



# **GUIDE FOR SUPPLIERS OF TUNA AND TUNA PRODUCTS**

Sustainable Development: Advocacy, Policy & Compliance, 2023

## **SUSTAINABLE SUPPLY CHAIN: TUNA**

Héctor M. Fernández  
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**BOLTON FOOD**, as a Participating Company 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 reserves the right to verify compliance with these requirements and, by signing this Guide, the supplier agrees to submit to verification of compliance as set forth in BF's Due Diligence Management System.

In any case, failure to comply with any of these requirements, and with any other 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.

## 1. RFMO Support

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

Effective: July 1, 2022

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 fishing vessels or received by carrier 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 or transshipment event, so long as the vessel is subject to listing in the RFMO authorized vessel record.

### Guidance.

All tuna fishing vessels shall be registered on the authorized vessel record of the RFMO with jurisdiction in the fishing zone at the time of the fishing trip. If the fish has been transshipped at any point of the supply chain, then the reefer bulk carrier shall be registered on the authorized vessel record of the RFMO with jurisdiction in the place of transshipment and at the time of transshipment.

If vessels are listed 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.

### SUPPLIER IS REQUIRED TO:

- 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.
- Supplier must guarantee that if an authorized transshipment has taken place, then the reefer bulk carrier shall also be listed on the authorized vessel record of the RFMO at the time of the transshipment.
- 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** as, for instance, **the vessel's fishing license**) **prior to the shipment of the tuna to BF**. BF will verify

the evidence provided and, where appropriate, will 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.

Effective: March 27, 2019

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 or cooperating non-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.

### SUPPLIER IS REQUIRED TO:

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.

## 2. Traceability & Data Collection

### CM 2.1: Product Traceability.

Effective: January 1, 2010

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 Unique Vessel Identifier (UVI: i.e. IMO whenever possible) 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.**

Effective: January 1, 2018

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 to be supplied to Bolton Food.

### 3. Bycatch Mitigation

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

Effective: December 31, 2022

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 **and/or not land all sharks with fins naturally attached if retained**.

For the purpose of applying this measure, it will be understood that a vessel has carried out "shark-finning" 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 (this policy shall include the compromise of landing all sharks with fins naturally attached if retained), 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-finning 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.

Effective: November 8, 2023

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 finning and requiring sharks be landed with fins naturally attached, if retained.

If transactions involve flag states that absolutely prohibit shark finning, no policy is required. If flag state allows 5% shark fin retention, the company must then 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 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 (this policy shall include the compromise of landing all sharks with fins naturally attached if retained) AND no known recent finding of vessel conducting shark finning) 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 finning.
3. The public policy prohibiting shark-finching must explicitly indicate it is required that sharks are landed with fins naturally attached, if they are retained.

### CM 3.2: Large-Scale Pelagic Driftnets Prohibition.

Effective: July 27, 2021

Applicable to: All vessels (all gears)

ISSF, and therefore also BF as an active Participating Company 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.

Effective: January 1, 2013

Applicable to: All Purse Seine vessels (LSPS, Small Scale PS & Very Small PS)

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 Fanning 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 m<sup>3</sup> 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 m<sup>3</sup> 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.

Effective: January 1, 2013

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

All purse seine vessel and large scale longline vessel skippers must have attended an ISSF Skippers Workshop in person an in-person Skippers Workshop provided by a tuna FIP and conducted by a trainer that has been accredited by ISSF, have viewed an ISSF Skippers Workshop video online, or have reviewed the [online Skippers Guidebook](#), which provide information on best practices.

Starting April 1, 2024, participation in one of the above training programs will be necessary every three (3) years.

#### Guidance.

Unless exempt per Conservation Measure 8.1, skipper has attended an ISSF Skippers Workshop in person or one provided by a tuna FIP, has viewed the Skippers Workshop video online, or has reviewed the Skippers Guidebook.

For vessels on the ISSF PVR:

Vessel Name	UUI Number	UUI Type	UUI 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 L.S. Driftnet	NE FADs
ROSITA C	9210969	IMO#	✓	Spain	IATTC	✓	✓	✓	✓	✓	✓	✓	✓	✓

Skipper WS/GB (skipper has attended a 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 m<sup>3</sup> 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.

