by including the relevant union representatives — or in cases where this does not apply — by involving NGO representatives in the review process	Required				Internal	
5.3.6	Does the organization promote robust labour standards with respective governments in the form of legislative frameworks that support workers – local or migrant labour – in their right to organize and collective bargaining?	Required				Internal	
5.4 Product tr	acking and transformation						
	Where a fish product, unit, or batch of fish products, originates from multiple source fishing activities or fisheries, is there identification and tracking of products from each source that enable products at final sale to be traceable to a single source and activity? The fish product or batch identification should be grouped or associated in ways to allow verification of legal compliance and of claims related to sustainability or fishing methods		Seafish lists UK regulations pertaining to labelling, marketing and more: <a href="https://www.seafish.org/trade-and-regulation/seafood-traceability-and-labelling-regulations/fish-traceability-requirements/">https://www.seafish.org/trade-and-regulations/fish-traceability-requirements/</a> .			External	Are there any fish products, units, or batches that originate from multiple source fishing activities or fisheries?  How are these products traced, e.g. electronic traceability system, from a single source and activity, e.g. vessel, to final sale?  Is this information subject to external verification or regular independent audits?
5.4.2	Are unique unit identifiers present at each level of the packaging hierarchy (e.g. from a pallet, a case or a consumer item)?	Required				External	Are unique unit identifiers present and consistent at each level of the packaging hierarchy, e.g. from a pallet, a case or a consumer item?  How are these unique unit identifiers documented and tracked, e.g. electronic traceability system?



3.1 General		Required or Risk Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Implementation of PAS/ PAS Compliant	Aspirational practice	Internal or external question	Rewritten question (if external)
	When a product is combined with other material/ products, processed, reconfigured, or re-packaged, does the new product have its own unique product identifier?	Required					When a product is combined with other material products, processed, reconfigured or re-packaged, does the new product have its own unique product identifier?  How are these unique product identifiers documented and tracked, e.g. electronic traceability system?
	Is the linkage (auditable function) maintained between this new product and its original inputs to maintain traceability? For example, a label, linked to the lot identification of the traceable input item, remains on the packaging until that entire traceable unit has reached the final point of sale	Required					Is the linkage maintained between a new product at final poin of sale (refer to 5.4.3) and its original inputs, e.g. lot identification of original input?  How is this linkage documented to maintain traceability?  Is this documentation available for external verification or independent audi?



Section 3 Mar	agement						
3.1 General	agement	Cross-over with RFVS	Cross-over with APR	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice
3.1.1	Does the organization have systems in place to manage critical aspects of legality These chards comply with requirements such as the EU LIUR Regulation, relevant policy, standards and abour conventions. These systems should include traceability, processes, information werification and transparency.	The vessel, or group of vessels must have a management system in place to ensure compliance with legal requirements (see CP1 section 1, 3 and 4).	ANNEX C- RP 895.01 & RP 895.02	A company should have systems in pince to manage critical aspects of legality, Mar comply selbs EU IUU Regulation, relevant placity, schaduck and labor connections. These systems should include:  "Traceability" have placed purity mesagement system conflication such as BRCUFS will halp to "Traceability" have played by an an place, as will MSC chain of custody, although these do encourage control of the contro	the supply chain to transition/improve supply chains that have been risk assessed and identified as in end of improvement. The policy is communicated be all supplier, and basis procedures to check product, supply chain (including EU IUU Regulation catch certificates), vessels, and suppliers are legal as far as it is practical to check.	A management system is in place that includes processes to manage information verification and unaceability. Where practical, a 3-for party and of management system (e.g. BRC, EPC or GSA) or processing standard are in place, to ensure traceability. The company is a member of GDST and is working with suppliers to capture the relevant NDEs.	Full supply chain transparency is achieved with public reporting of policy, practices, supply chains. Full supply chain reporting traceability using the GDST data requirements.
8	Do the managers of the organization engage on improvement work with other suppliers or actors in the supply chain (e.g. audits, reviews, site visits, etc.)?	The RFVS provides a mechanism flrough which downstream buyers in the supply-chain or engage with finiting seases to improve repositiob practices. The RFVS could be used within a vessel improver programme to support and educate failures wishing to adopt best fisheries practices.		the supply chain by:  Conducting audies and reviews  Conducting regular safe views  Conducting regular safe views  Conducting regular safe views  specifically faciled but relevant issues, supporting research, and advocating for legislation adoption and effective implementation	As to containing all products and stock keeping unstalffulls is available within the business, which deals business. Sufficient information is uncertained to support the product of the	The company seafood sourcing policy is formally acknowledged by all suppliers. The list of in products and suppliers has been risk seases and categories on the high, medium of succording to the company policy, with high risk products and high risk suppliers having either trainfarmer. Audits of high risk supply chains are taking place, ideally using filled parties, or are being arranged.	majority of sources are low or medium risk. All suppliers are working to achieve sustained low risk categorisation with routine risk assessment and monitoring systems established to
3.1.3	Where improvement work identifies corrective actions that can be completed to satisfy the organization's standards/policies, is support (e.g. approval/verbal, finances, time, meetings, etc.) given to the supplier or actor?		6.3, 8.2, 9.2- RP B95.01	Support in the form of approval/verbal, finances, time, meetings, etc. should be given to the supplier or supply chain actor in need in need of corrective actions, in order to satisfy the organization's standards/policies. Evidence of this support should be able to be provided upor request.	As above	As above	As above
	Is all seafood in the supply chain of the organization addressed using the same systems and level of scrutiny? Traceability and legality should be a minimum requirement for all seafood.		2- RP B95.02		A process is in place which is actively trying to achieve the same level of traceability, based on arisk assessed basis, for all sources of seafooth that are within the scope of the policy. The scope might initially be limited, so that the process and practices of mapping and supply chain interrugation are being establishment. When defining the scope of the sourcing policy, consideration of volume of trade and potential influence on the supply chain should be made.	The established policy has been expanded to include all sources of seafood whether for direct human consumption, as a marine ingredient, or other route to market.	All seations within the scope of the company's seations buying is either assessed as bing; buying its either assessed as bing; buying its hardy seat of the same to be achieved in a time-bound commitment.
	Does the organization document which of the products they set are covered by the EU/IUI Regulation?	The vessel shall be able to evidence at the legal documents required to fish (see clause CP1 128). This will meet the requirements of the EU I/U/Regulation.		IAU Regulation within their buying specifications and their suppler approval files. These includes.  Offers and not decrea, wild marrise capture fishery products, both whole and processed reflects that the description of the EU including catches made by non-EU vessels landed directly in an EU port, or landed in a third country not and subsequently exported to the EU, whether processed for ord consecution of the EU, whether processed for not exposed catcher made by EU vessels, based and imported in a third country and from their imported in the EU, whether processed or not description of the EU whether processed or not descript from EU, indige flower with a collect including those with a catcher clientified frequired by a third country. More information on the EU to U.R. regulation can be found at 1 the flowers as wealth number.	within as that a time as possible they know which products all under the EU IUU Regulation. Then with new all legal regular distinctions claus. In species resume, fully againstread, so the second production of the second products and the second products and determine which regulations apply to the products.	used to supply, vessel identifiers, flag, landing portis, and details of any transhipment.	Best practice information is routinely available with additional information documenting declared retained catch date quantity and product from per box. both not lank, as well as declared retained catch date quantity and product from per box. both not lank, as well as declared decembers, providing full supply chain transparency.
	covering the requirements of the EU IIIU Regulation (if sold)?	As above, the vessel shall be able to evidence all the legal documents required to fish (see CP1 clause 1.28). This will meet the requirements of the EU IUU regulation.	3.1, 6.1- UNE 195006	A company should have management systems in place that cover the requirements of the EL IUI Regulation if sells any of the products covered by this Regulation. Management systems will include traceability system and policy, incoming raw material bit assessment, and performance reporting which specifically covers IUI rehield topics such as ports of landing, timely presentation of catch certificates, cross checking UVIs.	Full supply chain traceability is desired and stated within a sourcing policy that is communicated to suppliers. Information no bits seadood sources and people involved within the supply chain should begin to be collected either by the buyer or its supplier, with a system being developed to manage and assess the information being collected.	Traceability systems capture all steps of people, product and process through which the seafood passes or is handled, as well as colating calcular certificates for species covered by the EU IUU Regulation. Verification of this information happens routinely via internal or third party audit, which forms what actions need to be taken to be able to continue sourcing products of high risk.	All products are sourced using an established monitoring system that collects information on the seaflood and people involved in the supply chains, with data collected in accordance with GDST KDE principles. All products are classified as low risk for IUU and labour risks by third parties.
3.3 Policies and 3.3.1 General	d Processes		3.3 6.1 & ANNEX J. LINE 195006				
6	Are documented profices and processes in place that provide requirements for full chain traceability to be ensured?	CPT Clause 128 requires the following traceability information to be captured; vessel in demonstrating and stock, see are code of explare, the Spitch, firthy tip dates (rockding landing date). Declared retained catch date quantity and product form in box. Such (rockding landing date). Declared retained catch date quantity and product form in box. Such consequence of careful and goal. Trans-eleptoned taken, name of careful dates and catch consequence declare.	ANNEX D-RP 886.02	The PNS 1550 defines full chain incondelity as the "imaging from the point of capture to the consumer of one stage of production at all miss, man ay stage of production to any other point along the entire supply chain (often through documentation)". In other words, capturing product fermation that miss at all every size of the supply chain from west for trader. Full chain traceability policies and processes should cultime but are not limited to thor risk is assessed, type of date capturing, therepany of data coelculor, data coelculor, and of coelculor, and of coelculor, and coelculo	Supply chains are in the process of being napped with information of vessel isometimes, species name, FAC both, and sub area of clopper, lag State, Instity of other, including landing date, being collected. The bot that the information is required to be collected is stated in a company sourcing jobby or specification that has been communicated to all supplies.	In addition to the base requirements that are supplied for all purchases, supply chains are (My imapped and declared, including relatined such data) quantly, and product from in box, but her base, plus fairing method and gear. Transhipment dates, name of carrier, dates and and and reachability systems are in place and MDEs using the GDGT Standard are being collected.	All information required in least practice is provided by supply chain in a limely and transparen manners that this provinces to the CDET follow standard. The whole supply chain is transparent with people and seatoful interactions fully understood and verification validation providing transactivities and consciously and complete the completion. Digital transactivity system is in place providing transactivity at with.
3.3.1.2	Are policies and processes audited and have the contents reviewed on, at a minimum, an annual basis in case changes or amendments are required to be made?	Management policies and procedures are broadly covered in Section 1, CP1 changes will be reviewed at annual surveillance audits.	6.2, 7, 8.1.1, 8.1.2- RP B95.01		A seafood sourcing policy is in place that makes reference to the company ambition that both it, and its implementation, will be reviewed and audited on an annual basis.	Policies and processes are audited annually to ensure that the assessment of IUU risk within the supply chain is sufficient to manage risk.	
l i	Are reports produced (at least annually) on the implementation and monitoring of the policies and processes that are in place to address risks?	The RFVS CP1 section 1 expects that a annual review of their processes are conducted annually and reports are maintain and any non compliances are identical and mitigated against.	ANNEX C- RP B95.01 & RP B95.02		As above		Policies and processes are audited annually to not only assess the assessment of IUU risk within the supply chain, but also to assess the implementation of the risk mitigation improvement processes.
3.3.1.4	Are policies and processes available upon request and made available to other actors in the supply chain within seven days of such a request being made?	Not an RFVS requirement for fishing vessels. However records of all vessels that meet the standard shall be placed on a publically facincg GSA website.	Not an APR requirement, but all vessels that meet the standard shall be placed on the web AENOR APR		The company has a seafood sourcing policy that is communicated to suppliers and available to customers upon request, with basic processes to assess suppliers.	The company seafood sourcing policy is communicated to and acknowledged by suppliers, with a functioning process to assess suppliers and their supply chains.	The company seafood sourcing policy and its processes for assessment are well established, customers know their suppliers' supply chains, and are aware of the work being undertaken within them.
ŧ	Are policies and processes demonstrated to have been communicated throughout the supply chain to, at a minimum, the stage before and the stage after the processor/importer?	Not an RFVS standard requirement for fishing vessels.	2- RP B95.02  ANNEX C- RP B95.01 & RP B95.02	good practice to ask suppliers to acknowledge that they have received and understand the policies and procedures, and that this is documented. Clarifications should be provided in the event that suppliers indicate they do not understand policies and/or procedures.	and shared with direct suppliers and customers can be shown.	Acknowledgement is received from both suppliers and customers that the company policies and procedures are understood and complex with. Policy and procedures are reviewed on a minimum annual basis and confirmation that they are understood by suppliers is in place.  All seafood supply chains are mapped and the relevant legislation applicable to each of them.	Purchasing polices and procedures are documented, regularly, reviewed and form part of a suppler management process that is independently assessed and demonstrated to work. In addition, purchasing policies are distributed and acnowledged by all stages and actors in the supply chain.  Leoislation associatable to each source of seafood is known and if it is not fully intelemented.
2	Is the organization able to demonstrate compliance and implementation of all of the required regulations, conventions and standards (dependent on the supply chain and market)? ence through risk assessments	The RFVS certification audits provide the mechanism through which assurance is provided.	ANNEX D- RP B95.02	It is the responsibility of any organization to understand and observe the laws and regulations in any territory in which they operate. The recommendations in this PAS help an organization to gain this understanding in relation to the legality of seafood and the working conditions of workers in the seafood supply chain.	supply crain is oring mapped to an seatood sources, which includes the desire or understand the performent local institution, regional, and international legislation applicable to the seafood, so that in time the legality of the seafood harvesting and employment practices being employed can be warranted.	is known. Steps to assess the quality of regulations in place and level of implementation is in	Logistation application to each source of seather to advantage in it is not ruly implemented, government aboved by the injurious destination to address the regulation issues, or steps have already been agreed to ensure full regulation implementation will occur in a known timescale. RFVS certification of vessels is widely adopted within the supply chain.
	Ones he organization conduct risk assessments on at of the supply-chains from which is sources to able to demonstrate that it does so? The level of risk in supply claims can be reduced by deathlying and shap inglistion contained to the state of the state of the state of Advisory Mole for the LMS Supply Chain on How to Avoid ULU Fabery		5.3-RP 895.02	A company should complete due dispunce through risk assessment on all of its supply chains. The level of this supply chains can be neduced by feelinging and taking migration actions or measures such as mandating future requirements or engaging in improvement processes with the supply chain. A company boding from the sure deeth supply chain. Reading and assigning merics that will evaluate results against factors such as the level of randows and assigning merics that will evaluate results against factors such as the level of randows and company. The risk assessments system should demonstrate and document that for each supply chain. The risk assessment system should demonstrate and document that for each supply chain the results of the results of the results of the results of second to the results of second to second to second second to second to second se		All seaflood supply chains have been imaged, risk assessments have been completed for all, when risk categorisation made and in the case of high risk source, incrovement plans agreed. Consideration to volume of seaflood plany chainsel from an individual source, and confedence in regulation of the supply and of the supply and risk regulation of the risk source seaflowers are supply to the risk source seaflowers and the supply and the supply that can be tabled.	All seathors supply chairs have been risk assessed on numerous occasions, all periously seasessed high risk cause have either handlight of are not supplying period seasessed high risk and the majority of sources being considered low risk.
3.3.2.2 E	Does the organization prioritize its use of each supply chain from which its sources according to the findings of the risk assessments?		5.3- RP B95.02	Companies should conduct risk analyses to help innimize and militagine their risk of ULU fait metring their supply drains, importating similar for assured traceably to legal origin. See example risk assessment to determine appropriate action. Where the risk assessment produces a moderable to high risk of ULU or information is missing, the sourcing decision should reflect the level of risk.	The seafood sourcing policy includes a statement that the company endeavours by purchase seafood from the visidov impact sources and imp to more its sources and oblying over time to achieve this. The sourcing policy has been communicated to the company's suppliers.		Advocacy, activity is well established with high and moderate mis source issues hirrly been addressed through complication of their improvement plans, or are also indemnstrate confined commitment to change. Where emprovement plans have been shown to not yield change, the company can show that purchasing volumes have been reduced or buying stappended.



3.1 General		Cross-over with RFVS	Cross-over with APR	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice
3.3.2.3	Does the risk assessment system demonstrate and document that for each supply chain an assessment and any required actions have been applied, that are appropriate according to the results of the risk assessments and prioritization exercises?		ANNEX C- RP 895.01 & RP 895.02		The safetod sourcing policy includes a statement that the company enderwors to purchase seasofor from one inflow impact sources and miss to move its sources and buying over time to achieve this. The sourcing policy has been communicated to the company's suppliers.	sources, and plans are being developed for low and middentale risk sources where improvements need to be made. Where risk assessments have been completed on numerous occasions or improvement plans are not yielding the desired change, the company can demonstrate fall these factors influence songing buying decisions by communicating to the governments and relevant supply chain actors, that continued reaction could lead to a reduction in vulence opurchase, or in setter cases the cassion on buying altogether - whether individually, or as part of a government led trade sanction.	Advocacy, activity is well established with high and moderate risk source issues having been addressed through complicion of their improvement plans or are able obmorastate continued commitment to change. Where improvements plans have been alroan to not yield change, the company can show that purchasing volumes have been reduced or buying suspended.
3.3.2.4	Are risk assessments reviewed on a regular basis (e.g. monthly sensule), seensule, dec.) deporting on the level of risk, of 4 something changes? The risk assessments and the review of the risk assessments and size-monthly for supply chains shortflood as higher risk.		7- RP 895.01 5.3, 5.4- RP 895.02		The seaflood sourcing policy includes a statement that the company endeavours to purchase seaflood from the richard protect process and man to move the course and outgroup con- tractions are seaflowed to the communication of the company's suppliers.	improvement pines for all high risk sources are in place and risk assessments understaten on a six or 12-month basic despondent upon he eved of risk definited. Overment and inclusivy absocacy in Supposeng (and which you are bloowing and engaging in where practically for high risk sources, and pines are being developed for the set and moderate high sources where his sources where the number of the source where the company can demonstrate that these floctors influence energing buying declarate, by communicating to the governments and relevant supply chain actors, that construed reaction cools lead to a reduction in videous floatings, the production in videous floatings, and the source are sourced to the source of the source.	Rola assessments are able to show hat over time, and with netablished advocacy, activity, in light and moderate in Source assess having been addressed, giving amoration to lover its given and the state of the source and the state of the source and the source of the continued commitment to change. Where improvements plant have been reduced or buying suspended.
3.3.3.1	Has the organization established and uses policies, practices and confidential reporting and assurance systems at every worker facility in all countries where fisheries products are sourced? This should allow all workers to have the ability to report labour stringements, under working conditions or associated unlawful treatment as necessary.	Clause 2.20 requires a a grirerance mechanism halpifre telephone number(s)/website details shall be displayed in a crew-accessible location on board the vessel.	195006		The commany recognises and understands the need for decent working conditions, it is mapping the supply-than to laterilly there is policies need to spey), and has policies in place that outline this ambition and those policies have been communicated to suppliers one step down the supply chain.		Company policies are shown to be working properly, with all supply chain actor's frown and proactively participating in policy implementation, assessment and remely. Confidence reporting mechanisms have been made available to all employees within the supply chain and demonstrable steps able to be shown that remely issues found.
3.3.3.2	is each of these systems supported by a transparent process available upon request as part of supply chain audis, and be equally applicable for workers with or without union representation?		Collective Bargaining: ANNEX E- UNE 195006	A company should be able to request and view the processes in place at any point along the supply chain, which resure that workers were the ability to report labour infringements, unlawful treatment, etc. Where the company, is not able to bothen evidence of such processes, this lock of information should result in the company receiving a higher risk rating and mitigating measures undertaken.	the supply chain can be assessed.	The buyer of the buyer's representative agent has unhibited access to an established recipient my which receive within the superior and the superior and the superior and superior and the superior and the superior and the superior and the superior and where labour infregments etc. are happening. Further to the reporting mechanism, mitigating measures are being taken to remedy any assues found.	Independent assessment and reporting of the seafood supply chain work places is taking place, with a system in place that can remedy any issues as they are highlighted.
3.3.3.3	Are confidential reporting processes established and maintained with associated policies and practices embedded throughout the corporate culture led at senior board level?	Clause 2.19 requires a policy and procedure shall be adopted by the skipper/owner that shall prohibit any form of bullying or physical abuse of a crew member.	Not an APR requirement yet		The company policies and processes should at a minimum establish the ambition that confidential reporting processes should be put in place where supply chain mapping and interrogation highlights that they are not already there.	Confidential reporting processes are established and maintained in all tier one supply chains and work is ongoing in tier two and three suppliers to achieve this.	Confidential reporting processes are established and maintained in all suppliers within the company's supply chains and evidence to support this can be provided.
3.3.3.4	Are all complaints from workers dealt with objectively and confidentially from/shedpender and impartial reviews leading to a remedy where applicable? These remedies should end the inflamment, until a verificial condition or associated unitwish treatment and provide retraspective framerical compensation to the worker and referral to legal authorities where individuals have broken the law. Complaints and associated remedies about the obscured and available for external scrutiny, with sadiquants falselin to protect the featurity of victims.	Cause 2.17 States that There shall be effective crier given acros and disciplinary procedures in place, governing how inestigiations relating to cree given areas that be conducted, including the process of how investigation outcomes shall be clearly communicated to difficult crier member(s).	Not an APR requirement yet		The company policies and processes should be a minimum establish the architors that confidential importancesses should be in place where supply chain mapping and interrugation highlights that they are not already there.	Complaints from workers can be shown to be dealt with objectively and confidentially.	Confidential reporting processes are established and manifest and as suggiers within the company' supply-chairs, endress is an oping practice where required, and evidence to support what action has been taken can be provided.
3.3.3.5	is social responsibly addressed explicitly in the policies and processes of the organization, by including as a minimum?  Headorn of association.  Florand babour:  Florand babour:  Florand babour:  Floring babo	Alcovered in Core Principle 2 of the RPVS, except requirement for equal remuneration.	S & ANNEX E: UNE 195096				
3.4.1	her records of traceabily sept that demonstrate whether of a product originates from a source where residue varieties on spage (see present configuration, foresting, catch documentation and complience records) is available If it is an algorithm to the completion and the completion of steps to find provide the standard of the standard or the completion of steps to executely the situation.	Clause 1.20 requires traceability information to be recorded during the trip and available at the good of landing.	ANNEX C- RP 895 01 & 02 ANNEX D- RP 895.02	The Father of Fish, is collaboration with FathNer, Global Food Taccability, Center and WMS developed a preliminary globe for fluidary ventring burster fails from Inscalably; https://links.inschub.com/pie/content/spicast/2018/03/OSM-Trace-Colab_Takeg-the-Fris-Steps-Towards-Geolobo-Trace-Balley pdf This global for the Steps-Towards-Geology of Towards-Geology of the Steps-Towards-Geology of th	The company has a selfect succing policy that establishes the need for traceability of its section products on a lost earth hash, so like locatival and sessement of food selfsy, sustainability, liabour and associated environmental impacts, including avoidance of IUU by warranting that it is caught legally.	Supplies we providing lef or batch traceabily information that allows the sourcing company, to assess and verify the cereficiate of the second cell is buying. The information supplied should be provided in a formal that conforms to the GDST KDEs. For IUU catch documentation, the links and references within this document should be consulted.	A fully digited electroshibly system is in place, giving secure, end-to-end traceability of the KDEs in a format complaint with the GDST standard.
3.4.2	Does the organization complete data (or data system) verification exercises to verify the authenticity of data entering the traceability system?	The traceability system on the vessel would be verified at each RFVS audit.	3.3, 6.1 & ANNEX J3,9- UNE 195006 ANNEX C- RP B95 01 & 02 ANNEX D- RP B95.02		The company has a seafood sourcing policy that establishes the need for traceability of its seafood products on a lot or batch basis, to aid its control and assessment of food safety, sustainability, labour and associated environmental impacts, including avoidance of IUU by warranting that it is caught legally.		A fully digitised e-traceability system is in place, giving secure, end-to-end traceability of the KDEs in a format compliant with the GDST standard.
3.4.3	Does information gathered, stored and processed on traceability enable full chain traceability to be assured transparently?	n/a - this would depend on the supply-chains sourcing from RFVS vessels. It is not explicit in the RFVS standard how key traceability data (see clause 1.26) will be captured but will ensure it is available if the supply requires it.	ANNEX C- RP 895.01 & 02 ANNEX D- RP 895.02		The company has a seafood sourcing policy that establishes the need for traceability of its seafood products on a lot or batch basis, to ad its control and assessment of food safety, sustainability, about and associated environmental impacts, including avoidance of IUU by warranting that it is caught legally.	Through a combination of routine and spot-check traceability audits, the company is able to verify the accuracy and authenticity of some, if not all of the data provided by its suppliers, and it is actively exploring how this information can be automatically captured and shared with its customers or other stakeholders.	A fully digitised e-traceability system is in place, giving secure, end-to-end traceability of the KDEs in a format compliant with the GDST standard.
3.4.4	Are all traceability systems, and all claims based on them subject to external verification mechanism and regular independent audits? Traceability data should be accessible during verification checks and audits.	Yes - Rey would be verified on an annual basis through certification and then surveillance incides.	33, 6.1 ft. ANNEX J.S UNE 1950006 ANNEX C. RP B95 01 & 02 ANNEX D RP B95.02	Traceability can be defined as "the systematic ability to access any or all information relating to a foot under construction, throughout the entire flexycist, by ment of recorded contributions? (WHF inaceability principles, 2015), it is important to risk that the different and which includes the contribution in shared, with which statishedow, and what the frequency.  The Other Disloyer on Feedood Traceability (ODET) Stateded 1.0 provides guidelines or extractional principles (or accessibly extraceability stated to the present but form traceability and improve data verifiability interesting interpresently of traceability stated to the present but form traceability and improve data verifiability. Interesting interpresently of traceability stated to the present but form traceability and improve data verifiability interesting interpresently or formation and the provides guidelines or contributions.	A policy and process for assessing claims and sourcing credentals is in place or under development.	There is a formal documented process in place for assessing claims. Third party guidance is used as the basis of making volutinary claims beyond the legally registed consumer information. Such guidance could be in the form of third party certification logisthms of the country of the confidence of the country of the party certification logisthms. Task Force.  Task Force.	The party sociativy is employed to warrant the in-house assessment of claims being made. Full anseparency of a selection of control of the c
3.4.5	is traceability provided by the vessel or group of vessels that caught the seafood?	Cause 126 stpolates the data recording requirements that all RFVS vessels must adhere to, respective if the unit of certification is a group of vessels.	33.6 1.6 ANNEX JS. UNE 195006 ANNEX C. RP 8950 16.02 ANNEX D. RP 895.02	Traceback searches can be concluded to test if tracebally is provided by the vessel or group of vessels that required to search compress should already have a range of tracebally processes in pilote, to which additional aspects relating to IUU can be added. Where barrane said, the camples data but a final a local sound said to be considered elevated. The search of IUU products should be considered elevated. The recognised that read all supply chains may be fully faceback and comparises may want to work with their suppliers to improve this. Some comparises may choose, for example, to work with their suppliers to improve this. Some comparises may choose, for example, to work with their suppliers to improve this. Some comparises may choose, for example, to work with their suppliers to improve this. Some comparises may choose, for example, to work with their suppliers to improve this. Some comparises may choose, for example, to work with suppliers to develop be acceptable or their suppliers to improve with their suppliers to improve the some comparises may choose the consideration, and from an improvement project or inflative. More are included in the "shared resources" section.  The Clobal Distage on Destinator Tracebally (QSDT) Standard 11, provides guideless on enhancing intercognitation of the consideration and provides and the section with surfacebally, and ease date sharing. This of examples date that increasibly, in prove date werefalledly and ease date sharing. This of examples date that increasibly.	Applier in in place that requires one up and one down traceability but includes a requirement that all fish and seadings of traceable but his the source vesser of regular of vessels that it comes from. The policy may include an ambition that all KDEs within CDST will be provided by a future date by suppliers. Mapping of supply chains is taking place, along with the creation of vessel sist.	Sopply chains are fully imapped. Incombility back to sopply vessel or group of vessels (picularly transingness vessels) is in pice and one to demonstrated within a reasonable timeframe, laking into account variables such as global time differences, public holdings, were provided and the control of the	GOST KDCs are in use for all supply chains, and all vessels (including any involved in transhipment) are present on government relatives and the global record. Beneficial owners are known, and traceability can be demonstrated on every occasion within 4 hours.



