PAS 1550: Implementation Guide

Contents

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PAS 1550 Implementation Guide

Implementation Guide Master

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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)**
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, food 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 legislation 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 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.	Full supply chain transparency is achieved with public reporting of policy, practices, supply chains. Full supply chain reporting traceability using the GDST 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.)?	Implementation of GDST standards to improve traceability requires to engage all 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	The RFVS provides a mechanism through which downstream buyers in the supply-chain can engage with fishing vessels to improve responsble practices. The RFVS could be used within a vessel improver programme to support and educate fisheres wishing to adopt best fisheries practices.	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 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.	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?		**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.		6.3, 8.2, 9.2- **RP B95.01**	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	
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.		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.	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 Regulation												
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**.	The vessel shall be able to evidence all the legal documents required to fish (see clause CP1 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 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.	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)?	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.	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**	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.	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	
3.3 Policies and 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?		**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.	CP1 Clause 1.26 requires the following traceability information to be captured; vessel identifier, species name and stock, sea area code of capture, flag State, fishing trip dates (including landing date), Declared retained catch data quantity and product form in box, batch or tank, fishing method and gear, Trans-shipment dates, name of carrier, dates and catch consignment details.	3.3, 6.1, & ANNEX J- **UNE 195006** ANNEX D- **RP B95.02**	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 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.	Supply chains are in the process of being mapped with information 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.	In addition to the base requirements that are supplied for 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 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.	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?			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**	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?			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.	ANNEX C- **RP B95.01** & **RP B95.02**	Required		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.	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?			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	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	

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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 B95.02**	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.	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.	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.	ANNEX C- **RP B95.01** & **RP B95.02** ANNEX D- **RP B95.02**	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.	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.	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.	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 diligence through risk assessments												
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*	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. **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	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 it 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 mitigated or are no longer supplying, leaving minimal medium risk and the majority of sources being considered low risk.	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?				5.3- **RP B95.02**	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.	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.	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?				ANNEX C- **RP B95.01** & **RP B95.02**	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. 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	
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 B95.01** 5.3, 5.4- **RP B95.02**	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.	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	
3.3.3 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 unlawful treatment as necessary.*	Implementation of GDST 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 retaliation.**	Clause 2.20 requires a a grievance mechanism helpline telephone number(s)/website details shall be 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.	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	
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.	Grievance systems- Not an APR 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.	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.	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	
3.3.3.3	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 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.	Internal	

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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 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.*			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 Traceability												
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.*	GDST Standard 1.0 KDEs: Vessel data (including vessel registration, transhipment 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) 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 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 t**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	Clause 1.26 requires traceability information to be recorded during the trip and available at the point of landing.	3.3, 6.1 & ANNEX J3,9- **UNE 195006** ANNEX C- **RP B95 01** & **02** ANNEX D- **RP B95.02**	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 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	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.	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-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 •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?	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 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**	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.		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	Does information gathered, stored and processed on traceability enable full chain traceability to be 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 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	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 J3,9- **UNE 195006** ANNEX C- **RP B95 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 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-to-end traceability of the KDEs in a format compliant with the GDST standard.	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.*	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 J3,9- **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: https://traceability-dialogue.org/core-documents/gdst-1-0-materials/	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 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?
3.4.5	Is traceability provided by the vessel or group of 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 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	Clause 1.26 stipulates the data recording requirements that all RFVS vessels must adhere to, irrespective if the unit of certification is a group of vessels.	3.3, 6.1 & ANNEX J3,9- **UNE 195006** 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 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/core-documents/gdst-1-0-materials/.	A policy is in place that requires one up 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 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.	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?		**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 wholesaler 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.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 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.	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 ensure full operability and compliance with expected norms.	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?	Not part of the standards themselves, but this is a function that is assumed through implementation of GDST.	**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	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 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	

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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)
3.4.8	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. 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.	The buyer of RFVS certified seafood must have a recognised Chain of Custody certificate to make an RFVS certification claim.	ANNEX D 22,23- **RP B95.02**	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 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?		**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.	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	
3.4.10	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.*	Implementation of GDST standards requires the collection of this information as defined in the KDE list. 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 transhipment data, all landing data, certifications and licenses (including fishing authorization, harvest certificaiton, harvest certification chain of custody, transhipment authorization, landing authorization), all traceable object information.	**See 9.3.4 requirements** • Facility certification number • 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 • 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 license number • Unique vessel identifier (such as vessel name or registration number) • Specific type of fishing gear used for harvesting • Evidence of chain of custody from harvest to export to USA, where applicable	Clause 1.26 requires the following traceability information to be captured; -vessel identifier, -species name and stock, -sea area code of capture, -flag State, -fishing trip dates (including landing date), -Declared retained catch data -quantity and product form in box, batch or tank, -fishing method and gear, -Trans-shipment dates, name of carrier, dates and catch consignment details	3.3, 6.1 & ANNEX J3,9- **UNE 195006**	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.	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) •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 •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.	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 •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.*	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): http://www.fao.org/publications/card/en/c/1701be4c-eb83-4b0f-97e5-b6d11d1c7c55/	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.	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 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.		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/standards/traceability/guidhttps://www.gs1.org/sites/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	
3.5.2	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.		As above	This is not a specific requirement of AENOR APR	Required	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.	Internal	
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.	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 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?			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.	**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.	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.	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?		**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	

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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 legality, 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. •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.*	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 suppliers…**Accurate labeling**: for the above and all other required information	Product labelling details are a requirement of the GSA Seafood Processing Standard (the SPS will provide assurance on this).	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 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: https://trade.ec.europa.eu/doclib/docs/2014/december/tradoc_152941.pdf.
Section 4. Fisheries and fishing operations												
4.1 Management of fisheries												
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?				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 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.	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?		**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 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 license 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.	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.	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?			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?	Implementation of GDST standards supports this due diligence requirement. It ensures full chain traceability and provides information on vessel registration and fishing authorization.	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.	Seafood has to have a transparent register of authorized vessels, as we explain above	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.	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 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 mitigate deficiencies in flag State compliance and enforcement are in place, so that they eventually become assessed as low risk.	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			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 criteria which are prerequesites requirements for vessels wishing to participate in the program and also remain in the program once certfifed. If they do not meet these requirements they will be barred fronm applying for the program for a period of 12 months.	ANNEX A,B, I-**UNE 195006**	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: https://www.iccat.int/en/IUUlist.html. EU's IUU vessel list: https://ec.europa.eu/fisheries/cfp/illegal_fishing/info TMT's combined IUU vessel list: https://www.iuu-vessels.org/Home/Search. 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.	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.	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 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.	Internal	
4.3 Monitoring, control and surveillance												
4.3.1 General - advisory only												
4.3.2 Due diligence												

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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	The RFVS would provide assurance that a vessel is compliant with MCS requirements.	No, it doesn't.	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 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, 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	
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 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 flags 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".	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 VMS/AIS use can be taken.	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, 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?				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 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.	The company is actively and demonstrably investigating 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 is accurate. Where logbooks are not used, then advocacy for their adoption and use is either happening or being considered.	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.	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 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.				NOT DEFINED	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.	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.	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.	At-sea inspections are routine for all of the source fisheries within the buye'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.			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.	4 -**UNE 195006**	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 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 oversight. EM uses technology (cameras, GPS, 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/issue-briefs/2019/09/electronic-monitoring-a-key-tool-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 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.	Every fishery employed within the supply chain has an effectively implemented regime of observation that is human, electronic or a mix. 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?	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, data of all wild-caught and farm-raised raw material suppliers. • Name of the flag of the harvesting vessel • Vessel permit or license number	IUU risk assessment not explicitly taken into account for the certification requirements of the RFVS. Burden is on the 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 has IUU risk factors incorperated. High risk vessel will then be subjected to more riguous on vessel assessment through their certficate.	5.3-**RP B95.02**	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	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.	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, '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.	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	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												

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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 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- **RP B95.02**	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: http://www.iuuwatch.eu/				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/
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?	Implementation of GDST standards supports this due diligence requirement as it provides information on vessel registration and fishing authorization.	**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"**).	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 certficate 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	
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?	Implementation of GDST standards supports this due diligence requirement. It ensures full chain traceability and provides information on vessel registration and fishing authorization.		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 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.iuuwatch.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.	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.	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 mechanism/protocol 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.	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												
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://iuu-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 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/
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)**	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. 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 organization request the following information from suppliers to inform their due diligence risk assessments?												
4.4.3.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	GDST standards require IMO number for 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)**	Clause 1.29 States 1.29 The applicant shall have a clearly visible Unique Vessel Identifier (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 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 non-compliance.	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*	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)**	As above	6.2 & ANNEX F- **UNE 195006**	Risk assessment consideration	IMO numbers can be searched here: https://imonumbers.lhs.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/	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 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?