Effective: October 18, 2016

(REPEALED and replaced by CM 3.7 from April 1, 2025)

Applicable to: LSPS, SSPS & Tender 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 column to track compliance with this new requirement. In any case, BF verifies 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.

Effective: November 8, 2023

Applicable to: 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) the use of whole finfish bait;

(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<sup>1</sup>

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](#)", the Bolton Food Code of Conduct for Suppliers (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).

<sup>1</sup> [https://www.ccbt.org/sites/ccbt.org/files/userfiles/file/other\\_rfmo\\_measures/wcpfc/CMM-2017-05-Conservation-and-ManagementMeasure-for-Sharks.pdf](https://www.ccbt.org/sites/ccbt.org/files/userfiles/file/other_rfmo_measures/wcpfc/CMM-2017-05-Conservation-and-ManagementMeasure-for-Sharks.pdf)

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

Effective: June 30, 2021 for LSPS & Supply vessels / December 31, 2021 for Small Scale Purse Seine vessels

Applicable to: All Purse Seine and Supply Vessels (except those < 30GT)

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. Report additional FAD buoy data (FAD daily position data and echosounder acoustic records) 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 (item d above), no later than 1 April 2025, public FAD management policies developed under this measure shall include a statement that purse seine vessels and supply vessels covered by the policy will from this date only deploy or redeploy (i.e., will be placed in the water) fully non-entangling FADs, without any netting in any components, including both the raft and the tail. From 1 April 2025, where practicable, the purse seine vessels and supply vessels should retrieve any encountered pre-existing non-fully NEFAD (whether a set is done or not) which is not in compliance with this measure.

With respect to the element on reporting additional FAD buoy daily position data for use by RFMO science bodies (item b above), by 1 January 2023, public FAD

Management Policies developed under this measure shall include a statement that purse seine vessels and supply vessels covered by the policy are reporting FAD position data to the relevant RFMO science bodies and/or national scientific institutions and/or its flag State, with a maximum time lag of 90 days. Data submissions must include the vessel name and IMO number (if available). Deployments should be identified in the data submissions when possible. In the event that purse seine vessels and supply vessels covered by the policy report these data to national scientific institutions and/or its flag State, they shall document that they requested that these data be made available to the relevant RFMO for scientific purposes.

With respect to the element on reporting additional FAD buoy echosounder acoustic biomass data for use by RFMO science bodies (item b above), by 1 April 2024, public FAD Management Policies developed under this measure shall include a statement that purse seine vessels and supply vessels covered by the policy are reporting FAD echosounder biomass data to the relevant RFMO science bodies and/or national scientific institutions and/or its flag State, with a maximum time lag of 90 days. Data submissions must include the vessel name and IMO number (if available). In the event that purse seine vessels and supply vessels covered by the policy report these data to national scientific institutions and/or its flag State, they shall document that they requested that these data be made available to the relevant RFMO for scientific purposes.

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.

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

Vessel Name	Vessel Type	UWI Number	UWI Type	UWI BSB Compliant?	Vessel Flag	Authorized RFMO	Active Region Authorized?	Flag/RFMO?	Not IUU Listed	Shark Fishing Policy?	Observer?	Full Tuna Retention?	Skipper WS/GB	No L.S. Driftnet	NE FADs?	Sharks, Turtles & Seabirds Best Practice	FAD Management?
ADRIA	Purse Seine	8919489	IMO#	✓	Korea, Republic of	ITTC	✓	✓	✓	✓	✓	✓	✓	✓	✓	-	✓
ADRIA DEL MAR	Purse Seine	7363059	IMO#	✓	Ecuador	IATTC	✓	✓	✓	✓	✓	✓	✓	✓	✓	-	✓

NE FADs & FAD Management columns with green check.

## REQUIRED FROM SUPPLIER:

The PVR contains a column to track compliance with this new requirement (see above).

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.

## 4. Monitoring, Control & Surveillance

### CM 4.1: Unique Vessel Identifiers – IMO.

Effective: May 31, 2011

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	U* Number	U Type	U 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.

Effective: May 31, 2011

Applicable to: All Purse Seine vessels

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.

### 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). In the case that the vessel is not eligible for an IMO number due to the fact that the vessel fishes exclusively inside national jurisdiction waters, then the vessel must have a TUVI granted by CLAV (<http://www.tuna-org.org/GlobalTVR.htm>) or an UVI granted by ISSF (<http://issf-foundation.org/download-monitor-demo/download-info/uvi-and-imo-numberinstructions/>).