3.1 General		Cross-over with RFVS	Cross-over with APR	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice
3.4.6	Are traceback exercises carried out at a frequency based		ANNEX D 13 to 18- RP B95.02	DNA testing of fish can be used to support claims of legality, inform risk assessments, and support traceback exercises to seafood origin. Seafish has produced a comprehensive guide	The buyer conducts regular traceback exercises to ensure that product purchased can be	The buyer conducts regular traceback exercises to ensure that product purchased can be reliably traced back to the source fishery/fishing vessel(s). The frequency of traceback	Traceability is verified on an ongoing basis through electronic supply chain tools such GDST compliant e-traceability systems. System operation is checked manually on a regular basis to
	on risk assessment and in a timescale that is appropriate for the origin of the seafood?			on the uses of DNA testing seafood that includes a list of well-established DNA databases: https://www.seafish.org/media/publications/SeafishGuidetoDNATestingofSeafood 201312.pdf	exercises is based on a risk assessment, taking into account publicly known risk factors for each specific supply chain.	exercises is based on an in-depth risk assessment, taking into account detailed supply chain information derived from supplier inspections, audits or SAQs.	ensure full operability and compliance with expected norms.
3.4.7	Does the organization complete random traceback exercises that are able to verify full traceability from point of sale to source within 48 hours?		Yes, actually those exercises have to be ready in less than 6 hours	Random traceback exercises to verify tracebally are typically conducted for food safely reasons. Some examples of food safely strainfest but require this route, the Test Debugston Standards. As a but, formation inversit to 100 can be calcelled, or 15 revokes processing Standards. As a but, formation inversit to 100 can be calcelled, or 15 revokes common transaction process, and short disrigate food safely information. If Test-actuals exercises cannot be conducted for certain supply chains or products, this should be taken into consideration when conducting a risk assessment, and companies should consider variety with their supply chains to improve traceablely facility for the 'haven' resources' section for common traceability guidelines and standards that can serve as a basis for traceability provineed projects or inflatives.	The buyer conducts regular tracelable exercises to ensure that product purchased can be reliably traced back to the source falsey filling ressel(s). The frequency of tracelable, ourcroses to based on a rick assessment, taking into account publicly known risk factors for each specific supply chain.	The buyer conductor regular tracebook cerecises to ensure that product purchased can be reliably traced back the Secure flowly productive productive careful can exercises is based on an in-depth risk assessment, foling into account detailed supply chain information derived from supplier respectives, audits or SAQs.	The origin of seathood supplied should be consistently demonstrated to the seathood company which off boxes of some harquest being made Companies that have supplier with BRC Global Standard IPS or a CSSI recognised chain of custody in place, will be able to deliver these operations whilst those without such certification will have bould the capability into their own supply chain.
3.4.8	Are sales transactions between actors in the supply chain accompanied and traced by unit or batch numbers on or accompanying invoices? To allow effective tracking of products, all buyers and sellers should be able to match sales transactions between them.	The buyer of RPVS certified seafood must have a recognised Chain of Custody certificate to make an RPVS certification claim.	ANNEX D 22,23- RP B95.02		The buyer is able to correlate physical stock components with the associated paperwork through simple accounting tools such as invoice numbers or lot codes.	Batch and lot number are detailed on purchase documents and these facilitate traceability back to source fishery and supply vessels for product at all stages of manufacture, storage or distribution.	Product is traced at all stages of manufacture, storage and distribution, through a comprehensive end-to-end e-traceability tool.
3.4.9	Does the organization cooperate with the relevant competent authorities (that conduct active and effective regulatory oversight and verification) by using effective compliance and enforcement mechanisms?	This is explicit for many RFVS requirements (e.g. catch documentation, crew lists etc).	This is explicit for many APR requirements (e.g. catch documentation, crew lists etc).		The company has an "open door and cooperation policy" for domestic government and enforcement agencies.	Company hosts viola (or demonstrates a willingness to host viola) from domestic poverment complaince satisfacties and cooperates to any reasonable request by supplying information in a timely manner. Either directly or via industry associations/bade bodies or other collaborations, the company demonstrates its willingness to provide injust consultations, meet with government officials and support government policy implementation, where relevant to its seatedod sources!	The company is able to demonstrate that it complex with all government interactions, advocated for improved compliance regime implementation and encourages its supply chain to do the same.
3.4.10	in order to ensure consistency in the requests for information in supply chains, it has following information collected (via request) and associated with the productor of the consistency of the consisten	Cause 12 for equires the following traceability information to be captured: vessel identifier,  species name and stock,  species name and stock,  species name and stock,  species name and stock,  species name and species name and  species of capture,  species	33, 6.1 & ANNEX.)3.9- UNE 1990006		The company sedecid sourcing paicy builds on the need for traceability by roting the minimum set of information it expects to be closed and available from the stage of the stage) chain. For the products it buys. The basis of the minimum information derives from EU (AUCL) SIGHER and COT (MSC), and the similar is communicated within the sourcing poley or product specification to its seafood suppliers.	The safection company is alle to demonstrate:  "revess identify from port, name, flags, negistration, and where issued, IMO or other UVI number of classify (in possible possi	In addition to the test practice information, the sealbood buyer will also have access to: vessel call stip.  GIPS coordinates of calcular seasons of the s
3.4.11	is information relating to the products maintained in an electronic system? As a minimum the key data should be held in the system, and other documentation such as EU Catch Certificates attached electronically or a record noting their physical location attached.	Not an explicit requirement of the RFVS	ANNEX B- UNE 195006	The FAO technical paper "Seafood traceability for fisheries compliance: Country-level support for catch documentation schemes," lists recommendations for traceability mechanisms based on the evaluation of different countries' catch documentation schemes (CDS) and key data elements (NDEs): <a href="https://www.lno.org/pi.ddications/cardinal/c1701be4c-abit3-4506-97e5-bit541416765">https://www.lno.org/pi.ddications/cardinal/c1701be4c-abit3-4506-97e5-bit5414167655</a>	The company seafood sourcing or other related policies detail the company ambition that product specific information (whether to enable IUU risk assessments to be undertaken routinely or noti) will need to be available electronically at some time in the future.	The company sourcing policies are understood and acknowledged by all actors in the supply chain and the company is able to demonstrate that some of the product specific information that it requires is being submitted electronically and that there is a time-bound commitment by which all of this information will be provided electronically.	Product is traced at all stages of manufacture, storage and distribution, through a comprehensive end-to-end e-traceability loci.
3.5 Informati 3.5.1	chain to agree levels of information required and share it to	which Life than teresorrory would be desirable, this is not a specific requirement of the MNOS. as one as it seep regulatory replacements be language. The sweet dependent on the coperation of actors within RFVS supply-chains. The CSA Seatood Processing Standard, outlines specific requirements around the transfer of KDEs.	This is not a specific requirement of AENOR APR	Tenaparency and Tenaciahity and its confused eith on another. Tenaparency releas to the other sections of account of the section is also define, with tenaciability refers to elementar on a certain product or batch from origin to end-use. The "CST Foundation for Fath, Seationd and Aquaculture Transability usefuleine" provides considered bustness products for efficiency amongstry tenaciability and enfancing considered bustness products for efficiency amongstry tenaciability and enfancing tenaciative and complication for endought products and complications of the stage. Inversi of complication of the control of	A transparency policy that details what information is needed from the supply chain is formulated and communicated to each supply chain actor.	The receptority policy is undestined by all actors in the supply chain and supply chain the programment of the committee of	Transperency is institutionalised within the company and its supply chains to such an extent, the company of the company and the supply chains are extend stakeholders, without the need to salk for supply chain information.
3.5.2	Does the organization engage with other actors in the supply chains to resolve any barriers that prevent this from being possible?		This is not a specific requirement of AENOR APR	It is recognised that full chain traceability may not always be achieved. In such cases, a programme or process to improve traceability is needed. There are resources and guidelines available in the "shared resources" section of this guide to assist companies in taking steps towards full chain traceability.	The transparency policy states that where barriers exist to achieving supply chain transparency, the seafood buyer will work collaboratively with its suppliers to address them.	Proactive engagement with suppliers to overcome transparency barriers can be demonstrated with successes having already been achieved.	All barriers to supply chain transparency of existing supply chains have been overcome. It is a pre-requisite to supply, that future supply chains must achieve the same level of transparency prior to supply commencing.
3.5.3	When assessing the impact on decent working conditions, is engagement with those potentially affected (in this case, workers) undertaken? If any information is unavailable during a traceback exercise then this should be investigated.	There will be crew interviews using APSCA registered auditors.	YES. 5, 6.4- UNE 195006	A company should establish and use policies, practices and confidential reporting and assurance systems, to ensure that decent working conditions protect workers in facilities in all countries where seafood products are sourced. A company should conduct inspections, audits and/or site visits to check for aspects of decent working conditions.	The transparency policy states that where barriers exist to achieving supply chain transparency, the seafood buyer will work collaboratively with its suppliers to address them.	The company is able to demonstrate that engagement with workers who are likely to be impacted by the lack of decent working conditions, is able to be made to all intent and purposi at will.	There is sufficient supply chain transparency that if so desired, the seafood sourcing company when it is assessing decent working conditions, is able to engage directly with any workers potentially affected by the lack of decent working conditions.
3.5.4	audits and/or site visits upon request?	For an RFVS certification claim to be made, Chain of Custody must be able to be demonstrated - which would require third-party audits linked through the SPS standard. Not an explicit requirement of the RFVS, though would be expected that the standard holder is	RP B95.02	All stages in the supply chain should be available for inspections, audits and/or site visits upon request. Additionally, DNA testing is an emerging technology applicable in spot checks.	within the company's sourcing policy.	1st, 2nd and 3rd party inspection and auditing of all stages within the supply chain happens for all high risk sources, with pilot electronic monitoring either in place or planned, and a plan to achieve the same for moderate and low risk supply chains is in place.	All supply chains are inspected and audited, with remote technology such as electronic monitoring routinely employed to facilitate random inspections where supply chain concerns are raised.
3.5.6	organization documented and available to other actors in the supply chain while Allous of the request?  Is first, seconds and third party verification of information allowed at any point, in the supply chain? Access should be granted to those conducting inspections, audits analor safe visits on behalf of them in the supply chain to check for visits on behalf of them in the supply chain to check for conditions. Random spot checks and unannounced audits should be permitted.	responsive to information requests.  RFVS is a third-party certification programme.	Yes, but not for unannounced audits	The commitments, expectations and standards of a company should be documented and available to action the supply chain within 5 hours of the request.  Est, second and their-party verification of information should be allowed at any point in the supply chain.  Access should be granted to those conducting inspections, audits and/or alle visits on bearful of times in the supply chain. To check the aspect of legality, inscalability and referred the application of the characteristic and continued and one of the supply chain to check the aspect of legality, inscalability and determined the supply chain to the chief periodical point of the supply chain to the chief periodical point of the supply chain to the chief periodical point of the supply chain to the chief periodical point of the supply chain to the chief periodical point of the supply chain to the chief periodical point of the supply chain to	A requirement to be able to undertake traceability executions within 48 hours is detailed within the company policy.  The company policies establish is insert to be able to verify information provided to it by its supply chain at wilk, whether using 1st, 2nd or 3rd party audit processes.	Traceablely exercises are able to be undertaken and completed for all supply chains within the 4th hour timeframe, taking into account weekend, public and religious holdey restrictions.	Traceability systems are so developed with information ciptured in real time, that fall supply chain traceability able to be demonstrated in real time through the employment of e- successibility platforms.
3.5.7	of the product? This includes all claims made about the origin of the product.	Product labeling details are a requirement of the GSA Seafood Processing Standard (the SPS will provide assurance on this).	8- RP B95.02	All products should be properly labelled in plain language, and be correct according to the source of the product. This includes country of origin.  *li is good practice for voluntary information beyond mandatory legal requirements to be clear, unambiguous and verifiable.  *Altertions of drawn to Regulation ((EL) 1578/2013 as well as the Sustainable Seafood Costition's Code of Conduct on Environmental Claims.	Policies are in place that detail how product labelling and packaging is checked to ensure compliance with legal requirements and clarify of labelling.		
Section 4. Fis	heries and fishing operations tent of fisheries						
4.1.1 managen	ent of habres.  In a risk assessment, is seaford assessment as higher in M. In an Assessment is seaford assessment as higher in M. In a risk assessment as overfixed or for which there is neither sufficient data to ensure it is not overfixed nor a plan in place to collect such data?		riva	In a risk assessment, seafood should be assessed as higher risk if sourced from a faithery flat its regarded on contribute, for of which here is nother sufficient data to ensure it is not overfineder, for a plain in pilce to collect such data.  There is no one list that expresses the State of all of the different fisheries, yet various competed authorities at plobal and national levels, assess whether fisheries are in an overfinede Data.  It is good practice for seafood to be sourced from fisheries with a peer reviewed assessment that demonstrates that the fishery is not fished in excess of the maximum sustainable yield MMS/). Such statissace can be accessed on PRAM wedgages, showly they may not be curred. The following may of RFAMOs may be useful here: https://lice.currops.auloccens-and-internativates.	Seatond expely chains are being napped and at a minimum the information with which to discentime whether a course father in coverfished, unregulated or has problems with under-reporting (high risk) is being colleted.	As source fisheries have been identified, information to determine the status of the stack has been collected, and an Assessment has determined the stock battle. Fatheries determined to be overfathed, date-deficient or without a management plan, are classified as high risk unless a justification is made to the contrary.	As source fisheries are either classified as fished at or habou MST or have a credible fathery exprovement process in place that is able to demonstrate on the water improvement.





3.1 General		Cross-over with RFVS	Cross-over with APR	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice
4.1.2	(including EU Member States) and NGOs have identified high levels of risk of IUU fishing, or if the species is assessed to be of higher risk, does the organization consider this seafood to be higher risk?	Taken into account in Section 4 Vessel License to Operate, and Stated in high level objectives of the RFN2 Comply with the regulatory controls of the country or RFNO which controls the factory. Expensing in fatheries under the jurisdiction of countries where they are not registered."	nia	When procuring higher risk scallood, e.g. seadood originating from a fishery identified with high event of risk of LUU fairing, extra measures should be basen to ensure full zeaceshiply, measurant transparency, and the hastworkness of the supply chain. This includes at meintum, completing talk assessments or audits at least once every six morties, with state meintum, completing talk assessments or audits at least once every six morties, with state meintum, completing talk assessments or audits at least once every six morties, with state meintum and the state of the	Source fisheries are being mapped and assessed to determine whether any are high risk.	Mapping and assessment of all fisheries has been completed, with steps being taken to address stocks that are classified as high risk.	High risk sources have an agreed improvement plan in place with slaps actively being taken to address for a source lightights. Low and medium risk fainters have also been assessed, with a regular review large undertaken to example undertaken to extend this risk level is being maintained or experienced where delicitority is identified.  High risk sources are now medium or low risk, with a sourcine soldow that prohibits their risk.
4.1.3	taken to ensure full traceability, maximum transparency, and the trustworthiness of the supply chain, including by as a minimum completing risk assessments or audits at least once every six months with steps taken to mitigate risks?	nia for vessels	nia		6-monthly reviews of ligh risk fishery sources is happening, with supply chain feedback of results communicated.	Proactive engagement of the buyer is occuring, and tangible improvement and advocacy is being practised.	High risk sources are now medium or low risk, with a sourcer goolcy that prohibits high risk seafood being bought without an improvement and advocacy plan already established.
4.2 Fisheries 4.2.1	secessic control and more in gradents are identified as originating from a used that its Bagod on Statle, or that father in the territorial or EEZ waters of a coastal State, that does not have a transportent register of authorized vessels, does the organization ensure that there is full chain traceability and that dispendents audits are completed at least every 12 months?	RRYS's reside require a borror to opporte, and IMO identification number if one has been tessed, if not must have a visible vessel identifier.	Saufocd has to have a transparent register of authorized vessels, as we explain above	When AZ monthly audits are not possible but obtainable, he company should factor the elementation into the risk assessment. Would audit on a less frequent basis elevate he risk to a level where sourcing is not responsible?  It is also recognised that conducting audits every 12 months is not always possible. This case, companies can request that supplies provide copies of versuel kerness, registrations, responsible to the conducting audits every 12 months is not always possible. This case, companies can request that supplies provide copies of versuel kerness, registrations, risks. Companies should also consider advocating the relevant State to complie and publish risks. Companies should also consider advocating the relevant State to complie and publish responsers for 10 reveals. It should consider whether the State that versuel information with RFMOs and/or the FAO Statel Record, in absence of its own transparent register.	supplying, so that a full list of supply vessels can be compiled.	All by State or a known, comprehensive vesse lists are wouldn't by the supply data center, and vessel replains are either public or their coping solvector, by this to happen. Ultiliary the mapping exercise for vessels, an assessment of the flag State controls in place may be undertaken, or bit an understanding of the monitoring, control and surveillance, as well as their compliance regime is understood, or at a minimum being explored.	Flag States are known, and all vessels within the flag States are contained on public registries and not the global record. Independent the play, or efficiation and audit of festing and transhipment vessels is routine. Flag State assessments have been completed, with high-risk lang States deriffed and either subjected to an audit or assessment of vessels, or one is planned. Action plans to mitigate deficiencies in flag State complance and enforcement are in places, so that they overstudy become assessed as low risk.
422	When fish products are sourced from high sess fashmers or form any tooks subject to the principion on RPMD or other titerational management arrangement. The other similar and the product of the product of the inferior of the product of the product of inferior of the product of the meaning that they are publicably available for instance on substance.  The product of the product of the product of inferior of inferior of the product of inferior of inferior in	RFVS exsects fairing in RFMO waters would have to provide evidence that they are in 64 congruince with RFM projections. This is all could read in the RFMO water for the RFVS explained, This is all could read that RFVS explained the RFVS explained that they program and also be a set of the RFVS explained that the RFVS	ANNEX A.B LUNE 195009	The company can use these conditions to basess the risk of the fathery, for example, it can check whether these conditions are in pice by exampling the relative RFMO/blier international arrangements weeklar and reading their conservation and management measures, as well as the resolutions and recommendations.  Importantly, the company can check if a vessel is on any ULU lists and/or is balackined. If so, the portangle, the company should be abuse the same service of the company should be source from their vessel to an early ULU lists and/or is balackined. If so, the properties of the company should not source from the vessel used which have previously carried out ULI fairing.  RFMO vessels called to cross-check the vessels used which the company's supply classes.  CACAT SU UV vessel that United Association (S.R.B.A.L	Source finemes are known or are being mapped and an assessment of the scalaribility status of the finelying exploited is planting to the determined. Where vessel fish instantially status of the finelying exploited is planting to the determined. Where vessel fish instantially are available, vessel assessment work is being planned to ensure none are engaged in IUU practice and this fish toom communicated to the supply chain.	All source findering are known and their stock is stable has been assessed and classified. Where stocks are deem death, and high stable known process are a place to activate concerns. Vessel registers are routinely assessed to ensure that there is no suchily from an activate the stable stable and the stable s	All sources financies are either to en xis, or an information where financy improvement projects that an abile show languight emprovement over past performance, are supplying the faith. All supply vessels are citied to demonstrate that they are routinely complying with all others are required to the complete of the c
4.3 Monitorin	g, control and surveillance - advisory only						
4.3.2 Due dili	igence						
4.3.2.1	chains related to MCS? When undertaking due diligence on a new supplier or product (or when repeating due diligence for an existing supplier or product), the organization should assess and record the following factors relating to flag States, coastal states and RFMOs responsible for MCS of a supplying vessel.	The RFVS would provide assurance that a vessel is compliant with MCS requirements.	No, ž doesn't.		The first steps of gathering data on source fisheries, which is a step toward assessing MCS requirements, has begun.	control and surveillance (MCS) within fisheries. All supply chains are mapped back to the source fishery, the status of each MCS regime has been complex, and a gap analysis has been completed for each fishery, with steps being taken to advocate for improved implementation by government, or compliance by the fleet within the supply chain.	All MCS regimes are understood. New are being fully implemented at each stage in the capture and landing topic chairs, and a process for samction is a place, which means that the literature of the process of the process of the process of the process of the third process of the process of the process of the process of the process of the process of the process of the process of the process
4.3.2.1.a	are required by flag State authorities to have an installed research mattering system (MSS) transported, authorities research mattering system (MSS) transported, authorities schooling of board? These systems where required should be continuously transmitting in accordance with any subsread programmes or requirements and those which have been programmes or requirements and those which have been programmes or requirements and those which have passed to the state of the state of the state of the State scorement. After set reportable for trading schemes that are required should be able to track the movements of these verselfs confinuously from port to port.	This is not an exploit requirement of the RFVS (Quito to the range of types and sizes of vessel that will be open to relong the scheme). Never class 1.8.3 L State "I in automatic destrictionism system (AKS) or vessel monitoring system (VAIS) is fitted, it will fully operational and be furned on whilst at eac."		RFMOs. The most secure form of tracking is through WMS, flough in most cases the information is proprietly rather than public. Some States have also required the use of AS, which is publicly available but easier for views the manipulate. Whether or not views the are functioned by the State and FFMOs that register the relevance is an emportant constraint when considering risk. If views the are not monitored, this significantly increases the risk that they may be operating fleagibly in areas that they may be operating fleagibly in areas that they were not authorised to be in (whether in EEZs, RFMOs or protected areas). As part of their in assessment, becauses should also consider what is known cases, As part of their in assessment, becauses should also consider what is known comparise supplying from to explain what there is a case secure, or grantitations should ask companies supplying from to explain what there is a case secure, or grantitations should ask companies supplying from to explain what views at tracking requirements are in the jurisdictions they operate in. These should be easily evidenced by supplying copies of license conditions or other commitmications from competent authorities to vested owners, setting out their vessel tracking requirements.	The company has a selected sourcing policy that aims to map its supply chains and identify the vessels of upon the vessels that supples within sealout. The poly-term be foundation into midn't further supply chain insight can be determined and steps to understand VMS/AS as a can be allow.	fisheres MSG regimes is capturing, as well as the method by which it is captured. Where ASG in manufactly, then riches should be made to understand whether this data is being a manufactly method in the should be made to understand whether this data is being reformation can be shared with supply childro convers should be happening. When ASG and WMG is used within the fishery compliance regime, the controllar are understood by the seafford beinger method to the state of the seafford being a seafford being the controllar are understood by the seafford being the	the government assessments of the fishing activity and levels of compliance.
	Logbooks: Does the organization research whether or not. MCS authorities require that vessels demonstrate they have met the requirements for recording and timely reporting of vessel position, calch of target and non-target species, flishing effort and other relevant fisheries data in accordance with coasts l'abst or other sub-region, regional and global standards for collection of such data?		3.3 & ANNEX B, J3- UNE 195006	For States to effectively regulate foring vessels, they need information on the location and content of their cache. Completent authorizes are not requiring this information, it not only suggests that fishings in not being reported, but also significantly increases the risk that the authority is not regulating access to the fishing, or moritoring the activities of vissels to determine whether or not they are operating lingally. Lopotox requirements should be easily reduced, by supplying option of license condiciones or other communications from comprehent authorities to viseased owners, setting out their visease tracking requirements.	the vessels or group of vessels that supplies it with seafood. This policy forms the foundation from which futher supply chain insight can be determined and steps to understand logbook use can be taken.	The company is actively and dimonstrably investigating settler or not MCS attributes have finderive implementation of log-books as a reason of monitoring failing activities. For example, a questionnaire has been developed that is being used to capture what data the source fisherly MCS regime capturing, as well as the method by which is captured. Where the use of log-books is manufation; then checks should be made to understand whether this data to being completed and is accurated. Where plotocks are not used, then advocacy for their adoption and use is either happening or being considered.	an effectively implemented element of the flag State MS2. Logbook data is being routinely used by the fatherine management enforcement authorities, or shared with independent third parties who are ablied to understake and publish to the government assessments of the fathering provernment departments to inform their fatheries management regime.
4.3.2.1.c	As an angeotions: Does the organization research whether on orlevesses in heapy chain are subject to a regime of imperions by MCS authorities? Vessels should give information to the relative coastal Side or day authorized control side of the control of the cont		NOT DEFNÉD	As-ean inspections are an important inneant to determine whether or not vessels are complying with financian tests and regularized. For example, excluded, can be compared with biglooks to verify the information, the finiting gast can be inspected, and the catch checked for the presence of endangened species and spined of the infirmity. The lack of catched for the presence of endangened species and spined of the infirmity. The lack of the catched the presence of endangened species and spined of the infirmity. The lack of the factor of the catched the present of the catched the	The company has a selected sourcing policy that are to may be supply chains and identify the vessels of range of vessels that supply his selectod. The policy from the foundation from which further supply chain in sight can be determined, along with steps to understand the use of all-sea responsives within the complaince regime, and next steps as appropriate for the site and scale of the company.	about what information is being collected, i.e. logbook checks, fishing gear and inspection of	Assessingsoctions are notified for all of the source fisheries within the buyer's supply chains. Evidence of the inspiration regime and findings are notinely published by the flag State and advocacy to address deficiencies is either routine or compileted.





3.1 General		Cross-over with RFVS	Cross-over with APR	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice
43.21.d	Observers. Does the organization research and ask for widere that sealeds is sourced from fisheries where doctored the programmes, whether declaration for human, or many continuous and the programmes, whether declaration for human, or many continuous and regional doctorer programs in which the file State is a participant? Information on observer whether the state of the programs in which the file State is a participant? Information on observer a second program of the programs in the programs in the programs in which the file State is a participant? Information on observer a second program of the programs in the programs of the pro	Osservers may be present on RPVS certified vessels in regions where there is high ILU risk. Though this is not a requirement of the RPVS programme.	- UNIC 1980006	To data. RFMO is have relied on human observers to months vessels at sex, coloriting sessertial data for efficie management. If many RFMOs, purse serve seas regard to dischere coverage, while longine vessels regard not yield protect discrete vessels regard to dischere coverage, while longine vessels regard not yield protect discrete vessels regard to dischere coverage. The many discrete settlement of the protect of the server of the server server. If the protection of the protection of the protection of the server settlement of the server s	The company has a selfood sourcing poley that aims to map its supply chains and identify the vessels or group of vesse that supply in the selfood. The poly forms the foundation from which further supply chain insight can be determined on whether the observation is human or electronic.	information on the flag State requirements for orboard observation is being oblicated for all source fasheries. A paid of the imapping and data collaction process, information on whether the observation is human or electrons, the profucols against which the observations are settlement of the information of the observation of the observations are sessioned. The fragment of observation orbitated specific versals and the water fleet all year assessed and compared with the relevant legislation in force. Protocols that detail what should be recorded the fragment of observation specific versals have a fleet with an experiment of the observation of th	
	Where fish is identified to originate from a vessel that is flagged to a State or that fishes in the termitorial or EEZ waters of a coastal s-M68bate that does not operate a national observer program, does the organization ensure that there is full chain traceability and that independent audits are completed at least every 12 months?	ILU risk assessment not explicitly taken into account for the certification requirements of the RFVS. Burden is not her vessel to demonstrate legal compliance. However applicants will be risk assessed to determine if they are high low or medium based on their country/region of operation and on the audit. This risk assessment last ILU III his factors incorporated. High risk vessel will then be subjected to more riguous on vessel assessment through their certificate.		If 4.3.2.1.d determines the vessel is not subject to an observer programme, this risk mitigation should be put in place. See 3.4 for details on full chain traceability	supply chain traceability exercises to be conducted.	A risk assessment to determine the risks of not having orboard observations (whether human or electron): either in process concepteds. An addition, discussions with the supply chain about low-costs observation may be happening.	Supply chains with no regulatory sanctioned orboard observation protocol are employing an observation mechanism. Advocacy to the regulatory body is ongoing, encouraging the adoption of onboard observation.
43.2.2	Where it is known that seatload or marine ingredients are sourced from vesset flagged to a State that is different than the State of nationality of their beneficial owner, is this regarded as increasing the risk of supplying flegal products?	As above.	5.3-RP 895.02	Although there are many reasons with a vessel conner of one nationally may use the flag of a different nationally, but has access to quade a or genuine prive vertices, the use of flags them another State increases risk. In some cases, flags of convenienced are used to sould more savinger flag State control secreticed by the owner's State. An effective flag State control state of the state of the think of the state of the takes of the state of the takes of the state of the takes of the state of the takes of the state of the takes of the state of the state of the state of the state of the takes of the state of the state of the state of the state of the takes of the state of the state of the state of the state of the takes of the state of the state of the state of the takes of the state of the state of the state of the takes of the state of the state of the state of the takes of the state of the state of the state of the takes of the state of the state of the takes of the state of the state of the takes of the state of the state of the state of the takes of the state of the state of the state of the takes of the state of the state of the state of the takes of the state of the state of the state of the takes of the state of the state of the state of the takes of the state of the state of the state of the takes of the state of the state of the state of the state of the takes of the state of the takes of the state of	The company has a selfood sourcing poley that aims to map its supply chains and identify the vessels of regular ovesset that supply in the selfood. The policy from the foundation from which further supply chain insight can be determined on the beneficial ownership of supplying vessels and research's information is compiled to enable the supply chain owner and supplier for assess IUU risk from them.	The beneficial conversity of all vessels supplying this and seathood is known, their background is being researched with where concerns such as different domicile status of owner to flag State is present, the reasons for this is being understood.	The beneficial connership of all vessels supplying seafoods is known, the vessels are Island along with this information on the global record and no evidence has been found that suggests any (LUI activity in the past, or if present, is no longer present
	centrols.  Does the organization undertake analysis of its supply chains and implement a system to enable it to identify the carding status of its supply chains?		53 & ANNEX D- RP 895.02	Market cortrols can help to establish the legal origin of sendord products. An example of a market cortrol scheme to out PULI fining is sen EU LUI Regulation 10550008. "Under the regulation, non-EU courtries identified as having raidequate measures in place to prevent and older EU Intelling raisy be seasor after its formal warrang, or aphios card to a product of the sendord and a sendord product of the sendord product of the A company should implement a system to identify the carding status of its susply, chains by fast accessing IUL Wich, an aggregated source or information for EU carding destances by courtry. For more information, including countries and their carding status, follow:			
4.3.3.2	Does the organization require that vessels in the supply that are not flagged or i clossed to find hy States that that the supply of the supply of the supply of the that the supply of the supply of the that the supply of the supply of the supply of the supply of the supply of supply	Vessels registered to States the have been red-carded by the EU would still be able to apply to the RFV/S, sought you would need by powly or closure devices the they are operating legally. The audit will reflect this increased level of scrutiny through out their certificate and is picked up at the country/region risk assessment.		A company should require that vessels it sources from in the supply chain are not flagged or licensed to fish by States that have been issued a red card. To determine if he vessels in lagged to a State that has been issued a red card, a company can request the following retrievable retrievable that the state of the card, a company can request the following states of the card of the c			
4.3.3.3	Are purchases made from fishing vessels flagged to States that have not notified a competent authority to the EU under the EU IUU Regulation?		Not an requirement in APR	A company should check that the flag State of the vessel(s) supplying them (already notified in other questions) are on the list of countries that have notified the EU (to be used as a proxy for non-EU countries) of their competent authority and been accepted: https://ec.europa.eu/fisheries/cfp/filegal_fishing/info			
4.3.3.4	Where fish is sourced from vessels flagged to a State given a yellow card by the EU, is the organization able to yellow card by the EU, is the organization able to demonstrate that there is a system that enables full chain traceability and that audits are completed at a minimum once every 12 months?	As above	Not an requirement in APR				
4335	If sourcing from these countries, does the organization research the reasons for the yellow card and, where it has access, record (and, where possible, support) efforts by the plane-canded State to address these reasons?	As above	Not an requirement in APR	Sealood from a country that has been given an EU yellow card is at interestify higher risk, as her relation can be beginned to entire the three events approximate for manage florieries. If organizations decide to continue stating assigned from them, and relations is placed as the continue of the continue stating assigned from them, and relations is placed as a respective to understand for reasons of the floy yellow card and the first being ballen is respective to understand the reasons of the floy is discussed and feets being ballen is the State to address those reasons. The EU publishes Statements when yellow cards are issued to septial the contents had been been stated in address and the statement of th	The company heat a selfoot society policy that aims to map to supply chains and sherify the coastal State that supplies a this selector. This policy forms the condisidation from which further supply chain insight can be determined of the EU card status.	The source country/fishery should be determined for all SNLs and the reasons for sold country countred toy slows or perior shits of the supply source is understood, on their engagement with the third country government and the supply chain can be planned. The reasons for any power country of the supply chains on the planned. The reasons for any powerment is happening, either facility or the supply chains. In this support is provided usabletes the issues raised. In addition, for countries that are supplying the EU, there is an understanding of the finitely management systems and controls against which an also estimate of the risk of EU sanction can't be made.	As source countries are green or more carded, have been assessed by the EU, and deemed to meet all of the necessary conditions to colors will green or preferred supply country status. In addition, there is a mechanism/protocol in place that allows the supplies within the control of the supplies of the supplies of the supplies of the supplies of the EU may have before they become an issue.
4.4 Source fis 4.4.1		Requirement of clause 1.26, vessels must have a scense to operate.	3.1, 6.1- UNE 195006	A company should not source seafood from vessels that appear on recognized blacklists	Mapping of supply chains is underway and a full list of all fishing, transhipment and support		
44.2	appear on any recognized blacklist (those established by RFMOs). Is there a system in place to verify whether vessels appear on any of the available blacklists? Other blacklists exist, but RFMO blacklists are the only ones recommended here.		3.1, 6.1- UNE 195006	established by RFMOs. To determine whether or not a fishing vessel is listed, follow:	vessels is being developed. Whilst the sources of supply are being mapped, information about fishing licences and authorization details begin to be collated and cross-referenced.		
	for relevant coastal State EEZs and territorial waters or, where on the high seas, by the relevant RFMO?	Requirement of clause 128, vessels must have a license to operate.		The nature close records on in-terruply vesticate, intergretated Lingthy vesticated states Supply vesticated and another process of the states	Mapping of supply chains is underway and a full stof off all bring, transitioners and support reversels is being diverged. What the source of supply are being import, information about fishing licences and authorization details begin to be collated and cross-referenced.		
Does the organ	ization request the following information from suppliers to info	rm their due diligence risk assessments?					



