



GUIDE FOR SUPPLIERS OF TUNA AND TUNA PRODUCTS

Internal Audit & Compliance (QA), 2020

SUSTAINABILITY OF RESOURCES

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BOLTON FOOD, as member of



has adopted the following commitments

PRELIMINARY NOTE

The following commitments constitute contractual clauses compulsory in all purchase orders of tuna or tuna-based products concluded by Bolton Food (BF).

BF shall randomly verify compliance with these requirements.

In any case, failure to comply with any of these requirements, and with the requirements described in the Annex II, “Bolton Food Tuna Sourcing Policy”, constitutes a breach of contract and so, BF reserves the right to take appropriate legal action.

RFMO Support

CM (Conservation Measure) 1-1: Tuna RFMO Authorized Vessel Record.

Applicable to: All vessels (all gears)

Processors, traders, importers, transporters, marketers and others involved in the seafood industry shall refrain from transactions in tuna caught by vessels that are not on the authorized vessel record of the RFMO governing the ocean area in which the tuna was caught, at the time of the fishing trip, so long as the vessel is subject to listing in the RFMO authorized vessel record.

Guidance.

All purchases must be from vessels listed on the authorized vessel record of the RFMO governing the ocean area in which the tuna was caught, at the time of the fishing trip, so long as the vessel is of a size subject to listing in the RFMO authorized vessel record.

Vessels on the ISSF PVR:

Vessel Name	UVI Number	UVI Type	UVI ISSF Compliant?	Vessel Flag	Authorized RFMO	Active Region Authorized?	Flag/RFMO?	Not IUU Listed	Shark Finning Policy?	Observer?	Full Tuna Retention?	Skipper WS/GB	No LS Driftnet	NE FADs
ROSITA C	9210969	IMO#	✓	Spain	IATTC	✓	✓	✓	✓	✓	✓	✓	✓	✓

Authorized RFMO (regions where the vessel is authorized to fish) & Active Region Authorized (is the vessel authorized to fish in regions currently active?) columns with green checks. For any purchases from non-PVR vessels, maintain a system check and approve vessel listing.

REQUIRED FROM SUPPLIER:

- Supplier must guarantee that all tuna (tuna products) purchased by BF comes from properly listed vessels, i.e. from vessels on the authorized vessel record of the RFMO governing the area where the capture took place at the time of capture.
- Application of the Principle "comply or explain": In case the vessel, either by size or because it operates exclusively in the EEZ, an area not subject to the management of any RFMO, the supplier must send evidence of these circumstances (vessel's file and evidence demonstrating that it only fishes in national waters) **prior to the shipment of the tuna to BF**. BF will verify the evidence provided and, where appropriate, approve the delivery of the goods. BF will not allow any tuna (or transformed product) from ships not registered in the correspondent RFMO to enter its facilities without first having evidence to justify this circumstance.

CM 1.2: RFMO Participation.

Applicable to: **All vessels (all gears)**

Processors, traders, importers, transporters, marketers and others involved in the seafood industry shall conduct transactions only with those vessels that are flagged to a member of the relevant RFMO (or have applied with the RFMO for such status), or if membership is not possible, flagged to an invited Expert or another such designation established by the RFMO.

Guidance.

Vessels on the ISSF PVR:

Vessel Name	UVI Number	UVI Type	UVI ISSF Compliant?	Vessel Flag	Authorized RFMO	Active Region Authorized?	Flag/RFMO?	Not IUU Listed	Shark Finning Policy?	Observer?	Full Tuna Retention?	Skipper WS/GB	No LS Driftnet	NE FADs
ROSITA C	9210969	IMO#	✓	Spain	IATTC	✓	✓	✓	✓	✓	✓	✓	✓	✓

Flag/RFMO? (vessel must be flagged to a Member or Cooperating Non-member of the relevant RFMO) column with **green** check.

REQUIRED FROM SUPPLIER:

The supplier must guarantee that all the tuna (tuna products) acquired by BF comes from vessels that are flagged in member or non-member countries but cooperating with the RFMO in which the tuna to be delivered has been caught and at the time of the capture.

Traceability & Data Collection

CM 2.1: Product Traceability.

Applicable to: All vessels (all gears)

Processors, traders, importers, transporters, marketers and others involved in the seafood industry shall credibly trace tuna products, from capture to plate. The traceability procedure will record the name, flag and IMO number of catcher and transshipping vessels, fish species, ocean of capture corresponding to tuna RFMO area, fishing trip dates, fishing gear employed, date the company took ownership of the fish and each species by weight.

Guidance.

Demonstrate ability to trace products from can code or sales invoice to vessel and trip.

REQUIRED FROM SUPPLIER:

All products, from raw fish to final products, containing tuna must be accompanied by documentation indicating at least:

- i) Name and flag of catcher.
- ii) Name and flag of transshipping vessel (if applicable).
- iii) Port or transshipment coordinates and dates of transshipment.
- iv) IMO number of both the fishing and transshipment vessels (if applicable).
- v) Fish species (detailed by weight/commercial sizes)
- vi) Ocean of capture corresponding to tuna RFMO area.
- vii) Fishing trip dates.
- viii) Fishing gear.
- ix) Dates of final unloading.
- x) Port of unloading.
- xi) Source of data (unloading, pre-processing, etc.)
- xii) Warranty of compliance with ISSF Conservation Resolution about IUU Fishing (by written declaration from supplier).

CM 2.3: Product Labelling by Species and Area of Capture.

Applicable to: All vessels (all gears)

Our company is committed to offering consumers of the products marketed under our brands a web-based system by product, by which they can request information on the species and origin of the tuna contained in the specific product. That is, by providing the product and the batch, we will indicate the traceability information of the tuna used in that specific production lot/batch (see CM 2.1).

REQUIRED FROM SUPPLIER:

All the requirements established in [CM 2.1](#) also apply to suppliers of any TRANSFORMED PRODUCT based on tuna, including end products.

Bycatch Mitigation

CM 3.1(b): Prohibition of Transactions with Shark-Finching Vessels.

Applicable to: All vessels (all gears)

The ISSF participating companies have committed themselves not to carry out transactions with vessels that carry or have carried out shark finning practices (retaining shark fins and discarding the remaining carcass while at sea) in the last two years. For the purpose of applying this measure, it will be understood that a vessel has carried out "shark-finching" activities if it was determined so by the RFMO that manages the area of activity of the vessel or the corresponding national governments.