NOTE: Vessels that fish exclusively 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): Observer Coverage.

Effective: January 1, 2013

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 m<sup>3</sup> 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.

All tuna RFMOs are already collecting or receiving some data through observer programs or fishing logbooks, and these efforts must be made more comprehensive in order to properly assess the impact of FAD fisheries and other activities.

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 m<sup>3</sup>), 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.

**Exemptions** may be made for large-scale purse seine vessels in the Western and Central Pacific Ocean fishing in **latitudes higher than 20°N/S** in cases **where the catch** (retained and discarded; target and non-target) **is adequately sampled and reported to the RFMO**. Such exemptions shall be based on a detailed report that will be reviewed and approved by the ISSF Board and announced publicly through the ISSF website (ISSF CM 4.3(b) Observer Coverage Exemption – WCPO Region)

An **exemption** is granted for tuna caught by **New Zealand flag** purse seine vessels that operate **only within New Zealand waters** targeting **free school skipjack** during the summer season (approximately between January and April each year).

These vessels are subjected to less than 100% observer coverage by the New Zealand Ministry for Primary Industries but are adequately monitored and managed and their catch and effort data are provided to SPC and WCPFC. For the purposes of this measure, large-scale purse seine vessels are those with at least 335 m<sup>3</sup> fish hold volume. (ISSF CM 4.3(b)(i) Observer Coverage Exemption – New Zealand Flag Purse Seine Vessels)

Another exemption is granted for tuna caught by Japan flag large-scale purse seine vessels that are on the ISSF Proactive Vessel Record (PVR) and operate north of 20°N, provided that:

1. Each year, vessels wishing to qualify for this exemption notify ISSF about the months when they plan to be fishing north of 20°N. If the exemption is granted to them, it will only cover these months.
2. Within one month after the end of each fishing trip, the vessel-owning company sends a trip catch report for each vessel covered under this exemption to the Secretariat of the Pacific Community (SPC, the science provider to WCPFC).
3. The trip catch reports in paragraph 1 must consist of the two data sets below, in a format agreed by SPC:
  - i) Set-by-set estimated catches and discards for target tunas (Albacore, Bigeye, Yellowfin and Skipjack) and non-target species (e.g., sharks, turtles, yellowtail). The set-by-set information shall indicate fishing day, time of set, latitude and longitude, and school type.
  - ii) Final Outturn Data (FOT). These are total trip catches by target species and size categories, corrected with sampling data. The size break downs shall be <1.8 Kg, 1.8-3.5 Kg, 3.5-10.0 Kg and >10.0 Kg.
4. For the purpose of verifying compliance with this measure, ISSF will contact SPC quarterly to determine which vessels are submitting the reports in paragraph 3. Vessels that have not submitted complete reports for the past three months according to their fishing plan in paragraph 1 will no longer qualify for this exemption.

(ISSF CM 4.3(b)(ii) Observer Coverage Exemption – Japan Flag Purse Seine Vessels Fishing North of 20°N)

Effective May 22, 2016, ISSF CM 4.3(c) Observer Coverage – Grace Period for Electronic Monitoring Systems for Certain Large-Scale Purse Seine Vessels, grants an exemption for those Purse Seine vessels with more than 335 m<sup>3</sup> fish hold volume (so LSPS by ISSF definition) and that are NOT considered large-sale in certain RFMOs and therefore are unable to obtain human observers for each fishing trip as a means to meet the requirements of ISSF CM 4.3(a). Owners of large-scale purse seine vessels who fit in this category may seek to install an electronic monitoring system (if proven to be effective) in lieu of human observers. In such an event, the following provisions apply:

The vessel owner must identify each vessel involved and provide satisfactory evidence of an executed agreement with a service provider to install an electronic monitoring system on each vessel.

Once such evidence has been determined to be satisfactory, the vessel will be deemed to be in compliance with this measure for a period of six (6) months, which will allow appropriate time for installation of and training on the electronic monitoring system.

The vessel owner must provide satisfactory proof that the equipment has been installed and is operating within that time period; in the event that such proof is not provided within grace period, the vessel will return to a non-compliant status with ISSF Conservation Measure 4.3(a).