3.1 General		Cross-over with RFVS	Cross-over with APR	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice
4.4.3.a	Evidence hat all qualifying fashing verses is under MO adopted resolution. A 107(28) and the latest version of Circular Latest 1989) in their supply chain have a unique vessel identifier (UVI) issued by IHSM&T on behalf of the IMO	Causer 129 States 1.29 The applicant shall have a clearly visible Unique Vessel Identifier (UNI) (a.g. IMO number, vessel reference number).	0.2- UNE 195006	Israpa vessel identifiers (UNIs) such as IMO after numbers, are an identification number that is unique to each high, and is never reseasing the another vessel. This means that vessel name, ownership, records of non-compliance etc., can be recorded using these numbers and on the recorded using these numbers of the contraction of elevative consistent including the contraction of elevative consistent including the support of the supply chain. Discluding rates where a specific country or RPMO does not enforce the two of UNIs or where audionize realt in UNI number changes. Supplies should request UNI records and find available, consider that the supply chain is of higher risk.  Companies thould aboutsel for the inclusion of vessels on pickir registers. This increases impropries thought aboutsel for the inclusion of vessels on pickir registers. This increases	skapping of spigly chains is underway and a full stof of all follows, translipment and support vessels is being developed, which includes the inertigh and weight, history gard of operation and whether they have a UVII and are on a publicly available vessel register maintained by their ligs States of RNOW where relevant. In addition, as vessel deaths are being captured the should be assessed to destine whether they qualify for an MO number and steps are being states of the state of the programment. The state of the the desire to assesse IUU risk.	Al vessels within the supply chain are known, they are no public vessel registers and the Global Record, stage with any relevant RRIVA. The vessels that quality have MD numbers pilice, and hose that do not, have been provided with UVIs by their flag State. Vessel pilice, and notes that do not, have been provided with UVIs by their flag State. Vessel commercible is known and checks are undertaken to ensure that all licences and authorizations are up to date with no mon-compliance.	Sopyl, others are fully transporent, with all supply vessels or public diabbases, not the global resort, and flagged to countries that rotulney tugled their students on of information to Collision Record and RFMOs. Beneficial owners are known and vessels are third party certified to reterrationally recognised stathardists. Landrespare are made to parties of the PSMA or to countries that have a recognised high compliance and well implemented catch contrios.
4.4.3.b	Evidence that those not qualifying for an MIO number have an alternative internationally or relationally recognized UV. versus the many control of the control of the control of the versus the marked nine the versus and appear on all related documentation including the catch documentation.	As above	6.2 & ANNEX F- UNE 196006	Another the part instances are in an in-ordination deep supply claims.  Some contributes of the letter of the use of MIO numbers or they may not be enforced on required. Examples instances are contributed in the letter of the use of MIO numbers or they may not be enforced on required. Examples instanced barried by Claims (and Fidel 1994), and the required of the particular of the Claims (and the Claims (and Fidel 1994) and the particular of	Mapping of supply chains is underway and a full list of all fairing, transhipment and support vessels is being developed, which includes their length and weight, type of fairing pair and full fair fair the supply of the supp	INO numbers are in place for all qualifying vessels and logitooks and official fishery management documents and unificiations have mention of it. Where vessels do not qualify land to the place of the presence of UNs on these documents and advocates for their inclusion and use when not present.	Following advocacy for an extension to the existing IMO numbering scheme, all vessels, imagencies of size are included within the IMO number scheme and all official theory produced documentation cross-reference and use the IMO number as a matter of matter.
4.4.3.c	Guidence that all fishing vassels in their supply chain have up-to-date authorization and fishing lonces assued by the relevant competent authorities. It should be possible to request this information from the suppliers and receive the information within 14 days	Covered in clause 1.28	2.1, c.1- UNE 195006	Opportung on which Batte a vesser in Regard to it. a registered with, certain fishing itemess with a applicable, and armadistry for the sess of the adia to fill, it is expected that a supplier would be ability to secure details of such fishing exists to be able to fill. It is expected that a supplier would be ability to secure details of such fishing expected to the secure details and the secure of the se	available vested register markaned by their this blast or H-MU, are being collected and cross referenced. As animam PMS 1500 shall be referred to in supplier communication so that they are aware of the desire to assess IUU risk.	Clobal Record, along with any relevant RFMO. The vessel's registers are checked to ensure that all scenes and antihorizations are up to lead with no non-complient. Where there is no evidence of scenes and authorizations, these should be able to be provided within 14 days of a request being match in evidence or of the other provided within 14 days of a request being match in evidence in the be provided, an option to suspend buying until the base con the addressed or considered.	The supply chains are fully transparent, with all supply vessels on public distributions, on the Global Record, and their fishing authorizations, current and historical, are available to be checked at with.
4.4.3.d	from the coastal State and/or RFMO that authorizations and fairing Exercise have been issued and the dates they are valid for, and make this information available upon request			this evidence, the risk of IUU file intering their supply chain will be higher. Where possible, his and other documents that apport legible, housed be digitated and accessible for relevant supply other actors and state-bridgers. The CIDST Standard 10 is an exemption for how to digitate data to ease data sharing and increase interoprisellity because interportable years traceability systems. https://acceability-dialogue.org/core-documents/gds-1-10-materials/	Faithing vessel licences and sulfortations are being collected by sealoud suppliers as part for suspity chairs repropry process, with the detable being recorded not a supply vessel like. Sample copies of authorizations and licences are either being requested or are recognised entering reprotates of the first clience of such sections of submittaneous care but chicked. As a minimum, PMS 1950 should be referred to in supplier communication on the chicked of the details to be seen ILU risk.	present on publicly available vessel registers such as the Global Record. Where this information is not available, advocacy is planned or ongoing, encouraging this to happen.	Fathey wessel licencing and authorization information is continued on the Clobal Record and publicly available wave fregisters markanised by the flig State. Copes of licences and authorizations are freely available for inspection by supply chain actors at will. for verification purposes with no evidence of concerns as to their validity being present.
4.4.3.e	Evidence that vessel operators have obtained and documented a full list of all of the conditions of fishing licences and authorizations directly from coastal State authorities and/or RFMOs; including locations where fishing is restricted, gear use, crew requirements, observer requirements and any other conditions	Covered in classes 1/28. The vessels shall have all off the required legal documents to fish, notuding;  • Fishing license from their flag State;  • Fishing license from the country where they are fishing, if different to their flag State;  • Ship registration certificate from their flag State; and  • Stelly certificate issued by their flag State; and	3.1, 6.1- UNE 195006	This should be available upon request from the catch sector, who should hold icenses and adhorizations together with their condition. If catch vessels are not maintaining such records, there is a risk that they do not understand the laws and regulations they are meant to complying with, increasing the likelysood of them engaging in IUU. This should be factored in to risk assessments as the vessel is considered at higher risk.	Communication is made to the supply chair requesting that the license conditions for supplying vessels are communicated by a specified firm in the future, or that RFVS certification is in place for all supply vessels. As a minimum, PAS 1550 should be referred to supplier communication, so that they are aware of the need to comply with licensing requirements.	Supply chain has provided license conditions for supplying vessels and these have been documented.	Spapiers are able to demonstrate to the company purchasing the seafood that the fishing vessel conners comply with the legal requirements, or RFVS certification is held for all supply vessels.
4.4.3.f	Evidence that fishing vessels and the companies that own them pay their idensel fees to State bank accounts and not to agents, and that they provide documentation and evidence of this to the processor/importer if requested	Not explicitly Stated as an SFVS requirement	Not an requirement in APR	The reduces the risk of a fraudulent learns being used, as it avoids the possibility of obtaining a learne from an unauflorised agency or comput official. Evidence of paying learne feets to a State bank can be in various forms, for example, neceigts or bank Statements. Where vessels or the comparises who own them are unable to supply such information, the vessel should be considered at higher risk of fishing illegally.	Mapping of supply chains is underway and a full list of all failting, transhipment and support vessels is being developed. Whilst the source of supply are being appect, information about fishing licences and authorization details begin to be collated and cross-referenced.	Fehing licences and authorizations are being collected for each vessel in the supply chain and questions about who pays for fem and who issues them are being asked to determine whether agents and unidemen, rather than direct destings with government bodies, is happening. The process through which vessel licences and authorizations are issued for the area in which the vessel is licenced and authorized to fish is known, and information on who involved in the process is understood, as the presence of unauthorized agents/brokers and modifiemen increase their side fishing documents.	Governments that issue lecroes and authorizations include the information in their submission to the Cold Record and see Josephs the Information on their vessel register. All licences and authorizations are issued by a government body.
4.4.3.g	Evidence that fishing vessels have a vessel monitoring system (VMS), automatic identification system (AIS) or other vessel tracking technologies that are continuously engaged while at sea and actively monitored by the coastal or flag State	system (AIS) or vessel monitoring system (VMS) is fitted, it will fully operational and be turned	3.2, 3.4 & ANNEX B- UNE 195006	The company should ask suppliers if these systems are in place on board vessels, the percentage of vessels covered, and the percentage of this data which is monitored. If possible, evidence of this data and monitoring by a thirt party should be requested. Where vessel tracking technologies are not used or authorities will not release this information, the supply chain should be considered at higher risk of IUI fishing.	and authorization State are in relation to the employment of VMS and AIS onboard these	The supply chains are mapped, the vessels supplying fish and seafood are understood, as is the requirement for the adoption of WMS ALS. In addition to this, the protocols for VMS/ALS use is known and the poling rates and protocols are being assessed to determine whether they are sufficient to provide supply chain assurance that fishing activity is being carried out legally and in compliance with licences and authorization.	VMSY AIS is being employed in sufficient numbers within the supply chain to warrant fishing activity. Independent vertication of the VMS and AIS data is being undertaken using data made publicy available. In the event that data is not made publicy, supply chains should advocate for an opportunity to secure data relevant to the fish and seafood they buy, so that verification of vessel activity can be undertaken on a risk assessed basis.
4.4.3.h	Circleme half the vessels are in complanes with respection regimes. This includes evidence that the vessel management of packed evidence that the vessel management of packed and selected evidence that the vessel of the complane of the complane of the control of the complane of the control of the vessel and the vessel and the vessel and the vessel and the relevant costal stalls respective or only and all the vessel and the relevant costal stalls respective or only an with the authorities of the flag State of the vessel and the relevant costal stale and respective.	The vesse would have to demonstrate they are legally compliant with inspection regimes. This could also be writed by the auditor manage out to the RFMO is certification, hap and of the RFMO certification. Age and the RFMO is certification and the RFMO certification are sufficiently as a substantial to the second section of the RFMO is an IUU risk assessment would be undertaken to inform audit scope.	S, ANHEX I: UNIE 198006	Records of Inspection regimes or inspection results can be used here to confirm whether or not have conditions are melt, inspections may include the following.  Document checks  Lingtools.  Fairwoon jain  Fairwoon jain  Fairwoon jain  Fairwoon jain  Comparison with logbook  Chockwell with the confirm of the confirm of the comparison of catch  Fairwoon in the comparison of catch  Chockwell with logbook  Chockwell weighting  Working conditions  All goar in use should be inspected for compliance, and appropriate mesh sizes and dimensions checked including some goar that is not in use.  It is recognized that this information may be difficult to obtain in some counties. Where this reformation cannot be obtained, catch vessels should be asked to counter sky the evidence does not exist (off the vessels) are provided to the supporting of the supporting of the contraction of the comparison of the contraction of the contr	As supply chains are being mapped, the desire to be able to review evidence that vieweds an  complying with any rejevant respection regime. As been communicated to the supplem an  stakeholders with inflamor in the supply chain to make the happen. Ledely the  communication include details of the types of devidence that vould be necessary to prove  this, i.e. the information details evident the guidance notes.  During the supply chain mapping exercise, information on whether the fag State has ratified  During the supply chain mapping exercise, information on whether the fag State has ratified.	As applies have confirmed their understanding and recognition of the value that vessel inspections briga and that information is being collected, reviewed and assessed for vessels within the supply chan, to determine the validity and engagement with the respection regimes. Where retiremation is not validable from self- their flag flatter over soft the supply chan actors engagement information should be shared with seaflood buyers, and ideally publicly.  The flag State has ratified ILO C188, employment contracts stating the employment and	Fag States padd share their legic acredition regimes, and which vessels are cooperating with them and which read Supply chains can disconstrates that the sessels they are buying from are cooperating with the published inspection regime and are able to demonstrate evidence of the when required.  Fag States have ratified and replamented LD CTEB, employment contracts are available for
**************************************	conditions. Aftention is drawn to ILO Convention C188 which sets minimum international levels for crew conditions on fishing vessels. The Convention will come into force on 16 November 2017	(Section 2 of the RPVS).		Bagged to a country that has signed and implemented LD CT88, risk of crew not having decreted working conditions is decreased, as government are board by the convention to verify that vessed conditions and crew contracts are in line with 1s provisions. Where Bag States have not adopted LO CT88, organizations can self request revidence that conditions and contracts are at the same standard, information supplied by the LIV Ris support LIV organizations residently with LO CT88 can be also a reference for organizations residing to compare conditions and contracts to the provisions of LO CT88. See:	and implemented LO C188 is being collected and the review of employment contracts and evidence of decent working conditions is required by the buyer.	working conditions are in place for all vessel crew, and independent evidence of working conditions and employment is provided by plany certification. Where this is not fully in place, advocacy is planned or underway to achieve the alm.	each crew member, and decent working conditions have been confirmed through 1st. 2nd or 3rd party audits and certification such as the responsible fishing vessel scheme.
4.4.3.j	Evidence that suppliers (e.g. fishing vessel companies) have checked the references and background of vessel captains before they were hired	Not an exploit requirement. However in the eligibility clause if they have been prosecuted for transacting any of these clauses in the previous di months they cannot apply, if they bend once certified this will exclude the skepper from applying for the RPVS for a period of 12 months.		Organizations should ask suppliers what checks they undertake on the background of captains they employ. Where it is found that no checks are made on their background, including previous convictions to ILU fishing or human rights abuses, this significantly, and the conviction of	Solicy is communicated to vestel owners/immagers that at a specified point in the future, (if not already happens), the background colopials should be checked before they are engaged, and those with a history of \$IU\$ belang or human rights abuses convictions should not be present in the company's supply chain or engaged in the future.	On request, vessel conventimagers are able to demonstrate that they are is complance with the policy, profing evidence of baciground checks performed such as references from previous employers and searches of complance histories of previous vessels captained.	
4.4.3.k	fishing on more than one occasion are not engaged and that those convicted on a single occasion receive extra supervision and audit	Not an explicit requirement, however covered in the eligibility clauses see above.	Not defined APR	a single IUU intraction may be engaged but with extra supervision. The absence of such a policy increases the risk of seafood supplied by that supplier.	engaged, and those with a history of IIIU fishing or human rights abuses convictions should not be present in the company's supply chain or engaged in the future.	On request, vessel owners/managers are able to demonstrate that they are in compliance with the policy, providing evidence of background checks performed such as references from previous employers and searches of compliance histories of previous vessels captained.	
4.4.3.1	Evidence that captains or other persons are not engaged if checks find they have been found responsible for any previous human rights abuses	Not an explicit requirement, however covered in the eligibility clauses see above.	Not defined APR	Where suppliers have a process in place to check the background of captains before they are hired, they should also have a policy setting out that captains found to have previously committed a human rights abuse are not engaged. The absence of such a policy increases the risk of seafood supplied by that supplier	As above	As above	As above



3.1 General		Cross-over with RFVS	Cross-over with APR	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice
4.4.3.m	rights abuses	Vessels will be suspended from the RPVS scheme if human rights abuse allegations are raised, and certificate withdrawn if allegations are verified to be true.	Not defined APR	See 4.4.4 below	Policy communicated to suppliers explaining a zero tolerance approach to supplying seafood from companies convicted of IUU fishing or human rights abuses.	Rolicy position is underprined by internal due diligence processes, using information obtained through MCS information pathered in supply cham mapping, including searched for previous convictions relating to vessels owned by suppliers. Where compliance histories of companies are not available due to a fact of public information, its should be documented and advocacy to relevant States undertaken to publish information relating to compliance.	Company has documented evidence of due difference checks on supply companies, demonentarily faith they have been assessed, and have not been associated with I/U fishing or human rights abuses. This is reviewed through audits.
4.4.4	Where any of the above checks for devidence of UIU falling or elegal working conforms, the should not be sourced from those supplets.  Where supplets are survable to supply one or more of the Where supplets are unable to supply one or more of the supplets are unable to the programme of the supplet of the supplets of	If previously certified RFVS vessels are found to be engaing in Regal activities, there certified will be withdrawn, and they will not able to reapply for a minimum period of 12 months.	6.3, 8.2, 9.2, 12-8P 895.01	been board to have engaged in human rights abuses or UU Briting. This information can be board brough the degliner process, relating plantamion repeats to suppliers, but board brough the degliner process, relating plantamion repeats to suppliers. But he was a supplier of the supply chains. This de digence process should also document where information or policies recommended above and or available and set out what mitigating measures, such as third party audis, internal audis, information requests from NGOs etc.  For example, such as the party audis, internal audis, information requests from NGOs etc.  For example, such as the party audis, internal audis, information requests from NGOs etc.  For example, such as the party audis, internal audis, information requests from NGOs etc.  For example, such as the party audis, internal audis, information requests from NGOs etc.  For example, such as the party audis, internal audis, information requests from NGOs etc.  For example, such as the party audis, internal audis, information requests from NGOs etc.  For example, such as the party audis, internal audis, information requests from NGOs etc.  For example, such as the party audis, internal audis, information requests from NGOs etc.  For example, such as the party audis, internal audis, information requests from NGOs etc.  For example, such as the party audis, internal audis		Policy position is underprised by internal due dispunce processes, using information chained through MCS information gainered in supply chain mapping, including searches for previous convictions relating to vessels owned by suppliers. Where compliance histories of companies are not validable on the salt of policy information, this school do deminered and advocacy to relevant States understann to policie information relating to compliance.	Company has documented evidence of the diligence checks on supply companies, demonstrating that have been assessed and have not been associated with IUU fishing or human rights abuses. This is reviewed through audits.
4.4.5	Does the organization research vessels, companies and their beneficial owners from which it sourcing seafood? This research should include verifying the IMO numbers for any new vessels entering a supply chain		5.3 & ANNEX D- RP B95.02	vessel identities and histories through online databases.	As part of the supply chain mapping service, information is being complect that not only includes the vessel name, UV, (lag Skin, felsing oper used and sencese, but due the ultrash- beneficial owner of the fishing vessel which might not be just the immediate registered owner of the vessel.	fishing boats, so that links to IOO or numan rights abuse can be identified.	The ultimate beneficial covers of fishing vessels that supply all sedicod are known, even if when we second or this fire owners desired fiving-shed and holding companies. The ownership structure of all vessels is included within the flag State public vessel register and where mandated by it, also within the flag State submission to the Global Record.
4.4.6	Does the organization source seafood where this research finds evidence of vessels, companies or beneficial owners with a history of engaging in illegal activity?		No, it doesn't. (above and F90)	See 4.4.4	from companies convicted of IUU fishing or human rights abuses.	Policy position is underprined by internal due diligence processes, using information oblained through MCS information gathered in supply chain mappine, including searches for previous convictions relating to vessels owned by suppliers. Where compliance histories of companies is not available due to a lack of public information, this should be documented and advocacy to relevant States undertaken to publish information relating to compliance.	demonstrating that they have been assessed, and have not been associated with IUU fishing or human rights abuses. This is reviewed through audits.
	is the organization able to provide copies of the flag State feshing authorizations granted to feshing vessels whentif requested by any actior or relevant party? Evidence should be maintained in the supply chain about the use of VMS and a fisheries tophock by the flag State to monitor vessel activities.		ANNEX J9- UNE 195006	Organizations should saik that suppliers maintain evidence of their fairing sulforsizations securedly relevant flag and coastal States, a web as relevant RFMOs. In the case of RFMOs and an increasing number of States, these can be verified by the organization floreagy checking ordines list of authorised versels. In the fiture, the FAO Global Record will also be a resource where the information can be verified. Where these are not shared by States ordine, on a semple beats, organizations should set that suppliers provide evidence, nuclosing iscenses issued by flag and costal States. Where the supply change provide evidence, nuclosing iscenses issued by the supplier of the suppliers of the suppliers provide evidence, nuclosing iscenses issued by the suppliers of the suppliers of the suppliers to the suppliers of and by an assertable to be suppliers of the organizations with the continue to supply the validity of sufforcisations.	Mapping of speply chains is underway, and a fill field oil fairling, translepment and support research is being drawn of the chain of speply are being only on the chain of speply and chain of speply are being chain of speply and speply of special chain of speply and special chain of speply and special chain of speply chain of special chain of	The company has the ability to access flag State fishing authorizations, or has been to hand soo that I can assess whether the fishing vesselicompany is complying with the authorization conditions.	Flag Satte fairing authorization: are available for all vessels within its supply chain and these authorizations are held electronizably, which enables the company to interruptile and validate them in set.
4.5 Tranship Does the orga	nization require that?						
4.5.1.a	All transligements in their supply claims are recorded, monitored and concess by an independent observer programme appropriate to the factory?	Clause 127 requires l'ambigniment dates, names of carrier, dates and catch consignment datab.	3.5, 6.1 & ANNEX J.3,9: UNE 199000	Unmonitore di sela transipiraria are a potential avvenue for IUI-caught sededori products tu with differing bent di documentary revisione and observer presenze reparat. The FALD i developing fransipirane test practises, and organizations should be aware of their development, adolf them when compelled and encourage their supply chams to use bent or elementary. A company should request from relevant sufficient products the supply cham, the following information: "Requise and practice and products of the product of the relevant flag, cossala, por States and "Requise Tolip practice observer coverage" (turnan, electronic or combination) "Requise transipient disal-starriag procedures among relevant sufforties (other ways to sensure coverage").	io Supply of them are being mapped, including stemsforp whether transforment in present and a monecastary part of the supply chash. Including stemsfor mapped in the mapping principal contents are requirements of the flag, costall and FFMO being collected.	There is an understanding of translationers within all source fisheries and the status of monitoring, control and efforcement in each choice; to government and PSMUs is taking place, which includes the needs for 100% observation of translationers and data sharing status of the status of the s	All translipment events are recorded, 100% observation of translipment is in place and all authorities within the supply chain have access to translipment data as they need it.
4.5.1.b	If a transhipment is licensed (and therefore permitted) then the vessel is checked to see if it is on the relevant authorized register for fish carriers?	Not an explicit requirement	3.3, 6.1 & ANNEX J3,9- UNE 195006		Supply chains are being mapped to determine whether transhipment is happening and the vessels involved with it.	Transhipment vessels are present on authorized vessel lists and their flag State is known or steps are being taken to achieve this.	
4.5.1.c	Both vessels in the transhipment have uninterrupted VMS, AIS or other vessel tracking technology operating?	Not an explicit requirement	3.3, 6.1 & ANNEX J3,9- UNE 195006		Information on whether AIS or VMS is used by vessels transhipping catch is either known or being collated.	AlS and VMS is used on both vessels transhipping seafood within the supply chains, and where their use is not continuous, it is being actively advocated for.	All vessels involved in at sea transhipment use AIS and VMS that is transmitted continuously. In the event of transmission interruptions, vessels are shown to meet the internationally agreed protocols of what to do in such an event.
4.5.2	Is all of the information regarding any at sea transhipments made available to the end purchaser of the seafood in the supply chain (e.g. restaurant, brand)?		6.1 & ANNEX J3,9- UNE 195006 5.3- RP B95.02		Communication to the supply chain is present which clearly states there is an ambition that where transhipment is present in the supply chain, that it is known and documented.	Transhipment in the supply chain is understood and information is either being routinely passed to consumers or can be upon request.	Supply chains are transparent enough that information on the use of transhipment is known by the end buyer and they have confidence that transhipment is being carried out as required by their authorization and meets internationally agreed protocols.
4.5.3	certificates provide information about any translipments that have taken glace? I make a thing the provide characteristics and authorities should be validated by appropriate authorities and authorities should be validated by appropriate authorities.	The RFVS certificate holder would need to declare if their vesse in his all the necessary document in pace to assume they are legal at the pight of landing or leaving the vessel including trans shipment activities.	6.1 & ANNEX.(3.5- UNE 199096 5.3- RP 895.02	A company should request the following information on transhipments: Laid divessite horizon thromstepinents or transhipments Laid divessite horizon thromstepinent is g. data, exe, problem Charles of transhipment is g. data, exe, problem Charles of transhipment object, as a pseudo, product form Whiteher an observer program is in piace to monther the transhipments, as well as number of whiteher an observer program.  The discourants should be calculated and stratificated by importers and processors.  The GDST Standard 10 lists key data elements that about the codecated for any control of the control of the calculated on section 6 of CII calculated control of the control of th	A policy is adopted that majures transferents to be mapped in the supply chain and communicated to suppliers.	Supply chain mapping a complete for all seaflood sources and the need or use of transference with the supply chains has been established. The delid described in the implementation radies and SOSPT are either collected and available to the supply chain covers, or are storing collected and evidences.	All of the GOST KDEs and term is lated in the implementation notes are available for all supply chains that employ transhipment within them.
4.6 Landing : 4.6.1 General	at port						
4.6.1.1	Does the organization request the landing procedures and control of the port of ending? This antimation should them control of the port of endings and record whether ports The organization should assess and record whether ports are in States that early for, and have implemented, the Port State Measures Agreement, Ports with records of non- compliance should be detelled as higher risk.	Part procedures and controls are outside of scope of the RFVS standard, ratification of the PMSA would be considered in the UU risk assessment however.  the considered in the UU risk assessment however.	6.2.2, 7-RP @95.01	What measures can a company late to obtain landing procedures and determine he level of port contribe? As a fast ties, a company can have preference for point in States that are party to the 740 Part State Measures Rysementer (PSMA), as these are associated with a designated port in the post State is a surply to the PSMA if not a party to the PSMA is company should ask what is preventing the port State for princip. An company should ask what is preventing the port State for princip. An expensy should ask Records of port not requests, density, documentary checks and respections are kept. If so, additional questions that a company should ask are: An expensy should ask Records of port notify requests, density, documentary checks and respections are kept. If so, additional questions that a company should ask are: An expensy should are records of port and proteins of a such principles of the record of the Records of port and proteins of such principles of the information and cannot when the proteins of the Records of port and procedures and controls at the port of landing? A company should not request: the requirements for vessels, practically foreign-flegged vessels, in requesting access to port.	landed, what controls, documents and systems each of the ports requires of a vessel when I lands, and whether the port State party to the port state of the state state state of the state state state of the state state state state of the state sta	ports are not designated within the PSMA suppliers should advocate for them to be designated and any placement advantage. The part fallows should be encouraged to the state of the part of the level of IUU they encounter is routinely reported.	
4.6.1.2.a	incation assess and record whether or not ports in their supply.  The port State competent authorities have resources that use a risk-based targeting approach to control	accounting visual as an encode, and it into higher up part or user lock discontinuity.		A company should ask if there is an IUU-related risk-based procedure for centrols on visseds that request entry into port to land or transitip fish. A company should sak if the risk- based procedure is documented and if it is made publically available.	Supply chain mapping is underway to determine all of the ports where fish and seafood is landed. At a minimum, PAS 1550 ahoudd be referred to in supplier communication, so that they are aware of the desire to assess IUU fak.	Ports of landing are being determined, and information on the procedures, protocols and checks that are undertaken by the port authorities prior to and during landing, is being collected and assessed information on the landing procedures is known for each port of landing, the checks are risk based, and advocacy is happening or planned if these procedures are not make publicly available to third parties.	Landing procedures at ports are publicly available, with summaries of the landing checks and their findings routinely being published and shared, so that other flag, port and market States along with seafood buyers, can assess the risks of buying seafood landed into and through these ports.





3.1 General		Cross-over with RFVS	Cross-over with APR	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice
4.6.1.2.b	The control systems in the port are appropriate for the		ANNEX C- UNE 195006	A company should ask if the port is operating under or over its capacity. One way of	Supply chain mapping is underway to determine all of the ports where fish and seafood is	Whilst collecting data on the ports of landing and the controls they employ to check for IUU, a	The port State routinely publicises the number of landings that it receives, the findings of its
	volume of cargo and vessels			assessing port capacity is to ask what percentage of vessels that land or tranship fish are subject to documentary checks or physical inspections.	landed. At a minimum, PAS 1550 should be referred to in supplier communication, so that they are aware of the desire to assess IUU risk.	dialogue within the supply chain and the ports being used should be instigated, to assess a port's capacity to adequately cope with the volume of inspections required.	inspections, and with whom it transmits and shares its information, so that other flag, port and market States, as well as seafood buyers, can assess the risks of IUU fish and seafood passing through its ports.
4.6.1.2.c	There are enough inspectors provided at the port to be able to inspect the volume of cargo and vessels that the port handles		Not defined the amount of inspectors in APR	While there is no standard measure or guideline, a determination can be made by weighing he valume or prot scappilly for carge with the multime of impaction as stiff. Accompany should as if there is a sufficient number of inspectors for the volume of cargo and vessels. There is no standard measure or guideline, sufficiency is determined by the pot State. Who determining sufficiency, consideration needs to be given to the monitoring, control and compliance griptin cond in the source fallery, confidence lived the the controls in the faller are being men, the level of corruption within the port State, and technology employed that sassists in targeting the inspection regime.		The port check protocol regime is documented, publicly available, and considered to be sufficient to inspect enough landings to deter and pick up any I/U Brish and sealood. Consideration given to RFIMO Conservation Management Measures (SMMs) which may have more specific requirements, e.g. a percentage of vessels that need to be inspected. These requirements have to be at least met to be considered a sufficient level.	
4.6.1.2.d	The port State competent authorities are able to demonstrate that they operate in an effective and transparent manner		ANNEX C- RP 895.01 ANNEX J- UNE 195006	A company can request if sunding procedures, standards for documentary checks and physical inspections and records are public, and ask to obtain opiosh. A good resource on inport cortics and landing procedures that may be of use can be found here. Control and the control of the control o	Supply chair mapping is underway to determine all of the ports where fish and seathod is handed. At a mismin, PAS 1505 should be referred to in supplier communication, so that they are aware of the desire to assess I/U risk.		Landing procedures have been assessed and where deficiencies highlighted, a request to be produced to the procedure of the deficiency has been made. Of all ports in the top port authorities to procedures publicly, each ports system has teen raied, and is public reporting of landing assessment summaries. AD PSM requirements, which include public reporting of landing assessment summaries.
	All records relating the port State control are well-maintained and available upon request to the relevant authorities or actors requesting information  The port State verifies the catch documentation and		ANNEX C- RP 895.01 ANNEX J- UNE 195006  ANNEX C- RP 895.01	A company should sale if records of port entry requests, denies, documentary checks and respections are keep if its auditional questions that a company should sale re: \( As the records public \)  The situation of the situati	Supply chain mapping is underway to determine all of the ports where fish and seatood is lunded. All aminimum, PMS 1509 should be referred to in supplier communication, so that they are aware of the desire to assess IUU risk.	Ports routinely, share the data of their landing inspections with port and flag States so that the necessary information is available to them to take action on ILU where necessary.	Landing reports are sent electronically to flag and port States and there is an established public reporting of all landing findings summarised and routhely published.
	maintains organized documentation and files/ records		ANNEX J- UNE 195006	vessel that can be verified through transhipment reports. Where these documents are not currently shared with purchasing companies, then a request should be made to both the flag and port State asking for it to happen.			flag and port States and there is regular public reporting of the summarised findings.
	There are no recorded instances of bribery and any personnel found guilty of this are not permitted to work in the port		ANNEX C- RP B95.01 ANNEX J- UNE 195006	A company should ask if any instances of bribery or corruption have been identified or reported, how they were resolved or if they were made public. The bribery and corruption rist of each port or flag State country within the supply chain should be considered when assessing this risk.	Communication to the company's suppliers has been made, which says that if not already happening, at some point in the future enquiries should be made to determine whether or not there are any instances of bribery or corruption in port administration relevant to fisheries controls.	Using information from MCS questionnaires and enquiries to ports, the bribery and corruption risk of each port or flag State country is included within determination of risk levels for each supply chain.	Information on bribery and corruption relating to supply States is publicly available, along with commentary on how this has been integrated into the risk assessment process.
4.6.2 Port Star	e Measures Agreement  Does the organization check whether the port(s) at which	PSMA ratification will be taken into account in IUU risk assessment to determine RFVS audit	NOT DEFINED FOR PSMA	Check the Pew website for PSMA status and also check the accession documentation to	The value of PSMA is recognised by the company within its seafood sourcing policy or	All ports of landing within the supply chain are mapped, the landing controls are understood,	All ports of landing are in countries that have ratified and implemented PSMA, are included
	Does are organization robot whether are properly a which is saidoof that they are purchasing is landed is located in a State party to the PSMA? If not, then the ports should be considered to be higher risk in the due diligence process.			determine whether the ports of landing used within the supply chain are actually included within the DNI radication documents. If they are included, then they can be considered at lower risk, but if they are not included, then consider them at higher risk and ask the port Sate to include them. For more information about PSMA, visit, powtrusts or opportune or stoppinews also orgious-State-measures/resources/delate/incl/11116102.	The Yabe to Power in recognised by the company when his sealed society goes; where specification, as it the fact that robust port controls based on PSMA should be correctly implemented.	we just so statute you are use supply clear and inapper, she taining controls are investiscou, and where PSM radification is desirable, then advocacy for this to happen is taking place.	re jud to validating are in social test used retained and implemented Prairet, are included within the rafficiation documents, or are in State and regional agreements with measures that are at least as effective as the PSMA in ensuring that vessels carrying IUU product cannot access ports.
	As part of the risk assessment process, does the organization seek relation on whether or not the PSMA requirements are being implemented by the contracting the contracting the scale of the process of the process of the pseudo- tion of the pseudo-pseudo-pseudo-pseudo-pseudo-pseudo- to-pseudo-pseudo-pseudo-pseudo-pseudo-pseudo-pseudo-pseudo- for compliance should be treated as an increased risk of fain passang through the port being flegal	implementation of the PSMA would not be taken into account.	NOT DEFINED FOR PSMA	A company should said if the port State is early to the PSIAM and/or what is preventing them from printing. A company should sall whether ben or State has designated ports for access by foreign happed vessels, whether they have been publicated for check here:  A company should saik whether they have been publicated for check here:  A company should saik whether requests to enter port and inspection reports include the designated ports: this whether requests to enter port and inspection reports include the designated ports: this whether a complaint in the state of the FAO date has a distillated and search of the FAO date has a distillated of the state of the st	Evidence of checks at gort is being requested from suppliers, and the suppliers have acknowledged the importance of having profugented, and robust and documented checks being undertaken at each port of landing.	Suppliers have knowledge of the clocks that are being understation at jort, as well as the regime of checks that two been risk assessed to make sure they resulticent in quality and quality to capture IVU thin't presented for lawfur, When the assessment deems checks under the PSMA, and notified through the FAO system.	Information on complance by relevant port States with the PSMA is publicly available.
4.6.3 Vessel in Does the organ	ization require that?						
	port when vessels dock, as far as is permitted by the immigration laws of the port State	The RFVS requirements would align with the requirments of local immigration laws.	The APR requirements would align with the requirments of local immigration laws	A company can ask if crew are granted shore leave access in accordance with immigration laws of the port State.	Suppliers have been written to, advising them that at a specified point of time they will be asked to report on the immigration laws of relevant port States and how they relate to the ability of crew to leave vessels in port.	Port visits and independent assessments verify that crew are able to leave vessels in countries where this is permitted. In countries where this is not permitted, advocacy is undertaken to address this.	Ports are used that allow crew the ability to leave vessels when at port to access health, religious and recreational services.
	to the port State inspector, are in possession of their own work contracts and identification documents and are available for confidential interview if a request is made by the port State authorities	Clause 1.12 requires At the commencement of each fishing trip, an updated crew let shall be produced and kept on board, and a copy shall either be lodged with the regulatory authorities or with an authorized person based on shore.		In some countries, port in/port out inspections have been put in place to ensure there is not licit incidence or swapping of crew whitest at sea. When the FSAMILO 188 and Cape Town Agreement are all in force, raiffed and effectively implemented, there can be joint inspections that will verify his. If these 30 UN agreements are not in force for each of the supply chains lag or port States, then advocate for their implementation. A company should ask for crew documentation provided by the port State respector.		contracts and are available for port inspections. Where port inspections including confidential interviews are not being undertaken, advocacy is undertaken to call for this from the relevant State.	could also be demonstrated through independent third party audit.
	The captain is available at the port inspection and is able to provide all documentation and enquiries required at the port State inspection.  State inspection		ANNEX J-UNE 195006	Per-condition of arrival and landing should be made by vesselv or flag States so that document inspection as the underlaken and cultome recorded. Supplement should request a copy of these records relevant to being purchase from the vessel conventrappior. Where they are relevabled, their short-board respect of the information should be made to the practice. A company should request respection report the after brokelve reserved practice. A company should request respection report the after brokelve reserved documentation, processing and transfurent reports, vessel monitoring systems, and/or automatic derification occumentation. Learning the state of the practice and control control occumentation. Learning sear, fish species and quartiles, safely certifications and crew documentation.	The need for landing respections and pre-notification of landing is recognised as an important step to address ULV lether with an company poly or the buying precipitation. This recognition has been communicated to seafood suppliers of fish and seafood, whether or not they are landed to States party to PSMM.	improvement steps are being taken to achieve vibility of inspection reports that include checks on vessel 10 registration documents youth, branshyment and other criteria contained within the GDST KDEs or the specific buyers requirements.	Pre-notification of arrival and landing is routine at all ports of landing within the supply chain, and these records are available for timely sharing with interested statisfaction, of the galactic port States and they contain accurate information on all of the attributes detailed within the PA'S guidance notes.
4.7.1	Does the organization include in its policies and require from its suppliers that all of the major issues that are identified in ILO Convention C188 are addressed by source fisheries? These are essential to providing decent work conditions on board fishing vessels	Covered in the requirements of Core Principle 2, Section 1 requirements.	5.3- UNE 195006	See 4.4.3 i			
4.7.2	Wherever possible and relevant, does the organization demonstrate that it supports the ratification of the ILO Convention C188?	The management systems related to crew treatment to demonstrate that, at minimum, they comply with the International Labour Organization's C188 Work in Fishing Convention, 2007 (ILO C188).	5.3, 5.4 & ANNEX J8- UNE 195006			-	
4.7.3	Is traceability ensured down to vessel level to enable businesses with a turnover of over £38 million to produce their annual stavery and human trafficking Statement that covers what is being done in the supply chain to address the issue.		5.3, 5.4 & ANNEX J8- UNE 195006 ANNEX C- RP B95.01	See 3.4.5. An overview of the traceability system can be set out in reporting issued under the Modern Slavery Act			
4.7.4	Has the organization developed and made public protocols that guide how and when it will inform statutory agencies of human rights infractions identified during audits, risk assessments and other internal reviews?		NOT DEFINED				
4.7.5	Have industrial fishing vessels had a social and ethical responsibility policy/standard that includes the points in 3.3.3?	The RFVS would cover these requirements.	GRIEVANCE MECHANISMS TO BE INCLUDED IN NEXT VERSION OF UNE 195006	See 3.3.3	Communication made to suppliers setting out the requirement for vessels to have a policy/standard setting out working conditions. Reference should be made to the conditions required in ILO ILO C188.	Vessel policy/standard obtained and documented for all vessels in the supply chain. These require conditions in line with ILO C188, or where there is a departure from these requirements, it is clearly documented and incorporated into the risk assessment.	3rd party certification is in place for ports, vessels and other places where people are employed within the supply chain, or the flag and port States have ratified and robustly implemented PSMA/Cape Town Agreement and ILO C188.