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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**	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, 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)**	Covered in clause 1.28	3.1, 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/	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.	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.	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?
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 to provide evidence to confirm that they have the valid permissions / license to operate.	3.1 & ANNEX A- **UNE 195006**	Risk assessment consideration	This ensures that the vessel operators have used the correct procedures to obtain the authorizations or fishing 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.	Fishing vessel licences and authorization details are 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 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			Covered in clause 1.28. The vessel shall 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).	3.1, 6.1- **UNE 195006**	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.	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			Not explicitly Stated as an RFVS requirement	Not 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.	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.	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	GDST Standard 1.0 KDEs (vessel data): availability of catch coordinates, satellite vessel tracking authority.		For vessels where AIS / VMS applicable 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	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.	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 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/ AIS is being employed in sufficient numbers within the 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 data relevant to the fish and seafood they buy, so that verification of vessel activity can be undertaken on a risk assessed basis.	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 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			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.	3, ANNEX I- **UNE 195006**	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 that have notified the EU (to be used as a proxy for non-EU countries) of their competent authority and have been accepted: https://ec.europa.eu/fisheries/cfp/illegal_fishing/info	As supply chains are being mapped, the desire to be able to review 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.	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 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	GDST standards require information on the existence of human welfare policies (KDE) for crews on fishing vessels.	**5.0 Social Accountability Requirements**	Core objective of the RFVS is to demonstrate that crew have a decent working environment (Section 2 of the RFVS).	5- **UNE 195006**	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	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 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			Not an explicit requirement. However in the eligibility clause if they have been prosecuted for breaching any of these clauses in the previous 6 months they cannot apply. If they breach once certfied this will exclude the skipper from applying for the RFVS for a period of 12 months.	Not a requirement, but ANNEX C4- **UNE 195006**	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.	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.	An independent third party audit shows full compliance with this policy.	External	What checks are undertaken on the professional background of captains employed?

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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.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.	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.l	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 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.	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.	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 engaging 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, 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/illegal_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.	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	
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*	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 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.	The ultimate beneficial owners of fishing 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 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.
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 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 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	GDST standards require the fishing authorization number. This information should enable the organization to have access to the documents or to request them.			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.	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.	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 Transhipment												
Does the organization 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?	The GDST standards require collection of transhipment information (date, location, vessel name, UVI) which provide the basis to investigate all due 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 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.	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.	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?
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.	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.	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.	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)?	The GDST standards require collection of transhipment information (date, location, vessel name, UVI) which enables information-sharing to the end-purchaser.			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.	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*	GDST Standard 1.0 KDEs: all transhipment vessel data (including transhipment vessel name, UVI, regsitration, flag, transhipment location, dates of transhipment).	**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 RFVS certifcate holder would need to declare if their vessel has all the necessary document in place to ensure thay are legal at the pioint of landing 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: •List of vessels involved in transhipments •Details of transhipment e.g. date, area, position •Authorization 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/gdst-1-0-materials/	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.	Internal	

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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 Landing at 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.	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, 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: **• 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**	Port procedures and controls are outside of scope of the RFVS standard, ratification of the PMSA would be considered in the IUU risk assessment however.	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 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 •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.	All ports of landing used within the supply chain are 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 checks are being carried out on landings. Where ports are not designated within the PSMA, suppliers should advocate for them to be designated and any deficiencies addressed. The port States should be encouraged to publicise what entry checks are being carried out, who they share this data with, and that the level of IUU they encounter is routinely reported.	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 independent third party inspections of the ports have verified this.	External	What landing procedures are in place to determine the level of port controls?
Does the organization assess and record whether or not ports in their supply chain meet the following criteria and include the information as part of their risk assessment:												
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.	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.	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?
4.6.1.2.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.	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.	The port State routinely publicises the number of landings that 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.	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
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	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 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				ANNEX C- **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: https://eu.oceana.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.	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.	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				ANNEX C- **RP B95.01** 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: •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.	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				ANNEX C- **RP B95.01** 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.	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).	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				ANNEX C- **RP B95.01** 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.	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.	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 State Measures Agreement												
4.6.2.1	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.	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**	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/psma or http://www.fao.org/port-State-measures/resources/detail/en/c/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.	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)?

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-flagged vessels, whether they have been publicized (or check here: http://www.fao.org/fishery/port-State-measures/psmapp/?locale=en&action=qry) 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/fishery/port-State-measures/psmapp/?locale=en&action=qry 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.	Evidence of checks at port is being requested from suppliers, and the suppliers have acknowledged the importance of having ports designated, and robust and documented checks being undertaken at each port of landing.	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 in port												
Does the organization require that?												
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		5.0 Social Accountability Requirements	The RFVS requirements would align with the requirments of local immigration laws.	The APR requirements would align with the requirments of local immigration laws	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.	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?
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			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.	5.3 & ANNEX J8-**UNE 195006**	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.	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?
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, 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.	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 Decent working 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			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	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**…		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				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?	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		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	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.	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	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?			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 •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	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.	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. Factories												
5.1 Information												
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).		**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**.	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)	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**?	GDST standards require the digitisation of traceability information which enables rapid sharing of traceability information.	**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 •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 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/				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?

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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)?
5.2 Process Control												
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 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?	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.		5.3 & 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	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 & ANNEX D- **RP B95.02**						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)?	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.	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		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.	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?		**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.	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.	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 anonymously without being put at risk of negative repercussions? *Any grievance report should be investgated 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 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.	2.16 An active and confidential crew grievance mechanism procedure shall be adopted which provides transparent, fair and confidential procedures to be followed in the event of a grievance being raised.	GRIEVANCE MECHANISMS TO BE 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 retaliate 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).	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**	Required					Internal	
5.4 Product tracking and transformation												
5.4.1	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	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.	5.3 & ANNEX C, D- **RP B95.02**	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?

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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 the packaging hierarchy (e.g. from a pallet, a case or a consumer item)?	Implementation of standards enables 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, linking KDE (batch, lot, or serial number).	**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.	Covered in the GSA Seafood Processing Standard.	ANNEX C, D22,23- **RP B95.02**	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?	Implementation of standards allows unique unit identifiers for aggregated or transformed seafood. Critical tracking events resulting in irreversable change to the 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	Covered in the GSA Seafood Processing Standard.	ANNEX C, D25:29- **RP B95.02**	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*	Implementation of standards maintains the 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	Covered in the GSA Seafood Processing Standard.	ANNEX C, D- **RP B95.02**	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?

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Section 3. Management						
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)**
3.1.1	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	
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.	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	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.	Internal	
3.2 The IUU Regulation						
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: 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	

THE PEW CHARITABLE TRUSTS

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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 and 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 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.	Supply chains are in the process of being mapped with information 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?
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.	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.	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.	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.	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	
3.3.2 Due diligence through risk assessments						
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	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 it 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	

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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.	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	
3.3.2.3	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 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	

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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 Traceability						
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 resources 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	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: https://traceability-dialogue.org/core-documents/gdst-1-0-materials/	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?

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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)
3.4.5	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/core-documents/gdst-1-0-materials/	A policy is in place that requires one up 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 is taking place, along with the creation of vessel lists.	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/SeafishGuidetoDNATestingofSeafood_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 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	
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		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	

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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)
3.4.10	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 •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): http://www.fao.org/publications/card/en/c/1701be4c-eb83-4b0f-97e5-b6d11d1c7c55/	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 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?	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/standards/traceability/guidhttps://www.gs1.org/sites/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.	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?	Required	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	

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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 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
Section 4. Fisheries and fishing operations						
4.1 Management of fisheries						
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?	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 a source fishery is overfished, unregulated or has problems with under-reporting (high risk) is being collated.	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	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 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.	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	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: https://www.iccat.int/en/IUUlist.html EU's IUU vessel list: https://ec.europa.eu/fisheries/cfp/illegal_fishing/info TMT's combined IUU vessel list: https://www.iuu-vessels.org/Home/Search 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.	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, control and surveillance						
4.3.1 General - advisory only						
4.3.2 Due diligence						

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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)
4.3.2.1	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.	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”.	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 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	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.	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.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.	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?