After a period of two years from the date of conclusion of the investigation, processors, traders, importers, transporters and others involved in the seafood industry can resume operations with the vessels mentioned in the previous paragraph, provided the vessels are not involved in further incidents.

Guidance.

Refrain from transactions with vessels that have shark finned within two years of the product purchase date (as found by RFMO or competent national authority).

Vessels on the ISSF PVR:

Vessel Name	UVI Number	UVI Type	UVI ISSF Compliant?	Vessel Flag	Authorized RFMO	Active Region Authorized?	Flag/RFMO?	Not IUU Listed	Shark Finning Policy?	Observer?	Full Tuna Retention?	Skipper WS/GB	No LS Driftnet	NE FADs
ROSITA C	9210969	IMO#	✓	Spain	IATTC	✓	✓	✓	✓	✓	✓	✓	✓	✓

Shark Finning Policy (Established and published company policy prohibiting shark finning AND no known recent finding of vessel conducting shark finning) with green check.

REQUIRED FROM SUPPLIER:

Verify, prior to the delivery of the tuna, or transformed product, to BF that the fishing vessels from which the supplied tuna originates have not intervened in shark-finching activities in the last two years (according to official information of the RFMO or of the national government of flag).

CM 3.1(c): Prohibition of Transactions with Companies without a Public Policy Prohibiting Shark-Finching.

Applicable to: **All vessels (all gears)**

ISSF Participating Companies shall not conduct transactions with companies that do not have a public policy prohibiting shark-finching.

For the purposes of this measure a policy is “public” if it is published on the company’s website or is otherwise available to the general public.

Guidance.

No transactions with companies that do not have a public policy prohibiting shark finching. If transactions involve flag states that absolutely prohibit shark finching, no policy is required. If flag state allows 5% shark fin retention, the company must have a public policy.

For vessels on the ISSF PVR:

Vessel Name	UVI Number	UVI Type	UVI ISSF Compliant?	Vessel Flag	Authorized RFMO	Active Region Authorized?	Flag/RFMO?	Not IUU Listed	Shark Finching Policy?	Observer?	Full Tuna Retention?	Skipper WS/GB	No LS Driftnet	NE FADs
ROSITA C	9210969	IMO#	✓	Spain	IATTC	✓	✓	✓	✓	✓	✓	✓	✓	✓

Shark Finching Policy (Established and [published company policy prohibiting shark finching](#) AND no known recent finding of vessel conducting shark finching) with **green** check.

REQUIRED FROM SUPPLIER:

1. The supplier must send to BF a copy of its public policy prohibiting the practice of shark-finching or indicate the internet web page where it can be found. In case of not having web, the provider will indicate the means by which said policy is made public.
2. By signing the “[Bolton Food Tuna Sourcing Policy](#)” (or derived policies as Grupo Conservas Garavilla Code of Conduct for Suppliers”), the supplier is declaring its acceptance of all the ISSF commitments of application and doing so, the supplier explicitly repudiates the activity of shark finching.

CM 3.2: Large-Scale Pelagic Driftnets Prohibition.

Applicable to: **All vessels (all gears)**

ISSF, and therefore also BF as an active member of this Foundation, resolves to adopt the conservation measure so that processors, traders, importers, transporters and others involved in the fishing industry **abstain from transactions with tuna caught using large-scale driftnets.**

Guidance.

For vessels on the ISSF PVR:

Vessel Name	UVI Number	UVI Type	UVI ISSF Compliant?	Vessel Flag	Authorized RFMO	Active Region Authorized?	Flag/RFMO?	Not IUU Listed	Shark Finning Policy?	Observer?	Full Tuna Retention?	Skipper WS/GB	No LS Driftnet	NE FADs
ROSITA C	9210969	IMO#	✓	Spain	IATTC	✓	✓	✓	✓	✓	✓	✓	✓	✓

No LS Driftnet (no known use of Large-Scale Driftnet by vessel) column with **green** check.

REQUIRED FROM SUPPLIER:

BF DOES NOT ACCEPT tuna from vessels using large-scale driftnets.

Never supply BF tuna, or processed product, that has been caught by vessels using large-scale driftnets.

CM 3.3: Full Retention of Tunas.

Applicable to: All Purse Seine vessels.

Objective of the commitment: All the tuna caught by a purse seiner (skipjack, yellowfin and bigeye), except those not fit for human consumption or those corresponding to the last set of the fishing trip when there is not enough space in the hold to accommodate all the fish of that haul, must be kept on board until unloading at port. ("Not suitable for human consumption" follows the definition adopted by WCPFC CMM 2009-02).

Guidance.

All purse seine caught tuna (skipjack, yellowfin and bigeye) is retained onboard, except those unfit for human consumption as defined, or when in the final set of a trip, where there is insufficient well space to accommodate all fish caught in that set. If the vessel fishes in areas where full retention is mandatory, no further policy is needed. If RFMO does not require full retention, vessel must have documented and implemented policy in accordance with this conservation measure.

For vessels on the ISSF PVR:

Vessel Name	UVI Number	UVI Type	UVI ISSF Compliant?	Vessel Flag	Authorized RFMO	Active Region Authorized?	Flag/RFMO?	Not IUU Listed	Shark Finning Policy?	Observer?	Full Tuna Retention?	Skipper WS/GB	No LS Driftnet	NE FADs
ROSITA C	9210969	IMO#	✓	Spain	IATTC	✓	✓	✓	✓	✓	✓	✓	✓	✓

Full Tuna Retention? (Full tuna (skipjack, yellowfin and bigeye) retention) column with green check.

REQUIRED FROM SUPPLIER:

1. In the case of large-scale purse seiners (LPS), BF commits to acquire, stock up and use 100% of skipjack, yellowfin and bigeye tuna which were caught by vessels that are registered on the PVR Registry of ISSF. The supplier must be responsible for the fact that all purse-seine fishing vessels of more than 335 m³ fish hold volume shall be compulsorily registered on the PVR and with "green checks" in all columns, that is, complying with all the ISSF requirements at the time of the capture and for all the tuna supplied to BF.
2. In the case of purse-seine vessels not exceeding 335 m³ in fish hold volume (that is, not being LSP) and also not registered on the PVR, the supplier must provide evidence of the ship's policy with respect to the total retention of tunas (as an agreement with the organization providing observers on tuna retention control on board, official regulations of the flag country in this regard, etc.), or indication of the rule of the RFMO that requires such total retention of tunas.