3.1 General	I	Cross-over with RFVS	Cross-over with APR	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice
5.1 General					·		
4.7.6	Do inspections, audits and checks include, where possible, in-person interviews with the relevant vorkers or crew, which are conducted in a neutral and safe environment, guaranteeing the security and anonymity of the viterviewees ?	RFVS audits will require crew interviews using APSCA registered auditors.	GREVANCE MECHANISMS TO BE INCLUDED IN NEXT VERSION OF LINE 185006	Visesti integrations and sudits are a developing area, so the PAS indicates that this is a requirement where public importer processor pictor; relation on these in their du- disponce systems should seek assurance of the following bloor and interview standards for representations, and an other standards of the processor of the processor of the standards of relativistic standards of the processor of the proces	Communication made to suppliers requiring that crew are made available for confidental interviews by netward State impsectors or other experts on request.	Audits and port visits include confidential interviews with crew in a neutral and safe environment, guaranteeing the security and anonymity of the literviewees.	All vessels are subject to inspections under ILO C188 or are subject to a certification or standard that includes periodic crew interviews by trained professionals.
				to identify operated cases of Fi. 8.117 inches part analyze of the respections, should be provided inspection records including number, type and nature of the respections, should be provided respectives should use an interview questionnaire that is designed to identify indicators of forced above and human trafficing as defined by the LO importes processors should be provided with examples of completed questionnaires as inspections. The provided with examples of completed questionnaires as inspections. The provided with examples of completed questionnaires as inspections. The provided with examples of completed questionnaires as inspections.			
Section 5. Fac 5.1 Informatio	on .						
5.1.1	Is the organization able to demonstrate that processing factories in its supply chains comply with the policies and specifications of the organizations which they supply (see 3.3.3).	In supply chains supplying RFVS certified seafood, processing requirements would be covered by the GSA Seafood Processing Standard / or a credible chain of custody standard.	5.3- RP B95.02 (GRIEVANCE MECHANISMS NOT INCLUDED)				
5.1.2	Can information be provided to anyther action in the supply chain on the legalized cases of the product within a maximum of four hours?		In our case, the traceability excercise has to be done in a maximum of 6h - RP 895.02	Processors should be able to provide details on the following- yeads recept documentation traceability-faith coder chaceability process back to vessel or strategies in place to with gealty at level of processing mass balance reconciliation, i.e. where the original cache outlined in the catch certificate has been spill up and cache certificates have been photocopied by the common of the common of the common of the catch certificate has been spill up and cache certificates have been photocopied to the common of the common of the common of the common of the table to the common of the common of the common of the common of the strategies of a spill demand on both or forcesse conforces and interceptuality of information systems and therefore help case due sharing in the COST Standard 1.0. https://doi.org/10.1006/standard.10.0.0006/standard.10.0006/standard.			
5.1.3	Is there a designated person(s) at the factory that is responsible for ensuring that information relating to legality and traceability is compiled, stored, reviewed managed and available for checks (e.g. audits)?	For the vessel this would be the responsibility of the skipper.	The company has to have a Quality or Food Safety Manager as usual, to provide the information requested in ANNEX D- RP B95.02				
5.2 Process C			5.3 & ANNEX D- RP B95.02				
5.2.1	documented to ensure that the product meets the specifications and produces products that are compliant with the expectations of the end product users?						
5.2.2	Are product specifications, batch specifications, process monitoring, product testing, manufacturing site cleaning, and other quality control measures documented?		5.3 & ANNEX C, D- RP B95.02				
5.2.3	Spot purchases without any knowledge of the vendor should be avoided and therefore not present in supply chains. The organization should ensure that all subcontractors meet all laws and are included in traceability documentation		2- RP B95.02				
5.2.4	Does the organization complete mass balance checks at their factory for its supply chains? These should be completed at regular intervals throughout the year; at a rester appropriate according to the results of the risk assessment and to satisfy internal due dispence but at an ininimum of corne per year. Accurate conversions ratios from production line should be used to make sure that the mass-balance is accurate.		5.3 & ANNEX D- RP B95.02				
5.3 Ethics and	l labour						
	include in the policy)?	Section 1 of the RFVS states the requirements for Management Policies and Procedures for the vessel (or vessel group management organization).			A policy is in place that requires the full mapping of the seafood supply chain and includes an ambition for social and ethical responsibility and working conditions to be afforded to everyone working within it.	targeted to those areas of the supply chain that are assessed to be of high and medium risk.	
5.3.2	Does the organization apply this policy not only to the buildings and operations that it owns but also communicate that the behaviours outlined in the policy are expected of all the actors in its supply chain, from supplier to vessel operations?	As above	6.4- UNE 195006 ANNEX D.2- RP 895.02	Policies that dateers social and ethoid responsibility should be communicated to all actors along the supply chain. Where this cannot be communicated, for a connect occasions suppliers to not know who they will supply from in advance, efforts should be made to communicate these policies as soon as the supply chain in established.  There should be a mechanism in place that allows communication of these policies and standards to the potential suppliers of seathout from new courses. This can help inform a company's sourcing doction and it helps the supplier determine if it can met requirements.	The policy includes an allowance for new supply chains that are seasonal or have short lead times before supply to be mapped as some as time allows, but that all regular supply chains are to be mapped at the earliest opportunity.	A system is established that deals with seasonal variance in supply chains by exception, employer a risk-based approach to assessment to allow supply to occur, but outside of that the supply chain is understood and a demonstrable management system for assessment, imagistion and remediation is happening.	Supply drain is well mapped and the policy has been in place for a sufficiently long time that day party audia coefficient or all order place for a sufficiently long time that day party audia coefficient or all order place for a sufficiently long time that prespective of volume and value being sourced.
				company's sourcing decision and it helps the supplier determine if it can meet requirements now and in the future.			
	Does the organization ensure that at any of its factories, a review of its ethical and labour policy and systems is completed at least once per year to ensure that it is addressing current industry concerns and that it complies with any changes to the industry and supply chain requirements?		ANNEX D.2- RP B95.02				
	Is there a designated person(s) at each factory to ensure that workers are being treated ethically and that labour rights are being upheld? Translation services should be provided for migrant workers to facilitate effective communication		Not defined				
5.3.5	report should be investigated as a priority, in a fully transparent manner and by including the relevant union representatives – or in cases where this does not apply – by involving NGO representatives in the review process	2.16 As able and confidential cores glevance mechanism procedure shall be adopted which provides transparent, fill and confidential procedures to be followed in the event of a glevance being mixed:					
5.3.6	Does the organization promote robust labour standards with respective governments in the form of legislative frameworks that support workers – local or migrant labour – in their right to organize and collective bargaining?	2.27 The applicant shall have a policy in place that respects the rights of every crew member to be able to have freedom of association and the right to collective bargaining.	5.3 & ANNEX E- UNE 195006				
5.4 Product tr	acking and transformation Where a fish product, unit, or batch of fish products,	Traceability requirements for the RFVS are covered in Section 3 Catch Traceability	5.3 & ANNEX C, D- RP B95.02	Seafish lists UK regulations pertaining to labelling, marketing and more:			
0.4.1	Where a fish product, unit, or batch of fish products,	Traceability requirements for the RPNS are covered in Section 3 Catch Traceability Management. Supply chain requirements will be covered in the GSA Sediood Processing Dearnfaret.	u.o. a reffect U, D* RF B95.02	Seatish lists UK regulations pertaining to belling, marketing and more: some small profit and an end-profit profit profit and state of the state of			
5.4.2	Are unique unit identifiers present at each level of the	Covered in the GSA Seafood Processing Standard.	ANNEX C, D22,23- RP B95.02				
	packaging hierarchy (e.g. from a pallet, a case or a consumer item)?						





3.1 General		Cross-over with RFVS	Cross-over with APR	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice
5.4.3	When a product is combined with other material products, processed, reconfigured, or re-packaged, does the new product have its own unique product identifier?	ne GSA Seafood Processing Standard.	ANNEX C, D25:29- RP B95.02				
5.4.4	Is the linkage (auditable function) maintained between this covered in the G new product and its original injusts to maintain traceability? For example, a label, linked to the lot identification of the traceable injust item, remains on the packaging until that entire traceable unit has reached the final point of sale	e GSA Seafood Processing Standard. A	ANNEX C, D- RP 895.02				





Section 3. Ma	nagement						
3.1 General		Cross-over with GDST	Cross-over with SPSv5	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice
3.1.1	Does the organization have systems in place to manage critical aspects of legality? These should comply with requirements such as the EU IUU Regulation, relevant policy, standards and labour conventions. These systems should include traceability, processes, information verification and transparency.	0.3	2.12.1 The facility shall prepare and implement standard operating procedures, quality procedures, took safety management procedures, social accountability procedures, and work instructions for all processes and operations having an effect on product safety, legality and quality.  9.4.1 Products shall be packed in bags, boxes or master cartons, britestack pallets (i.e. canned) that are properly labeled with all information, including altergers, as required by local legislation and legislation of the country of destination.	A company should have systems in place to manage critical aspects of legality, that comply with EU IUU Regulation, relevant policy, standards and labor conventions. These systems should include:  -Traceability - third party management system certification such as BRC/IFS will help to ensure a management system is in place, as will MSC chain of custody, although these do not specifically cover aspects for IUU  -Processes -Information verification -Transparency	avoid buying IUU fish - which also makes reference to the Modern Slavery Act if UK based - or other relevant statutory due diligence requirements is written and available. The policy includes the desire to engage with	A management system is in place that includes processes to manage information verification and traceability. Where practical, a 7rd party audit of management system (e.g. BRC, IFS or GSA) or processing standard are in place, to ensure traceability. The company is a member of GDST and is working with suppliers to capture the relevant KDEs	Full supply chain transparency is achieved with public reporting of policy, practices, supply chains. Full suppl chain reporting traceability using the GDST data requirements.
3.1.2	Do the managers of the organization engage on improvement work with other suppliers or actors in the supply chain (e.g. audits, reviews, site visits, etc.)?	Implementation of GDST standards to improve traceability requires to engage al of the supply chain. Moreover, GDST may be used in conjunction with other certifications which may include audits, site visits etc.	2.5.1 The facility's senior management shall demonstrate their commitment to the development, implementation, and continuous improvement of all elements of the Quality Management System in order to ensure compliance with the entire scope of the Seafood Processing Standard	Company managers should engage on improvement work with other suppliers or actors in the supply chain by:  -Conducting audits and reviews  -Conducting regular site visits, engaging in fishery or aquaculture improvement projects that specifically tackle IUU relevant issues, supporting research, and advocating for legislation adoption and effective implementation	A list containing all products and stock keeping units/SKUs is available within the business, which details basic information of source fishery and supply chain. Sufficient information is collected to warrant that the seafood being purchased is legally caught, and that when sold, is labelled accurately. All suppliers have received copies of company policies and internal risk assessment processes are either being considered, are in the process of being developed, or an existing mechanism is adopted, so that where needed, supply chain improvements can be identified.	The company seafood sourcing policy is formally acknowledged by all suppliers. The list of products and suppliers has been risk assessed and categorised into high, medium or low risk according to the company policy, with high risk products and high risk suppliers having either written and agreed improvement plans, or are working to have agreed plans within an agreed timeframe. Audits of high risk supply chains are taking place, ideally using third parties, or are being arranged.	All SKUs have been risk assessed, all high risk products have been mitigated, so that the majority of sources are low or medium risk. All suppliers are working to achieve sustained low risk categorisation with routine risk assessment and monitoring systems established to maintain this.
3.1.3	Where improvement work identifies corrective actions that can be completed to satisfy the organization's standards/policies, is support (e.g. approval/verbal, finances, time, meetings, etc.) given to the supplier or actor?		2.1.5 The Quality and Food Safety Management Systems shall:     2.1.5.5 Implement action necessary to achieve planned results and continual improvement.	Support in the form of approval/verbal, finances, time, meetings, etc. should be given to the supplier or supply chain actor in need in need of corrective actions, in order to satisfy the organization's standards/policies. Evidence of this support should be able to be provided upon request.	As above	As above	As above
3.1.4	is all seafood in the supply chain of the organization addressed using the same systems and level of scrutiny? Traceability and legality should be a minimum requirement for all seafood.	Implementation of GDST standards requires the same level of scrutiny for all seafood.	9.1.1 Facilities that source raw material from both wild-caught and farm-raised sources shall properly identify, segregate and label products from different wild-caught and/or aquaculture sources and shall indicate any relevant certifications.		A process is in place which is actively trying to achieve the same level of traceability, based on a risk assessed basis, for all sources of seafood that are within the scope of the policy. The scope might hittally be limited, so that the process and practices of mapping and supply chain interrogation are being established. When defination of the scope of the sourcing policy, consideration of volum of trade and potential influence on the supply chain should be made.	consumption, as a marine ingredient, or other route to market.	All seafood within the scope of the company's seafood buying is either assessed as being low risk, having been traced back to source, or is within a process, with the aim to be achieved in a time-bound commitment.
3.2 The IUU							
3.2.1	Does the organization document which of the products they sell are covered by the EU IUU Regulation?	GDST implementation would uniquely label units going to EU and those not.	9.4.1 Products shall be packed in bags, boxes or master cartons, britestack pallets (i.e. canned) that are properly labeled with all information, including allergens, as required by local legislation and legislation of the country of destination.	A company should document which of the seafood products they sell are covered by the EU IUI Regulation within their buying specifications and their supplier approval ists. These include:  -All imports of fresh and frozen, wild marine capture fishery products, both whole and processed -Imports into the EU including catches made by non-EU vessels landed directly in an EU port, or landed in a third country port and subsequently exported to the EU, whether processed or not processed -Imports into the EU including catches made by EU vessels, landed and imported in a third country and from there imported in the EU, whether processed or not -Exports from EU, including those with a catch certificate if required by a third country	supply chains of the company so that within as short a time as possible they know which products fall under the EU IUU Regulation. This will have all legally required information such as: species name, fishing gear/method sea area of capture, date of catch and landing available to them, so that ultimately they can determine which regulations apply to the products.		Best practice information is routinely available with additional information documenting declared retained catch data quantity and product form per box, batch or tank, as well as details on beneficial ownership, background of captain, and other elements as explaine in detail elsewhere, providing full supply chain transparency.
3.2.2	Does the organization have management systems in place covering the requirements of the EU IUU Regulation (if sold)?		2.12.1 The facility shall prepare and implement standard operating procedures, quality procedures, food safety management procedures, social accountability procedures, and work instructions for all processes and operations having an effect on product safety, legality and quality.	A company should have management systems in place that cover the requirements of the EU IUU Regulation if it sells any of the products covered by this Regulation. Management systems will include traceability system and policy, incoming raw material tot assessment, and performance reporting which specifically covers IUU related topics such as ports of landing, timely presentation of catch certificates, cross checking UVIs.	Full supply chain traceability is desired and stated within a sourcing policy that is communicated to suppliers. Information on both seafood sources and people involved within the supply chain should begin to be collected either by the buyer or its supplier, with a system being developed to manage and assess the information being collected.	Traceability systems capture all steps of people, product and process through which the seafood passes or is handled, as well as collating catch certificates for species covered by the EU IIUU Regulation. Verification of this information happens routinely via internal or third party audit, which informs what actions need to be taken to be able to continue sourcing products of high risk.	All products are sourced using an established monitoring system that collects information on the seafood and people involved in the supply chains, with data collected in accordance with GDST KDE principles. All products are classified as low risk for IUL and labour risks by third parties.
3.3 Policies a 3.3.1 Genera	and Processes						
3.3.1.1	Are documented policies and processes in place that provide requirements for full chain traceability to be ensured?		9.0 Traceability Management 9.1.2 Proper identification shall be maintained for each lot, for each wid-caught and farmraised source, on all documents and at each step of the process flow from raw material receiving, handling, processing, packaging, storage and dispatch. Records shall be maintained to ensure product identity and demonstrate that products from wid-caught and aquaculture sources and those from certified and non-certified sources are not mixed.	The PAS 1550 defines full chain traceability as the "linkage from the point of capture to the consumer of one stage of production at a time, from any stage of production to any other point along the entire supply chain (often through documentation). In other words, capturing product information that tracks it at every stage of the supply chain from vessel to retailer. Full chain traceability policies and processes should outline but are not limited to: how risk is assessed, type of data required, methodology of data collection, frequency of data collection audit schedule, and response to gaps in data.  The co-mingling of seafood from different sources can pose challenges to achieving full chair traceability. As such, companies may use a combination of recognised traceability standards and schemes to inform full chair traceability policies and processes. Some examples include the British Retail Consortium Global Standard (BRCGS) for food safety and the Global Dialogue on Seafood Traceability (GDST) standard.	dates, including landing date, being collected. The fact that this information is required to be collected is stated in a company sourcing policy or specification that has	in addition to the base requirements that are supplied for al purchases, supply chains are fully mapped and declared, including retained catch data quantity, and product form in box, batch or tank, plus fishing method and gear, Transhipment dates, name of carrier, dates and catch consignment details are required from suppliers. Third party certified chain of custody and traceability systems are in place and KDEs using the GDST Standard are being collected.	supply chain in a timely and transparent manner that fully conforms to the GDST KDE standard. The whole supply chain is transparent with people and seafood interactions fully understood and verification/validation processes are embedded to demonstrate compliance. Digital traceability system is in place providing





3.1 General		Cross-over with GDST	Cross-over with SPSv5	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice
3.3.1.2	Are policies and processes audited and have the contents reviewed on, at a minimum, an annual basis in case changes or amendments are required to be made?				A seafood sourcing policy is in place that makes reference to the company ambition that both it, and its implementation, will be reviewed and audited on an annual basis.	Policies and processes are audited annually to ensure that the assessment of IUU risk within the supply chain is sufficient to manage risk.	
	Are reports produced (at least annually) on the implementation and monitoring of the policies and processes that are in place to address risks?				As above		Policies and processes are audited annually to not only assess the assessment of IUU risk within the supply chain, but also to assess the implementation of the risk mitigation improvement processes.
	Are policies and processes available upon request and made available to other actors in the supply chain within seven days of such a request being made?				The company has a seafood sourcing policy that is communicated to suppliers and available to customers upon request, with basic processes to assess suppliers.	The company seafood sourcing policy is communicated to and acknowledged by suppliers, with a functioning process to assess suppliers and their supply chains.	The company seafood sourcing policy and its processes for assessment are well established, customers know their suppliers' supply chains, and are aware of the work being undertaken within them.
3.3.1.5	Are policies and processes demonstrated to have been communicated throughout the supply chain to, at a minimum, the stage before and the stage after the processor/importer?			A document setting out policies and procedures should be shared within the supply chain. It is good practice to ask suppliers to acknowledge that they have received and understand the policies and procedures, and that this is documented. Clarifications should be provided in the event that suppliers indicate they do not understand policies and/or procedures.		Acknowledgement is received from both suppliers and customers that the company policies and procedures are understood and complied with. Policy and procedures are reviewed on a minimum annual basis and confirmation that they are understood by suppliers is in place.	Purchasing polices and procedures are documented, regularly reviewed and form part of a supplier management process that is independently assessed and demonstrated to work. In addition, purchasing policies are distributed and acnowledged by all stages and actors in the supply chain.
3.3.1.6	Is the organization able to demonstrate compliance and implementation of all of the required regulations, conventions and standards (dependent on the supply chain and market)?			It is the responsibility of any organization to understand and observe the laws and regulation in any territory in which they operate. The recommendations in this PAS help an organization to gain this understanding in relation to the legality of seafood and the working conditions of workers in the seafood supply chain.	Supply chain is being mapped for all seaflood sources, which includes the desire to understand the pertinent local, national, regional, and international legislation applicable to the seaflood, so that in time the legality of the seaflood harvesting and employment practices being employed can be warranted.	legislation, or implementation to be filled or already	Legislation applicable to each source of seafood is known and if it is not fully implemented, government advocacy is being undertaken to address the regulation issues, or steps have already been agreed to ensure full regulation implementation will occur in a known timescale. RFVS certification of vessels is widely adopted within the supply chain.
3.3.2 Due dili.	and be able to demonstrate that it does so? The	Implementation of GDST standards facilitates risk assessments as it helps to gather information to determine the level of risk.	9.1.4 The procedures and records shall clearly show controls and traceability at ALL steps: chain of custody evidence from the outsourced entity (country of origin, for example), on the way to the outsourced entity, during handling, production, labeling or storage at the outsourced entity, and during transport away from the outsourced entity, and during transport away from the outsourced entity. 3.6.1 The facility shall have a documented food fraud vulnerability assessment Critical Control Points) in place to identify potential vulnerability and prioritize food fraud mitigation measures.	A company should complete due diligence through risk assessment on all of its supply chains. The level of risk in supply chains can be reduced by identifying and taking mitigation actions or measures such as mandating future requirements or engaging in improvement processes with the supply chain. A company should prioritize its use of each supply chain according to the findings of the risk assessments. Ranking and assigning metrics that will evaluate results against factors such as the level of risk, volume and importance of the supply chain to the business, is subject to the needs of an individual company. The risk assessment system should demonstrate and document that for each supply chain is an assessment and any required actions have been applied. For example, if a supply chain is identified as higher risk, it will require additional verification for the company to assure its integrity.  *Risk assessments should be reviewed on a regular basis e.g. monthly, annually, biannually	finds acceptable within supply chains and is formulating a risk assessment matrix with which to assess the information being collected from its supply chains.	All seafood supply chains have been mapped, risk assessments have been completed for all, with risk categorisations made and in the case of high risk sources, improvement plans agreed. Consideration to volume of seafood purchased from an individual source, and confidence in regulation and of the supply chain, will inform the metrics of the risk assessment, as well as mitigation and improvements steps that can be taken.	All seafood supply chains have been risk assessed on numerous occasions, all previously assessed high risk sources have either been miligated or are no tonger supplying, leaving minimal medium risk and the majority of sources being considered low risk.
3.3.2.2	Does the organization prioritize its use of each supply chain from which it sources according to the findings of the risk assessments?			Companies should conduct risk analyses to help minimize and miligate the risk of IUU fish entering their supply chains, importantly aiming for assured traceability to legal origin. See example risk assessment to determine appropriate action. Where the risk assessment produces a moderate to high risk of IUU or information is missing, the sourcing decision should reflect the level of risk.	The seafood sourcing policy includes a statement that the company endeavours to purchase seafood from low risk/low impact sources and aims to move its sources and buying over time to achieve this. The sourcing policy has been communicated to the company's suppliers.	Improvement plans for all high risk sources are in place. Government and industry advocacy is happening (and which you are following and engaging in where practical) for high risk sources, and plans are being developed for low and moderate risk sources where improvements need to be made. Where risk assessments have been completed on numerous occasions or improvement plans are not yielding the desired change, the company can demonstrate that these factors influence ongoing buying decisions by communicating to the governments and relevant supply chain actors, that continued inaction could lead to a reduction in volume of purchases, or in extreme cases the cessation of buying altogether - whether individually, or as part of a government led trade sanction.	Advocacy activity is well established with high and moderate risk source issues having been addressed through completion of their improvement plans, or are able to demonstrate continued commitment to change. Where improvement plans have been shown to not yield change, the company can show that purchasing volumes have been reduced or buying suspended.
3.3.2.3	Does the risk assessment system demonstrate and document that for each supply chain an assessment and any required actions have been applied, that are appropriate according to the results of the risk assessments and prioritization exercises?				The seafood sourcing policy includes a statement that the company endeavours to purchase seafood from low risk/low impact sources and aims to move its sources and buying over time to achieve this. The sourcing policy has been communicated to the company's suppliers.	Improvement plans for all high risk sources are in place. Government and industry advocacy is happening (and which you are following and engaging in where practical) for high risk sources, and plans are being developed for low and moderate risk sources where improvements need to be made. Where risk assessments have been completed on numerous occasions or improvement plans are not yielding the desired change, the company can demonstrate that these factors influence ongoing buying decisions by communicating to the governments and relevant supply chain actors, that continued inaction could lead to a reduction in volume of purchases, or in extreme cases the cessation of buying altogether - whether classes the cessation of buying altogether - whether individually, or as part of a government led trade sanction.	Advocacy activity is well established with high and moderate risk source issues having been addressed through completion of their improvement plans or are able to demonstrate continued commitment to change. Where improvements plans have been shown to not yield change, the company can show that purchasing volumes have been reduced or buying suspended.