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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)
4.3.2.1.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 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 oversight. EM uses technology (cameras, GPS, 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.	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?	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	The company operates a seafood sourcing policy that requires regular (at least annual) supply chain traceability exercises to be conducted.	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?	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.	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.	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	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. •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: http://www.iuuwatch.eu/		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/

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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.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 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?	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 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.iuuwatch.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.	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						

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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: https://iuu-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 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/
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 organization request the following information from suppliers to inform their due diligence risk assessments?						
4.4.3.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 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 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.	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	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/	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.	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?

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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**	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/	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	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/	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	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.	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	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.	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 (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?

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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.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 • 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 that have notified the EU (to be used as a proxy for non-EU countries) of their competent authority and have been accepted: https://ec.europa.eu/fisheries/cfp/illegal_fishing/info	As supply chains are being mapped, the desire to be able to review 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	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.	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.	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	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.	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?

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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.l	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/illegal_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 Transhipment						
Does the organization require that?						

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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?	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.	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?
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?	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*	Required	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 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/gdst-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 at port						
4.6.1 General						

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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)
4.6.1.1	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 •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 organization assess and record whether or not ports in their supply chain meet the following criteria and include the information as part of their risk assessment:						
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.	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 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	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

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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 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	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.oceana.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.	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 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	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.	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?
4.6.2 Port State Measures Agreement						
4.6.2.1	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/	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)?

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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*	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-flagged vessels, whether they have been publicized (or check here: http://www.fao.org/fishery/port-State-measures/psmaapp/?locale=en&action=qry) 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/fishery/port-State-measures/psmaapp/?locale=en&action=qry 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.	Evidence of checks at port is being requested from suppliers, and the suppliers have acknowledged the importance of having ports designated, and robust and documented checks being undertaken at each port of landing.	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 organization require that?						
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.	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.	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 working 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	

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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)
4.7.4	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.
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?	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	Communication made to suppliers requiring that crew are made available for confidential interviews by relevant State inpsectors or other experts on request.	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. Factories						
5.1 Information						
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).	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: •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 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/		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	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)?	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 Control						

THE PEW CHARITABLE TRUSTS

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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)
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?	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	
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		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)	
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.	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	
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?	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 Assessment Consideration	Implementation Notes (for areas where industry feedback requested further detail)	Base practice	Internal or external question	Rewritten question (if external)
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 tracking and transformation						
5.4.1	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?
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?
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?

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Section 3. Management							
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.	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.	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 Regulation							
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: 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.	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.	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.	Internal	
3.3 Policies and 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 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.	Supply chains are in the process of being mapped with information 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.	In addition to the base requirements that are supplied for 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 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.	Internal and ext	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.	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.	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 diligence through risk assessments							

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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)
3.3.2.1	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	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 it 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.	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.	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.	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.	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	

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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)
3.3.2.4	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	
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 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.	The policies are communicated to second and third tier suppliers with assessments being undertaken either in-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	
3.4 Traceability							

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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 resources 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	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.	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		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.	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: https://traceability-dialogue.org/core-documents/gdst-1-0-materials/	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 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?

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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)
3.4.5	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/core-documents/gdst-1-0-materials/	A policy is in place that requires one up 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 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.	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/SeafishGuidetoDNATestingofSeafood_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 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.	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 in-depth risk assessment, taking into account detailed supply chain information derived from supplier inspections, audits or SAQs.	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		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.	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?

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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)
3.4.9	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 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.	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) •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 •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.	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): http://www.fao.org/publications/card/en/c/1701be4c-eb83-4b0f-97e5-b6d11d1c7c55/	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 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?	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/standards/traceability/guidhttps://www.gs1.org/sites/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.	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?	Required	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.	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.		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 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
Section 4. Fisheries and fishing operations							
4.1 Management of fisheries							

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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	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. 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.	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.	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.	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	
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.	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	

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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)
4.2.2	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	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: https://www.iccat.int/en/IUUlist.html EU's IUU vessel list: https://ec.europa.eu/fisheries/cfp/illegal_fishing/info TMT's combined IUU vessel list: https://www.iuu-vessels.org/Home/Search 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.	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.	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.	Internal	
4.3 Monitoring, control and surveillance							
4.3.1 General - advisory only							
4.3.2 Due diligence							
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.	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 completed for each fishery, with steps being taken to advocate for improved implementation by government, or compliance by the fleet within the supply chain.	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)
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.	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”.	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 VMS/AIS use can be taken.	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.	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, 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.	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.	The company is actively and demonstrably investigating 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 is accurate. Where logbooks are not used, then advocacy for their adoption and use is either happening or being considered.	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 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.	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.	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.	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?

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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 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 oversight. EM uses technology (cameras, GPS, gear sensors) to	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.	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.	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?	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	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.	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?	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.	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.	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	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. •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: http://www.iuuwatch.eu/			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/

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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 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?	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 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 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.	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 fishing 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.*	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://iuu-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 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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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 transhp 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 organization request the following information from suppliers to inform their due diligence risk assessments?							
4.4.3.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 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 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 non-compliance.	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	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/	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 chain checks for the presence of UVIs on these documents and advocates for their inclusion and use when not present	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?

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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)
4.4.3.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	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.	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/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.	Fishing vessel licences and authorization details are 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 ongoing, encouraging this to happen.	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.	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.	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.	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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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.	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.	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 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.	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 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	As supply chains are being mapped, the desire to be able to review 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.	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.	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	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.	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?

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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.	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	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.l	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 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, 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/illegal_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.	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	

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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.	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.
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.	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	
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.	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.	External	Please provide copies of flag State authorizations for supplying fishing vessels.
4.5 Transhipment							
Does the organization 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?	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?
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?	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.	External	Are all transhipments at sea relating to supply authorized?

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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 •Details of transhipment e.g. date, area, position •Authorization 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/gdst-1-0-materials/	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.	Internal	
4.6 Landing at 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 •the processes by which authorities determine which vessels should be granted/denied entry into port or be selected for documentary checks and/or 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.	All ports of landing used within the supply chain are 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 checks are being carried out on landings. Where ports are not designated within the PSMA, suppliers should advocate for them to be designated and any deficiencies addressed. The port States should be encouraged to publicise what entry checks are being carried out, who they share this data with, and that the level of IUU they encounter is routinely reported.	External	What landing procedures are in place to determine the level of port controls?
Does the organization assess and record whether or not ports in their supply chain meet the following criteria and include the information as part of their risk assessment:							

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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.	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.	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?
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.	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.	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
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 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.oceana.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.	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.	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 State Measures Agreement							
4.6.2.1	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/	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.	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 has designated ports for access by foreign-flagged vessels, whether they have been publicized (or check here: http://www.fao.org/fishery/port-State-measures/psmaapp/?locale=en&action=qry) 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/fishery/port-State-measures/psmaapp/?locale=en&action=qry 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.	Evidence of checks at port is being requested from suppliers, and the suppliers have acknowledged the importance of having ports designated, and robust and documented checks being undertaken at each port of landing.	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?
4.6.3 Vessel in port							
Does the organization require that?							

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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)
4.6.3.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.	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.	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 working 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	
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.	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.	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 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)
4.7.6	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?	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	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.	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. Factories							
5.1 Information							
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).	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: •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 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/			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	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)?	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 Control							
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?	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)
5.2.2	Are product specifications, batch specifications, process monitoring, product testing, manufacturing site cleaning, and other quality control measures documented?	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	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		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.	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.	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.	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	
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?	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 tracking and transformation							

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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)
5.4.1	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?
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?
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?