CM 3.4: Skipper Best Practices.

Applicable to: All Purse Seine vessels (except “very small” purse seiners, i.e., of less than 30GT)

All purse seine vessel skippers must have attended an ISSF Skippers Workshop in person, have viewed the Skippers Workshop video online, or have reviewed the online Skippers Guidebook, which provide information on best practices.

Guidance.

Unless exempt per Conservation Measure 8.1, skipper has attended an ISSF Skippers Workshop in person, has viewed the Skippers Workshop video online, or has reviewed the Skippers Guidebook. The workshop video is located at this link. The online guidebook is located at www.issfguidebooks.org.

For vessels on the ISSF PVR:

Vessel Name	UVI Number	UVI Type	UVI ISSF Compliant?	Vessel Flag	Authorized RFMO	Active Region Authorized?	Flag/RFMO?	Not IUU Listed	Shark Finning Policy?	Observer?	Full Tuna Retention?	Skipper WS/GB	No LS Driftnet	NE FADs
ROSITA C	9210969	IMO#	✓	Spain	IATTC	✓	✓	✓	✓	✓	✓	✓	✓	✓

Skipper WS/GB (skipper has attended ISSF Best Practice Workshop or reviewed guidebooks or videos) column with green check.

REQUIRED FROM SUPPLIER:

1. The supplier agrees to identify the skipper on the date of capture and to demonstrate that this skipper has received the required training in the face-to-face session or to demonstrate that the skipper has completed the on-line course provided by ISSF for such training.
2. In the case of large-scale purse seiners (LPS), BF commits to acquire, stock up and use 100% of skipjack, yellowfin and bigeye tuna which were caught by vessels that are registered on the PVR Registry of ISSF. The supplier must be responsible for the fact that all purse-seine fishing vessels of more than 335 m³ fish hold volume shall be compulsorily registered on the PVR and with "green checks" in all columns, that is, complying with all the ISSF requirements at the time of the capture and for all the tuna supplied to BF. Sending BF tuna caught by large purse seiners not registered on the PVR or with any “red cross” on the PVR, will be considered a serious breach of the purchase contract and BF reserves the right to take appropriate legal actions.

NOTE: Purse-seine vessels with less than 30 GT will be considered "artisanal" and, therefore, this commitment will not be applied. If this is the case, the supplier must identify each and every fishing vessel and provide evidence that all vessels are less than 30 gross registered tons (GT) by written declaration and, always, prior to the shipment of the tuna to BF.

CM 3.5: Transactions with Vessels that Use Only Non-Entangling FADs.

Applicable to: **All Purse Seine Vessels and Support Vessels.**

1. Processors, traders, importers, transporters, marketers and others involved in the seafood industry shall conduct transactions only with those purse seine vessels **whose owners have a public policy** regarding the use of only non-entangling FADs. The policy should refer to the [ISSF Guide for Non-Entangling FADs](#) and shall apply to all new FAD deployments, regardless of the type of vessel that deploys the FADs.
2. For the purposes of this measure, a policy is “public” if it is published on the company’s website or is otherwise available to the general public.
3. For purposes of this measure, non-entangling FADs should meet the minimum specifications in the [ISSF Guide for Non-Entangling FADs](#). Vessel owners shall not deploy FADs that meet the description of “highest entanglement” contained in the ISSF Guide.

Guidance.

For vessels on the ISSF PVR:

Vessel Name	UVI Number	UVI Type	UVI ISSF Compliant?	Vessel Flag	Authorized RFMO	Active Region Authorized?	Flag/RFMO?	Not IUU Listed	Shark Finning Policy?	Observer?	Full Tuna Retention?	Skipper WS/GB	No LS Driftnet	NE FADs
ROSITA C	9210969	IMO#	✓	Spain	IATTC	✓	✓	✓	✓	✓	✓	✓	✓	✓

NE FADs (Established and published company policy on Non-Entangling FADs) column with **green** check.

REQUIRED FROM SUPPLIER:

The PVR has a new column to track compliance with this new requirement. In any case, BF will verify compliance with ISSF Conservation Measure 3.5 on the PVR for all fish caught as of April 18, 2017.

BF reminds all its suppliers that compliance with this requirement of ISSF (as well as with the rest of the ISSF requirements) is mandatory, contractual clause, for any transaction made with BF, so we require our tuna suppliers a **WRITTEN DECLARATION** in which they indicate the web address where we can find this policy for non-entangling FADs. In case the supplier does not have a website, they must send us a declaration of conformity with the adoption of the conservation measure of ISSF before the deadline of April 18, 2017.

If the vessel is a member of a fleet or fleet association that has a public policy on the use of non-entangling FADs, which equals or exceeds the requirements established in the document "ISSF Guidelines for NE FADs", the vessel must have a policy of adherence to the policy of the fleet or association of which it is a member.

CM 3.6: Transactions with vessels implementing best practices for sharks and sea turtles.

Applicable to: **All LARGE-SCALE LONGLINE VESSELS.**

Processors, traders, importers, marketers and others involved in the seafood industry shall conduct transactions only with those longline vessels whose owners have a policy requiring the implementation of [the following best practices for sharks and marine turtles](#):

(a) the [use of circle hooks and only monofilament lines](#) (e.g., the use of wire trace is prohibited); and

(b) implementation by the crew of best practice handling techniques such as those outlined in the [ISSF Skippers' Guidebook to Sustainable Longline Fishing Practices](#); and

(c) [No use of "shark lines" at any time](#) (defined here:

https://www.ccbt.org/sites/ccb.org/files/userfiles/file/other_rfmo_measures/wcpfc/CMM-2017-05-Conservation-and-ManagementMeasure-for-Sharks.pdf).

For the purposes of this measure, a large-scale longline vessel is defined as a vessel that is equal to or greater than 20m [length overall](#) (LOA)

Guidance.