3.1 General		Cross-over with GDST	Cross-over with SPSv5	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice
3.3.2.4	Are risk assessments reviewed on a regular basis (e.g. monthly, annually, ib-annually, etc.) depending on the level of risk, or if something changes? The risk assessments should be completed at annimum annually, and then at least six-monthly for supply chains identified as higher risk.		3.6.2 The food fraud plan and risk assessment shall be reviewed, at minimum, annually.		The seafood sourcing policy includes a statement that the company endeavours to purchase seafood from low riskflow impact sources and aims to move its sources and buying over time to achieve this. The sourcing policy has been communicated to the company's suppliers.	Improvement plans for all high risk sources are in place and risk assessments undertaken on a six or 12-month basis dependent upon the level of risk identified. Government and industry advocacy is happening (and which you are following and engaging in where practical) for high risk sources, and plans are being developed for low and moderate risk sources where improvements need to be made. Where risk assessments have been completed on numerous occasions or improvement plans are not yielding the desired change, the company can demonstrate that these factors influence ongoing buying decisions by communicating to the governments and relevant supply chain actors, that continued inaction could lead to a reduction in volume of purchases, or in extreme cases the cessation of buying altogether - whether individually, or as part of a government ted trade sanction.	Risk assessments are able to show that over time, and with established advocacy activity, high and moderant risk source issues having been addressed, giving transition to low risk outcomes through completion of their improvement plans, or are able to demonstrate continued commitment to change. Where improvements plans have been shown to not yield change, the company can show purchasing volumes have been reduced or buying suspended.
	working conditions						
3.3.3.1	Has the organization established and uses policies, practices and confidential reporting and assurance systems at every worker facility in all countries where fisheries products are sourced? This should allow all workers to have the ability to report labour infringements, unfair working conditions or associated unlawful treatment as necessary.	Implementation of GIST standards allows an organization to gather information where such policies along their supply chains exist and where gaps occur.	5.8.4 There shall be a written worker grievance process, made available to all workers, that allows for the anonymous reporting of grievances to management without fear of retailation.		The company recognises and understands the need for decent working conditions, it is mapping its supply chains to identify where its policies need to apply, and has policies in place that outline this ambition and those policies have been communicated to suppliers one step down the supply chain.	The policies are communicated to second and third tier suppliers with assessments being undertaken either in- house or through third parties.	Company policies are shown to be working properly, with all supply chain actors known and proactively participating in policy implementation, assessment and remedy. Confidential reporting mechanisms have been made available to all employees within the supply chain and demonstrable steps able to be shown that remedy issues found.
3.3.3.2	Is each of these systems supported by a transparent process available upon request as part of supply chain audits, and be equally applicable for workers with or without union representation?		5.8.4 There shall be a written worker grievance process, made available to all workers, that allows for the anonymous reporting of grievances to management without fear of retailation.	A company should be able to request and view the processes in place at any point along the supply chain, which ensure that workers have the ability to report labour infringements, unfair working conditions, unlawful treatment, etc.  Where the company is not able to obtain evidence of such processes, this lack of information should result in the company receiving a higher risk rating and mitigating measures undertaken.	data available for inspection by the buyer or the buyer's representative agents, so that decent working conditions of people within the supply chain can be assessed.	The buyer or the buyer's representative agent has uninhibited access to an established system in which workers within the supply chain are able to highlight withou risk of sanction, where labour infringements etc. are happening. Further to the reporting mechanism, mitigating measures are being taken to remedy any issues found.	highlighted.
3.3.3.3	Are confidential reporting processes established and maintained with associated policies and practices embedded throughout the corporate culture led at senior board level?		5.8.1 Facilities shall respect the rights of workers to associate, organize, and bargain collectively (or refrain from doing so) without the need of prior authorization from management. Facilities shall not interfere with, restrict, or prevent such activities and shall not discriminate against or retailate against workers exercising their right to representation in accordance with international labor standards.		The company policies and processes should at a minimum establish the ambliotin that confidential reporting processes should be put in place where supply chain mapping and interrogation highlights that they are not already there.	Confidential reporting processes are established and maintained in all tier one supply chains and work is ongoing in tier two and three suppliers to achieve this.	Confidential reporting processes are established and maintained in all suppliers within the company's supply chains and evidence to support this can be provided.
3.3.3.4	Are all complaints from workers dealt with objectively and confidentially through independent and impartial reviews leading to a remedy where applicable? These remedies should end the infringement, unfair working condition or associated unlawful treatment and provide retrospective financial compensation to the worker and referral to legal authorities where individuals have broken the law. Complaints and associated remedies should be documented and available for external scrutiny, with safeguards taken to protect the identity of victims.				The company policies and processes should at a minimum establish the ambition that confidential reporting processes should be put in place where supply chain mapping and interrogation highlights that they are not already there.	Complaints from workers can be shown to be dealt with objectively and confidentially.	Confidential reporting processes are established and maintained in all suppliers within the company' supply chains, redress is an ongoing practice where required, and evidence to support what action has been taken can be provided.
3.3.3.5	Is social responsibility addressed explicitly in the policies and processes of the organization, by including as a minimum?  *freedom of association;  *freedom of association;  *the right of workers to organize;  *forced labour;  *minimum age of workers;  *child labour;  *equal remuneration; and  *discrimination.		5.8 Freedom of Association and Collective Bargaining 5.4 Forced, Bonded, Indentured, Trafficked and Prison Labor 5.5 Child Labor and Young Workers 5.7 Discrimination, Discipline, Abuse and Harassment				





3.1 General		Cross-over with GDST	Cross-over with SPSv5	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice
3.4.1	compliance records) is available? If it is not possible to trace to the origin of the seafood, this should trigger an investigation and the completion of steps to remedy the situation.	GDST Standard 1.0 KDEs: Vessel data (ncbuding vesse registration), catch data (ncbuding seath area, fishery improvement project, vessel trip date(s), date(s) of capture, gear type, production method, certification and itenses (including fishing authorization, harvess (including fishing authorization, harvess certification, harvest certification chain of custody, transhipment authorization, landing authorization) implementation of GDST standards enables traceability to the origin of the seafood to further verify claims of legality.	9.1.2 Proper identification shall be maintained to reach lot, for each wild-caught and farmraised source, on all documents and at each step of the process flow from raw material receiving, handling, processing, packaging, storage and dispatich. Records shall be maintained to ensure product Identity and demonstrate that products from wild-caught and aquaculture sources and hose from certified and non-certified sources are not mixed.  9.3.1 Wild-Caught Raw Material - The facility shall keep an up-to-date list of all wild-caught raw material suppliers, including the quantity supplied by each  9.3.2 Farm-Raised Raw Material - Facilities shall maintain documented farm data for all farm deliveries received from all BAP certified and non-certified farm suppliers to include the below information	The Future of Fish, in collaboration with FishWise, Global Food Traceability Center and WWF, developed a preliminary guide for industry working lowards full-chain traceability; https://fishwise.org/wp-content/uploads/2018/03/OSMI-Trace-Collab_Taking-the-First-Steps Towards-Seafood-Traceability.pdf  This guide links to useful resources including a comprehensive compilation of key data elements (ROEs) across certification schemes, governmental organizations, industries, etc.: <a href="https://instwike.org/wp-content/uploads/2018/03/2017/05/25">https://instwike.org/wp-content/uploads/2018/03/2017/05/25</a> ROEs-for-Seafood-Compilation-of-Resources. Final -1-1.off.  An example of traceability compliance can be found in the ISO standard document Traceability of finish products' (12875:2011): https://www.iso.org/standard/52084.html	The company has a seafood sourcing policy that establishes the need for traceability of its seafood products on a lot or batch basis, to aid its control and assessment of food safety, sustainability, labour and associated environmental impacts, including a voidance of IUU by warranting that it is caught legally.	Suppliers are providing lot or batch traceability information that allows the sourcing company to assess and verify the credentials of the seafood it is buying. The information supplied should be provided in a format that conforms to the GDST KDEs. For IUU catch documentation, the links and references within this document should be consulted.	A fully digitised e-traceability system is in place, giving secure, end-bend traceability of the KDEs in a format compliant with the GDST standard.
3.4.2		The "authoritative data source" within the Basic Universal List of KDEs helps to verify data by indicating the source of validity of the KDE information.	9.2.3 Where a facility's traceability system consists of paper records, separate documents, forms, notebooks and/or files, this information shall be transferred to a computer database or spreadsheet to allow for transmission and verification of electronic data.  9.2.4 Where a facility's traceability system uses an online system or computer database, the facility shall keep copies of the documents or records that were used to transfer the data to the electronic system in order to allow verification of the information in the electronic system.		The company has a seafood sourcing policy that establishes the need for traceability of its seafood products on a lot or batch basis, to aid its control and assessment of food safety, sustainability, labour and associated environmental impacts, including avoidance of IUU by warranting that it is caught legally.		A fully digitised e-traceability system is in place, giving secure, end-to-end traceability of the KDEs in a format compilant with the GDST standard.
3.4.3	assured transparently?	The GDST enables full chain traceability through unique identification of logistical units and standardized data formats for KDEs necessary for seafood traceability esp for IUU.	9.3.4 Finished Product – Facilities shall have a system in place that ensure up-to-date, and easily accessible, data of all wild-caught and farm- raised raw material suppliers. The facility shall maintain documented records and quantities for all finished product production tols to include the below information		The company has a seafood sourcing policy that establishes the need for traceability of its seafood products on a lot or batch basis, to aid its control and assessment of food safety, sustainability, labour and associated environmental impacts, including avoidance of IUU by warranting that it is caught legally.	Through a combination of routine and spot-check traceability audits, the company is able to verify the accuracy and authenticity of some, if not all of the data provided by its suppliers, and it is actively exploring how this information can be automatically captured and shared with its customers or other stakeholders.	A fully digitised e-traceability system is in place, giving secure, end-lo-end traceability of the KDEs in a format compliant with the GDST standard.
3.4.4	Are all traceability systems, and all claims based on them, subject to external verification mechanisms and regular independent audits? Traceability data should be accessible during verification checks and audits.	Implementation of GDST standards requires digital storage of traceability data which facilitates accessibility of data for verification and audits.		Traceability can be defined as "the systematic ability to access any or all information relating to a foot under consideration, throughout its entire file cycle, by means of recorded identifications" (WWF traceability principles, 2015). It is important to note that this is different to transparency, which focuses on what information is shared, with which stakeholders, and at what frequency.  The Global Dialogue on Seafood Traceability (GDST) Standard 1.0 provides guidelines on enhancing interoperability of traceability systems to help enable full chain traceability and improve data verifiability: <a href="https://braceability-dialogue.org/core-documents/adst-1-0-materials">https://braceability-dialogue.org/core-documents/adst-1-0-materials</a>	A policy and process for assessing claims and sourcing credentials is in place or under development.	There is a formal documented process in place for assessing claims. Third party guidance is used as the basis for making voluntary claims beyond the legally required consumer information. Such guidance could be in the form of third party certification (gol/brand guidelines, or via pre-competitive collaborations, e.g. Sustainable Seafood Coalition, Seafood Task Force.	
3.4.5	vessels that caught the seafood?	GDST Standard 1.0 KDEs: all vessel data, including for transhipments if applicable implementation of GDST standards enables traceability to the vessel.	9.3.4 Finished Product – Facilities shall have a system in place that ensures up-to-date, and easily accessible, data of all wild-caught and farm-raised raw material supplers. The facility shall maintain documented records and quantities for all finished product production to its to include the below information:  Name of the flag of the harvesting vessel	Traceback exercises can be conducted to test if traceability is provided by the vessel or group of vessels that caught the seafcod. Companies should already have a range of traceability processes in place, to which additional aspects relating to IUU can be added. Where barriers exist, for example data loss due to auction sales or lack of transparency fron certain vessels, the risk of IUU products should be considered elevated.  It is recognised that not all supply chains may be fully traceable, and companies may want to work with their suppliers to improve this. Some companies may choose, for example, to wor with suppliers to develop traceability improvement projects or initiatives with time-bound deliverables. There are links to publicly available traceability standards and guidelines included in the PAS 1550, which can help to fullif requirements and risk assessment considerations, and inform an improvement project or initiative. More are included in the "shared resources" section.  The Global Dialogue on Seafood Traceability (GDST) Standard 1.0, provides guidelines on enhancing interoperability of traceability systems to help enable full chain traceability, improvided tax verifiability and ease data sharing: https://traceability-dialogue.org/core-documents/lods/1.0-materials/.			GDST KDEs are in use for all supply chains, and all vessels (including any involved in transhipment) are present on government registers and the global record. Beneficial owners are known, and traceability can be demonstrated on every occasion within 4 hours.
3.4.6	Are traceback exercises carried out at a frequency based on risk assessment and in a timescale that is appropriate for the origin of the seaflood?		2.10.3 The supplier approval program shall include all suppliers described under 2.10.1. The program shall also include criteria for approval, and the facility spolicy and/or procedure for temporary use of unapproved suppliers. Examples of criteria for approval: "Suppliers must have traceability systems in place to allow trace-backs to vessel or wholesaler for wild-caught or individual farm for farmed species."	DNA testing of fish can be used to support claims of legality, inform risk assessments, and support traceback exercises to seafood origin. Seafish has produced a comprehensive guide on the uses of DNA testing seafood that includes a list of well-established DNA databases:  https://www.seafish.org/media/publications/SaafishGuidetoDNATestingofSeafood_201312.pd [	The buyer conducts regular traceback exercises to ensure that product purchased can be reliably traced back to the source fishery/fishing vessel(s). The frequency of traceback exercises is based on a risk assessment, taking into account publicly known risk factors for each specific supply chain.	The buyer conducts regular traceback exercises to ensure that product purchased can be reliably traced back to the source fishery/fishing vessel(s). The frequency of traceback exercises is based on an Indepth risk assessment, taking into account detailed supply chain information derived from supplier inspections, audits or SAQs.	Traceability is verified on an ongoing basis through electronic supply chain tools such GDST compliant eltraceability systems. System operation is checked manually on a regular basis to ensure full operability and compliance with expected norms.





3.1 General		Cross-over with GDST	Cross-over with SPSv5	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice
3.4.7	Does the organization complete random traceback exercises that are able to verify full traceability from point of sale to source within 48 hours?	this is a function that is assumed through implementation of GDST.	shall be achieved in no more than one half-day (6 hours).	Random traceback exercises to verify traceability are typically conducted for food safety reasons. Some examples of food safety standards that require this include the BRC Global Standard (BRCGS) for Food Safety, IFS Food Standard 6.1, and GSA Seafood Processing Standards. As such, information relevant to IUU can be collected, e.g. through commercial transaction process, and stored alongside food safety information.  If traceback exercises cannot be conducted for certain supply chains or products, this should be taken into consideration when conducting a risk assessment, and companies should consider working with their supply chains to improve traceability. Refer to the "sharer resources" section for common traceability guidelines and standards that can serve as a basis for traceability improvement projects or initiatives.	The buyer conducts regular traceback exercises to ensure that product purchased can be reliably traced back to the source fisheryffishing vessel(s). The frequency of traceback exercises is based on a risk assessment, taking into account publicly known risk factors for each specific supply chain.	The buyer conducts regular traceback exercises to ensure that product purchased can be reliably traced back to the source fishery/fishing vessel(s). The frequency of traceback exercises is based on an in-depth risk assessment, taking into account detailed supply chain information derived from supplier inspections, audits or SAQs.	The origin of seafood supplied should be consistently demonstrated to the seafood company within 48 hours of such a request being made. Companies that have suppliers with BRC Global Standard/IFS or a GSSI recognised chain of custody in place, will be able to deliver this expectation whilst those without such certification will have built this capability into their own supply chain.
3.4.8	Are sales transactions between actors in the supply chain accompanied and traced by unit or batch numbers on or accompanying invoices? To allow effective tracking of products, all buyers and sellers should be able to match sales transactions between them.	Implementation of GDST standards enables to match sales transactions. Purchase orders and other information can be included in EPCIS. Batchlots should be able to be traced to transactions, but this isn't explicitly spoken to in the standard.	9.1.2 Proper identification shall be maintained for each lot, for each wid-caught and farmraised source, on all documents and at each step of the process flow from raw material receiving, handling, processing, packaging, storage and dispatch. Records shall be maintained to serue product identity and demonstrate that products from wild-caught and aquaculture sources and those from certified and non-certified sources are not mixed.		The buyer is able to correlate physical stock components with the associated paperwork through simple accounting tools such as invoice numbers or lot codes.	Batch and lot number are detailed on purchase documents and these facilitate traceability back to source fishery and supply vessels for product at all stages of manufacture, storage or distribution.	
3.4.9	Does the organization cooperate with the relevant competent authorities (that conduct active and effective regulatory oversight and verification) by using effective compliance and enforcement mechanisms?		1.0 Regulatory Management		The company has an "open door and cooperation policy for domestic government and enforcement agencies.	Company hosts vists (or demonstrates a willingness to host visits) from domestic government compliance authorities and cooperates to any reasonable request by supplying information in a timely manner. Either directly or via industry associations/trade bodies or other collaborations, the company demonstrates its willingness to provide input to consultations, meet with government officials and support government policy implementation, where relevant to its seafood sourcing.	The company is able to demonstrate that it complies with all government interactions, advocates for improved compliance regime implementation and encourages its supply chain to do the same.
3.4.10	In order to ensure consistency in the requests for information in supply chains, is the following information collected (via request) and associated with the products?  - vessel dentity (home port, name, flag and call sign), registration and, where issued IMO or other UV1 number;  - location of catch [e.g. GPS coordinates, specific location of fishery, FAO codes, EEZ's ISO country code, relevant Regional Fisheries Management Organization (FMO)];  - fishing license and validity; - species (FAO alpha 3 code), product name and code; - species (FAO alpha 3 code), product name and code; - fishing dates of capture; - quantities (in (a) of catch; - date/area/position/estimated weight/call sign and declaration of any transhipment at sea. This will include the receiving vessel mame and where applicable the IMO number or other UV1 number; and - personienterprise with custody and ownership after landing.  - which is the company the product at every stage, but the information should be maintained and available on request.	requires the collection of this information as defined in the KDE lets. All custodian identity data (i.e. product owner and information provider) which is necessary for the proper documentation of individual EPCIS events—is treated separately as EPCIS 'technical data'. GDST Standard 1.0 KDEs: all vessel data, all catch data, all catch data, all respectively and including fishing authorization, harvest	Country of first landing     Country of origin		The company seafood sourcing policy builds on the need for traceability by noting the minimum set of information it expects to be collected and available to the next stage of the supply chain, for the products it buys. The basis of the minimum information derives from EU IUU/US SIMP and GDST KDEs, and this ambition is communicated within the sourcing policy or product specification to its seafood suppliers.		In addition to the best practice information, the seafood buyer will also have access to:  *vessel call sign  *GPS coordinates of catch  *quantilies (in kg) of catch  *person/enterprise with custody and ownership after landing.  Not all of this information will accompany the product at every stage, but the information should be maintained and available on request.
3.4.11	Is information relating to the products maintained in an electronic system? As a minimum the key data should be held in the system, and other documentation such as EU Catch Certificates attached electronically or a record noting their physical location attached.	The GDST Standard 1.0 provides guidance on how to maintain key data elements (KDSs) digitally and allow interoperably between traceability systems.	9.2.3 Where a facility's traceability system consists of paper records, separate documents, forms, notebooks and/or files, this information shall be transferred to a computer database or spreadsheet to allow for transmission and verification of electronic data.  9.2.4 Where a facility's traceability system uses an online system or computer database, the facility shall keep copies of the documents or records that were used to transfer the data to the electronic system in order to allow verification of the information in the electronic system.	The FAO technical paper "Seafood traceability for fisheries compliance: Country-level support for catch documentation schemes," lists recommendations for traceability mechanisms based on the evaluation of different countries' catch documentation schemes (CDS) and key data elements (KDEs): <a href="http://www.fao.org/publications/card/en/c/1701be4c-ab83-4b01-97e5-b6d11d1c7c55/">http://www.fao.org/publications/card/en/c/1701be4c-ab83-4b01-97e5-b6d11d1c7c55/</a>	The company seafood sourcing or other related policies detail the company ambition that product specific information (whether to enable IUU risk assessments to be undertaken routinely or not) will need to be available electronically at some time in the future.	The company sourcing policies are understood and acknowledged by all actors in the supply chain and the company is able to demonstrate that some of the product specific information that it requires is being submitted electronically and that there is a time-bound commitment by which all of this information will be provided electronically.	Product is traced at all stages of manufacture, storage and distribution, through a comprehensive end-to-end e-traceability tool.
3.5 Informati	on verification and transparency						
3.5.1	Does the organization work with other actors in the supply chain to agree levels of information required and share it to ensure a level of transparency that is appropriate to enable regulatory visibility across the entire supply chain?	Implementation of GDST standards requires to work with supply chain actors on a standardised set of information shared along the supply chain.		Transparency and Traceability can be confused with one another; Transparency refers to how and what information is disclosed to certain stakeholders, while Traceability refers to information on a certain product or batch from origin to end-use.  The "GS1 Foundation for Fish, Seafood and Aquaculture Traceability Guideline" provides consistent business practices for effectively managing traceability and enhancing transparency across supply chains:			





3.1 General		Cross-over with GDST	Cross-over with SPSv5	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice
	Does the organization engage with other actors in the supply chains to resolve any barriers that prevent this from being possible?	Standardizing file formats and data field reduces barriers to implementing digital traceability and the sharing of that information across the supply chain.		It is recognised that full chain traceability may not always be achieved. In such cases, a programme or process to improve traceability is needed. There are resources and guidelines available in the 'shared resources' section of this guide to assist companies in taking steps towards full chain traceability.	The transparency policy states that where barriers exist to achieving supply chain transparency, the seafood buyer will work collaboratively with its suppliers to address them.	successes having already been achieved.	All barriers to supply chain transparency of existing supply chains have been overcome. It is a pre-requisite to supply, that future supply chains must achieve the same level of transparency prior to supply commencing.
3.5.3	When assessing the impact on decent working conditions, is engagement with those potentially affected (in this case, workers) undertaken? If any information is unavailable during a traceback exercise then this should be investigated.		5.0 Social Accountability Requirements 6.0 Employee health and Safety (EHS) For subcontractors: 2.10.1 The facility shall exercise proper control over any outsourced supplier or service that may have an impact on food safety, legality, quality, traceability and social responsibility. There shall be a policy statement that normally disallows the use of unapproved outsourced supplier or service provider.		The transparency policy states that where barriers exist to achieving supply chain transparency, the seaflood buyer will work collaboratively with its suppliers to address them.	The company is able to demonstrate that engagement wit workers who are likely to be impacted by the lack of decent working conditions, is able to be made to all intent and purpose at will.	There is sufficient supply chain transparency that if so desired, the seafood sourcing company when it is assessing decent working conditions, is able to engage directly with any workers potentially affected by the lack of decent working conditions.
3.5.4	Are all stages in the supply chain available for inspections, audits and/or site visits upon request?			All stages in the supply chain should be available for inspections, audits and/or site visits upon request. Additionally, DNA testing is an emerging technology applicable in spot checks.	1st, 2nd and 3rd party inspection and auditing of all stages in the supply chain is an ambition within the company's sourcing policy.	1st, 2nd and 3rd party inspection and auditing of all stages within the supply chain happens for all high risk sources, with pilot electronic monitoring either in place or planned, and a plan to achieve the same for moderate and low risk supply chains is in place.	All supply chains are inspected and audited, with remote technology such as electronic monitoring routinely employed to facilitate random inspections where supply chain concerns are raised.
	Are the commitments, expectations and standards of the organization documented and available to other actors in the supply chain within 48 hours of the request?		2.2.1 The facility shall have an appropriate Quality Manual which incorporates Food Safety that is readily available to all personnel involved in quality management. The Quality Manual shall include controls that address all requirements of the SPS Standard, including the Annexes. Copies may be a printed or electronic version.	The commitments, expectations and standards of a company should be documented and available to actors in the supply chain within 48 hours of the request.	A requirement to be able to undertake traceability exercises within 48 hours is detailed within the company policy.	Traceability exercises are able to be undertaken and completed for a lupply chains within the 48 hour timeframe, taking into account weekend, public and religious holiday restrictions.	Traceability systems are so developed with information captured in real time, that full supply chain traceability is able to be demonstrated in real time through the employment of e-traceability platforms.
3.5.6	Is first, second- and third-party verification of information allowed at any point in the supply chain? Access should be granted to those conducting inspections, audits and/or site visits on behalf of those in the supply chain to check for aspects of legality, traceability and decent working conditions. Random spot checks and unannounced audits should be permitted.			First, second and third-party verification of information should be allowed at any point in the supply chain.  -Access should be granted to those conducting inspections, audits and/or site visits on behalf of those in the supply chain, to check for aspects of legality, traceability and decent working conditions.  -Random spot checks and unannounced audits should be permitted.  -DNA testing to verify species is an emerging technology used in spot checks.  -Third-party auditors help to ensure that inspections are conducted without jeopardizing necessary business confidentialing.	The company policies establish its intent to be able to verify information provided to it by its supply chain at will, whether using 1st, 2nd or 3rd party audit processes.		
3.5.7	is all of the text on the final product labelling and packaging written in pian language and correct according to the source of the product? This includes all claims made about the origin of the product.	GDST is B2B only, but can facilitate consumer facing information.	9.3.4 Finished Product – Facilities shall have a system in place that ensures up-to-date, and easily accessible, data of all wild-caught and farm- raised raw material suppliersAccurate labeling: for the above and all other required information	All products should be properly labelled in plain language, and be correct according to the source of the product. This includes country of origin.  11 is good practice for ovoluntary information beyond mandatory legal requirements to be clear, unambiguous and verifiable.  12 Altentino is drawn to Regulation (EU) 1379/2013 as well as the Sustainable Seafood Coalition's Code of Conduct on Environmental Claims.	Policies are in place that detail how product labelling and packaging is checked to ensure compliance with legal requirements and clarity of labelling.		
	heries and fishing operations						
4.1.1 Managem	ent of fisheries In a risk assessment, is seafood assessed as higher risk if sourced from a fishery that is either regarded as overfished of for which there is neither sufficient data to ensure it is not overfished nor a plan in place to collect such data?			In a risk assessment, seafood should be assessed as higher risk if sourced from a fishery that is regarded as overfished, or for which there is neither sufficient data to ensure it is not overfished, nor alpain in place to collect such data.  There is no one list that expresses the State of all of the different fisheries, yet various competent authorities at global and national levels, assess whether fisheries are in an overfished State.  It is good practice for seafood to be sourced from fisheries with a peer reviewed assessment that demonstrates that the fishery is not fished in excess of the maximum sustainable yield ((MSY), Stock statuses can be accessed on RFMO webpages, although they may not be current. The following map of RFMOs may be useful here: https://ec.europa.eu/oceans-and-fisheries/index_en	Seafood supply chains are being mapped and at a minimum the information with which to determine whether a source fishery is overfished, unregulated or has problems with under-reporting (high risk) is being collated.	All source fisheries have been identified, information to determine the status of the stock has been collected, and a risk assessment has determined the stock status. Fisheries determined to be overfished, data-deficient or without a management plan, are classified as high risk unless a justification is made to the contrary.	All source fisheries are either classified as fished at or below MSY or have a credible fishery improvement process in place that is able to demonstrate on the water improvement.





3.1 General		Cross-over with GDST	Cross-over with SPSv5	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice
a o S ri b	Where seafood originates or might originate from fishery where RFMOs, intergovernmental graphizations, States (including EU Member States) and NGOs have identified high levels six of IUU fishing, or if the species is assessed to be of higher risk, does the organization consider his seafood to be higher risk?		2.12.1 The facility shall prepare and implement standard operating procedures, quality procedures, to do safety management procedures, social accountability procedures, and work instructions for all processes and operations having an effect on product safety, legality and quality. See 9.3.4 requirements  - Species of fish, both scientific name and common or commercial name  - Date harvested/production date (process date or date code)  - FAO statistical area of harvest  - Country of first landing  - Country of first landing  - Country of origin  - Date landed  - Name of the flag of the harvesting vessel  - Vessel permit or license number  - Unique vessels identifier (such as vessel name or registration number)	When procuring higher risk seafood, e.g. seafood originating from a fishery identified with high levels of risk of IUU fishing, extra measures should be taken to ensure full traceability, maximum transparency, and the trustworthiness of the supply chain. This includes at at minimum, completing risk assessments or audits at least once every six months, with steps taken to mitigate risks. Extra measures might include certification verification such as Marine Stewardship Council (MSC), including the associated Chain of Custody certification where applicable, to mitigate the higher risk presented by the fishery.	Source fisheries are being mapped and assessed to determine whether any are high risk.	Mapping and assessment of all fisheries has been completed, with steps being taken to address stocks that are classified as high risk.	High risk sources have an agreed improvement plan in place with steps actively being taken to address the issues highlighted. Low and medium risk fisheries have also been assessed, with a regular review being undertaken to ensure that this risk level is being maintained or improved where deficiency is identified.
m o c	When procuring higher risk seafood, are extra neasures taken to ensure full traceability, naximum transparency, and the trustworthiness of the supply chain, including by as a minimum completing risk assessments or audits at least none every six months with steps taken to nitigate risks?				6-monthly reviews of high risk fishery sources is happening, with supply chain feedback of results communicated.	Proactive engagement of the buyer is occuring, and tangible improvement and advocacy is being practised.	High risk sources are now medium or low risk, with a sourcing policy that prohibits high risk seafood being bought without an improvement and advocacy plan already established.
4.2.1 V ic ff. E a tr	Where seafood and marine ingredients are	provides information on vessel	Clause 9.3.4 requires the following:  • Name of the flag of the harvesting vessel  • Vessel permit or license number	Where 12 monthly audits are not possible but obtainable, the company should factor this information into the risk assessment. Would audits on a less frequent basis elevate the risk to a level where sourcing is not responsible?  It is also recognised that conducting audits every 12 months is not always possible. In this case, companies can request that suppliers provide copies of vessell licenses, registrations, etc. annually, to check that fish come from legal sources and help companies realize potential risks. Companies should also consider advocating the relevant State to compile and publish a transparent list of vessels. It should consider whether the State shares vessel information with RFMOs and/or the FAO Global Record, in absence of its own transparent register.	Supply chains are being mapped with the desire to know the flag State of the fishing vessels supplying, so that a full list of supply vessels can be compiled.	All flag States are known, comprehensive vessel lists are available to the supply chain owner, and vessel registries are either public or there is ongoing advocacy for this to happen. Utilising the mapping exercise for vessels, an assessment of the flag State controls in place may be undertaken, so that an understanding of the monitoring, control and surveillance, as well as their compliance regime is understood, or at a minimum being explored.	Flag States are known, and all vessels within the flag States are contained on public registries and on the plobal record. Independent third party certification and audits of fishing and transhipment vessels is routine. Flag State assessments have been completed, with high-risk flag States identified and either subjected to ar audit or assessment of vessels, or one is planned. Action plans to mitgate deficiencies in flag State compliance and enforcement are in place, so that they eventually become assessed as low risk.
filings accidence of the second of the secon	Where fish products are sourced from high seas sheries or from any stock subject to the unselected or from any stock subject to the unselected or from any stock subject to the unselected or from the selected or from the			check whether these conditions are in place by searching the relevant RFMO/other international arrangements website and reading their conservation and management measures, as well as their resolutions and recommendations.	Source fisheries are known or are being mapped and an assessment of the sustainability status of the fishery being exploide is planned to be determined. Where vessel lists/registries are available, vessel assessment work is being planned to ensure none are engaged in IJU practice and this has been communicated to the supply chain.	All source fisheries are known and their stock status has been assessed and classified. Where stocks are deemed medium and high risk, improvement plans are in place to address concerns. Vessel registers are routinely assessed to ensure that there is no activity from vessels on IUU lists, the monitoring, compliance and enforcement regimes of the fisheries are understood, and improvements are in place to address deficiencies. Tools such as SFP Catch Check are being employed.	All source fisheries are either low risk, or are from fisheries where fishery improvement projects that are able to show tangble improvements over past performance, are supplying the fish. All supply vessels are able to demonstrate that they are routinely complying with all relevant national, regional and international laws that govern where they operate.
4.3 Monitoring, 4.3.1 General - a 4.3.2 Due dilige							





3.1 General		Cross-over with GDST	Cross-over with SPSv5	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice
4.3.2.1	Does the organization complete due diligence on their supply chains related to MCS? When undertaking due diligence on a new supplier or product (or when repeating due diligence for an existing supplier or product), the organization should assess and record the following factors relating to flag States, coastal States and RFMOs responsible for MCS of a supplying vessel.		9.3.4 Finished Product – Facilities shall have a system in place that ensures up-to-date, and easily accessible, data of all wild-caught and farm- raised raw material suppliers.  Name of the flag of the harvesting vessel - Vessel permit or license number		The first steps of gathering data on source fisheries, which is a step toward assessing MCS requirements, has begun.	surveillance (MCS) within fisheries. All supply chains are mapped back to the source fishery, the status of each MCS regime has been compiled, and a gap analysis has	All MCS regimes are understood, they are being fully implemented at each stage in the capture and landing supply chain, and a process for sanction is in place, which means that the likelihood of being caught undertaking IUU activities outweighs the benefit of carrying them out.
4.3.2.1.a	Montoring systems: Does the organization research whether or not industrial fishing vessels in the supply chain are required by flag State authorities to have an installed vessel monitoring system (VMS) transponder, automatic identification system (AIS) transponder or other tracking technology onboard? These systems where required should be continuously transmitting in accordance with any national programmes or requirements and those which have been sub-regionally, regionally or globally agreed among the States concerned. Those responsible for tracking schemes that are required should be able to track the movements of these vessels continuously from port to port.			Vesselt tracking requirements are increasingly required by flag and coastal States, as well as FRMOs. The most secure form of tracking is through WMS, though in most cases this information is proprietary rather than public. Some States have also required the use of AIS, which is publicly available but easier for vessels to manipulate. Whether or not vessels are tracked by the States and RFMOs that regulate their behaviour, is an important consideration when considering risk.  If vessels are not monitored, this significantly increases the risk that they may be operating ligegally in areas that they are not authorised to be in (whether in EEZs, RFMOs or protected areas). As part of this risk assessment, businesses should also consider what is known about the State that is undertaking the monitoring, for example, are they subject to a yellow card from the European Union. To inform this risk assessment, organizations should ask companies supplying them to explain what vessels tracking requirements are in the jurisdictions they operate in. These should be easily evidenced by supplying copies of tenese conditions or other communications from competent authorities to vessel owners, setting out their vessel tracking requirements.  Technical guidance relating to electronic monitoring from WWF and EFCA are provided in 'shared resources'.	map its supply chains and identify the vessels or group of vessels that supplies it with seafood. This policy forms the foundation from which further supply chain insight	to capture what data the source fisheries MCS regimes is capturing, as well as the method by which it is captured.	AlS and VMS are an effectively implemented element of the flag State MCS. AlS and VMS is being routinely shared with independent third parties who are able to undertake and publish to the government assessments of the fishing activity and levels of compliance.
4.3.2.1.b	Logbooks: Does the organization research whether or not MCS authorities require that vessels demonstrate they have met the requirements for recording and timely reporting of vessel position, catch of target and non-target species, fishing effort and other relevant fisheries data in accordance with coastal State or other sub-regional, regional and global standards for collection of such data?			For States to effectively regulate fishing vessels, they need information on the location and content of their catch. If competent authorities are not requiring this information, if not only suggests that fishing is not being reported, but also significantly increases the risk that the authority is not regulating access to the fishery, or monitoring the activities of vessels to determine whether or not they are operating illegally. Logbook requirements should be easily evidenced, by supplying copies of license conditions or other communications from competent authorities to vessel owners, setting out their vessel tracking requirements.	map its supply chains and identify the vessels or group of vessels that supplies it with seafood. This policy forms the foundation from which further supply chain insight	fishing activities. For example: a questionnaire has been developed that is being used to capture what data the source fishery's MCS regime is capturing, as well as the method by which it is captured. Where the use of logbooks is mandatory, then checks should be made to understand whether this data is being completed and is accurate. Where logbooks are not used, then advocacy for their	The company has conducted research that reasonably concludes that the use of logbooks is an effectively implemented element of the flag State MCS. Logbook data is being routinely used by the fisheries management enforcement authorities, or shared with independent third parties who are able to undertake and publish to the government assessments of the fishing activity and levels of compliance, and the data contained within them is used by the relevant government departments to inform their fisheries management regime.
4.3.2.1.c	At sea inspections: Does the organization research whether or not vessels in the supply chain are subject to a regime of inspections by MCS authorities? Vessels should give information to the relevant coastal State or duly authorized RFMO inspecting authority regarding vessel position, catches, fishing gear, fishing operations and related activities. The appropriate authority should be allowed to inspect the vessel, its license, gear, equipment, records, facilities, fish and fish products and any relevant documents necessary to verify compliance with coastal State rules and regulations or relevant RFMO conservation and management measures.			Al-sea inspections are an important means to determine whether or not vessels are complying with fisheries laws and regulations. For example, actual catch can be compared with loghooks to verify the information, the fishing gear can be inspected, and the catch checked for the presence of endangered species and signs of shark finning. The lack of such inspections increases the risk that vessels are operating illegally. States often publicize fisheries patrols to increase their deterrent effect. Vessel companies can also be requested to share post-inspection reports when organizations are seeking to verify whether or not they take place.	The company has a seafood sourcing policy that aims to map its supply chains and identify the vessels or group of vessels that supply it with seafood. This policy forms the foundation from which further supply chain insight can be determined, along with steps to understand the use of at-sea inspections within the compliance regime, and next steps as appropriate for the size and scale of the company.	sea inspections are taking place is known for all source fisheries. Where at-sea inspections are happening, details are known about what information is being collected, i.e.	Al-sea inspections are routine for all of the source fisheries within the buyer's supply chains. Evidence of the inspection regime and findings are routinely published by the flag State and advocacy to address deficiencies is either routine or completed.