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Section 3. Management							
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 GDST 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	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.	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		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 Regulation							
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: http://www.iuuwatch.eu/new-background-to-the-iuu-regulation/.	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 lot 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	
3.3 Policies and Processes							
3.3.1 General							

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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)
3.3.1.1	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 Consortium Global Standard (BRCGS) for food safety and the Global Dialogue on Seafood Traceability (GDST) standard.	In addition to the base requirements that are supplied for 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 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.	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.	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)?	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.	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.	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 diligence through risk assessments							
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	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.	Internal	

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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.	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	
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		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	
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		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.	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	
3.3.3 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 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	
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.	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.	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	
3.3.3.3	Are confidential reporting processes established and maintained with associated policies and practices embedded throughout the corporate culture led at senior board level?	Requirement		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.	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		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	

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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 Traceability							
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 resources 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	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-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 •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			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	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.	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	
3.4.4	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: https://traceability-dialogue.org/core-documents/gdst-1-0-materials/	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.	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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3.4.5	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/core-documents/gdst-1-0-materials/	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.	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/SeafishGuidetoDNATestingofSeafood_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.	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 ensure full operability and compliance with expected norms.	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 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	
3.4.8	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		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.	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	

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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 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) •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 •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.	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 •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): http://www.fao.org/publications/card/en/c/1701be4c-eb83-4b0f-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?
3.5 Information 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?	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/standards/traceability/guidhttps://www.gs1.org/sites/default/files/docs/traceability/GS1_Foundation_for_Fish_Seafood_Aquaculture_Traceability_Guideline.pdf	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	
3.5.2	Does the organization engage with other actors in the supply chains to resolve any barriers that prevent this from being possible?	Required	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.	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	
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 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?
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 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.	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.	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	

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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)
3.5.6	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			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.			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: https://trade.ec.europa.eu/doclib/docs/2014/december/tradoc_152941.pdf
Section 4. Fisheries and fishing operations							
4.1 Management of fisheries							
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?	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	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	
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 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		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?	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.	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 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 mitigate deficiencies in flag State compliance and enforcement are in place, so that they eventually become assessed as low risk.	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)
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	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: https://www.iccat.int/en/IUUlist.html EU's IUU vessel list: https://ec.europa.eu/fisheries/cfp/illegal_fishing/info TMT's combined IUU vessel list: https://www.iuu-vessels.org/Home/Search 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.	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 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.	Internal	
4.3 Monitoring, control and surveillance							
4.3.1 General - advisory only							
4.3.2 Due diligence							
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		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 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, 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	
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.	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”.	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?

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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)
4.3.2.1.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.	The company is actively and demonstrably investigating 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 is accurate. Where logbooks are not used, then advocacy for their adoption and use is either happening or being considered.	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.	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 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.	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.	At-sea inspections are routine for all of 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 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 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 oversight. EM uses technology (cameras, GPS, gear sensors) to increase transparency and accountability of fishing activities, by collecting timely and verifiable catch information.	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.	Every fishery employed within the supply chain has an effectively implemented regime of observation that is human, electronic or a mix. 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?	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	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.	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?	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.	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?
4.3.3 Market controls							

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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)
4.3.3.1	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. •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: http://www.iuuwatch.eu/			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/
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 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?	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 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	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.	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 mechanism/protocol 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.	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							

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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.*	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://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 organization request the following information from suppliers to inform their due diligence risk assessments?							
4.4.3.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 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 public registers. This increases transparency and reduces the risk of IUU seafood entering supply chains.	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.	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	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/	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	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	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/	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.	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 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.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/core-documents/gdst-1-0-materials/	Fishing vessel licences and authorization details are 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 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.	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 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/ AIS is being employed in sufficient numbers within the 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 data relevant to the fish and seafood they buy, so that verification of vessel activity can be undertaken on a risk assessed basis.	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 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	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 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?

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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)
4.4.3.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.	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.l	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.	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.	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/illegal_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.	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	

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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)
4.4.5	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.	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.	The ultimate beneficial owners of fishing 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 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.
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 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 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.	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 Transhipment							
Does the organization 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?	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?)	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.	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.	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?
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?	Required		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?	Required		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.	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.	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	

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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)
4.5.3	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 •Details of transhipment e.g. date, area, position •Authorization 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/gdst-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.	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 at 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 •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	All ports of landing used within the supply chain are 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 checks are being carried out on landings. Where ports are not designated within the PSMA, suppliers should advocate for them to be designated and any deficiencies addressed. The port States should be encouraged to publicise what entry checks are being carried out, who they share this data with, and that the level of IUU they encounter is routinely reported.	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 independent third party inspections of the ports have verified this.	External	What landing procedures are in place to determine the level of port controls?
Does the organization assess and record whether or not ports in their supply chain meet the following criteria and include the information as part of their risk assessment:							
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.	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.	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?

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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)
4.6.1.2.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.	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.	The port State routinely publicises the number of landings that 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.	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
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: https://eu.oceana.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.	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.	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 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 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	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.	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?
4.6.2 Port State Measures Agreement							

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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)
4.6.2.1	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/.	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)?
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 has designated ports for access by foreign-flagged vessels, whether they have been publicized (or check here: http://www.fao.org/fishery/port-State-measures/psmaapp/?locale=en&action=qry) 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/fishery/port-State-measures/psmaapp/?locale=en&action=qry 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.	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 organization require that?							
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.	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?
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.	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?
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.	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.	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 working 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	

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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)
4.7.4	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.
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?	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. Factories							
5.1 Information							
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).	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: •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 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/			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	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)?	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 Control							
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?	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	

THE PEW CHARITABLE TRUSTS

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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 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		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.	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?	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 tracking and transformation							
5.4.1	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?
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?

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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)
5.4.3	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?

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Section 3. Management							
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
3.1.1	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.*	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**	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.	Full supply chain transparency is achieved with public reporting of policy, practices, supply chains. Full supply 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.)?	The RFVS provides a mechanism through which downstream buyers in the supply-chain can engage with fishing vessels to improve responsble practices. The RFVS could be used within a vessel improver programme to support and educate fisheries wishing to adopt best fisheries practices.	ANNEX D & 5.3- **RP B95.02**	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?		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 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.*		2- **RP B95.02**		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.	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 Regulation							
3.2.1	Does the organization document which of the products they sell are covered by the EU IUU Regulation?	The vessel shall be able to evidence all the legal documents required to fish (see clause CP1 1.28). This will meet the requirements of the EU IUU Regulation.	3.1, 6.1 & ANNEX A- **UNE 195006**	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.	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.
3.2.2	Does the organization have management systems in place covering the requirements of the EU IUU 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 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.	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.
3.3 Policies and 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?	CP1 Clause 1.26 requires the following traceability information to be captured; vessel identifier, species name and stock, sea area code of capture, flag State, fishing trip dates (including landing date), Declared retained catch data quantity and product form in box, batch or tank, fishing method and gear, Trans-shipment dates, name of carrier, dates and catch consignment details.	3.3, 6.1, & ANNEX J- **UNE 195006** ANNEX D- **RP B95.02**	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.	Supply chains are in the process of being mapped with information 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.	In addition to the base requirements that are supplied for 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 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.	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.
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.	
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?	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.	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.
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 B95.02**	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.	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)?	The RFVS certification audits provide the mechanism through which assurance is provided.	ANNEX C- **RP B95.01** & **RP B95.02** 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 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.	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.	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 diligence through risk assessments							
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*		5.3- **RP B95.02**	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 it 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 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**	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.	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.

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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 B95.01 & RP B95.02**		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 improvements plans have been shown 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, 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.*		7- **RP B95.01** 5.3, 5.4- **RP B95.02**		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.	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.
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 unlawful treatment as necessary.*	Clause 2.20 requires a a grievance mechanism helpline telephone number(s)/website details shall be displayed in a crew-accessible location on board the vessel.	Not an APR requirement yet- Next version UNE 195006		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?	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.	Grievance systems- Not an APR requirement 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 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.	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 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.*	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		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; • the right of workers to organize; • forced labour; • minimum age of workers; • child labour; • equal remuneration; and • discrimination.	All covered in Core Principle 2 of the RFVS, except requirement for equal remuneration.	5 & ANNEX E- **UNE 195006**				
3.4 Traceability							
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.*	Clause 1.26 requires traceability information to be recorded during the trip and available at the point of landing.	3.3, 6.1 & ANNEX J3.9- **UNE 195006** ANNEX C- **RP B95 01 & 02** ANNEX D- **RP B95.02**	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 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	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.	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-to-end traceability of the KDEs in a format compliant 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.	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.	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 mechanisms and regular independent audits? *Traceability data should be accessible during verification checks and audits.*	Yes - they would be verified on an annual basis through certification and then surveillance audits.	3.3, 6.1 & ANNEX J3.9- **UNE 195006** 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 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: https://traceability-dialogue.org/core-documents/gdst-1-0-materials/	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 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.
3.4.5	Is traceability provided by the vessel or group of vessels that caught the seafood?	Clause 1.26 stipulates the data recording requirements that all RFVS vessels must adhere to, irrespective if the unit of certification is a group of vessels.	3.3, 6.1 & ANNEX J3.9- **UNE 195006** ANNEX C- **RP B95 01 & 02** ANNEX D- **RP B95.02**	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/core-documents/gdst-1-0-materials/.	A policy is in place that requires one up 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 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.	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.