For vessels on the ISSF PVR (Longline-PVR):

Vessel Name	UVI Number	UVI Type	UVI ISSF Compliant?	Vessel Flag	Authorized RFMO	Active Region Authorized?	Flag/RFMO?	Not IUU Listed	Shark Finning Policy?	No LS Driftnet	Sharks & Turtles Best Practices
ALTAR 10	8803977	IMO#	✓	Ecuador	IATTC	✓	✓	✓	✓	✓	✓

Sharks & Turtles Best Practices column with **green** check.

REQUIRED FROM SUPPLIER:

1. The supplier must send to BF a copy of its public policy by which it has adopted the "Good practices" described in previous paragraphs in relation to fishing, gear and handling of sharks and turtles.
2. By signing the "[Bolton Food Tuna Sourcing Policy](#)" (or derived policies as Grupo Conservas Garavilla Code of Conduct for Suppliers") the supplier is declaring its acceptance of all the ISSF commitments of application and doing so, the supplier explicitly commits to adopt the "good practices" defined by ISSF in relation to the fishing and handling of sharks and turtles by Large Scale Longliners (> 20m LOA).

CM 3.7: Transactions with Vessels or Companies with Vessel-Based FAD Management Policies.

Applicable to: **All Purse Seine and Supply Vessels.**

ISSF, and so BF, is committed to supporting better FAD management globally, and recognizes that it is an important component to meet the MSC Standard without conditions.

BF shall conduct transactions with only with those purse seine vessels whose owners develop and make public FAD Management Policies that include the activities purse seine and supply vessels are undertaking (if any) on the following elements:

- a. Comply with flag state and **RFMO reporting requirements** for fisheries statistics by set type;
- b. **Voluntarily report additional FAD buoy data** for use by RFMO science bodies;
- c. Support **science-based limits on the overall number of FADs** used per vessel and/or **FAD sets** made;
- d. **Use only non-entangling FADs** to reduce ghost fishing;
- e. Mitigate other environmental impacts due to FAD loss including through the **use of biodegradable FADs and FAD recovery policies**;
- f. For **silky sharks** (the main bycatch issue in FAD sets) implement **further mitigation efforts**.

Guidance.

In developing a FAD Management Policy, purse seine vessels and purse seine vessel owning companies should refer to **ISSF Technical Paper 2019-11** (or any subsequent revision) in designing the activities for each element.

With respect to the element on the use of only non-entangling FADs, ISSF CM 3.5 remains in force and public FAD Management Policies developed under this measure should be in accordance with ISSF CM 3.5.

For the purposes of this measure a policy is “public” if it is published on the owner or company’s website or is otherwise available to the general public.

REQUIRED FROM SUPPLIER:

The PVR will incorporate a new column to track compliance with this new requirement. Until then, BF requires its suppliers to develop and make public a FAD Management Policy covering activities in ALL elements (a to f) listed on this CM following the best practices described in the ISSF Technical Paper 2019-11 or any subsequent revision.

Monitoring, Control & Surveillance

CM 4.1: Unique Vessel Identifiers – IMO.

Applicable to: **All vessels (all gears).**

Processors, traders, importers, transporters, marketers and others involved in the seafood industry shall refrain from transactions in tuna caught by vessels subject to listing in the [RFMO](#) authorized vessel record and capable of being registered by IMO, that have not registered with IMO and thus have not received an IMO number [Unique Vessel Identifier](#).

Guidance.

All purchases must be from vessels with an IMO UVI number, unless ineligible due to IMO requirements or due to other reasons stated by IMO.

For vessels on the ISSF PVR:

Vessel Name	UVI Number	UVI Type	UVI ISSF Compliant?	Vessel Flag	Authorized RFMO	Active Region Authorized?	Flag/RFMO?	Not IUU Listed	Shark Finning Policy?	Observer?	Full Tuna Retention?	Skipper WS/GB	No LS Driftnet	NE FADs
ROSITA C	9210969	IMO#	✓	Spain	IATTC	✓	✓	✓	✓	✓	✓	✓	✓	✓

UVI Number (IMO or other UVI number), UVI Type (Type of UVI number) and UVI ISSF Compliant? (Does UVI meet ISSF requirement for vessel type/size?) columns with **green** check in the later.

Vessels that fish only in waters under national jurisdiction, and that provide a national certificate of operation, **will be considered compliant** under this section.

REQUIRED FROM SUPPLIER:

The supplier must ensure that all tuna (tuna products) purchased by BF comes from **vessels with an IMO number** whenever the vessel is able to register with IMO. If a fishing vessel is not able to register with the IMO, that is, is not able to obtain an IMO number, this circumstance will be communicated to BF prior to the shipment of the tuna or the supplier shall guarantee that this will be made explicit in a declaration from the supplier that must accompany each shipment of tuna supplied (or tuna product).

NOTE: The IHS Maritime & Trade (IHSM & T), which manages the granting of IMO identification numbers, has expanded the range of vessels potentially eligible to obtain an IMO number so that **now ships of less than 100 GT down to a size limit of 12 meters LOA** that are authorized to fish outside waters under exclusive national jurisdiction may request and obtain IMO identification numbers. In 2017, IMO, through its Circular No. 1886 / Rev6, modifies resolution A.1078 (28) so that, now, all motorized (inboard) LOA (length over all) fishing vessels greater than 12 meters that are authorized to fish outside waters under exclusive national jurisdiction. **This applies to metal boats as well as any other material (such as wood).**

CM 4.2: Purse Seine Unique Vessel identifiers.

Applicable to: **All Purse Seine**

If [IMO](#) requirements do not provide for a particular vessel to receive an IMO UVI for reasons other than vessel size, the vessel shall obtain a TUVI from the [Consolidated List of Authorized Vessels](#) (CLAV) or a UVI from ISSF. If IMO requirements do not provide for a particular vessel to receive an IMO UVI due to vessel size (< 12m LOA), such vessels do not need to obtain a TUVI from the [CLAV](#) or a [UVI from ISSF](#).

Guidance.

For vessels on the ISSF PVR:

Vessel Name	UVI Number	UVI Type	UVI ISSF Compliant?	Vessel Flag	Authorized RFMO
TRI STAR	i7000129	TUVI/ISSF		Indonesia	NA(EEZ)
VERONA 1	i7000524	TUVI/ISSF		Indonesia	NA(EEZ)

UVI Number (IMO or other UVI number), UVI Type (Type of UVI number) and UVI ISSF Compliant? (Does UVI meet ISSF requirement for vessel type/size?) columns with **green** check in the later.