3.1 General		Cross-over with GDST	Cross-over with SPSv5	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice
4.3.2.1.d	Observers: Does the organization research and ask for evidence that seafood is sourced from fisheries where observer programmes, whether electronic or human, or alternative measures have been implemented through national, subregional and regional observer programs in which flag State is a participant? Information on observer coverage levels, or alternative measures such as increased inspections where observer schemes are not possible, should be obtained from an RFMO (where relevant) or coastal State.			To date, RFMOs have relied on human observers to monitor vessels at sea, collecting essential data for effective management. At many RFMOs, purse seine vessels require full observer coverage, while longine vessels require only 5 percent observer coverage. This minimal observer coverage increases the risk of IUU fishing going undetected. However, human observer schemes can be problematic due to the isolation of observers and the potential for corruption or intimidation. Although the presence of observers reduces IUU risk, this method should only form part of the risk assessment. Information on RFMO schemes related to observer coverage are sometimes published on the RFMO website, but this information tends to be limited and inconsistent.  In order to establish whether or not a coastal State scheme exists, organizations should request observer reports verifying vessel catch. These may also be evidenced by supplying copies of coastal State license conditions or other communications from competent authorities, such as regional observer program providers.  As managers, scientists and stakeholders recognize that more observer coverage is needed to ensure a sustainable seafood supply chain, electronic monitoring (EM) has proven to be a vehicle to increase transparency and accountability of fishing activities, by collecting timely and verifiable catch information.  The organization should advocate for the development of electronic monitoring programs at RFMOs and for the adoption of standards and the appropriate infrastructure to integrate EM with existing observer programs.  Additional information on electronic monitoring program design and implementation can be found here: https://www.pewtrusts.org/en/research-and-analysis/ssue-briefs/2019/09/electronic-monitoring-a-k-ey-toot-for-global-fisheries	The company has a seafood sourcing policy that aims to map its supply chains and identify the vessels or group of vessels that supply at with seafood. This policy forms the foundation from which further supply chain insight can be determined on whether the observation is human or electronic.	information on the flag State requirements for onboard observation is being collected for all source fisheries. As part of this mapping and data collection process, information on whether the observation is human or electronic, the protocols against which the observations are happening is being determined, and controls or lack of are being understood and risk assessed. The frequency of observation onboard specific vessels and the wider fleet at large are assessed and compared with the relevant legislation in force. Protocols that detail what should be recorded, the frequency of recording, the steps taken if issues are found, along with who pays and monitors the observers and ensures their findings are understood. Where deficiencies are identified, advocacy is planned or human observers onboard boats, adequate safeguards and communication protocols are in place to guarantee their safety and confidence to carry out their tasks without fear of reprisal.	
4.3.2.1.e	Where fish is identified to originate from a vessel that is flagged to a State or that fishes in the territorial or EEZ waters of a coastal s-M68tate that does not operate a national observer program, does the organization ensure that there is full chain traceability and that independent audits are completed at least every 12 months?	Implementation of GDST standards supports this due diligence requirement. It ensures full chain traceability and provides information on vessel registration and fishing authorization.	9.3.4 Finished Product – Facilities shall have a system in place that ensures up-to-date, and easily accessible, date of all wild-caught and farmraised raw material suppliers.  Name of the flag of the harvesting vessel  Vessel permit or license number	If 4.3.2.1.d determines the vessel is not subject to an observer programme, this risk miligation should be put in place. See 3.4 for details on full chain traceability	The company operates a seafood sourcing policy that requires regular (at least annual) supply chain traceability exercises to be conducted.	A risk assessment to determine the risks of not having onboard observations (whether human or electronic) is either in process or completed, in addition, discussions with the supply chain about low-costs observation may be happening.	Supply chains with no regulatory sanctioned onboard observation protocol are employing an observation mechanism. Advocacy to the regulatory body is ongoing, encouraging the adoption of onboard observation.
	Where it is known that seafood or marine ingredients are sourced from vessels flagged to a State that is different than the State of nationally of their beneficial owner, is this regarded as increasing the risk of supplying illegal products?			Although there are many reasons why a vessel owner of one nationality may use the flag of a different nationality (such as access to quota or a genuine joint venture), the use of flags from another State increases risk. In some cases, flags of convenience' are used to avoid more stringent flag State controls exercised by the owner's State. As effective flag State controls are a key means of reducing the risk of a vessel fishing legally, avoiding them increases risk. In addition, if an owner is based in a different jurisdiction from the flag, it can be more difficult to apply sanctions in the case of IUU fishing or human rights abuses. This reduces the deterrent effect of sanctions.	The company has a seafood sourcing policy that aims to map its supply chains and identify the vessels or group of vessels that supply it with seafood. This policy forms the foundation from which further supply chain insight can be determined on the beneficial ownership of supplying vessels and research information is compiled to enable the supply chain owner and supplier to assess IUU risk from them.	The beneficial ownership of all vessels supplying fish and seafood is known, their background is being researched, and where concerns such as different domicile status of owner to flag State is present, the reasons for this is being understood.	The beneficial ownership of all vessels supplying seafood is known, the vessels are listed along with this information on the global record and no evidence has been found that suggests any IUU activity in the past, or if present, is no longer present
4.3.3 Market of	controls						
4.3.3.1	Does the organization undertake analysis of its supply chains and implement a system to enable it to identify the carding status of its supply chains?		responsibility. (See also 2.10 – "Supplier Approval and Performance Monitoring").	Market controls can help to establish the legal origin of seafood products. An example of a market control scheme to curb IUU flathing is the EU IUU Regulation 1005/2008.  *Under this regulation, non-EU countries identified as having inadequate measures in place to prevent and ident IUU fishing may be issued with a formal warning, or a yellow card to improve efforts, or a red card for failure to curb IUU fishing.  *A company should implement a system to identify the carding status of its supply chains by first accessing IUU Watch, an aggregated source of information for EU carding decisions by country. For more information, including countries and their carding status, follow:			
4.3.3.2	supply chain are not flagged to or licensed to fish	supports this due diligence requirement	2.9.8 Specifications for outsourced processes as described in 2.9 shall be developed by the facility and included as part of a signed contract or service agreement between the facility and the provider. These specifications shall include compliance criteria associated with food safety, quality, legality, traceability and social responsibility. (See also 2.10 — "Supplier Approval and Performance Monitoring").	A company should require that vessels it sources from in the supply chain are not flagged or I censed to fish by States that have been issued a red card. To determine if the vessel is flagged to a State that has been issued a red card, a company can request the following information from their supply chains: -Request catch certificate information in accordance with the EU IUU Regulations, including fishing vessel name, flag State, vessel or IMO number, for example -Review and verify information on the catch certificate to determine compliance. This may include requesting physical inspection reports of consigned seafood products carried out by third country authorities -Reject consignments of seafood products if the vessel is determined to be flagged to a State that has been issued a red card. See www.iuuwatch.eu for more information.			
4.3.3.3	Are purchases made from fishing vessels flagged to States that have not notified a competent authority to the EU under the EU IUU Regulation?			A company should check that the flag State of the vessel(s) supplying them (already notified in other questions) are on the list of countries that have notified the EU (to be used as a proxy for non-EU countries) of their competent authority and been accepted: https://ec.europa.eu/fisheries/cfp/filegal_fishing/info			
4.3.3.4	Where fish is sourced from vessels flagged to a State given a yellow card by the EU or fishing in a coastal State given a yellow card by the EU, is the organization able to demonstrate that there is a system that enables full chain traceability and that audits are completed at a minimum once every 12 months?	supports this due diligence requirement. It					





3.1 General		Cross-over with GDST	Cross-over with SPSv5	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice
4.3.3.5	If sourcing from these countries, does the organization research the reasons for the yellow card and, where it has access, record (and, where possible, support) efforts by the yellow- carded State to address these reasons?			Seafood from a country that has been given an EU yellow card is at inherently higher risk, as less reliance can be placed on efforts by the relevant government to manage fisheries. If organizations decide to continue taking supplies from them, and reliance is placed on government fisheries management measures to mitigate the risk of IUU fishing, then it is important to understand the reasons for the EU yellow card and the efforts being taken by the State to address those reasons. The EU publishes Statements when yellow cards are issued to explain the concerns that led to the cardings. In addition, organizations can contact NGOs and other stakeholders active in those countries, to gain an insight into what progress is being made.  If is also recommended that suppliers in the yellow carded country are contacted to discuss the reasons from the yellow card, to ascertain what is being done by the government to address the situation, and whether or not the supplier is playing a role in supporting any reforms. Organizations may also choose to individually or in partnership with their suppliers and/or NGOs, contact the authorities in the yellow carded country to encourage them to make relevant reforms, in order to ensure they can continue to supply from the country.  Through the above, a view can be formed regarding whether or not the yellow carded country's authorities are engaging proactively to address the issues that led to the card. This in turn can inform the organization's view on whether it is advisable to continue to supply from the country or if new sources need to be sought.  The following map, maintained by NGOs, lists current and former cards: http://www.luuwatch.eu/map-of-eu-carding-decisions/	The company has a seafood sourcing policy that aims to map its supply chains and identify the coastal State that supplies it with seafood. This policy forms the foundation from which further supply chain insight can be determined of the EU card status.	SKUs and the reasons for any current red, yellow or green	All source countries are green or never carded, have been assessed by the EU, and deemed to meet all of the necessary conditions to continue with green or preferred supply country status. In addition, there is a mechanismlyrotocol in place that allows the suppliers within the supply chain to engage with the third country of source to address any potential concerns that the EU may have before they become an issue.
4.4 Source fis	hing vassals						
4.4.1	Seaflood should not be sourced from any vessel(s) that appear on any recognized blacklist (those established by RFMOs), is there a system in place to verify whether vessels appear on any of the available blacklists? Other blacklists exist, but RFMO blacklists are the only ones recommended here.		9.3.4 Finished Product – Facilities shall have a system in place that ensures up-to-date, and easily accessible, data of all wild-caught and farm-raised raw material suppliers.  Name of the flag of the harvesting vessel  Vessel permit or license number	A company should not source seafood from vessels that appear on recognized blacklists established by RFMOs. To determine whether or not a fishing vessel is listed, follow: https://www.vessels.org/	Mapping of supply chains is underway and a full list of all fishing, transhipment and support vessels is being developed. Whist the sources of supply are being mapped, information about fishing licences and authorization details begin to be collated and cross-referenced.		
4.4.2	Does the organization only source from fishing vessels that appear on authorized vessel lists where these are available for relevant coastal State EEZs and territorial waters or, where on the high seas, by the relevant RFMO?	Implementation of GDST standards supports this due diligence requirement at it provides information on vessel registration and fishing authorization.	9.3.4 Finished Product – Facilities shall have a system in place that ensures up-to-date, and easily accessible, data of all wild-caught and farm- raised raw material suppliers.  Name of the flag of the harvesting vessel  Vessel permit or license number  Unique vessel identifier (such as vessel name or registration number)	The FAO Global Record of Fishing Vessels, Refrigerated Cargo Vessels and Supply Vessels, maintains a record of fishing vessels, including their identify, history and authorizations to fish and tranship and, in the future, will also have a record of non- compliance for that vessel. This tool is intended to support risk assessment. Follow this link for more information or a list of vessels: http://www.lao.org/global-record/en/ Another useful database for searching if EU vessels fishing in the waters of a non-EU State have an agreement with that State is: http://www.whofishesfar.org/	Mapping of supply chains is underway and a full list of all fishing, transhipment and support vessels is long developed. Whilst the sources of supply are being mapped, information about fishing licences and authorization details begin to be collated and cross-referenced.		
Does the organ	nization request the following information from supplie	ers to inform their due diligence risk assess	sments?				
4.4.3.a	IMO adopted resolution A.1078(28) and the lately version of Circular Letter 1886 bin their supply chain have a unique vessel identifier (UVI) issued by IHSM&T on behalf of the IMO	all qualifying fishing vessels GDST Standard 1.0 KDEs (vessel data): Unique vessel identification (UVI), transhipment UVI (if applicable).	9.3.4 Finished Product – Facilities shall have a system in place that ensures up-to-date, and easily accessible, data of all wild-caught and farm-raised raw material suppliers.  Name of the flag of the harvesting vessel  Vessel permit or license number  Unique vessel identifier (such as vessel name or registration number)	Unique vessel identifiers (UVIs) such as IMO ship numbers, are an identification number that sunique to each ship, and is never reassigned to another vessel. This means that vessel name, ownership, records of non-compilance etc., can be recorded using these numbers. Once allocated, these numbers should be included on all relevant documentation including incences and authorizations, transhipment reports, landing requests/reports etc., to improve transparency of the supply chain. Difficulty arises where a specific country or RFNIO does not enforce the use of UVIs or where auctions result in UVI number changes. Suppliers should request UVI records and if not available, consider that the supply chain is of higher risk.  Companies should advocate for the inclusion of vessels on public registers. This increases transparency and reduces the risk of IUU seafood entering supply chains.	fishing, transhipment and support vessels is being developed, which includes their length and weight, fishing gear of operation and whether they have a UVI and are on a publicly available vessel register maintained by their flag State or RFMO where relevant. In addition, as vessel details are being captured they should be assessed to determine whether they qualify for an IMO number and steps are being taken to encourage the supply chain to obtain them where they are missing. At a minimum PAS 1550 should be referred to in supplier communication so that they are aware of the desire to assess IUU risk.	All vessels within the supply chain are known, they are on public vessel registers and the Global Record, along with any relevant RFMO. The vessels that qualify have IMO numbers in place, and those that do not, have been provided with UVIs by their flag State. Vessel ownership is known and checks are undertaken to ensure that all locences and authorizations are up to date with no noncompliance.	Supply chains are fully transparent, with all supply vessels on public databases, on the global record, and flagged to countries that routinely update their submission of information to Global Record and RFMOs. Beneficial owners are known and vessels are third party certified to internationally recognised standards. Landings are made to parties of the PSMA or to countries that have a recognised high compliance and well implemented catch controls.
4.43.b		GDST standards require UVI number for all qualifying fishing vessels GDST Standard 1.0 KDEs: Unique vessel identification (UVI), transhipment UVI (if applicable).	9.3.4 Finished Product – Facilities shall have a system in place that ensures up-to-date, and easily accessible, data of all wild-caught and farm-raised raw material suppliers.  Name of the flag of the harvesting vessel  Vessel permit or license number  Unique vessel identifier (such as vessel name or registration number)	IMO numbers can be searched here: <a href="https://monumbers his com/">https://monumbers or his may not be enforced on vessels below a certain size. Therefore, alternative unique vessel identifiers (UVIs) may be required. Examples include CaribShip Unique Numberng Schemes, tuna RFMO vessell lists, High Seas Vessel Authorization Record, among others. Suppliers should request that a UVI and not just an IMO number, is included within the catch documentation.  The UVI should be collected for all vessels in the supply chain, such as when a transhipment occurs. The Global Dialogue on Seafood Traceability (GIST) Standard 1.0 includes these as key data elements (KDEs) to collect as part of establishing full dain traceability. The Core Normative Standards can be accessed here: <a href="https://traceability-dialogue.org/core-documents/dist-1-0-materials/">https://traceability-dialogue.org/core-documents/dist-1-0-materials/</a></a>	Mapping of supply chains is underway and a full list of all fishing, transhipment and support vessels is being developed, which includes their length and weight, type of fishing gear and whether they have a UVI and are on a publicly available vessel register maintained by their flag State or RFMO where relevant. In addition, as vessel details are captured, they are being assessed to determine whether they qualify for an IMO number and steps are being taken to encourage the supply chain to obtain a UVI where vessels do not qualify for an IMO number. At a minimum, PAS 1550 should be referred to in supplier communication so that they are aware of the desire to assess IUU risk.	IMO numbers are in place for all qualifying vessels and logbooks and official fishery management documents and authorizations have mention of it. Where vessels do not qualify for an IMO number and their UVI is not included on official documents such as logbooks and landing records the company is able to demonstrate their their supply chair checks for the presence of UVIs on these documents and advocates for their inclusion and use when not present	Following advocacy for an extension to the existing IMO numbering scheme, all vessels, irrespective of size are included within the IMO number scheme and all official fishery management documentation cross-references and uses the IMO number as a matter of routine.
4.4.3.c	licences issued by the relevant competent authorities. It should be possible to request this information from the suppliers and receive the	GDST Standard 1.0 KDEs (certifications and licenses); fishing authorization, harvest certification, harvest certification chain of custody, transhipment authorization (if applicable), landing authorization.	9.3.4 Finished Product – Facilities shall have a system in place that ensures up-to-date, and easily accessible, date of all wild-caught and farmraised raw material suppliers.  Name of the flag of the harvesting vessel  Vessel permit or license number  Unique vessel identifier (such as vessel name or registration number)	Depending on which State a vessel is flagged to, i.e. registered with, certain fishing licences will be applicable, and are mandatory for the vessel to be able to fish. It is expected that a supplier would be able to secure details of such licences from the vessel operators within 14 days. If the vessel operator is unable to provide such evidence, the vessel should be considered at higher risk of I/U due to the lack of transparency.  The Global Record of Vessels is an FAO initiative that aims to centralise information on vessels by pairing IMO numbers and fishing authorizations, among other data. As this database is developed, it has the potential to be a powerful tool for improving vessel transparency. http://www.fao.org/global-record/information-system/en/	Mapping of supply chains is underway and a full list of all fishing, transhipment and support vessels is being developed. Whist the sources of supply are being mapped, information about fishing licences and authorization details, whether vessels have a UVI and are on a publicly available vessel register maintained by their flag State or RFMO, are being collated and cross-referenced. At a minimum PAS 1550 should be referred to in supplier communication so that they are aware of the desire to assess IUU risk.	All vessels within the supply chain are known, they are on public vessel registers and the Global Record, along with any relevant RFMO. The vessels registers are checked to ensure that all licences and authorizations are up to date with no non-compliance. Where there is no evidence of licences and authorizations, these should be able to be provided within 14 days of a request being made. If evidence is not able to be provided, an option to suspend buying until the issue can be addressed is considered.	vessels on public databases, on the Global Record, and their fishing authorizations, current and historical, are





3.1 General	1	Cross-over with GDST	Cross-over with SPSv5	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice
4.4.3.d	Evidence that vessel operators obtain			This ensures that the vessel operators have used the correct procedures to obtain the	Fishing vessel licences and authorizations are being	Fishing vessel licences and authorization details are	Fishing vessel licencing and authorization information is
	confirmation directly from the coastal State and/or RFMO that authorizations and fishing licences have been issued and the dates they are valid for, and make this information available upon request			authorizations or fishing licences, and supports legality claims. If the company does not obtain this evidence, the risk of I/U fish entering their supply chain will be higher.  Where possible, this and other documents that support legality should be digitized and accessible to relevant supply chain actors and stakeholders. The GDST Standard 1.0 is an exemplar for how to digitize data to ease data sharing and increase interoperability between traceability systems. https://traceability-dialogue.org/core-documents/gdst-1-0-materials/	collected by seafood suppliers as part of the supply chain mapping process, with the details being recorded onto a supply vessel list. Sample copies of authorizations and licences are either being requested or are recognised as being important, so that their dates of issue, dates of expiry and conditions of authorization can be checked. At a minimum, PAS 1550 should be referred to in supplier communication so that they are aware of the desire to assess IUU risk.	information is not available, advocacy is planned or	contained on the Global Record and publicly available wessel registers maintained by the flag State. Copies of licences and authorizations are freely available for inspection by supply chain actors at will, for verification purposes with no evidence of concerns as to their validity being present.
4.4.3.e	Evidence that vessel operators have obtained and documented a full list of all of the conditions of fishing licences and authorizations directly from coastal State authorities and/or RFMOs; including locations where fishing is restricted, gear use, crew requirements, observer requirements and any other conditions			This should be available upon request from the catch sector, who should hold keenses and authorizations together with their conditions. If catch vessels are not maintaining such records, there is a risk that they do not understand the laws and regulations they are meant to complying with, increasing the likelihood of them engaging in IUU. This should be factored in to risk assessments as the vessel is considered at higher risk.	Communication is made to the supply chain requesting that the license conditions for supplying vessels are communicated by a specified time in the future, or that RFVS certification is in place for all supply vessels. At a minimum, PAS 1550 should be referred to in supplier communication, so that they are aware of the need to comply with lonersing requirements.	Supply chain has provided license conditions for supplying vessels and these have been documented.	Suppliers are able to demonstrate to the company purchasing the seafood that the fishing vessel owners comply with the legal requirements, or RFVS certification is held for all supply vessels.
4.4.3.f	Evidence that fishing vessels and the companies that own them pay their license fees to State bank accounts and not to agents, and that they provide documentation and evidence of this to the processor/importer if requested			This reduces the risk of a fraudulent license being used, as it avoids the possibility of obtaining a license from an unauthorized agency or corrupt official.  Evidence of paying license fees to a State bank can be in various forms, for example, receipts or bank Statements. Where vessels or the companies who own them are unable to supply such information, the vessel should be considered at higher risk of fishing illegally.	Mapping of supply chains is underway and a full list of all fishing, transhipment and support vessels is longing developed. Whilst the sources of supply are being mapped, information about fishing licences and authorization details begin to be collated and cross-referenced.	Fishing licences and authorizations are being collected for each vessel in the supply chain and questions about who pays for them and who issues them are being asked to determine whether agents and middlemen, rather than direct dealings with poverment bodies, is happening. The process through which vessel licences and authorizations are issued for the area in which the vessel is licenced and authorised to fish is known, and information on who is invoked in the process is understood, as the presence of unauthorised agents/brokers and middlemen increase the risk of falsified documents.	Governments that issue licences and authorizations include the information in their submission to the Global Record and also publicise the information on their vessel register. All licences and authorizations are issued by a government body.
4.4.3.g	Evidence that fishing vessels have a vessel monitoring system (VMS), automatic identification system (AIS) or other vessel tracking technologies that are continuously engaged while at sea and actively monitored by the coastal or flag State	GDST Standard 1.0 KDEs (vessel data): availability of catch coordinates, satellite vessel tracking authority.		The company should ask suppliers if these systems are in place on board vessels, the percentage of vessels covered, and the percentage of this data which is monitored. If possible, evidence of this data and monitoring by a third party should be requested. Where vessel tracking technologies are not used or authorities will not release this information, the supply chain should be considered at higher risk of IUU fishing.	Mapping of supply chains to identify the vessels supplying fish and seafood is Appening, and as part of this process, information is being collected to understand what the rules of the flag and authorization State relation to the employment of VMS and AIS onboard these vessels. At a minimum PAS 1550 should be referred to in supplier communication so that they are aware of the desire to assess IUU risk.	The supply chains are mapped, the vessels supplying fish and seafood are understood, as is the requirement for the adoption of VMS/ AIS. In addition to this, the protocols for WMS/ AIS us is known and the polling rates and protocols are being assessed to determine whether they are sufficient to provide supply chain assurance that fishing activity is being carried out legally and in compliance with licences and authorizations.	the supply chain to warrant fishing activity. Independent verification of the VMS and AIS data is being undertaken
4.4.3.h	Evidence that the vessels are in compliance with inspection regimes. This includes evidence that the vessel management:  1) accept and facilitate the prompt and safe at sea boarding by relevant coastal State inspectors or duly authorized RFMO inspecting authority;  2) cooperate with and assist in the inspection of the vessel conducted pursuant to an authorized at sea inspection;  3) do not obstruct, intimidate or otherwise interfer with relevant coastal State inspectors or duly authorized RFMO inspecting authority in the performance of their dulies; and  4) allow the relevant coastal State inspectors or duly authorized RFMO inspecting authority to communicate with the authorities of the flag State of the vessel and the relevant coastal State during the boarding and inspection			Records of inspection regimes or inspection results can be used here to confirm whether or not these conditions are met. Inspections may include the following:  Document checks  Logbook  Logbook  Leence, variations and permits  Fishroom plan  Certificate of Registry  Fishroom  Assessment of catch  Comparison with logbook  Check weighing  Working conditions  Gear  All gear in use should be inspected for compliance, and appropriate mesh sizes and dimensions checked, including some gear that is not in use.  It is recognised that this information may be difficult to obtain in some countries. Where this information cannot be obtained, catch vessels should be asked to document why the evidence does not exist (either vessels are not inspected or the inspecting State does not exist (either vessels are not inspected or the inspecting State does not exist (either vessels are not inspected or the inspecting State does not exist (either vessels are not inspected or the inspecting State does not exist of the property of		Where information is not available from either the flag State or vessel, the supply chain actors and stakeholders are advocating to the flag State that legal compliance regimes and engagement information should be shared with seafood buyers, and ideally publicly.	the vessels they are buying from are cooperating with the published inspection regime and are able to demonstrate evidence of this when required.
4.4.3.i	Evidence that fishing vessels engage crew in decent conditions.  Attention is drawn to ILO Convention C188 which sets minimum international levels for crew conditions on fishing vessels. The Convention will come into force on 16 November 2017	GDST standards require information on the existence of human welfare policies (KDE) for crews on fishing vessels.	5.0 Social Accountability Requirements	ILO Convention C188 sets out minimum standards for crew working conditions. For vessels fagged to a country that has signed and implemented ILO C188, risk of crew not having decent working conditions is decreased, as governments are bound by the convention to verify that vessel conditions and crew contracts are in line with its provisions. Where flag States have not adopted ILO C188, organizations can still request evidence that conditions and contracts are at the same standard. Information supplied by the UK to support UK operators complying with ILO C188 can be used as a reference for organizations seeking to compare conditions and contracts to the provisions of ILO C188. See: https://www.gov.uk/government/collections/fice-work-in-fishing-convention	During the supply chain mapping exercise, information on whether the flag State has ratified and implemented ILO C188 is being collected and the review of employment contracts and evidence of decent working conditions is required by the buyer.	The flag State has ratified ILO C188, employment contracts stating the employment and working conditions are in place for all vessel crew, and independent evidence of working conditions and employment is provided by 3rd party certification. Where this is not fully in place, advocacy is planned or underway to achieve the aim.	Flag States have raffled and implemented ILO C188, employment contracts are available for each crew member, and decent working conditions have been confirmed through 1st, 2nd or 5rd party audits and certification such as the responsible fishing vessel scheme.





sequency were trained from understand and sequences where the sequence of the	3.1 General		Cross-over with GDST	Cross-over with SPSv5	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice
sodgement of coginant or robust personnel and supplies and supplie	4.4.3.j	companies) have checked the references and background of vessel captains before they were hired			captains they employ. Where it is found that no checks are made on their background, including previous convictions for IUU fishing or human rights abuses, this significantly increases the risk of supplying from those vessels. It can be recommended that suppliers undertake these checks going forward to reduce risks associated with the seaflood they are supplying in the future. Where a supplier undertakes checks on the background of captains, these can be verified on a sample basis during audit processes.	at a specified point in the future, (if not already happening), the background of captains should be checked before they are engaged, and those with a history of IUU fishing or human rights abuses convictions should not be present in the company's supply chain or engaged in the future.	demonstrate that they are in compliance with the policy, providing evidence of background checks performed such as references from previous employers and searches of compliance histories of previous vessels captained.	An independent third party audit shows full compliance with this policy.
seymode of checks for the your procuse Lamps aboves  See 4.4 follow  See 5.5 follows that specime are not procured from if chains a following process of the specimen are procured from if chains and following process of the specimen are procured from its specimen are procured	4.4.3.k	guilty of IUU fishing on more than one occasion are not engaged and that those convicted on a single occasion receive extra supervision and			background of captains before they are hired, they should also have a policy setting out that captains with a history of multiple IUU infractions are not engaged, and those with a history of a single IUU infraction may be engaged but with extra supervision. The absence of such a	at a specified point in the future, (if not already happening), the background of captains should be checked before they are engaged, and those with a history of IUU fishing or human rights abuses convictions should not be present in the company's	demonstrate that they are in compliance with the policy, providing evidence of background checks performed such as references from previous employers and searches of	An independent third party audit shows full compliance with this policy.
checks for tary tweeze human rights abuses    Comparison of the co	4.4.3.1	engaged if checks find they have been found			are hired, they should also have a policy setting out that captains found to have previously committed a human rights abuse are not engaged. The absence of such a policy increases	As above	As above	As above
Use fining or Regula working conditions, fish should for the sourced from those suppliers are untilled to supply or a supplier are untilled to supply or a supplier and until for suppliers are untilled to supply or an expension of the suppliers are untilled to supply or an expension of the suppliers are untilled to supply or an expension of the suppliers are untilled to supply or an expension of the suppliers are untilled to supply or an expension of the suppliers are untilled to supply or an expension of the suppliers are untilled to supply or an expension of the suppliers are untilled to supply or an expension of the suppliers are untilled to supply or an expension of the suppliers are untilled to supply or an expension of the suppliers are untilled to supply or an expension of the suppliers are untilled to supply or an expension of the suppliers are untilled to supply or an expension of the suppliers are untilled to supply or an expension of the suppliers are untilled to supply or an expension of the supply or an expension or an expension of the suppliers are untilled to supply or an expension or an	4.4.3.m	checks find they have been found responsible for			See 4.4.4 below	tolerance approach to supplying seafood from companies convicted of IUU fishing or human rights	processes, using information obtained through MCS information gathered in supply chain mapping, including searches for previous convictions relating to vessels owned by suppliers. Where compliance histories of companies are not available due to a lack of public information, this should be documented and advocacy to relevant States undertaken to publish information relating	
companies and their beneficial owners from which such grant of the supply chain or sourcing seafood? This research is a busined worst finds evidence of vessels, companies or beneficial owners with a history of engaging in lilegal activity?    Companies and their beneficial owners from which set it is sourcing seafood? This research is should in sourcing the IMD numbers for any new vessels and the supply chain of small-scale vessels are used by suppliers, and depending on the level of risk assessed in the supply chain of small-scale vessels are used by suppliers, and depending on the level of risk assessed in the supply chain of small-scale vessels are used by suppliers, and depending on the level of risk assessed in the supply chain of small populated will provide details of operations, the fishing wessels which might not be just the immediate registered owner of the vessel.    Companies and their beneficial owners from which we used name, UVI, flag State, fishing gears used all soft included in the Glabal Record, where the story owners of shing log based which might not be just the immediate registered owner of the vessel.    Companies and their beneficial owners with a history of engaging in lilegal activity?		IUU fishing or illegal working conditions, fish should not be sourced from those suppliers. Where suppliers are unable to supply one or more of the above areas of evidence, does the organization document as part of the risk assessment, the decision of whether or not to supply and what mitigating actions are to be			been found to have engaged in human rights abuses or IUU fishing. This information can be found through the due diligence process, including information requests to suppliers, third party audits, internal audits, internet searches and meetings with NGOs active in countries relevant to their supply chains. The due diligence process should also document where information or pocioise recommended above are not available and set out what mitigating measures, such as third party audits, internal audits, information requests from NGOs etc. are sought.  For example:  ICCAT's IUU vessel list: <a href="https://www.iccat.int/en/IUUlist.html">https://www.iccat.int/en/IUUlist.html</a> FU's IUU vessel list: <a href="https://www.iccat.int/en/IUUlist.html">https://www.iccat.int/en/IUlist.html</a> FU's IUU vessel list: <a href="https://www.iccat.int/en/IUUlist.html">https://www.iccat.int/en/IUlist.html</a> FU's IUU vessel list: <a href="https://www.iccat.int/en/IUUlist.html">https://www.iccat.int/en/IUlist.html</a> FU's IUU vessel list: <a href="https://www.iccat.int/en/IUlist.html">https://www.iccat.int/en/IUlist.html</a>	tolerance approach to supplying seafood from companies convicted of IUU fishing or human rights	processes, using information obtained through MCS information gathered in supply, chain mapping, including searches for previous convictions relating to vessels owned by suppliers. Where complaines in bistories of companies are not available due to a lack of public information, this should be documented and advocacy to relevant States undertaken to publish information relating	
research finds evidence of vessels, companies or beneficial owners with a history of engaging in formation obtained through MCS companies convicted of IUU fishing or human rights abuses.  It contains a processes, using information obtained through MCS companies convicted of IUU fishing or human rights abuses.  It is convicted of IUU fishing or human rights abuses. This is reviewed through audits.  It is convicted of IUU fishing or human rights abuses. This is reviewed through audits.  It is convicted of IUU fishing or human rights abuses. This is reviewed through audits.  It is convicted of IUU fishing or human rights abuses. This is reviewed through audits.	4.4.5	companies and their beneficial owners from which it is sourcing seafood? This research should include verifying the IMO numbers for any new	supports this due diligence requirement at it provides information on IMO numbers		them, including their full names, IMO numbers and beneficial owners. This information can be used to research vessel histories on online databases (see APPENDIX). Where a large fleet of small-scale vessels are used by suppliers, and depending on the level of risk assessed in the supply chain, organizations may decide to use a sample-based approach to verifying	information is being compiled that not only includes the vessel name, UVI, flag State, fishing gear used and licences, but also the ultimate beneficial owner of the fishing vessel which might not be just the immediate	either fully available and included on the company's vessel ist, or included in the Global Record, which when fully populated will provide details of operator, owner, beneficial owner and IMO number if applicable. Online databases are being used to check the history and background of the first liter owners of fishing boats, so that links to IUU or human	
to compliance.	4.4.6	research finds evidence of vessels, companies or beneficial owners with a history of engaging in			See 4.4.4	tolerance approach to supplying seafood from companies convicted of IUU fishing or human rights	processes, using information obtained through MCS information gathered in supply chain mapping, including searches for previous convictions relating to vessels owned by suppliers. Where compliance is histories of companies is not available due to a lack of public information, this should be documented and advocacy to relevant States undertaken to publish information relating	
flag State fishing authorizations granted to fishing vessels whenife requested by any actor or vessels whenife requested by any actor or request the supply chain about the use of VMS and a fisheries logbook by the flag State to monitor vessel activities  ### April 2 Technical States, as well as relevant RFMOs. In the case of RFMOs and an increasing number of States, these can be verified by the organization to have authorized vessels. In the future, the FAO Global Record will also be a resource of supply reading through checking information about fishing is cence and sulthorization can be verified. Where these are not should send the sources of supply are being developed. Whilst the sources of supply are being whether the fishing vessel/company is complying with the authorization about fishing is cence and sulthorization about fishing is cence and authorization details begin to be collated and cross-fisheries (objects). Where these are not should ask that suppliers provide evidence, including licenses is sued by flag and coastal States. Where the supply chain or competent authority are assessed as being high risk but organizations to be collated and cross-fishing, transhipment and support vessels is being developed. Whilst the sources of supply are being whether the fishing vessel/company is complying with the authorization about fishing is cence and authorization about fishing is cence and authorization details begin to be collated and cross-fishing. Transhipment and support vessels is being developed. Whilst the sources of supply are being whether the fishing vessel/company is complying with the authorization conditions.  ### States online, on a sample basis, on has them to hand so that it can assess whether the fishing tensor of supply reading the velocity will be a released by the organization to have a ulthorization and these authorizations are the delectronically, which enables the company are the developed. Whilst the sources of supply read the velocity will be authorization to have a ulthorization or th		flag State fishing authorizations granted to fishing vessels when/fir equested by any actor or relevant party? Evidence should be maintained in the supply chain about the use of VMS and a fisheries logbook by the flag State to monitor vessel activities	authorization number. This information should enable the organization to have		issued by relevant flag and coastal States, as well as relevant RFMOs. In the case of RFMOs and an increasing number of States, these can be verified by the organization through checking online lists of authorised vessels. In the future, the FAO Global Record will also be a resource where this information can be verified. Where these are not shared by States online, on a sample basis, organizations should ask that suppliers provide evidence, including licenses issued by flag and coastal States. Where the supply chain or competent authority are assessed as being high risk but organizations wish to continue to supply from them, then they should consider contacting governments directly to verify the validity of	fishing, transhipment and support vessels is being developed. Whilst the sources of supply are being mapped, information about fishing licence and authorization details begin to be collated and cross-	authorizations, or has them to hand so that it can assess whether the fishing vessel/company is complying with the	Flag State fishing authorizations are available for all vessels within its supply chain and these authorizations are held electronically, which enables the company to interrogate and validate them at will.
Transhipment s she organization require that?								