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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 on risk assessment and in a timescale that is appropriate for the origin of the seafood?		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 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 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.	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 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 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 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.*	The buyer of RFVS certified seafood must have a recognised Chain of Custody certificate to make an RFVS 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 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.	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 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.*	Clause 1.26 requires the following traceability information to be captured; -vessel identifier, -species name and stock, -sea area code of capture, -flag State, -fishing trip dates (including landing date), -Declared retained catch data -quantity and product form in box, batch or tank, -fishing method and gear, -Trans-shipment dates, name of carrier, dates and catch consignment details	3.3, 6.1 & ANNEX J3,9- **UNE 195006**		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.	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) •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 •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.	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.
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 (KDEs): http://www.fao.org/publications/card/en/c/17013be4c-eb83-4b0f-97e5-b6d11d1c7c55/	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 Information 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?	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	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/standards/traceability/guidhttps://www.gs1.org/sites/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.
3.5.2	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	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 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?	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.	**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.	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.
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?	Not an explicit requirement of the RFVS, though would be expected that the standard holder is responsive to information requests.	YES, both RP	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 holday 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.*	RFVS is a third-party certification programme.	Yes, but not for unannounced audits	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.		
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.*	Product labelling 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. •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.		
Section 4. Fisheries and fishing operations							
4.1 Management of fisheries							
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?		n/a	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 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.

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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	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?	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	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.	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.
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?	n/a for vessels	n/a		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 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?	RFVS vessels require a license to operate, and IMO identification number if one has been issued, if not must have a visible vessel identifier.	Seafood has to have a transparent register of authorized vessels, as we explain above	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.	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 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 mitigate deficiencies in flag State compliance and enforcement are in place, so that they eventually become assessed as low risk.
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	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 criteria which are prerequesites requirements for vessels wishing to participate in the program and also remain in the program once certified. If they do not meet these requirements they will be barred fromn applying for the program for a period of 12 months.	ANNEX A,B, I-**UNE 195006**	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: https://www.iccat.int/en/IUUlist.html EU's IUU vessel list: https://ec.europa.eu/fisheries/cfp/illegal_fishing/info TMT's combined IUU vessel list: https://www.iuu-vessels.org/Home/Search 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.	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.	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 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.
4.3 Monitoring, control and surveillance							
4.3.1 General - advisory only							
4.3.2 Due diligence							
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.	The RFVS would provide assurance that a vessel is compliant with MCS requirements.	No, it doesn't.		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 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, 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	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**	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".	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 VMS/AIS use can be taken.	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.
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?		3.3 & ANNEX B, J3- **UNE 195006**	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.	The company is actively and demonstrably investigating 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 is accurate. Where logbooks are not used, then advocacy for their adoption and use is either happening or being considered.	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.		NOT DEFINED	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.	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.	At-sea inspections are routine for all of 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 either routine or completed.

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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
4.3.2.1.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.	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.	4 - **UNE 195006**	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 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 oversight. EM uses technology (cameras, GPS, 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/issue-briefs/2019/09/electronic-monitoring-a-key-tool-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 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.	Every fishery employed within the supply chain has an effectively implemented regime of observation that is human, electronic or a mix. 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.
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?	IUU risk assessment not explicitly taken into account for the certification requirements of the RFVS. Burden is on the 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 has IUU risk factors incorperated. High risk vessel will then be subjected to more riguous on vessel assessment through their certificate.	5.3-**RP B95.02**	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.	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.
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**	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.	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 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?		5.3 & ANNEX D- **RP B95.02**	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: http://www.iuuwatch.eu/			
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?	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**	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.			
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	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			
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?	As above	Not an requirement in APR				
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	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.iuuwatch.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.	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.	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 mechanism/protocol 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 fishing 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.*	Requirement of clause 1.28, vessels must have a license to operate.	3.1, 6.1- **UNE 195006**	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/	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.		
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?	Requirement of clause 1.28, vessels must have a license to operate.	3.1, 6.1- **UNE 195006**	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.wholfishesfar.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.		
Does the organization request the following information from suppliers to inform their due diligence risk assessments?							

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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 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	Clause 1.29 States 1.29 The applicant shall have a clearly visible Unique Vessel Identifier (UVI) (e.g. IMO number, vessel reference number).	6.2- **UNE 195006**	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 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 non-compliance.	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.
4.4.3.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*	As above	6.2 & ANNEX F- **UNE 195006**	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/	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 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.
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**	Covered in clause 1.28	3.1, 6.1- **UNE 195006**	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-systemlen/	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.	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.	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.
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 to provide evidence to confirm that they have the valid permissions / license to operate.	3.1 & ANNEX A- **UNE 195006**	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.	Fishing vessel licences and authorization details are 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 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.
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 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).	3.1, 6.1- **UNE 195006**	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.	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	Not explicitly Stated as an RFVS requirement	Not an requirement in APR	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.	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.
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	For vessels where AIS / VMS applicable 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**	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.	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 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/ AIS is being employed in sufficient numbers within the 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 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	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	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.	3, ANNEX I- **UNE 195006**	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 • 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 that have notified the EU (to be used as a proxy for non-EU countries) of their competent authority and have been accepted: https://ec.europa.eu/fisheries/cfp/illegal_fishing/info	As supply chains are being mapped, the desire to be able to review 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.	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.
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	Core objective of the RFVS is to demonstrate that crew have a decent working environment (Section 2 of the RFVS).	5- **UNE 195006**	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	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 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.
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 prosecuted 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.	Not a requirement, but ANNEX C4- **UNE 195006**	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.	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.	An independent third party audit shows full compliance with this policy.
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	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.	An independent third party audit shows full compliance with this policy.
4.4.3.l	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

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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	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	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.	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.
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 engaing 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**	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/illegal_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.	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.
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*		5.3 & ANNEX D- **RP B95.02**	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.	The ultimate beneficial owners of fishing 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 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	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.	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.
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		ANNEX J9- **UNE 195006**	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.	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.
4.5 Transhipment							
Does the organization 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?	Clause 1.26 requires transhipment dates, name of carrier, dates and catch consignment details.	3.3, 6.1 & ANNEX J3,9- **UNE 195006**	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.	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.
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.	All transhipment vessels are known and fully comply with their vessel authorizations.
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.	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.	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	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*	The RFVS certifcate holder would need to declare if their vessel has all the necessary document in place to ensure thay are legal at the poijnt of landing or leaving the vessel including trans shipment activities.	6.1 & ANNEX J3,9- **UNE 195006** 5.3- **RP B95.02**	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 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/gdst-1-0-materials/	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 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.	Port procedures and controls are outside of scope of the RFVS standard, ratification of the PMSA would be considered in the IUU risk assessment however.	6.2.2, 7- **RP B95.01**	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 •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.	All ports of landing used within the supply chain are 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 checks are being carried out on landings. Where ports are not designated within the PSMA, suppliers should advocate for them to be designated and any deficiencies addressed. The port States should be encouraged to publicise what entry checks are being carried out, who they share this data with, and that the level of IUU they encounter is routinely reported.	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 independent third party inspections of the ports have verified this.
Does the organization assess and record whether or not ports in their supply chain meet the following criteria and include the information as part of their risk assessment:							
4.6.1.2.a	The port State competent authorities have resources that use a risk-based targeting approach to control			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.	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.	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.