Vessels that fish only in waters under national jurisdiction, and that provide a national certificate of operation, will be considered compliant under this section.

REQUIRED FROM SUPPLIER:

Any boat (including purse seine vessels) of more than 12 meters LOA must have an IMO (if it is eligible to do so for fishing outside of national jurisdiction waters) or does not have it for fishing exclusively in national waters. In the latter case the vessel must have a TUVI granted by CLAV (<http://www.tuna-org.org/GlobalTVR.htm>) or an UVI granted by ISSF (<http://iss-foundation.org/download-monitor-demo/download-info/uvi-and-imo-numberinstructions/>).

NOTE: Vessels that fish only in waters under national jurisdiction, and that provide a national certificate of operation, will be considered compliant under this section.

If IMO requirements do not provide for a vessel to receive an IMO number due to vessel size, such vessels do not need to obtain a TUVI nor an UVI from ISSF. For very small purse seiners (VSPS) that are defined as less than 30GT, the following equivalence is accepted: <30GT = <12m LOA.

CM 4.3(a): 100% Observer Coverage.

Applicable to: **Large-Scale Purse Seine vessels**

BF only carries out commercial transactions with those suppliers that guarantee (with documentary evidence) that if the tuna has been captured by a large purse seine vessel (> 335 m³ of fish hold volume), this vessel has an observer coverage of 100% of its fishing activity (human or electronic observer if proven effective), unless prevented by "force majeure" conditions in a particular region.

Guidance.

The data collected by the observer must be made available to the flag state authorities and, if appropriate, to the RFMO, in the format required by the flag state (and RFMO). In case the flag state (or RFMO) does not accept the data, the vessel owner must store data for **at least three years** from the end of the trip. At a minimum, data to be made available are those fields required by the flag state for vessel logbooks.

For vessels on the ISSF PVR:

Vessel Name	UVI Number	UVI Type	UVI ISSF Compliant?	Vessel Flag	Authorized RFMO	Active Region Authorized?	Flag/RFMO?	Not IUU Listed	Shark Finning Policy?	Observer?	Full Tuna Retention?	Skipper WS/GB	No LS Driftnet	NE FADs
ROSITA C	9210969	IMO#	✓	Spain	IATTC	✓	✓	✓	✓	✓	✓	✓	✓	✓

Observer? (vessel has 100% observer coverage (human or electronic)) column with **green** check.

REQUIRED FROM SUPPLIER:

BF has committed that when tuna comes from LSPS (> 335 m³), said vessel **MUST OBLIGATORY** be listed on the PVR of ISSF. The provider must ensure that the vessel has a "green-check" in the box corresponding to observer coverage **at the time of capture** of the fish supplied.

If RFMO requires 100% observer coverage, no further evidence is required.

CM 4.4(a): Transshipment.

Applicable to: All Purse Seine vessels.

Processors, traders, importers, transporters, marketers and others involved in the seafood industry shall conduct transactions only with those purse seine vessels that do not engage in transshipments at sea, whether [high seas](#), [EEZ](#), [territorial seas](#) or archipelagic waters.

CM 4.4(b)(i): EXEMPTION – PAPUA NEW GUINEA.

This exemption applies only to:

- Vessels with carrying capacity \leq 600mt; and
- that fish only in the archipelagic waters of PNG; and
- that are based in PNG and are associated with processing facilities in PNG.

The above vessels are allowed to transship on to carrier vessels that must go to a PNG port for either offloading or for transshipping in port under strict monitoring controls. These carrier vessels are not allowed to take the catch directly from PNG archipelagic waters to a foreign port.

REQUIRED FROM SUPPLIER:

1. Transshipment documents to verify that the tuna purchased has not been subject to unauthorized transshipment.
2. These documents (i.e., B & L) must provide evidence that the transshipment has been carried out in port (except for the vessels that operate in the archipelagic waters of Papua New Guinea, based in PNG and associated to centers of transformation in PNG). In any case, the transshipment must comply with the official PNG control requirements.
3. Merchant vessel name, flag, IMO number, port and transshipment date shall be recorded and provided to BF with the supplied tuna (or tuna products).

NOTE: Purse seiners with less than 30 GT (= 12m LOA) will be considered "artisanal" and, therefore, this commitment will not be applied. If this is the case, the supplier must identify each and every fishing vessel and provide evidence that all vessels are less than 30 gross registered tons (GT) by written declaration.

CM 4.4(c): Transshipment at Sea – Observer Coverage.

Applicable to: All Large-Scale **Longline** vessels.

To further support the implementation of [RFMO conservation measures](#) for longline observer coverage and the regulation of at-sea transshipment, the collection of data and the effective monitoring of [longline vessels](#):

1. Processors, traders, importers, marketers and others involved in the seafood industry shall conduct transactions with longline vessels that conduct transshipments at sea, whether [high seas](#), [EEZ](#), [territorial seas](#) or archipelagic waters, [only if 100% of such transshipments are observed](#) (either by a human observer on board the longline vessel or onboard the carrier vessel).
2. For the purposes of this measure, a large-scale longline vessel is defined as a vessel that is equal to or greater than 20m [length overall](#) (LOA).

Guidance.

The WCPFC E-reporting system allows transshipment declarations (TDs) to be filed without the observer's signature. In such cases, company should obtain a copy of the observer contract, the crew list (signed and dated by the skipper), or some other evidence of 100% observer coverage for the period during which TDs were submitted using the E-reporting system.

REQUIRED FROM SUPPLIER:

The supplier must send documentary evidence of the presence of an observer either on the Large Scale Longliner or on the merchant ship to which it is transhipped.

The "transshipment declarations" of the RFMOs will be sent to BF, which must be signed by the observer present during the transshipment. This documentation must be sent to BF prior to sending the tuna and BF must explicitly and documentally accept said shipment.

WCPFC E-reporting system transshipment declarations (TDs) are considered valid if compliant with requirements listed in the "Guidance" section.

Illegal, Unreported and Unregulated Fishing.

CM 5.1: ILLEGAL, UNREPORTED AND UNREGULATED (IUU) FISHING.

Applicable to: **All vessels (all gears).**

ISSF resolves:

Maintain and make public a complete list of all vessels designated as INDRN (IUU) by all RFMOs.