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3.1 General		Cross-over with GDST	Cross-over with SPSv5	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice
	All transhipments in their supply chains are recorded, monitored and covered by an independent observer programme appropriate to the fishery?	The GDST standards require collection of transhipment information (date, location, vessel anner, UVI) which provide the basis to investigate all due diligence requirements listed in chapter 4.5.		Unmonitored at-sea transhipments are a potential avenue for IUU-caught seafood products to enter the supply chain. There are currently different protocols for transhipment activity, each with different protocols for transhipment activity, each with differing levels of documentary evidence and observer presence required. The FAO is developing transhipment best practises, and organizations should be aware of their development, adopt them when completed, and encourage their supply chains to use them to alc consistent implementation. To ensure better reporting and more complete, uniform information, a company should request from relevant authorities throughout their supply chain, the following information:  *Require all transhipment events be reported to the relevant flag, coastal, port State and RFMO Secretariat  *Require 100 percent observer coverage (human, electronic or combination)  *Require 100 percent observer coverage (human, electronic or combination)  *Require 100 percent observer coverage (human, electronic or combination)	Supply chains are being mapped, including Identifying whether transhipment is present and a necessary part of the supply chain. Included within the mapping information on transhipment are requirements of the flag, coastal and RFMO being collected.	fisheries and the status of monitoring, control and	All transhipment events are recorded, 100% observation of transhipment is in place and all authorities within the supply chain have access to transhipment data as they need it.
	If a transhipment is licensed (and therefore permitted) then the vessel is checked to see if it is on the relevant authorized register for fish carriers?				Supply chains are being mapped to determine whether transhipment is happening and the vessels involved with it.	Transhipment vessels are present on authorized vessel lists and their flag State is known or steps are being taken to achieve this.	All transhipment vessels are known and fully comply with their vessel authorizations.
	Both vessels in the transhipment have uninterrupted VMS, AIS or other vessel tracking technology operating?				Information on whether AIS or VMS is used by vessels transhipping catch is either known or being collated.	seafood within the supply chains, and where their use is not continuous, it is being actively advocated for.	All vessels involved in at sea transhipment use AIS and VMS that is transmitted continuously. In the event of transmission interruptions, vessels are shown to meet the internationally agreed protocols of what to do in such an event.
	Is all of the information regarding any at sea transhipments made available to the end purchaser of the seafood in the supply chain (e.g. restaurant, brand)?	The GDST standards require collection of transhipment information (date, location, vessel name, UVI) which enables information-sharing to the end-purchaser.			Communication to the supply chain is present which clearly states there is an ambition that where transhipment is present in the supply chain, that it is known and documented.	information is either being routinely passed to consumers	Supply chains are transparent enough that information on the use of transhipment is known by the end buyer and they have confidence that transhipment is being carried out as required by their authorization and meets internationally agreed protocols.
	any transhipments that have taken place? All	GDST Standard 1.0 KDEs: all transhipment vessel data (including transhipment vessel name, UVI, registration, flag, transhipment location, dates of transhipment).	9.4.1 Products shall be packed in bags, boxes or master cartons, britestack pellets (i.e. canned) that are properly labeled with all information, including allergens, as required by local legislation and legislation of the country of destination.	A company should request the following information on transhipments: -\text{\t	A policy is adopted that requires transhipments to be mapped in the supply chain and communicated to suppliers.	Supply chain mapping is complete for all seafood sources and the need or use of transhipment within the supply chains has been established. The details described in the implementation notes and GDST are either collected and available to the supply chain owner, or are being collected and reviewed.	All of the GDST KDEs and items listed in the implementation notes are available for all supply chains that employ transhipment within them.
4.6 Landing at							
	Does the organization request the landing procedures and controls of the port of landing? This information should then be used in the risk assessment and due diligence process. The organization should assess and record whether ports are in States that ap party to, and have implemented, the Port State Measures Agreement. Ports with records of non-compliance should be identified as higher risk.	The GDST standards require information on landing location and landing date which provide the basis to investigate all due diligence requirements listed in chapter 4.6.1.	9.3.4 Finished Product – Facilities shall have a system in place that ensures up-to-date, and easily accessible, date of all wide-aught and farmraised raw material suppliers. The facility shall maintain documented records and quantities for all finished product production lots to include the below information, as applicable:  - Country of first landing: - Name of entity to which the fish was first landed or delivered including: name, telephone, and email address of contact person - Evidence of chain of custody from harvest to export to USA, where applicable	What measures can a company take to obtain landing procedures and determine the level of port controls? As a first step, a company can show preference for ports in States that are party to the FAO POR State Measures Agreemen (FSMA), as these are associated with a lower level of risk of being entry points for illegal catch. A company should ask if the designated port in the port State is a party to the PSMA. If not a party to the PSMA, a company should ask if records of port entry requests, denials, documentary checks and inspections are kept. If so, additional questions that a company should ask are:  'Are the records public?'  Is there a protocol to notify foreign port authorities of such information?  How can companies and relevant stakeholders obtain copies of this information and landing procedures and controls at the port of landing?  A company should also request:  the requirements for vessels, particularly foreign-flagged vessels, in requesting access to port  the processes by which authorities determine which vessels should be granted/denied entry into port or be selected for documentary checks and or inspections  senent:	Supply chain mapping is underway to determine all of the ports where fish and seafood is landed, what controls, documents and systems each of the ports requires of a vessel when it lands, and whether the port State is party to the port State measures agreement and the ports used to land are designated within it. At a minimum, PAS 1550 should be referred to in supplier communication so that they are aware of the desire to assess IUU risk.	where relevant the ports are located within States that are party to the Agreement on Port State Measures (PSMA),	All ports of landing used are in States which are either members of the PSMA or are deemed by a third party to have implemented checks at port that are sufficient to eliminate IUU fish being landed. The regime used to check landings are publicised, as is a summary of the checks and their findings. Risk assessments routinely show the ports of landing have a low risk of IUU fish being landed through them, and in dependent third party inspections of the ports have verified this.
	ization assess and record whether or not ports in the The port State competent authorities have	neir supply chain meet the following criteria	and include the information as part of their risk asses	sment: A company should ask if there is an IUU-related risk-based procedure for controls on	Supply chain mapping is underway to determine all of the	Ports of landing are being determined, and information on	Landing procedures at ports are publicly available, with
	The purification of the complete and the control of			recompany amount are in users a aim in chester since because of incompany should ask if the risk- based procedure is documented and if it is made publically available.	copply tests rilepping is underlying to observate an order.  PAS 150 should be referred to in supplier communication, so that they are aware of the desire to assess IUU risk.	In a constanting at colony greath makes, the time materials by the port authorities protocols and checks that are undertaken by the port authorities prior to and during landing, is being collected and assessed. Information on the landing procedures is known for each port of landing, the checks are risk based, and advocacy is happening or planned if these procedures are not made publicly available to third parties.	summaries of the landing checks and their findings routinely being published and shared, so that other flag, port and market States along with seaflood buyers, can assess the risks of buying seaflood landed into and through these ports.





3.1 General		Cross-over with GDST	Cross-over with SPSv5	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice
4.6.1.2.b	The control systems in the port are appropriate			A company should ask if the port is operating under or over its capacity. One way of	Supply chain mapping is underway to determine all of the	Whilst collecting data on the ports of landing and the	The port State routinely publicises the number of
	for the volume of cargo and vessels			assessing port capacity is to ask what percentage of vessels that land or tranship fish are subject to documentary checks or physical inspections.	ports where fish and seafood is landed. At a minimum, PAS 1550 should be referred to in supplier communication, so that they are aware of the desire to assess IUU risk.	controls they employ to check for IUU, a dialogue within the supply chain and the ports being used should be instigated, to assess a port's capacity to adequately cope with the volume of inspections required.	landings that it receives, the findings of its inspections, and with whom it transmits and shares its information,
4.6.1.2.c	There are enough inspectors provided at the port to be able to inspect the volume of cargo and vessels that the port handles			While there is no standard measure or guideline, a determination can be made by weighing the volume or ports capacity for cargo with the number of inspectors on staff. A company should ask if there is a sufficient number of inspectors for the volume of cargo and vessels. There is no standard measure or guideline, sufficiency is determined by the port State. When determining sufficiency, consideration needs to be given to the monitoring, control and compliance regime found in the source fishery, confidence level that the controls in the fishery are being met, the level of corruption within the port State, and technology employed that assists in targeting the inspection regime.	Supply chain mapping is underway to determine all of the ports where fish and seafood is landed. At a minimum, PAS 1550 should be referred to in supplier communication, so that they are aware of the desire to assess IUU risk.	Enquiries should be being made to determine what checks are being undertaken at port and consideration given to assess whether there is sufficient diligence being made to IUU checks. The port check protocol regime is documented, publicly available, and considered to be sufficient to inspect enough landings to deter and pick up any IUU fish and seafood. Consideration given to RFMO Conservation Management Measures (SMMs) which may have more specific requirements, e.g. a percentage of vessels that need to be inspected. These requirements have to be at least met to be considered a sufficient level.	
4.6.1.2.d	The port State competent authorities are able to demonstrate that they operate in an effective and transparent manner			A company can request if landing procedures, standards for documentary checks and physical inspections and records are public, and ask to obtain copies. A good resource on import controls and landing procedures that may be of use can be found here: <a href="https://eu.ocean.or/en/publicions/reports/comparative-study-kew-data-elements-import-controls-chames-aimed-landking.">https://en/publicions/reports/comparative-study-kew-data-elements-import-controls-chames-aimed-landking.</a> It includes a list of key data elements that should be collected as part of a robust import control scheme. In addition, whether the country has signed to be a member of the Fisheries Transparency Initiative may be an indicator of risk.	Supply chain mapping is underway to determine all of the borts where fish and seafood is landed. At a minimum, PAS 1550 should be referred to in supplier communication, so that they are aware of the desire to assess IUU risk.	Companies have knowledge of all landing procedures for each port into which their seafood is landed.	Landing procedures have been assessed and where deficiencies highlighted, a request to the port authorities to improve/address the deficiency has been made, OR all ports in the supply chain share their landings procedures publicly, each port's system has been rated, and its implementation assessed and shown to meet the FAO PSM requirements, which include public reporting of landing assessment summaries.
4.6.1.2.e	All records relating the port State control are well- maintained and available upon request to the relevant authorities or actors requesting information			A company should ask if records of port entry requests, denials, documentary checks and inspections are kept. If so, additional questions that a company should ask are:  -Are the records public?  -Is there a protocol to notify foreign port authorities of such information?  -Is an electronic information system used to collect, store and share this information?  -How can companies and relevant stakeholders obtain copies of this information and landing procedures and controls at the port of landing?  This information should be available and therefore be furnished upon request.	ports where fish and seafood is landed. At a minimum, PAS 1550 should be referred to in supplier communication, so that they are aware of the desire to assess IUU risk.	Ports routinely share the data of their landing inspections with port and flag States so that the necessary information is available to them to take action on IUU where necessary.	landing findings summarised and routinely published.
4.6.1.2.f	The port State verifies the catch documentation and maintains organized documentation and files/ records			A company should ask for catch documentation for landing or transhipment of fish from a vessel that can be verified through transhipment reports. Where these documents are not currently shared with purchasing companies, then a request should be made to both the flag and port State asking for it to happen.	ports where fish and seafood is landed. At a minimum, PAS 1550 should be referred to in supplier communication, so that they are aware of the desire to assess IUU risk.	Ports routinely share data on their verification process of catch documentation undertaken as part of inspections (see also above).	Findings summarising the results of catch documentation verification are sent electronically to flag and port States and there is regular public reporting of the summarised findings.
4.6.1.2.g	There are no recorded instances of bribery and any personnel found guilty of this are not permitted to work in the port			A company should ask if any instances of bribery or corruption have been identified or reported, how they were resolved or if they were made public. The bribery and corruption risk of each port or flag State country within the supply chain should be considered when assessing this risk.	Communication to the company's suppliers has been made, which says that if not laready happening, at some point in the future enquiries should be made to determine whether or not there are any instances of bribery or corruption in port administration relevant to fisheries controls.	Using information from MCS questionnaires and enquiries to ports, the bribery and corruption risk of each port or flag State country is included within determination of risk levels for each supply chain.	States is publicly available, along with commentary on
		The GDST standards require information on landing location which provides the basis to investigate the due diligence requirements listed in chapter 4.6.2.	9.3.4 Finished Product  • Country of first landing	Check the Pew website for PSMA status and also check the accession documentation to determine whether the ports of landing used within the supply chain are actually included within the PSM artification documents. If they are included, then they can be considered at lower risk, but if they are not included, then consider than at higher risk and ask the port State to include them. For more information about PSMA, visit: pewtrusts.orolosma or tito://www.ho.oro/piort-State-measures/resources/detaillenic/1111616/.	The value of PSMA is recognised by the company within its seafood sourcing policy or specification, as is the fact that robust port controls based on PSMA should be correctly implemented.	All ports of landing within the supply chain are mapped, the landing controls are understood, and where PSM ratification is desirable, then advocacy for this to happen is taking place.	implemented PSMA, are included within the ratification
4.6.2.2	As part of the risk assessment process, does the organization soek evidence on whether or not the PSMA requirements are being implemented by the contracting party of the PSMA in which the port found in the supply chain is located? Evidence of non-compliance or lack of evidence of compliance should be treated as an increased risk of fish passing through the port being illegal			A company should ask if the port State is party to the PSMA and/or what is preventing them from joining. A company should ask whether the port State has designated ports for access by foreign-flagged vessels, whether they have been publicized (or check here: <a href="http://www.fiao.org/lishery/bort-State-measures/sensens/piocaleses/sactioneng/">http://www.fiao.org/lishery/bort-State-measures/sensens/piocaleses/sactioneng/</a> ) and confirm that it does not allow foreign-flagged vessels into any non-designated ports.  A company should ask whether requests to enter port and inspection reports include the information detailed in Annexes A and C of the PSMA. The FAO also has a database of designated ports:			





3.1 General		Cross-over with GDST	Cross-over with SPSv5	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice
				, , , , , , , , , , , , , , , , , , , ,	·		•
4.6.3.b	All crew are verified as present as per the crew list provided to the port State inspector, are in possession of their own work contracts and identification documents and are available for confidential interview if a request is made by the port State authorities			In some countries, port in/port out inspections have been put in place to ensure there is no illusti incidence or swapping of crew whilst at saw. When the PSMAULO 188 and Cape Town Agreement are all in force, ratified and effectively implemented, there can be joint inspections that will verify this. If these 3 UN agreements are not in force for each of the supply chains flag or port States, then advocate for their implementation. A company should ask for crew documentation provided by the port State inspector.		Port visits and independent assessments verify that crew are in possession of work contracts and are available for port inspections. Where port inspections including confidential interviews are not being undertaken, advocacy is undertaken to call for this from the relevant State.	All crew are verifiably in possession of work documents and are checked on departure and arrival from ports. A sample of crew are periodically interviewed confidentially by port authorities to verify they are operating in decent working conditions. Verification of the above could also be demonstrated through independent third party audit.
4.6.3.c	The captain is available at the port inspection and is able to provide all documentation and enquiries required at the port State inspection			Pre-notification of arrival and landing should be made by vessels or flag States so that document inspection can be undertaken and outcome recorded. Suppliers should request a copy of these records relevant to their purchase from the vessel owner/supplier. Where they are not available, then a time-bound request for this information should be made to the supplier and also to the flag State of the vessel, asking that this is mandated as a customary practice. A company should request inspection reports that include vessel identification, construction, registration documentation, license to fish or tranship, catch and by catch documentation, processing and transhipment reports, vessel monitoring systems, and/or automatic identification systems, fishing gear, fish species and quantities, safety certifications and crew documentation.	The need for landing inspections and pre-notification of landing is recognised as an important step to address IUU, either within a company policy or the buying specification. This recognition has been communicated to seaflood suppliers of fish and seaflood, whether or not they are landed to States party to PSMA.	Improvement steps are being taken to achieve visibility of inspection reports that include checks on vessel ID, registration documents, by-catch, transhipment and other criteria contained within the GDST KDEs or the specific buyers requirements.	Pre-notification of arrival and landing is routine at all ports of landing within the supply chain, and these records are available for timely sharing with interested stakeholders, other flag and port States and they contain accurate information on all of the attributes detailed within the PAS guidance notes.
4.7 Decent we	orking conditions in the fishing sector						
4.7.1	Does the organization include in its policies and require from its suppliers that all of the major issues that are identified in ILO Convention C188 are addressed by source fisheries? These are essential to providing decent work conditions on board fishing vessels			See 4.4.3.i			
4.7.2	Wherever possible and relevant, does the organization demonstrate that it supports the ratification of the ILO Convention C188?						
4.7.3	Is traceability ensured down to vessel level to enable businesses with a turnover of over £36 million to produce their annual slavery and human trafficking Statement that covers what is being done in the supply chain to address the issue.	Traceability down to the vessel is enabled through implementation of GDST standards	2.10.3 Suppliers must have traceability systems in place to allow trace-backs to vessel or wholesaler for wild-caught	See 3.4.5. An overview of the traceability system can be set out in reporting issued under the Modern Slavery Act			
4.7.4	Has the organization developed and made public protocols that guide how and when it will inform statutory agencies of human rights infractions identified during audits, risk assessments and other internal reviews?	The GDST standards request the name of internationally recognized Human Welfare standards to which policy on a vessel/trip claims conformity.	5.4 Forced, Bonded, Indentured, Trafficked and Prison Labor				
4.7.5	Have industrial fishing vessels had a social and ethical responsibility policy/standard that includes the points in 3.3.3?			See 3.3.3	out working conditions. Reference should be made to the conditions required in ILO ILO C188.	these requirements, it is clearly documented and incorporated into the risk assessment.	3rd party certification is in place for ports, vessels and other places where people are employed within the supply chain, or the flag and port States have ratified and robustly implemented PSMA/Cape Town Agreement and ILO C188.
	Do inspections, audits and checks include, where possible, in-person interviews with the relevant workers or crew, which are conducted in a neutral and safe environment, guaranteeing the security and anonymity of the interviewees?			Vessel inspections and audits are a developing area, so the PAS indicates that this is a requirement where possible. Importer/processors placing reliance on these in their due diligence systems should seek assurance of the following labour and interview standards for inspections, audits and checks:  *There is evidence of a standard operating procedure for inspections that includes worker interviews.  *This SOP should be in accordance with international standards and follow a victim centred approach irrispectors should receive accredited or government/ILO approved training in conducting labour inspections/interviews/worker interactions. Certificates of completed training should be provided to the importer/processor interpections should be conducted both on a scheduled but also unannounced basis in order to identify potential cases of FL & HT  *Inspection records including number, type and nature of the inspections, should be provided to the importer/processor on a quarterly basis  *Inspectors should use an interview questionnaire that is designed to identify indicators of forced labour and human trafficing as defined by the ILO  *Importers/processors should be provided with examples of completed questionnaires as part of baseline measurements  *Inspectors/auditors agree to importers or processors conducting unannounced spot checks of inspection/interview procedures	Communication made to suppliers requiring that crew are made available for confidential interviews by relevant State inpsectors or other experts on request.	Audits and port visits include confidential interviews with crew in a neutral and safe environment, guaranteeing the security and anonymity of the interviewees.	All vessels are subject to inspections under ILO C188 or are subject to a certification or standard that includes periodic crew interviews by trained professionals.
Section 5. Fac							
<b>5.1 Informatio 5.1.1</b>	on  Is the organization able to demonstrate that processing factories in its supply chains comply with the policies and specifications of the organizations which they supply (see 3.3.3).		2.2.3 The Quality Manual shall clearly define all of the quality attributes for all raw material received, and finished products produced, that shall be monitored and controlled to ensure conformance to legal requirements and customer and facility specifications.				





3.1 General		Cross-over with GDST	Cross-over with SPSv5	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice
5.1.2	Can information be provided to any other actor in	CDST standards require the digitization of	A3 3.2 Once the lots are selected by the auditor for	Processors should be able to provide details on the following:			
5.1.2	Lan information be provised to any other actor in the supply-chain on the legality and traceability of a product within a maximum of four hours?	GUS I standards require the digitisation of traceability information which enables rapid sharing of traceability information.		Processor's should be able to provise details on the holowing: goods receipt documentation traceability/batch code traceability records back to vessel product specs systems in place to verify legality at level of processing mass balance reconciliation, i.e. where the original catch outlined in the catch certificate has been spit up and catch certificates have been photocopied  Is this information easily accessible and are actors willing to share this information? An example of a guideline on how to increase coherence and interoperability of information systems and therefore help ease data sharing is the GDST Standard 1.0. https://traceability- dialogue.org/core-documents/gds1-10-materiability-			
	Is there a designated person(s) at the factory that is responsible for ensuring that information relating to legality and traceability is compiled, stored, reviewed managed and available for checks (e.g. audits)?		2.4.3 The facility shall clearly identify the Staff Member accountable for the maintenance of the Quality Management System and for the company meeting and adhering to all of the requirements of the Seafood Processing Standard.				
5.2 Process C							
5.2.1	Is the production process defined, controlled and documented to ensure that the product meets the specifications and produces products that are compliant with the expectations of the end product users?		2.12.1 The facility shall prepare and implement standard operating procedures, quality procedures, food safety management procedures, social accountability procedures, and work instructions for all processes and operations having an effect on product safety, legality and quality.  4.1.1 The facility shall document and implement appropriate Product Release Procedures that identify processes and testing procedures that identify processes and testing procedures that be performed. These Procedures shall identify the responsible person or persons authorized to release product and include food safety, quality and legal specifications that shall be verified as having been met prior to release.				
5.2.2	Are product specifications, batch specifications, process monitoring, product testing, manufacturing site cleaning, and other quality control measures documented?	Batch lots and the association of ingredients in processing are handled in the traceability data. These pedigree files can be linked to other production data.	3.1.1 All elements of the facility's Food Safety Management System (e.g. the HACCP, GMP, Hygiene, SSOP, Food Defense Plan, and other related plans) shall be documented, implemented, maintained and continually improved.				
5.2.3	Spot purchases without any knowledge of the vendor should be avoided and therefore not present in supply chains. The organization should ensure that all subcontractors meet all laws and are included in traceability do	Widespread adoption of GDST standards can facilitate the universal request for pedigree files such as in the case of spot transactions.	2.10.2 The facility shall have a supplier approval program which includes a list of approved suppliers and service providers as described in 2.9 above. This list shall be kept up-todate and reviewed, at a minimum, annually.				
5.2.4	Does the organization complete mass balance checks at their factory for its supply chains? These should be completed at regular intervals throughout the year, at a rate appropriate according to the results of the risk assessment and to satisfy internal due diligence but at a minimum of once per year. Accurate conversions ratios from production line should be used to make sure that the mass-balance is accurate	GDST standards were developed to allow for mass balance checks.	9.6 Mass Balance				
5.3 Ethics an							
	Does the organization have a policy that defresses social and ethical responsibility (see 3.3.3, a) to g) for what to include in the policy)?	GDST standards require information on the existence of human welfare policies for staff in processing facilities. The GDST standards also request the name of internationally recognized Human Welfare standards to which the policy claims conformity.	5.1.1 Facilities shall operate in compliance with this standard and all local, national, and international conventions, rules and regulations, whichever provides the highest protection to the worker. The facility shall have in place policies and procedures pertaining to, but not limited to: worker health and safety and compliance with requirements regarding wages, benefits, hours, hiring practices, minimum age, status of workers, and good employee relations that provide the highest protection to the workers.		A policy is in place that requires the full mapping of the seaflood supply chain and includes an ambition for social and ethical responsibility and working conditions to be afforded to everyone working within it.	Supply chains are fully mapped and suppliers at all levels have communicated their understanding of what its trying to be achieved with 1st, 2nd and 3rd party audits being targeted to those areas of the supply chain that are assessed to be of high and medium risk.	



3.1 General		Cross-over with GDST	Cross-over with SPSv5	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice
5.3.2	Does the organization apply this policy not only to the buildings and operations that it owns but also communicate that the behaviours outlined in the policy are expected of all the actors in its supply chain, from supplier to vessel operations?		2.9.1 The facility shall exercise proper control over any entity that is used to outsource any processes that may have an impact on food safety, legality, quality, traceability and social responsibility.	Policies that address social and ethical responsibility should be communicated to all actors along the supply chain. Where this cannot be communicated, (e.g., on some occasions suppliers do not know who they will supply from in advance, efforts should be made to communicate these policies as soon as the supply chain is established.  There should be a mechanism in place that allows communication of these policies and standards to the potential suppliers of seafood from new sources. This can help inform a company's sourcing decision and it helps the supplier determine if it can meet requirements now and in the future.	The policy includes an allowance for new supply chains that are seasonal or have short lead times before supply to be mapped as soon as time allows, but that all regular supply chains are to be mapped at the earliest opportunity.	in supply chains by exception, employs a risk-based	Supply chain is well mapped and the policy has been in place for a sufficiently long time that Srd party audits and certification of all supply chain options are known and understood, irrespective of volume and value being sourced.
5.3.3	Does the organization ensure that at any of its factories, a review of its ethical and labour policy and systems is completed at least once per year to ensure that it is addressing current industry concerns and that it complies with any changes to the industry and supply chain requirements?		5.1.1 Facilities shall operate in compliance with this standard and all local, national, and international conventions, rules and regulations, whichever provides the highest protection to the worker				
5.3.4	is there a designated person(s) at each factory to ensure that workers are being treated ethically and that tabour rights are being uphet? Translation services should be provided for migrant workers to facilitate effective communication		2.4.3 The facility shall clearly identify the Staff Member accountable for the maintenance of the Quality Management System and for the company meeting and adhering to all of the requirements of the Seafood Processing Standard				
5.3.5	Are grievance mechanisms in place that allow workers to report issues and any cases of abuse anonymously without being put at risk of negative repercussions? Any grievance report should be investigated as a priority, in a fully transparent manner and by including the relevant union representatives — or in cases where this does not apply—by involving NGO representatives in the review process		5.4.5 information regarding hottlines, competent suthorities, and other resources for victims of labor rights abuse must be on display to workers in the facility.  5.7.6 The facility must have in place an established complaints and remediation system to handle cases and allegations of sexual abuse/harassment, bullying or discriminatory practices. This must, at a minimum, include a confidential reporting mechanism, information on any hottlines or other outside support services available and the possibility of calling in independent assessment/arbitration.				
5.3.6	Does the organization promote robust labour standards with respective governments in the form of legislative frameworks that support workers – local or migrant labour – in their right to organize and collective bargaining?		5.8.1 Facilities shall respect the rights of workers to associate, organize, and bargain collectively (or refrain from doing so) without the need of prior authorization from management. Facilities shall not interfere with, restrict, or prevent such activities and shall not discriminate against or retailate against workers exercising their right to representation in accordance with international labor standards. 5.8.2 Where the right to freedom of association accollective bargaining is prohibited or restricted under local law, the facility shall not prevent alternative means to facilitate worker representation and negotiation. (For example, the election of one or more employees by the workers to represent them to management).				
5.4 Product ti 5.4.1	racking and transformation  Where a fish product, unit, or batch of fish products, originates from multiple source fishing activities or fisheries, is there identification and tracking of products from each source that enable products at final sale to be traceable to a single source and activity? The fish product or batch identification should be grouped or associated in ways to allow verification of legal compliance and of claims related to sustainability or fishing methods	Implementation of standards requires unique unit identifiers.	9.1.1 Facilities that source raw material from both wild-caught and farm-raised sources shall properly identify, segregate and label products from different wild-caught and/or aquaculture sources and shall indicate any relevant certifications. 9.1.2 Proper identification shall be maintained for each lot, for each wild-caught and farmraised source, on all documents and at each step of the process flow from raw material receiving, handling, processing, packaging, storage and dispatch. Records shall be maintained to ensure product identity and demonstrate that products from wild-caught and aquaculture sources and those from certified and non-certified sources are not mixed.	Seafish lists UK regulations pertaining to labelling, marketing and more: https://www.seafish.org/trade-and-regulation/seafood-traceability-and-labelling-regulations/fish-traceability-reguirements/.			
5.4.2	Are unique unit identifiers present at each level of the packaging hierarchy (e.g. from a pallet, a case or a consumer item)?	traceability back to a single source. GDST standards allow for aggregation and deaggregation based on parent/child identifiers. GDST Standard 1.0 KDEs (traceable object information): Item/SKU/UPC/GTIN,	9.2.1 The facility shall develop, maintain and document appropriate traceability procedures and systems to include identification of batches of raw material, ingredients, in-process products, rework, outsourced processing, packaging, additives, and final product throughout the production process and any out-sourced product, ingredient or service.				