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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 volume of cargo and vessels		ANNEX C- **UNE 195006**	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.	The port State routinely publicises the number of landings that 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.
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 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 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		ANNEX C- **RP B95.01** ANNEX J- **UNE 195006**	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.oceana.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.	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		ANNEX C- **RP B95.01** ANNEX J- **UNE 195006**	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.	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.
4.6.1.2.f	The port State verifies the catch documentation and maintains organized documentation and files/ records		ANNEX C- **RP B95.01** ANNEX J- **UNE 195006**	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).	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		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 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.	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 State Measures Agreement							
4.6.2.1	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.	PSMA ratification will be taken into account in IUU risk assessment to determine RFVS audit requirements.	NOT DEFINED FOR PSMA	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/.	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.	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.
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	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: http://www.fao.org/fishery/port-State-measures/psmaapp/?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/fishery/port-State-measures/psmaapp/?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.	Evidence of checks at port is being requested from suppliers, and the suppliers have acknowledged the importance of having ports designated, and robust and documented checks being undertaken at each port of landing.	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.
4.6.3 Vessel in port							
Does the organization require that?							
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	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.
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	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.	5.3 & ANNEX J8-**UNE 195006**	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.	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	Not explicit requirement for the RFVS	ANNEX J-**UNE 195006**	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.	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 working 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	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 £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.		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		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
4.7.6	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?	RFVS audits will require crew interviews using APSCA registered auditors.	GRIEVANCE MECHANISMS TO BE INCLUDED IN NEXT VERSION OF UNE 195006	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	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. Factories							
5.1 Information							
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 any other actor in the supply chain on the legality and traceability of a product **within a maximum of four hours**?		In our case, the traceability excercise has to be done in a **maximum of 6h**.- **RP B95.02**	Processors should be able to provide details on the following: •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 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 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 Control							
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?		5.3 & ANNEX D- **RP B95.02**				
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 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*		5.3 & ANNEX D- **RP B95.02**				
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)?	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)		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.	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.	
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 B95.02**	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.	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.
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?		ANNEX D.2- **RP B95.02**				
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*		Not defined				
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*	2.16 An active and confidential crew grievance mechanism procedure shall be adopted which provides transparent, fair and confidential procedures to be followed in the event of a grievance being raised.	GRIEVANCE MECHANISMS TO BE INCLUDED IN NEXT VERSION OF UNE 195006				
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 tracking and transformation							
5.4.1	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*	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.	5.3 & ANNEX C, D- **RP B95.02**	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/			
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)?	Covered in the GSA Seafood Processing Standard.	ANNEX C, D22,23- **RP B95.02**				

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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?	Covered in the GSA Seafood Processing Standard.	ANNEX C, D25:29- **RP B95.02**				
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*	Covered in the GSA Seafood Processing Standard.	ANNEX C, D- **RP B95.02**				

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Section 3. Management							
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, food 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 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	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.	Full supply chain transparency is achieved with public reporting of policy, practices, supply chains. Full supply 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 all 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 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.	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 Regulation							
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 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.	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.
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.	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.	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.
3.3 Policies and 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?		**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.	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.	Supply chains are in the process of being mapped with information 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.	In addition to the base requirements that are supplied for 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 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.	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.

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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
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.	
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?				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?				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.	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.	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 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.	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.	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 diligence through risk assessments							
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*	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. **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.	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 it 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 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?			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.	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 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.

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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
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**.		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.	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.
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 unlawful treatment as necessary.*	Implementation of GDST 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 retaliation.**		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 retaliation.**	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.	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?		**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.		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 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; • 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**				
3.4 Traceability							

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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
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.*	GDST Standard 1.0 KDEs: Vessel data (including vessel registration, transhipment 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) 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 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 **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 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 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	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.	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-to-end traceability of the KDEs in a format compliant 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 "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 compliant with the GDST standard.
3.4.3	Does information gathered, stored and processed on traceability enable full chain traceability to be 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 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		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-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 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 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: https://traceability-dialogue.org/core-documents/gdst-1-0-materials/	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 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.
3.4.5	Is traceability provided by the vessel or group of 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 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	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/core-documents/gdst-1-0-materials/	A policy is in place that requires one up 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 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.	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 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 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/SeafishGuidetoDNATestingofSeafood_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 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.	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 ensure full operability and compliance with expected norms.

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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
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?	Not part of the standards themselves, but this is a function that is assumed through implementation of GDST.	**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)**.	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 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. 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.		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?		**1.0 Regulatory Management**		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.	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 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.*	Implementation of GDST standards requires the collection of this information as defined in the KDE list. 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 transhipment data, all landing data, certifications and licenses (including fishing authorization, harvest certificaiton, harvest certification chain of custody, transhipment authorization, landing authorization), all traceable object information.	**See 9.3.4 requirements** • Facility certification number • 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 • 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 license number • Unique vessel identifier (such as vessel name or registration number) • Specific type of fishing gear used for harvesting • Evidence of chain of custody from harvest to export to USA, where applicable		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.	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) •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 •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.	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.
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 (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.	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): http://www.fao.org/publications/card/en/c/1701be4c-eb83-4b0f-97e5-b6d11d1c7c55/	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 Information 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: https://www.gs1.org/standards/traceability/guidhttps://www.gs1.org/sites/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.

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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
3.5.2	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.	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.		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.	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.
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.
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?		**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 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.
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 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.		
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.*	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 suppliers....**Accurate 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. •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.		
Section 4. Fisheries and fishing operations							
4.1 Management of fisheries							
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?			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 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.

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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
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?		**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 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 license number • Unique vessel 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 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.
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?				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 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?	Implementation of GDST standards supports this due diligence requirement. It ensures full chain traceability and provides information on vessel registration and fishing authorization.	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 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.	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 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 mitigate deficiencies in flag State compliance and enforcement are in place, so that they eventually become assessed as low risk.
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: https://www.iccat.int/en/IUUlist.html EU's IUU vessel list: https://ec.europa.eu/fisheries/cfp/illegal_fishing/info TMT's combined IUU vessel list: https://www.iuu-vessels.org/Home/Search 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.	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.	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 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.
4.3 Monitoring, control and surveillance							
4.3.1 General - advisory only							
4.3.2 Due diligence							

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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
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.	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 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, 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	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.			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".	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 VMS/AIS use can be taken.	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.
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, 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.	The company is actively and demonstrably investigating 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 is accurate. Where logbooks are not used, then advocacy for their adoption and use is either happening or being considered.	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.			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.	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.	At-sea inspections are routine for all of 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 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, 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.			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 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 oversight. EM uses technology (cameras, GPS, 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/issue-briefs/2019/09/electronic-monitoring-a-key-tool-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 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.	Every fishery employed within the supply chain has an effectively implemented regime of observation that is human, electronic or a mix. 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.
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, data of all wild-caught and farm-raised 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 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.	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.
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?			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.	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 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?		**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"**).	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: http://www.iuuwatch.eu/			
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?	Implementation of GDST standards supports this due diligence requirement as it provides information on vessel registration and fishing authorization.	**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 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.			
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/illegal_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?	Implementation of GDST standards supports this due diligence requirement. It ensures full chain traceability and provides information on vessel registration and fishing authorization.					

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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
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.iuuwatch.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.	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.	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 mechanism/protocol 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 fishing 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**	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/	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.		
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 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.		
Does the organization request the following information from suppliers to inform their due diligence risk assessments?							
4.4.3.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	GDST standards require IMO number for 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 is unique to each ship, and is 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 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 non-compliance.	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.
4.4.3.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*	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: 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/	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 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.
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**	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, 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)**	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.	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.	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.

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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
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.	Fishing vessel licences and authorization details are 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 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.
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 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.	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 being 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.	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 cooridnates, 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 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.	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 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/ AIS is being employed in sufficient numbers within the 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 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	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			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 that have notified the EU (to be used as a proxy for non-EU countries) of their competent authority and have been accepted: https://ec.europa.eu/fisheries/cfp/illegal_fishing/info	As supply chains are being mapped, the desire to be able to review 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.	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.
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 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	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 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.