Adopt the conservation measure of the tuna RFMOs so that all commercial agents, importers, transports and any other agent related to the fishing industry refrain from any transaction with tuna from fishing vessel(s) or transported by carrier(s) on any list of IUU vessels of any tuna RFMOs.

For vessels on the ISSF PVR:

Vessel Name	UVI Number	UVI Type	UVI ISSF Compliant?	Vessel Flag	Authorized RFMO	Active Region Authorized?	Flag/RFMO?	Not IUU Listed	Shark Finning Policy?	Observer?	Full Tuna Retention?	Skipper WS/GB	No LS Driftnet	NE FADs
ROSITA C	9210969	IMO#	✓	Spain	IATTC	✓	✓	✓	✓	✓	✓	✓	✓	✓

Not IUU Listed (must not appear on any tuna RFMO IUU list) column with **green** check.

REQUIRED FROM SUPPLIER:

The supplier shall ensure that any fishing vessel and / or merchant vessel of transshipment involved in the collection, transport or any other activity related to the tuna supplied is not included in the official list of IUU vessels ("IUU list") of any tuna RFMO.

Capacity

CM 6.1: Transaction ban for large-scale purse-seine vessels not actively fishing for tuna as of december 31, 2012.

Applicable to: **Large-Scale Purse Seine vessels**

Processors, traders, importers, transporters, marketers and others involved in the seafood industry shall refrain from transactions in [skipjack](#), [bigeye](#) and [yellowfin tuna](#) caught by large scale [purse seine](#) vessels that are not actively fishing for tuna as of December 31, 2012.

Guidance.

Vessel Name	UVI Number	UVI Type	UVI ISSF Compliant?	Vessel Flag	Authorized RFMO	Active Region Authorized?	Flag/RFMO?	Not IUU Listed	Shark Finning Policy?	Observer?	Full Tuna Retention?	Skipper WS/GB	No LS Driftnet	NE FADs
ROSITA C	9210969	IMO#	✓	Spain	IATTC	✓	✓	✓	✓	✓	✓	✓	✓	✓

For a Large-Scale Purse Seine vessel to be listed on the PVR, compliance with this Conservation Measure is mandatory. So, by verifying that a LSPS vessel is listed on the PVR on the date of catch, compliance with CM 6.1 is also verified.

REQUIRED FROM SUPPLIER:

The supplier shall ensure that any tuna that supplies BF from purse-seine vessels of more than 335 m³ fish hold volume has been caught by **vessels that are listed on the ISSF PVR** on the date of capture, with all green-checks of all PVR requirements correctly marked on that date. Sending to BF tuna caught by large purse seiners not registered on the PVR, or with any requirement of the PVR indicated as non-conforming (red cross on PVR) at the time of the capture of the supplied tuna, will be considered a serious breach of contract and BF reserves the right to take the appropriate legal actions.

CM 6.2(e): Purchases from purse seine vessels in fleets with other vessels not in compliance with ISSF conservation measures 6.1 and 6.2(a).

Applicable to: **Large-Scale Purse Seine vessels**

Processors, traders, importers, transporters and others involved in the fishing industry will not engage in any commercial transactions with tuna from fleets in which any of their large purse seine vessels (LSPS) do not comply with ISSF resolutions 6.1 and 6.2 (a) in terms of capacity limitation.

Guidance.

Vessel Name	UVI Number	UVI Type	UVI ISSF Compliant?	Vessel Flag	Authorized RFMO	Active Region Authorized?	Flag/RFMO?	Not IUU Listed	Shark Finning Policy?	Observer?	Full Tuna Retention?	Skipper WS/GB	No LS Driftnet	NE FADs
ROSITA C	9210969	IMO#	✓	Spain	IATTC	✓	✓	✓	✓	✓	✓	✓	✓	✓

For a Large Scale Purse Seine vessel to be listed on the PVR, compliance with this Conservation Measure is mandatory. So, by verifying that a LSPS vessel is listed on the PVR on the date of catch, compliance with CM 6.2(e) is also verified.

REQUIRED FROM SUPPLIER:

The supplier shall ensure that any tuna that supplies BF from purse-seine vessels of more than 335 m³ fish hold volume has been caught by vessels that are listed on the ISSF PVR on the date of capture, with all green-checks of all PVR requirements correctly marked on that date. Sending to BF tuna caught by large purse seiners not registered on the PVR, or with any requirement of the PVR indicated as non-conforming (red cross on PVR) at the time of the capture of the supplied tuna, will be considered a serious breach of contract and BF reserves the right to take the appropriate legal actions.

ProActive Vessel Register

CM 7.3: 100% purchases from vessels on the ISSF PVR.

Applicable to: **Large-Scale Purse Seine vessels**

In the case of Large-Scale Purse Seine Vessels (LSPS), BF commits itself to source only skipjack, yellowfin and bigeye tuna from vessels registered on the PVR of the ISSF (Proactive Vessel Register), and complying with all the ISSF requirements included in the PVR ("green-checks ") at the moment of the capture of the tuna to be supplied.

Vessel Name	UVI Number	UVI Type	UVI ISSF Compliant?	Vessel Flag	Authorized RFMO	Active Region Authorized?	Flag/RFMO?	Not IUU Listed	Shark Finning Policy?	Observer?	Full Tuna Retention?	Skipper WS/GB	No LS Driftnet	NE FADs
ROSITA C	9210969	IMO#	✓	Spain	IATTC	✓	✓	✓	✓	✓	✓	✓	✓	✓

REQUIRED FROM SUPPLIER:

The supplier shall ensure that any tuna that supplies BF from purse-seine vessels of more than 335 m³ fish hold volume has been caught by **vessels that are listed on the ISSF PVR** on the date of capture, with all green-checks of all PVR requirements correctly marked on that date. Sending to BF tuna caught by large purse seiners not registered on the PVR, or with any requirement of the PVR indicated as non-conforming (red cross on PVR) at the time of the capture of the supplied tuna, will be considered a serious breach of contract and BF reserves the right to take the appropriate legal actions.

Anex I: Table of ISSF Conservation Measures: catalog of evidences for suppliers.