3.1 General		Cross-over with GDST	Cross-over with SPSv5	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice
5.4.3	products, processed, reconfigured, or re- packaged, does the new product have its own unique product identifier?	inique unit identifiers for aggregated or ransformed seafood. Critical tracking wents resulting in irreversable change to he product, including comingling are core to the GDST standards.	9.5.2 The facility shall maintain documented records for all production lots that records the below information, as applicable, for each BAP star category (1, 2, 3, and 4-star) and for wild-caught species the facility is eligible to produce:  - Lot number  - Storage location - Shipping — company, method, date - Unique shipping identifiers — container or seal number, bill of lading				
	Is the linkage (auditable function) maintained between this new product and its original inputs to than the control of the con	ne linkage between inputs and outputs.	9.3.4 Finished Product – Facilities shall have a system in place that ensures up-to-date, and easily accessible, data of all wild-caught and farm-raised raw material suppliers. The facility shall maintain documented records and quantities for all finished product production lots to include the below information, as applicable				

Section	No.	Question
3.3.1.1		What policies and processes are in place that provide requirements for full chain traceability to be ensured?
	1	Can traceback exercises be conducted from end point (i.e. retailer) to start point (i.e. vessel), to support full chain traceability claims?
3 4 1		•vessel license •catch documentation
	2	What other records or documents do you keep that support claims of legality of a source?
3.4.4		How frequently are traceability systems, and all claims based on them, subject to external verification and independent audits?
	3	How is traceability data made accessible during verification checks and audits e.g. use of an electronic system?
3.4.5		How is traceability provided to the vessel or group of vessels (e.g. catch certificate) that caught the seafood?
		What processes, e.g. traceback exercises, are used to demonstrate traceability to a vessel or group of vessels?
		Have you adopted any traceability standards, e.g. ISO 12875, as part of traceability compliance, and if so which ones?
	4	If you have undertaken a traceability improvement project or initiative, can you please provide details of this i.e. time-bound deliverables?
3.4.8		Are sales transactions accompanied and traced by unit or batch numbers on, or accompanying invoices?
Where are unit		Where are unit or batch numbers captured?
	5	Are you able to match sales transactions with buyers or sellers?
3.4.10		Which of the following data is available for collection upon request and associated with products?  •vessel identity (home port, name, flag and call sign), registration, and where issued, IMO or other UVI number  •location of catch (e.g. GPS coordinates, specific location of fishery, FAO codes, EEZ's ISO country code, relevant Regional Fisheries Management Organization (RFMO))  •fishing license and validity
		•species (FAO alpha 3 code), product name and code •fishing method used •fishing dates of capture
		•quantities (in kg) of catch •date/area/position/estimated weight/call sign and declaration of any transhipment at sea. This will include the
		receiving vessel name and where applicable, the IMO number or other UVI number •person/enterprise with custody and ownership after landing.
	6	What other information is associated with products?
3.4.11		What key data relating to products (refer to question X) at a minimum, are maintained in an electronic system?
	7	Is other documentation such as EU Catch Certificates attached electronically, or is a record noting their physical location attached?









Section	No.	Question			
3.5.3		Can you assess the impact of decent working conditions through a verifiable traceback exercise across your supply chains within 48 hours from the time the request is made? A traceback exercise involves gathering information or documenting events from the point of origin or source. If any information is unavailable during a traceback exercise, a further multi-part question should be asked, such as:			
	8	Can you access information or furnish evidence related to freedom of association, right of workers to organize, forced labour, minimum age of workers, child labour, equal remuneration or discrimination?			
3.5.4		As a company, are you able to conduct inspections, audits and/or site visits to check for aspects of legality, traceability and decent working conditions?			
		How often do you conduct site visits?			
	9	What information are you able to obtain from the site visits to help verify legality of seafood products and decent working conditions from the point of origin?			
3.5.6		As a company, can you obtain third-party verification of information at any point in the supply chain?			
		Do you have designated access to conduct inspections, audits and/or site visits on behalf of those in the supply chain?			
	10	Can you conduct random spot checks, and are you permitted to conduct unannounced audits?			
3.5.7	11	Are all products properly and visibly labelled and written in plain language, including correct source of the product and country of origin? If so, please supply examples of labelling where relevant, for all seafood supplied in this contract. See link for information on labelling as a resource:  https://trade.ec.europa.eu/doclib/docs/2014/december/tradoc 152941.pdf			
4.3.2.1.a	1	What requirements are in place for vessels to have Vessel Monitoring Systems (VMS)?			
		What requirements are in place for vessels to operate Automatic Identification Systems (AIS)?			
	12				
4.3.2.1.b	12	Are there any other vessel tracking requirements in place for vessels?  What requirements are in place to provide data on vessel position, catch of target and non-target species and fishing effort to the following:  •the vessel's flag State?  •the vessel's coastal State (if applicable)?  •the Regional Fisheries Management Organization where the vessel fishes (if applicable)			
	13	What other data requirements are in place of fishing activity by vessels that supply seafood in this contract?			
4.3.2.1.c		At what frequency are vessels in the supply chain subject to at-sea vessel inspections by the coastal State, by parties to RFMOs in the high sea?			
	14	Can you share any post-inspection reports?			
4.3.2.1.d		What requirements are in place by the flag State, coastal State or RFMO for human observers to be on the vessel(s)?			
	15	What electronic monitoring measures are in place on the vessel and what authorities have access to these records?			
4.3.2.2		What is the flag State of the vessel(s) supplying seafood under this contract?			
	16	What is the nationality of the vessel(s)' beneficial owner?			









Section No.		No. Question				
4.3.3.1						
		What flag States, coastal States and processing States have responsibility for seafood caught in this supply chain?				
	17	Are any of the above States subject to an EU yellow card or red card? See: http://www.iuuwatch.eu/map-of-eu-carding-decisions/				
4.4.1	18	As a company, can you confirm that none of the vessels in this supply chain appears on a regional IUU black list. See: https://iuu-vessels.org/				
4.4.3.a		Do all qualifying fishing vessels have a unique vessel identifier (UVI) issued by IHSM&T on behalf of the IMO?				
		Where is this information captured, e.g. catch certificate, registration?				
	19	Can this information be made available upon request?				
4.4.3.b		Do those fishing vessels not qualifying for an IMO number have an alternative internationally or nationally recognised unique vessel identifier (UVI)?				
		If so, what alternative UVI is used and can this information be made available upon request?				
	20	What assurance or evidence exists to support that UVIs remain the same for the entire life of the vessel?				
4.4.3.c		Do all fishing vessels in your supply chain have up-to-date authorizations and fishing licences issued by the relevant competent authorities?				
		How often are authorizations and fishing licenses reviewed/renewed?				
	21	If requested, could this information be provided within 14 days?				
4.4.3.d		Do vessel operators obtain confirmation directly from the coastal State and/or RFMO that authorizations and fishing licences have been issued and the dates they are valid for?				
	22	Is there evidence to support this and can this information be made available upon request?				
4.4.3.e		Have vessel operators obtained and documented a full list of all of the conditions of fishing licences and authorizations directly from coastal State authorities and/or RFMOs, including locations where fishing is restricted, gear use, crew requirements, observer requirements and any other conditions?				
	23	Is there evidence to support this and can this information be made available upon request?				
4.4.3.f		Who do fishing vessels and the companies that own them pay their license fees to?				
	24	Do they provide documentation and evidence of this to the processor/importer if requested?				
4.4.3.g		Do all fishing vessels have a vessel monitoring system (VMS), automatic identification system (AIS) or other vessel tracking technologies?				
		If not, what percentage of vessels have these systems and what percentage of this data is monitored?				
		Are these systems and technologies continuously engaged while at sea and actively monitored by the coastal or flag State?				
	25	Can this information be made available upon request?				











Section No. Question		Question	
4.4.3.h			
		What evidence is available to support that vessels are in compliance with inspection regimes?	
		Is there evidence to support that the vessel management:	
		•Accept and facilitate the prompt and safe at sea boarding by relevant coastal State inspectors or duly authorised	
		RFMO inspecting authority •cooperate with and assist in the inspection of the vessel conducted pursuant to an authorized at-sea inspection	
		•do not obstruct, intimidate or otherwise interfere with relevant coastal State inspectors or duly authorized RFMO inspecting authority in the performance of their duties	
		*allow the relevant coastal State inspectors or duly authorized RFMO inspecting authority to communicate with the authorities of the flag State of the vessel and the relevant coastal State during the boarding and inspection?	
	26	Where this information or evidence is not available, can you document why it does not exist, e.g. vessels are not inspected, inspecting State does not issue inspection reports?	
4.4.3.i		What minimum standards are required for worker contracts and vessel conditions for vessels supplying seafood under this contract?	
	27	What labour inspections do vessels supplying seafood under this contract face by government authorities?	
4.4.3.j	28	What checks are undertaken on the professional background of captains employed?	
4.4.3.k Are captains hired if they have been found to have been guilty of IUU infractions?			
	29	Are any additional corporate risk mitigation measures put in place if such captains are hired?	
4.4.3.1	30	Are captains hired if they have been found to have a history of human rights abuses?	
4.4.3.m		What measures are put in place to make sure that seafood is not purchased from suppliers that have been found	
	31	have been associated with human rights abuses?	
4.4.5	32	Provide a complete list of all vessels used to supply seafood under this contract, including full names, IMO numbers and the beneficial owner of the vessel.	
4.4.7	33	Please provide copies of flag State authorizations for supplying fishing vessels.	
4.5.1.a		What practices are in place to ensure transhipments in their supply chain are recorded, monitored and covered by	
	34	independent observer programs appropriate to the fishery?	
4.5.1.b	35	Are all transhipments at sea relating to supply authorized?	
4.5.1.c	36	Do both vessels involved in the landing and transhipping of fish operate VMS/AIS or vessel tracking technology?	
4.6.1.1	37	What landing procedures are in place to determine the level of port controls?	
4.6.1.2.a		What are the procedures for controls on vessels that request entry into port to land or tranship fish?	
		Are the procedures documented?	
		Are the procedures publicly available?	
	38	If not, why are the procedures not documented and available?	









Section	No.	Question			
4.6.1.2.b		What percentage of vessels that land or tranship fish are subject to documentary checks or physical inspections in port?			
		How are selections made for which vessels to check/inspect?			
		How were the vessels your company sources from selected for documentary checks/ inspections?			
		Which of the following are covered by checks and inspections?  •vessel identification, construction and registration documentation  •license and authorizations to fish or tranship  •catch and bycatch documentation			
		<ul><li>processing and transhipment reports</li><li>VMS/AIS systems in use</li><li>type of fishing gear used</li></ul>			
		•type and volume of fish species •crew documentation			
4.6.1.2.c	39 40				
4.6.1.2.d	41	How many inspectors are available to inspect the volume of cargo and vessels that the port handles?  Are landing procedures, standards for documentary checks and inspection reports publicly available upon request from the port State through the supply chain?			
4.6.1.2.e	42	Are all records relating to the port State control available to the relevant authorities and supply chain actors upon request within a given timeframe?			
4.6.1.2.f	43	Is catch documentation available and verified and reported by the port State authorities?			
4.6.1.2.g	10	Is there evidence of any recorded instances of bribery through enquiry or public documents including press?			
	44	Is there evidence of any personnel found guilty of bribery through public documents including press?			
4.6.2.1	45	Is the port State a party to the FAO Port State Measures Agreement (PSMA)?			
4.6.2.2		Does the port State have designated ports for access by foreign-flagged vessels?			
	46	Are your ports of landing included in the list of PSMA designated ports?			
4.6.3.a		Are crew granted shore leave access in accordance with laws of the port State?			
	47	How is this verified?			
4.6.3.b		Are all crew verified as per the crew list provided to the port State inspector?			
	48	Do you verify if crew are in possession of their work contracts?			
4.6.3.c		Is the captain of the vessel able to provide all documentation requested by port State inspectors?			
	49	How would a company obtain this information?			
4.7.5	50	Please supply the policies and procedures relating to the treatment of crew members on fishing vessels supply seafood to this contract.			
4.7.6	51	Please set out in detail what measures are in place to interview crew from vessels supplying seafood to this contract, to determine whether or not crew have experienced human rights abuses, violations of labour laws or any other legal violations.			
5.1.1 Please set out what reporting mechanisms are in place for workers in factor to report labour infringements, unfair working conditions or associated unla		Please set out what reporting mechanisms are in place for workers in factories processing seafood for this contract to report labour infringements, unfair working conditions or associated unlawful treatment. Have any specifications or			
	52	codes of practice been agreed to cover these areas, and if yes, please share these.			









Section	No. Question	
What information can be provided to any other actor in the supply chain to supproduct, e.g., goods receipt, batch code, traceability records back to vessel?		What information can be provided to any other actor in the supply chain to support the legality and traceability of a product, e.g., goods receipt, batch code, traceability records back to vessel?
	53	Can this information be provided within a maximum of four hours?
5.1.3	54	Is there a designated person(s) at the factory responsible for ensuring that information relating to legality and traceability is compiled, stored, reviewed managed and available for checks (e.g. audits)?
5.4.1		Are there any fish products, units, or batches that originate from multiple source fishing activities or fisheries?
		How are these products traced, e.g. electronic traceability system, from a single source and activity, e.g. vessel, to final sale?
	55	Is this information subject to external verification or regular independent audits?
Are unique unit identifiers present and consistent at each level of the packaging hierarchy, or a consumer item?		Are unique unit identifiers present and consistent at each level of the packaging hierarchy, e.g. from a pallet, a case or a consumer item?
	56	How are these unique unit identifiers documented and tracked, e.g. electronic traceability system?
5.4.3		When a product is combined with other material/ products, processed, reconfigured or re-packaged, does the new product have its own unique product identifier?
	57	How are these unique product identifiers documented and tracked, e.g. electronic traceability system?
5.4.4		Is the linkage maintained between a new product at final point of sale (refer to 5.4.3) and its original inputs, e.g. lot identification of original input?
		How is this linkage documented to maintain traceability?
	58	Is this documentation available for external verification or independent audit?











#### **Shared Resources**

Topic (traceability, IUU, human rights) Traceability			
rights)			
,			
Traceability	Title	Authors	Link
	GDST 1.0 Standards and Materials	GDST	https://traceability-dialogue.org/gdst-1-0-materials/
	Standards and Guidelines for Interoperable		https://traceability-dialogue.org/wp-
T	Seafood Traceability Systems – Core Normative	ODOT	content/uploads/2020/03/2020.03.11_GDST1.0CoreNormative
Traceability	Standards (Version 1.0)	GDST	StandardsfinalMAR13.pdf
		Future of Fish, in collaboration	https://fishwise.org/wp-content/uploads/2018/03/OSMI-Trace-
Traceability	Taking the first steps towards full-chain seafood traceability: A preliminary guide for industry	with FishWise, Global Food Traceability Center, and WWF	Collab_Taking-the-First-Steps-Towards-Seafood- Traceability.pdf
- racousy	a accasimity . 11 promitmany galactics in accas	Tracoasinty Conton, and TTTT	https://www.worldwildlife.org/publications/traceability-
Traceability	Traceability Principles for Wild-Caught Fish Products	WWF	principles-for-wild-caught-fish-products
	ISO 12875:2011: Traceability of finfish products —		
	Specification on the information to be recorded in		
Traceability	captured finfish distribution chains	ISO	https://www.iso.org/standard/52084.html
I - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -	T. 0 5:10:11 BM T :: (0 ( )	G F: 1	https://www.seafish.org/media/publications/SeafishGuidetoDN
Traceability	The SeaFish Guide to DNA Testing of Seafood	SeaFish	ATestingofSeafood_201312.pdf
	Seafood traceability for fisheries compliance: Country-		http://www.fao.org/publications/card/en/c/1701be4c-eb83-4b0f-
Traceability	level support for catch documentation schemes	FAO	97e5-b6d11d1c7c55/
			https://www.gs1.org/standards/traceability/guideline/gs1-
	GS1 Foundation for Fish, Seafood and Aquaculture		foundation-fish-seafood-and-aquaculture-traceability-
Traceability	Traceability Implementation	GS1	implementation
IUU	IUU vessel list	ICCAT	https://www.iccat.int/en/IUUlist.html
IUU	The EU rules to combat illegal fishing (IUU)	European Commission	https://ec.europa.eu/fisheries/cfp/illegal_fishing/info
IUU	Combined IUU Vessel List	TMT	https://www.iuu-vessels.org/Home/Search
	The Global Record of Fishing Vessels, Refrigerated		
Traceability	Transport Vessels and Supply Vessels	FAO	http://www.fao.org/global-record/information-system/en/
Traceability	IMO GISIS: Ship and Company Particulars	IMO	https://gisis.imo.org/Public/SHIPS/Default.aspx
Traceability	Fish traceability requirements	SeaFish, UK government	https://www.seafish.org/article/fish-traceability-requirements
	Information on at-sea inspections by the Marine		https://assets.publishing.service.gov.uk/government/uploads/s
IUU	Management Organisation and Royal Navy in UK waters	UK Government	ystem/uploads/attachment data/file/314557/code-sea.pdf
			_
	Remote Electronic Monitoring: Why camera technology is a cost-effective and robust solution to		https://www.wwf.org.uk/sites/default/files/2017- 10/Remote%20Electronic%20Monitoring%20in%20UK%20Fis
IUU	improving UK fisheries management	WWF	heries%20Management WWF.pdf
	An Advisory Note For The UK Supply Chain on how		https://ejfoundation.org/resources/downloads/EJF-Advisory-
IUU	to avoid IUU fishery products	BRC, EJF, WWF	Note-low-res-final.pdf
	Advancing Traceability In The Seafood Industry		https://fishwise.org/traceability/advancing-traceability-in-the-
Traceability	Assessing Challenges and Opportunities	FishWise	seafood-industry-assessing-challenges-and-opportunities/
	Three Treaties to End Illegal Fishing (status of		https://www.pewtrusts.org/en/research-and-analysis/data-
	ratification PSMA/ c188/ CTA)	Pew	visualizations/2018/three-treaties-to-end-illegal-fishing
			https://www.pewtrusts.org/en/research-and-analysis/fact-
			sheets/2019/08/how-to-end-illegal-fishing-the-role-of-the-flag-
	How to end illegal fishing: The role of the flag state	Pew	<u>state</u>
	Equasis Shipping Information	Equasis	http://www.equasis.org/EquasisWeb/public/HomePage
	IMO Database	ISSF	https://iss-foundation.org/pvr/public-imo.php?what=fullscreen
		1	https://www.pewtrusts.org/en/research-and-analysis/fact-
	IMO Explained	Pew	sheets/2017/05/the-imo-number-explained
	UVI Database (Tuna vessels)	ISSF	https://iss-foundation.org/pvr/public-uvi.php?what=fullscreen
	RFMO Best Practice Performance	ISSF	https://iss-foundation.org/download-monitor-demo/download-info/rfmo-best-practice-performance
<u> </u>	Transhipment: Strengthening Tuna RFMO	1001	пполино-резергасисе-репониансе
	Transhipment Regulations	ISSF	https://iss-foundation.org/pvr/public-uvi.php?what=fullscreen
			Transshipment
	Transshipment Reform	Pew	Reform Needed To Ensure Legal, Verifiable Transfer of Catch
· <del></del>			https://www.pewtrusts.org/en/research-and-analysis/fact-
	Transshipment Best Practices	Pew	sheets/2017/11/best-practices-for-transshipment
		_	,,
	Consolidated List of Authorised Tuna Vessels (CLAV)	I una.org	http://clav.iotc.org/browser/search/es/#quick
	CCAMI D.Vesseli-t	CCAMIR	https://www.ccamlr.org/en/compliance/list-vessel-
	CCAMLR Vessel register	CCAMLR FAO	authorisations http://www.fao.org/gfcm/data/en/
	GFCM Vessel Register	1 /10	
	NAFO Vessel Register	NAFO	https://www.nafo.int/Fisheries/Monitoring-Control-and- Surveillance/Vessel-Registry
		NEAFC	https://www.neafc.org/neafc-vessel-register
	NEAEC Vessel Register		https://www.nearc.org/nearc-vesser-register
Traceability/ILU	NEAFC Vessel Register  NPFC Vessel Register		https://www.npfc.int/compliance/vessels
Traceability/IUU	NEAFC Vessel Register NPFC Vessel Register	NPFC	https://www.npfc.int/compliance/vessels
Traceability/IUU	NPFC Vessel Register	NPFC	https://www.ccsbt.org/en/content/ccsbt-record-authorised-
Traceability/IUU	-		



#### **Shared Resources**

Topic			
(traceability,			
IUU, human			
rights)	Title	Authors	Link
	ICCAT Vessel Register	ICCAT	https://www.iccat.int/en/VesselsRecord.asp
	IOTC Vessel Register	IOTC	https://www.iotc.org/vessels
Traceability/IUU	SEAFO Vessel Register	SEAFO	http://www.seafo.org/Management/Authorized-Vessel-List
Traceability/IUU	SIOFA Vessel Register	SIOFA	https://www.apsoi.org/mcs/authorised-vessels
Traceability/IUU	SPRFMO Vessel Register	SPRFMO	https://www.sprfmo.org/Web/Vessels/VesselSearchView.aspx
	WCPFC Vessel Register	WCPFC	https://www.wcpfc.int/record-fishing-vessel-database
	World Shipping Register : Determine insurance	World Shipping Register	https://world-ships.com/
	Magnus-Stevens Act: List of IUU Identified Nations	NOAA	https://www.fisheries.noaa.gov/foreign/international-affairs/
			https://www.iotc.org/sites/default/files/documents/compliance/D
	IOTC Designated Ports	IOTC	esignated Ports 20190726.xls
	ICCAT Designated Ports	ICCAT	https://www.iccat.int/en/Ports.asp
	SEAFO Designated Ports	SEAFO	http://www.seafo.org/Management/Authorized-Ports
	SIOFA Designated Ports	SIOFA	https://www.apsoi.org/mcs/designated-ports
	SPRFMO Designated Ports	SPRFMO	https://www.sprfmo.int/measures/points-of-contact/
	WCPFC Designated Ports	WCPFC	https://www.wcpfc.int/folder/designated-ports
	Tron to Boolghatou totto	1	https://www.ccsbt.org/en/content/ccsbt-register-designated-
	CCSBT Designated Ports	CCSBT	ports-and-contacts
	GFCM Designated Ports	GFCM	http://www.fao.org/gfcm/data/ports
	S. S. Sooignated Forte	C. 5III	https://www.nafo.int/Portals/0/PDFs/fc/PSC-
	NAFO Designated Ports	NAFO	forms/All PortInfo.pdf
	INAL O Designated Folis	NAI O	IOTHIS/AII_FOIGHIO.pdf
	NEAEC Designated Borto	NEAFC	https://ec.europa.eu/fisheries/cfp/control/designated_ports_en
	NEAFC Designated Ports	NEAFC	
	EAO DOMA Designated Desta	540	http://www.fao.org/fishery/port-state-
	FAO PSMA Designated Ports GSSI Recognised Schemes	FAO GSSI	measures/psmaapp/?locale=en&action=gry
	GSSI Recognised Schemes	GSSI	http://www.ourgssi.org/benchmarking/recognized-schemes/
	Technical guidelines and specifications for the		https://www.efca.europa.eu/en/content/technical-guidelines-
	implementation of Remote Electronic Monitoring	European Fisheries Control	and-specifications-implementation-remote-electronic-
All	(REM) in EU fisheries	Agency (EFCA)	monitoring-rem-eu
			http://assets.wwf.org.uk/downloads/fisheriesmanagement2
All	Electronic monitoring in fisheries management	WWF	<u>pdf</u>
			<u>Electronic</u>
All	Electronic monitoring: A tool for global fisheries	Pew	Monitoring: A Key Tool for Global Fisheries
IUU	High Seas Boarding & Inspection	WCPFC	https://www.wcpfc.int/high-seas-boarding-inspection
			https://www.pewtrusts.org/en/research-and-analysis/issue-
IUU	How to end illegal fishing	Pew	briefs/2017/12/how-to-end-illegal-fishing
			https://www.pewtrusts.org/en/research-and-analysis/issue-
			briefs/2018/04/the-port-state-measures-agreement-from-
PSMA	The PSMA from intention to implementation	Pew	<u>intention-to-implementation</u>
			https://www.pewtrusts.org/en/research-and-analysis/fact-
			sheets/2020/02/port-state-measures-agreement-what-
			guestions-should-seafood-buyers-ask-authorities-and-
PSMA	PSMA questionnaire for seafood buyers	Pew	suppliers
			https://www.pewtrusts.org/en/research-and-analysis/fact-
			sheets/2017/11/port-state-measures-agreement-why-seafood-
PSMA	PSMA: Why seafood buyers should help	Pew	buyers-should-help
Vessel			
Monitoring			https://www.pewtrusts.org/en/research-and-analysis/issue-
Systems (VMS)	Tracking fishing vessels around the globe	Pew	briefs/2017/04/tracking-fishing-vessels-around-the-globe
			https://www.pewtrusts.org/en/research-and-analysis/data-
			visualizations/2017/how-illegal-fishing-threatens-the-safety-of-
IUU	Crew safety	Pew	crews
	News updates on IUU fishing and resources on the		
IUU	EU's IUU policies	EU IUU NGO Coalition	http://www.iuuwatch.eu/
IUU	Map of current and past EU cards	EU IUU NGO Coalition	http://www.iuuwatch.eu/map-of-eu-carding-decisions/
l	Database of authorisations for EU vessels to fish in		
IUU	third countries	EU IUU NGO Coalition	http://www.whofishesfar.org/
			http://www.iuuwatch.eu/wp-
	Essential criteria for improving transparency and		content/uploads/2019/10/Transparency-good-governance-
Advocacy	achieving good governance in fisheries	EU IUU NGO Coalition	criteria_EU-IUU-Coalition.pdf
IUU and human		L	
rights	EJF news releases on Oceans issues	EJF	https://ejfoundation.org/news?filter=oceans
IUU and human			
rights	EJF briefings and reports on oceans issues	EJF	https://ejfoundation.org/reports?campaign=oceans&language=
	10 transparency principles (to inform government		https://ejfoundation.org/news-media/ejfs-ten-principles-for-
Advocacy	advocacy)	EJF	global-transparency-in-the-fishing-industry-launched
Traceability/IUU	European Fleet Register	European Commission	https://webgate.ec.europa.eu/fleet-europa/search_en_
Traceability/IUU	List of authorisations under SMEFF	European Commission	https://ec.europa.eu/fisheries/cfp/international_en



#### **Shared Resources**



Topic			
(traceability,			
IUU, human	T141 -	Ath. a.m.	Date.
rights)	Title	Authors	Link
Traceability/IUU	Vessels licensed to fish under CTMFM (Argentina/Uruguay)	CTMFM	http://ctmfm.org/buguesAutorizados/
Traceability/100	(Algeriana oraguay)	OTIVII IVI	https://www.amsa.gov.au/vessels-operators/ship-
Traceability/IUU	Australian shipping registers	AMSA	registration/list-registered-ships
Traceability/IUU	Bolivian shipping register	RIBB	https://www.ribb.gob.bo/index.php?id=212⟨=sp
Traceability/IUU	Belize's list of licensed vessels	BHSFU	https://www.bhsfu.gov.bz/vessels/list-of-authorized-vessels/
			https://www.apps.tc.gc.ca/Saf-Sec-Sur/4/vrgs-srib/eng/vessel-
Traceability/IUU	Canadian vessel register	Transport Canada	registrations
			http://www.sernapesca.cl/tramites-formularios/registro-de-
Traceability/IUU	Chile's list of licensed vessels	SERNAPESCA	naves-en-licencias-transables-de-pesca-ltp-o-permisos
	FFA's list of licences	FFA	https://rimf2.ffa.int/public/goodstanding
Traceability/IUU	Georgian flag certificate verification system	MTA	http://mta.gov.ge/index.php?m=98&parent_id=56&Ing=eng
		1404514	http://peches.gov.gn/index.php/pecheadmin/indicpeche/indicat
Traceability/IUU	Guinea's list of licensed/sanctioned vessels	MPAEM Dirección G. de la Marina	eurs#ild-2
Traceability/IUU	Honduran shipping register	Mercante	http://marinamercante.gob.hn/?lang=en
			nap.//mamamorounto.gob.m//.tang_on
			http://www.fiskistofa.is/english/guotas-and-catches/induvidual-
			vessels/?skipnr=&timabil=1920&fyrirspurn=UmSkip&landhelgi
Traceability/IUU	Faroes' list of licensed vessels	Fiskistofa	<u>=</u>
Traceability/IUU	Liberia's list of licensed vessels	NAFAA	https://nafaa.gov.lr/index.php/vessel-registry/vessel-listing
			https://www.gov.mv/en/organisations/ministry-of-fisheries-
Traceability/IUU	Maldives' list of licensed vessels	MOFMRA	marine-resources-and-agriculture
Traceability/IUU	Norwegian shipping register	Norwegian Maritime Authority	https://www.sdir.no/en/shipsearch/
Traceability/IUU	Panama's list of licensed vessels (international)	ARAP	https://arap.gob.pa/listado-embarcaciones-apoyo-y-captura/
Traceability/IUU	Philippines' list of licensed vessels	BFAR	https://www.bfar.da.gov.ph/BFAR_EU?id=237#post
Traceability/IUU	Sierra Leone's list of licensed vessels	MFMR	https://www.mfmr.gov.sl/publications/
Traceability/IUU	Sri Lanka's list of high seas licensed vessels	Dept. of Fisheries and Aquatic Res.	https://www.fisheriesdept.gov.lk/web/index.php?option=com_c ontent&view=article&id=97&ltemid=253⟨=en
Traceability/IUU	Somalia's list of licensed vessels	MFMR	https://mfmr.gov.so/en/licenses/
Traceability/IUU	Taiwan's lists of RFMO authorised vessels	FA	https://www.fa.gov.tw/en/Record of Vessel/index.aspx
Traceability/IUU	Taiwan's list of 'flag of convenience' vessels	FA	https://www.fa.gov.tw/cht/FOC/
IUU	Taiwan's list of sanctions	FA	https://www.fa.gov.tw/cht/PolicyIUU/index.aspx
			https://e-
			justice.europa.eu/content business registers in member sta
All	Business registers in EU Member States	European Commission	tes-106-en.do?clang=en
All	Database of companies	OpenCorporates	https://opencorporates.com
	DG SANTE's list of third countries authorised		https://webgate.ec.europa.eu/sanco/traces/output/non_eu_lists
Traceability	establishments	European Commission	PerCountry_en.htm
T	Achieving transparency and combating IUU fishing in	FILLULIA NOO OEE	http://www.iuuwatch.eu/wp-content/uploads/2019/05/RFMO-
Traceability/IUU	RFMOs	EU IUU NGO Coalition	report EN May-2019 FINAL.pdf
	A comparative study of key data elements in import control schemes aimed at tackling illegal, unreported		
	and unregulated fishing in the top three seafood		
	markets: the European Union, the United States and		http://www.iuuwatch.eu/wp-content/uploads/2020/01/CDS-
Traceability/IUU	Japan	EU IUU NGO Coalition	Study-WEB.pdf
Traceability	GSA Seafood Processing Standard	GSA	http://www.seafoodassurances.org/ProgramStandards
			https://iss-foundation.org/new-issf-report-benchmarks-tuna-
PSMA	RFMO PSMA Benchmark	ISSF	rfmo-performance-against-the-u-n-fao-agreement-on-port- state-measures-psma/
. 5140 (	The Following Control of the Control		<u>'</u>
			https://iss-foundation.org/what-we-do/influence/rfmo-best- practices-snapshots/download-info/rfmo-best-practices-
IUU	Observer Requirements Best Practice	ISSF	snapshot-2020-observer-requirements/
Flag State			https://www.humanrightsatsea.org/2020/10/05/2020-flag-states
Performance	Flag States and Human Rights Reports	HRAS	and-human-rights-report-published/
IUU	IUU Fishing Index	Global Initiative	https://globalinitiative.net/analysis/iuu-fishing-index/
Human rights	Global Slavery Index	Walk Free Foundation	https://www.globalslaveryindex.org/
Human rights	Seafood Slavery Risk Tool	MBA & SFP	https://libertyshared.org/ssrt-beta
			https://www.seafoodtaskforce.global/wp-
	Operford Took Force Vessel 14, 17, 11, Ct., 1	0 - f - d T - d 5	content/uploads/2019/01/STF_Code-of-Conduct-and-Vessel-
Human rights	Seafood Task Force Vessel Auditable Standard	Seafood Task Force	Auditable-Standards-V.2_20181212.pdf

# **Further Information**

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