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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
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			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.	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.	An independent third party audit shows full compliance with this policy.
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			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.	An independent third party audit shows full compliance with this policy.
4.4.3.l	Evidence that captains or other persons are not engaged if checks find they have been found responsible for any previous human rights abuses			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
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			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.	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.
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?			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/illegal_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.	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.
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*	Implementation of GDST standards supports this due diligence requirement at it provides information on IMO numbers for all qualifying fishing vessels.		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.	The ultimate beneficial owners of fishing 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 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?			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.	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.
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	GDST standards require the fishing authorization number. This information should enable the organization to have access to the documents or to request them.		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.	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.
4.5 Transhipment							
Does the 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
4.5.1.a	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 name, 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 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.	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.
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?				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.
4.5.1.c	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.	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.	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)?	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.	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	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*	GDST Standard 1.0 KDEs: all transhipment vessel data (including transhipment vessel name, UVI, regsitration, flag, transhipment location, dates of transhipment).	**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 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 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/gdst-1-0-materials/	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 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.	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, 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: • **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 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 •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.	All ports of landing used within the supply chain are 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 checks are being carried out on landings. Where ports are not designated within the PSMA, suppliers should advocate for them to be designated and any deficiencies addressed. The port States should be encouraged to publicise what entry checks are being carried out, who they share this data with, and that the level of IUU they encounter is routinely reported.	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 independent third party inspections of the ports have verified this.
Does the organization assess and record whether or not ports in their supply chain meet the following criteria and include the information as part of their risk assessment:							
4.6.1.2.a	The port State competent authorities have resources that use a risk-based targeting approach to control			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.	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.	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.

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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
4.6.1.2.b	The control systems in the port are appropriate for the volume of cargo and vessels			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.	The port State routinely publicises the number of landings that 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.
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 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 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: https://eu.oceana.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.	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.	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.	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.
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.	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).	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 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 State Measures Agreement							
4.6.2.1	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.	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 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/	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.	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.
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: http://www.fao.org/fishery/port-State-measures/psmaapp/?locale=en&action=qry) 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/fishery/port-State-measures/psmaapp/?locale=en&action=qry 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.	Evidence of checks at port is being requested from suppliers, and the suppliers have acknowledged the importance of having ports designated, and robust and documented checks being undertaken at each port of landing.	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.
4.6.3 Vessel in port							
Does the organization require that?							
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		5.0 Social Accountability Requirements	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.

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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
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.	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 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.	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 working 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	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.
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 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	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. Factories							
5.1 Information							
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).		**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.**				

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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
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**?	GDST standards require the digitisation of traceability information which enables rapid sharing of traceability information.	**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)**	Processors should be able to provide details on the following: •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 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 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 Control							
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 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.				
5.2.2	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 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.				
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 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)?	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 seafood 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 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.	

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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
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.	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.
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 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				
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 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.				
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 retaliate 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).				
5.4 Product tracking and transformation							
5.4.1	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-requirements/.			
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)?	Implementation of standards enables 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, linking KDE (batch, lot, or serial number).	**9.2.1** The facility shall develop, maintain and document a**ppropriate 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.				

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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
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?	Implementation of standards allows unique unit identifiers for aggregated or transformed seafood. Critical tracking events resulting in irreversable change to the 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				
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*	Implementation of standards maintains the 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				

PAS 1550 Implementation Guide

Risk assessment checklist

Section	No.	Question
3.3.1.1	1	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?
3.4.1	2	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?
3.4.4	3	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	4	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?
3.4.8	5	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?
3.4.10	6	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	7	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?

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Section	No.	Question
3.5.3	8	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	9	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?
3.5.6	10	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	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	12	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	13	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	14	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	15	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?
4.3.2.2	16	What is the flag State of the vessel(s) supplying seafood under this contract? What is the nationality of the vessel(s)' beneficial owner?

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Section	No.	Question
4.3.3.1	17	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/
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	19	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	20	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	21	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	22	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	23	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	24	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	25	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?

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Section	No.	Question
4.4.3.h	26	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	27	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	28	What checks are undertaken on the professional background of captains employed?
4.4.3.k	29	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.l	30	Are captains hired if they have been found to have a history of human rights abuses?
4.4.3.m	31	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?
4.4.5	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	34	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	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	38	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?

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Section	No.	Question
4.6.1.2.b	39	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
4.6.1.2.c	40	How many inspectors are available to inspect the volume of cargo and vessels that the port handles?
4.6.1.2.d	41	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	44	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?
4.6.2.1	45	Is the port State a party to the FAO Port State Measures Agreement (PSMA)?
4.6.2.2	46	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.a	47	Are crew granted shore leave access in accordance with laws of the port State? How is this verified?
4.6.3.b	48	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	49	Is the captain of the vessel able to provide all documentation requested by port State inspectors? How would a company obtain this information?
4.7.5	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	52	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.

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Section	No.	Question
5.1.2	53	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	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	55	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	56	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	57	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	58	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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Topic (traceability, IUU, human rights)	Title	Authors	Link
Traceability	GDST 1.0 Standards and Materials	GDST	https://traceability-dialogue.org/gdst-1-0-materials/
Traceability	Standards and Guidelines for Interoperable Seafood Traceability Systems – Core Normative Standards (Version 1.0)	GDST	https://traceability-dialogue.org/wp-content/uploads/2020/03/2020.03.11_GDST1.0CoreNormativeStandardsfinalMAR13.pdf
Traceability	Taking the first steps towards full-chain seafood traceability: A preliminary guide for industry	Future of Fish, in collaboration with FishWise, Global Food Traceability Center, and WWF	https://fishwise.org/wp-content/uploads/2018/03/OSMI-Trace-Collab_Taking-the-First-Steps-Towards-Seafood-Traceability.pdf
Traceability	Traceability Principles for Wild-Caught Fish Products	WWF	https://www.worldwildlife.org/publications/traceability-principles-for-wild-caught-fish-products
Traceability	ISO 12875:2011: Traceability of finfish products — Specification on the information to be recorded in captured finfish distribution chains	ISO	https://www.iso.org/standard/52084.html
Traceability	The SeaFish Guide to DNA Testing of Seafood	SeaFish	https://www.seafish.org/media/publications/SeafishGuidetoDNATestingofSeafood_201312.pdf
Traceability	Seafood traceability for fisheries compliance: Country-level support for catch documentation schemes	FAO	http://www.fao.org/publications/card/en/c/1701be4c-eb83-4b0f-97e5-b6d11d1c7c55/
Traceability	GS1 Foundation for Fish, Seafood and Aquaculture Traceability Implementation	GS1	https://www.gs1.org/standards/traceability/guideline/gs1-foundation-fish-seafood-and-aquaculture-traceability-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
Traceability	The Global Record of Fishing Vessels, Refrigerated 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
IUU	Information on at-sea inspections by the Marine Management Organisation and Royal Navy in UK waters	UK Government	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/314557/code-sea.pdf
IUU	Remote Electronic Monitoring: Why camera technology is a cost-effective and robust solution to improving UK fisheries management	WWF	https://www.wwf.org.uk/sites/default/files/2017-10/Remote%20Electronic%20Monitoring%20in%20UK%20Fisheries%20Management_WWF.pdf
IUU	An Advisory Note For The UK Supply Chain on how to avoid IUU fishery products	BRC, EJF, WWF	https://ejfoundation.org/resources/downloads/EJF-Advisory-Note-low-res-final.pdf
Traceability	Advancing Traceability In The Seafood Industry Assessing Challenges and Opportunities	FishWise	https://fishwise.org/traceability/advancing-traceability-in-the-seafood-industry-assessing-challenges-and-opportunities/
	Three Treaties to End Illegal Fishing (status of ratification PSMA/ c188/ CTA)	Pew	https://www.pewtrusts.org/en/research-and-analysis/data-visualizations/2018/three-treaties-to-end-illegal-fishing
	How to end illegal fishing: The role of the flag state	Pew	https://www.pewtrusts.org/en/research-and-analysis/fact-sheets/2019/08/how-to-end-illegal-fishing-the-role-of-the-flag-state
	Equasis Shipping Information	Equasis	http://www.equasis.org/EquasisWeb/public/HomePage
	IMO Database	ISSF	https://iss-foundation.org/pvr/public-imo.php?what=fullscreen
	IMO Explained	Pew	https://www.pewtrusts.org/en/research-and-analysis/fact-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
	Transhipment: Strengthening Tuna RFMO Transhipment Regulations	ISSF	https://iss-foundation.org/pvr/public-uvi.php?what=fullscreen
	Transshipment Reform	Pew	Transshipment Reform Needed To Ensure Legal, Verifiable Transfer of Catch
	Transshipment Best Practices	Pew	https://www.pewtrusts.org/en/research-and-analysis/fact-sheets/2017/11/best-practices-for-transshipment
	Consolidated List of Authorised Tuna Vessels (CLAV)	Tuna.org	http://clav.iotc.org/browser/search/es/#quick
	CCAMLR Vessel register	CCAMLR	https://www.ccamlr.org/en/compliance/list-vessel-authorisations
	GFCM Vessel Register	FAO	http://www.fao.org/gfcm/data/en/
	NAFO Vessel Register	NAFO	https://www.nafo.int/Fisheries/Monitoring-Control-and-Surveillance/Vessel-Registry
	NEAFC Vessel Register	NEAFC	https://www.neafc.org/neafc-vessel-register
Traceability/IUU	NPFC Vessel Register	NPFC	https://www.npfc.int/compliance/vessels
	CCSBT Vessel Register	CCSBT	https://www.ccsbt.org/en/content/ccsbt-record-authorised-vessels
	IATTC Vessel Register	IATTC	https://www.iattc.org//VesselRegister/VesselList.aspx?List=RegVessels&Lang=ENG