TODOS LOS BUQUES (TODAS LAS ARTES)			
ISSF CM	MEDIO DE PRUEBA (EVIDENCIAS A PRESENTAR POR PROVEEDOR)	CUÁNDO	
1.1	Registro de buques autorizados por la OROP	El proveedor debe garantizar que el atún suministrado procede de barcos registrados en el OROP correspondiente. PRINCIPIO "CUMPLE O EXPLICA": En caso de que por tamaño o por que el barco faena en aguas nacionales no gestionadas por ninguna OROP, el proveedor deberá enviar evidencia de estas circunstancias PREVIAMENTE AL ENVÍO DEL ATÚN. GCG verificará las evidencias suministradas y dará conformidad expresa para proceder al envío del atún.	Previamente al envío de la mercancía a instalaciones de GCG
1.2	Participación en las OROPs del país de bandera	El proveedor debe garantizar que el atún (productos base atún) adquirido por GCG proviene de buques abanderados en países miembros o no-miembro cooperante de la OROP en la que se ha realizado la captura del atún a suministrar, en el momento de la captura.	Previamente al envío de la mercancía a instalaciones de GCG
2.1	Trazabilidad de los productos con base atún	Todos los productos base atún, desde pescado entero a producto terminado, deben ir acompañados de información detallada de origen. Dicha información debe recoger tanto la actividad de pesca como el transbordo (si procede), hasta descarga final.	Se recomienda que el proveedor envíe la documentación de trazabilidad antes del envío de la mercancía. En todo caso, GCG debe contar con dicha información en el momento de la recepción del atún (producto base atún) en sus instalaciones
3.1(b)	Prohibición de actividades de "shark-finning"	El proveedor debe verificar con anterioridad a la entrega del atún (o transformado) que los pesqueros de origen no han estado involucrados en shark-finning en los dos últimos años previos a dicha entrega.	Con anterioridad a la entrega.
3.1(c)	Política anti "shark-finning"	El proveedor debe enviar a GCG copia de su política pública en la que se prohíba la práctica de aleteo de tiburones, o indicar la dirección de internet donde ésta puede ser localizada. En caso de no tener web, el proveedor nos indicará por qué medios podemos conocer su política "anti shark-finning" o nos enviará una declaración firmada de sostenibilidad del atún en la que acepte todos los compromisos ISSF de aplicación y en la que explícitamente repudien la actividad de aleteo de tiburones.	Inmediata.
4.1	Identificador único de buque (UVI)	El proveedor deberá garantizar que todo el atún (productos de atún) adquirido por GCG proviene de buques con número IMO siempre que sea posible. Si algún barco pesquero no es capaz de registrar con la OMI, es decir, no es capaz de obtener un número de la OMI, esta circunstancia será comunicada a GCG previamente al envío del atún o bien el proveedor garantiza que se hará explícita en una declaración del proveedor que debe acompañar a cada envío de atún suministrado (o producto de atún). NOTA: La IHS Maritime & Trade (IHSM&T), que gestiona la concesión de números de identificación IMO, ha aumentado el rango de barcos potencialmente elegibles para obtener un número IMO de forma que ahora los barcos de menos de 100 GT (hasta los 12 metros LOA) y que estén autorizados para faenar fuera de aguas bajo jurisdicción nacional exclusiva pueden solicitar y obtener números de identificación IMO.	Con anterioridad a la entrega.
5.1	Pesca ilegal, INDNR (IUU)	El proveedor deberá garantizar que cualquier buque de pesca y/o buque mercante de transbordo involucrado en la recolección, transporte o cualquier otra actividad relacionada con el atún suministrado no está incluido en la lista oficial de barcos INDNR ("IUU list") de cualquier OROP de tónidos.	Inmediata.

TODOS LOS BUQUES DE CERCO (independientemente de su tamaño)			
ISSF CM	MEDIO DE PRUEBA (EVIDENCIAS A PRESENTAR POR PROVEEDOR)	CUÁNDO	
3.3	Retención a bordo de todos los túnidos capturados	En caso de grandes cerqueros (> 335 m ³ FHV) el proveedor SIEMPRE debe verificar que el barco está en el PVR de ISSF con todas las marcas "verdes" en el momento de captura. En el caso de barcos de menos de 335 m ³ FHV, y tampoco estén registrados en el PVR, el proveedor debe proporcionar evidencia de la política del buque respecto a la retención total de túnidos o indicación de la norma de la OROP que obligue a dicha retención total.	Con anterioridad a la entrega.
3.4	Formación de patrones y capitanes, "best practices"	LSPS debe estar en el PVR con todas las marcas verdes. En caso de cerquero de menos de 335 m ³ FHV que no esté en el PVR, el proveedor debe identificar al patrón/capitán en el momento de la captura del atún a suministrar y demostrar que dicho patrón/capitán ha recibido la formación requerida por ISSF. NOTA IMPORTANTE: los barcos DE CERCO de menos de 30 GT se consideran artesanales y no se les aplica este requisito ISSF CM 3.4.	Con anterioridad a la entrega.
3.5	Non-entangling FADs	Se aplica tanto a barcos de cerco como a "Supply & Tender Vessels": GCG recuerda a todos sus proveedores que la conformidad con este requisito de ISSF (así como con el resto de las exigencias de ISSF) es de obligado cumplimiento, cláusula contractual, para toda transacción realizada con GCG, de manera que requerimos a nuestros proveedores de atún y productos con atún una DECLARACIÓN POR ESCRITO en la cual se nos indique la dirección web donde podemos encontrar su política pro FADs no-enmallantes. En caso de que el proveedor no cuente con página web, debe enviarnos una declaración de conformidad con la adopción de la medida de conservación de ISSF antes de la fecha límite del 18 de abril de 2017. Si el barco es miembro de una flota o asociación de flota que cuenta con una política pública sobre utilización de FADs no-enmallantes, que iguale o sobrepase los requisitos establecidos en el documento "ISSF Guidelines for NE FADs", el barco debe contar con una política de adhesión a la política de la flota o asociación de la que forma parte.	Inmediata.
4.2	Identificador Único de Buque (UVI) para cerco	Todo barco (incluido los que faenan a cerco) de más de 12 metros LOA o bien debe tener un IMO (si es elegible para ello por faenar fuera de aguas de jurisdicción nacional) o bien no lo tiene por faenar exclusivamente en aguas nacionales. En este último caso debe contar con un TUVI otorgado por CLAV: http://www.tuna-org.org/GlobalTVR.htm o un UVI dado por ISSF: http://iss-foundation.org/download-monitor-demo/download-info/uvi-and-imo-number-instructions/ NOTA: Para barcos de cerco muy pequeños ("very small purse seiners", VSPS) que se definen como aquéllos de menos de 30GT, se acepta la equivalencia: < 30GT = < 12m LOA.	Con anterioridad a cada entrega.
4.4(a)	Transbordos	En la información de trazabilidad ya señalada (ISSF CM 2.1) ya se establece que el proveedor debe enviar a GCG información completa y detallada tanto de la actividad de pesca como de cualquier eventual TRANSBORDO para verificar que el atún adquirido no ha sido objeto de transbordo no autorizado.	Con anterioridad a cada entrega.
4.4(b)(i)	Excepción para barcos que faenan en aguas PNG	Si el barco cumple las siguientes tres condiciones: a) menos de 600 tm de capacidad de carga; b) pesca exclusivamente en PNG; c) tiene base en PNG y está asociado a transformador en PNG; el proveedor proporciona evidencia de que el transbordo cumple la normativa oficial PNG ("declaración de transbordo").	Con anterioridad a cada entrega.

GRANDES BUQUES DE CERCO (LSPS, > 335 m ³ FHV)			
ISSF CM	MEDIO DE PRUEBA (EVIDENCIAS A PRESENTAR POR PROVEEDOR)	CUÁNDO	
4.3(a)	100% presencia de observadores	En caso de grandes cerqueros (> 335 m ³ FHV) el proveedor SIEMPRE debe verificar que el barco está en el PVR de ISSF con todas las marcas "verdes" en el momento de captura.	Con anterioridad a cada entrega.
6.2(a)	Los barcos deben estar en el registro LSPS de ISSF	En caso de grandes cerqueros (> 335 m ³ FHV) el proveedor SIEMPRE debe verificar que el barco está en el PVR de ISSF con todas las marcas "verdes" en el momento de captura.	Con anterioridad a cada entrega.
6.2(b)	Excepción registro LSPS de ISSF para barcos PNA	En caso de grandes cerqueros (> 335 m ³ FHV) el proveedor SIEMPRE debe verificar que el barco está en el PVR de ISSF con todas las marcas "verdes" en el momento de captura.	Con anterioridad a cada entrega.
6.2(e)	Flotas con barcos que no cumplen CM 6.2 "Capacity"	En caso de grandes cerqueros (> 335 m ³ FHV) el proveedor SIEMPRE debe verificar que el barco está en el PVR de ISSF con todas las marcas "verdes" en el momento de captura.	Con anterioridad a cada entrega.
7.3	Compra (100%) a LSPS registrados/conforme en PVR	En caso de grandes cerqueros (> 335 m ³ FHV) el proveedor SIEMPRE debe verificar que el barco está en el PVR de ISSF con todas las marcas "verdes" en el momento de captura.	Con anterioridad a cada entrega.

GRANDES BUQUES PALAGREROS (Large Scale Longliners, > 20m LOA)			
ISSF CM	MEDIO DE PRUEBA (EVIDENCIAS A PRESENTAR POR PROVEEDOR)	CUÁNDO	
4.4(c)	Prohibición transbordos no controlados	El proveedor debe enviar evidencias documentales de la presencia de observador bien en el Large Scale Longliner bien en el buque mercante al que se transborda. Se enviará a GCG las "declaraciones de transbordo" de las OROPs, que deben estar firmadas por el observador presente durante el transbordo. Esta documentación debe ser enviada a GCG previamente al envío del atún y GCG debe aceptar explícita y documentalmente dicho envío.	Previamente al envío de la mercancía a instalaciones de GCG

Anex II: Bolton Food Tuna Sourcing Policy – Mandatory.



BOLTON FOOD TUNA SOURCING POLICY

In force from June 30th, 2019

Bolton Food uses the United Nations Sustainable Development Goals as guiding principles, particularly the 14th goal *"to conserve and sustainably use the oceans, seas and marine resources for sustainable development."* As a result, Bolton Food is engaged in the careful management of tuna fisheries as a key feature of its social responsibility commitments and has developed the following requirements for all suppliers of Bolton Food involved in tuna fishing or processing:

1. Comply with European Regulations No. 853/2004 (hygiene rules for food of animal origin) and No. 1005/2008 (illegal, unreported and unregulated fishing);
2. Comply with all applicable RFMO and ISSF conservation measures (<https://iss-foundation.org/what-we-do/verification/conservation-measures-commitments/>);
3. Increase sourcing from Marine Stewardship Council (MSC) certified fisheries. For uncertified fisheries, ensure Robust Fishery Improvement Projects (Robust FIPs) are in place.
4. Preferentially source tuna caught from more selective fishing methods with a lower level of by-catch and environmental impact (pole and line, hand line, FAD-free purse seine, small-scale purse seine vessels fishing only in the EEZ of their flag state and participating in a FIP) and provide appropriate documentation (e.g. catch certificates, Captain statements, third party CoC audits);
5. For tuna caught by large-scale purse seiners, ensure FAD management measures are in place including:
 - a. Not exceeding 300 active (i.e. deployed and activated within 5 miles from the boat only once) drifting FADs per vessel across the fleet and per RFMO area;
 - b. Use only fully non-entangling FADs made primarily with natural materials by 2024.
6. Comply with the "Dolphin Safe" program, as defined by the Earth Island Institute;
7. Do not use tuna caught in marine reserves or protected areas identified by and located within the EEZ's of Coastal States;
8. Do not use tuna caught by longline vessels for Bolton Food products unless the fishery is MSC certified or in a Robust FIP;
9. Comply with the Code of Ethics and Human Rights Policy of the Bolton Group;
10. Comply with the Bolton Food Code of Conduct for Tuna Suppliers (vessels):
 - a. All Bolton Food owned vessels by 2020;
 - b. All Large-scale purse seiners supplying Bolton Food by 2022;
 - c. All vessels by 2024;
11. Report all information regarding tuna traceability and transparency in the Bolton Supplier Workplace Portal, including fishing operations (fishing vessel, fishing trip, fishing gear, ocean, FAO area), transport and unloading (transshipment vessel, port of unloading), and processing (frozen loins and finished products);
12. Collaborate with Bolton Food to verify compliance with this policy. Bolton supports a continuous improvement approach whereby non-compliance will be addressed with incremental corrective action plans.