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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/
	IOTC Designated Ports	IOTC	https://www.iotc.org/sites/default/files/documents/compliance/Designated_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
	CCSBT Designated Ports	CCSBT	https://www.ccsbt.org/en/content/ccsbt-register-designated-ports-and-contacts
	GFCM Designated Ports	GFCM	http://www.fao.org/gfcm/data/ports
	NAFO Designated Ports	NAFO	https://www.nafo.int/Portals/0/PDFs/fc/PSC-forms/All_PortInfo.pdf
	NEAFC Designated Ports	NEAFC	https://ec.europa.eu/fisheries/cfp/control/designated_ports_en
	FAO PSMA Designated Ports	FAO	http://www.fao.org/fishery/port-state-measures/psmaapp/?locale=en&action=gry
	GSSI Recognised Schemes	GSSI	http://www.ourgssi.org/benchmarking/recognized-schemes/
All	Technical guidelines and specifications for the implementation of Remote Electronic Monitoring (REM) in EU fisheries	European Fisheries Control Agency (EFCA)	https://www.efca.europa.eu/en/content/technical-guidelines-and-specifications-implementation-remote-electronic-monitoring-rem-eu
All	Electronic monitoring in fisheries management	WWF	http://assets.wwf.org.uk/downloads/fisheriesmanagement__2_.pdf
All	Electronic monitoring: A tool for global fisheries	Pew	Electronic Monitoring: A Key Tool for Global Fisheries
IUU	High Seas Boarding & Inspection	WCPFC	https://www.wcpfc.int/high-seas-boarding-inspection
IUU	How to end illegal fishing	Pew	https://www.pewtrusts.org/en/research-and-analysis/issue-briefs/2017/12/how-to-end-illegal-fishing
PSMA	The PSMA from intention to implementation	Pew	https://www.pewtrusts.org/en/research-and-analysis/issue-briefs/2018/04/the-port-state-measures-agreement-from-intention-to-implementation
PSMA	PSMA questionnaire for seafood buyers	Pew	https://www.pewtrusts.org/en/research-and-analysis/fact-sheets/2020/02/port-state-measures-agreement-what-questions-should-seafood-buyers-ask-authorities-and-suppliers
PSMA	PSMA: Why seafood buyers should help	Pew	https://www.pewtrusts.org/en/research-and-analysis/fact-sheets/2017/11/port-state-measures-agreement-why-seafood-buyers-should-help
Vessel Monitoring Systems (VMS)	Tracking fishing vessels around the globe	Pew	https://www.pewtrusts.org/en/research-and-analysis/issue-briefs/2017/04/tracking-fishing-vessels-around-the-globe
IUU	Crew safety	Pew	https://www.pewtrusts.org/en/research-and-analysis/data-visualizations/2017/how-illegal-fishing-threatens-the-safety-of-crews
IUU	News updates on IUU fishing and resources on the 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/
IUU	Database of authorisations for EU vessels to fish in third countries	EU IUU NGO Coalition	http://www.whofishesfar.org/
Advocacy	Essential criteria for improving transparency and achieving good governance in fisheries	EU IUU NGO Coalition	http://www.iuuwatch.eu/wp-content/uploads/2019/10/Transparency-good-governance-criteria_EU-IUU-Coalition.pdf
IUU and human 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=
Advocacy	10 transparency principles (to inform government advocacy)	EJF	https://ejfoundation.org/news-media/ejfs-ten-principles-for-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

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Topic (traceability, IUU, human rights)	Title	Authors	Link
Traceability/IUU	Vessels licensed to fish under CTMFM (Argentina/Uruguay)	CTMFM	http://ctmfm.org/buquesAutorizados/
Traceability/IUU	Australian shipping registers	AMSA	https://www.amsa.gov.au/vessels-operators/ship-registration/list-registered-ships
Traceability/IUU	Bolivian shipping register	RIBB	https://www.ribb.gob.bo/index.php?id=212&lang=sp
Traceability/IUU	Belize's list of licensed vessels	BHSFU	https://www.bhsfu.gov.bz/vessels/list-of-authorized-vessels/
Traceability/IUU	Canadian vessel register	Transport Canada	https://wwwapps.tc.gc.ca/Saf-Sec-Sur/4/vrqs-srib/eng/vessel-registrations
Traceability/IUU	Chile's list of licensed vessels	SERNAPESCA	http://www.sernapesca.cl/tramites-formularios/registro-de-naves-en-licencias-transables-de-pesca-ltp-o-permisos
Traceability/IUU	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&lng=eng
Traceability/IUU	Guinea's list of licensed/sanctioned vessels	MPAEM	http://peches.gov.gn/index.php/pecheadmin/indicpeche/indicateurs#ild-2
Traceability/IUU	Honduran shipping register	Dirección G. de la Marina Mercante	http://marinamercante.gob.hn/?lang=en
Traceability/IUU	Faroes' list of licensed vessels	Fiskistofa	http://www.fiskistofa.is/english/quotas-and-catches/induvidual-vessels/?skipnr=&timabil=1920&fyrirspurn=UmSkip&landhelgi=i
Traceability/IUU	Liberia's list of licensed vessels	NAFAA	https://nafaa.gov.lr/index.php/vessel-registry/vessel-listing
Traceability/IUU	Maldives' list of licensed vessels	MOFMRA	https://www.gov.mv/en/organisations/ministry-of-fisheries-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_content&view=article&id=97&Itemid=253&lang=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
All	Business registers in EU Member States	European Commission	https://e-justice.europa.eu/content_business_registers_in_member_states-106-en.do?clang=en
All	Database of companies	OpenCorporates	https://opencorporates.com
Traceability	DG SANTE's list of third countries authorised establishments	European Commission	https://webgate.ec.europa.eu/sanco/traces/output/non_eu_listsPerCountry_en.htm
Traceability/IUU	Achieving transparency and combating IUU fishing in RFMOs	EU IUU NGO Coalition	http://www.iuuwatch.eu/wp-content/uploads/2019/05/RFMO-report_EN_May-2019_FINAL.pdf
Traceability/IUU	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 Japan	EU IUU NGO Coalition	http://www.iuuwatch.eu/wp-content/uploads/2020/01/CDS-Study-WEB.pdf
Traceability	GSA Seafood Processing Standard	GSA	http://www.seafoodassurances.org/ProgramStandards
PSMA	RFMO PSMA Benchmark	ISSF	https://iss-foundation.org/new-issf-report-benchmarks-tuna-rfmo-performance-against-the-u-n-fao-agreement-on-port-state-measures-psma/
IUU	Observer Requirements Best Practice	ISSF	https://iss-foundation.org/what-we-do/influence/rfmo-best-practices-snapshots/download-info/rfmo-best-practices-snapshot-2020-observer-requirements/
Flag State Performance	Flag States and Human Rights Reports	HRAS	https://www.humanrightsatsea.org/2020/10/05/2020-flag-states-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
Human rights	Seafood Task Force Vessel Auditable Standard	Seafood Task Force	https://www.seafoodtaskforce.global/wp-content/uploads/2019/01/STF_Code-of-Conduct-and-Vessel-Auditable-Standards-V.2_20181212.pdf

Further Information

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