Download the [Electronic Monitoring Vendors and Data Submission Information \(PDF\)](#) for (1) an EM vendors list; (2) contact information for submitting (a) FAD tracking and echosounder biomass data and (2) bycatch data; and (3) data submission guidelines.

**CM 4.4(a): Transshipment.**

Effective: January 1, 2012

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): Transshipment Exemptions – General**

Exemptions will be made in cases where the at-sea transshipments are authorized (as necessary, by all of the following: the vessel's flag state, by the coastal state where the transshipment took place, and by the relevant RFMO) and [the transshipped catch is adequately sampled](#) according to the RFMO science provider.

Such exemptions shall be based on a detailed report that will be reviewed and approved by the ISSF Board and announced publicly through the ISSF website.

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

This exemption applies only to:

- Vessels with carrying capacity  $\leq 600\text{mt}$ ; 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.

**CM 4.4(b)(ii): Transshipment Exemption – Philippines.**

Exemption granted for those Philippine-flagged purse seiners that engage in transshipments in the WCPFC High Seas Pocket no. 1. This exemption applies only to:

- Purse seine catcher vessels with carrying capacity  $\leq 600\text{mt}$ ; and
- that fish and transship only in High Seas Pocket no. 1 and are allowed to do so by the WCPFC; and
- that are based in Philippines and are associated with processing facilities in Philippines.

The above vessels are allowed to transship on to carrier vessels that must go to a Philippines port operated by the Philippines Fisheries Development Authority for either offloading or for transshipping in port under strict monitoring controls. These carrier

vessels are not allowed to take the catch directly from High Seas Pocket no. 1 waters to a port outside the Philippines.

The catcher and the carrier vessels shall operate under all the conditions stated in ISSF CM 4.4(b)(ii)

#### **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).

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

Effective: January 1, 2018

Applicable to: 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:

As stated in the [Bolton Food Tuna Sourcing Policy](#), BF will only accept longline caught tuna from MSC certified fisheries and always with explicit and specific confirmation by a BF Procurement Senior Manager.

In the case that the shipment of LL-tuna has been accepted, 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.

## 5. Illegal, Unreported and Unregulated Fishing.

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

Effective: October 21, 2014

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.

## 6. Capacity

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

Effective: January 1, 2013

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 m<sup>3</sup> 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).**

Effective: January 1, 2018

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 m<sup>3</sup> 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.

## 7. ProActive Vessel Register

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

**Effective:** January 1, 2016 (for fishing trips commencing on or after January 1, 2016)

**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 m<sup>3</sup> 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 <sup>3</sup> 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 <sup>3</sup> 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 <sup>3</sup> 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. <b>NOTA IMPORTANTE:</b> 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 <b>DECLARACIÓN POR ESCRITO</b> 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: <a href="http://www.tuna-org.org/GlobalTVR.htm">http://www.tuna-org.org/GlobalTVR.htm</a> o un UVI dado por ISSF: <a href="http://issf-foundation.org/download-monitor-demo/download-info/uv-and-imo-number-instructions/">http://issf-foundation.org/download-monitor-demo/download-info/uv-and-imo-number-instructions/</a> . <b>NOTA:</b> 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 m³ 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 m³ 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 m³ 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 m³ 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 m³ 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 m³ 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.

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# SPECIFIC REQUIREMENTS

## FOOD APPENDIX

In line with our "Bolton Group's Policy on Ingredients and Raw Materials", our Food Business Unit has adopted several policies related to:

- **ingredients of animal origin:** tuna, mackerel and sardines, farmed salmon, mollusks, beef;
- **ingredients of vegetable origin:** oil, vegetables.

In order to spread our commitment towards the suppliers, they are fostered to undertake this virtuous path by submitting these policies.



## TUNA SOURCING

Bolton Food (hereafter "BF") has determined that the **environmental and social respectful management of tuna fisheries is a core aspect of its sustainability commitments and that must require the commitment of its suppliers and business partners** to improve and reinforce the key elements and requirements set forth in this Policy.

BF is committed to have 100% of its tuna MSC certified or coming from comprehensive and credible **Fishery Improvement Projects (CC FIP)**<sup>1</sup> by 2024. For this reason, BF has the aim of increasing its sourcing from **Marine Stewardship Council (MSC)** certified fisheries. In order to source tuna from fisheries not yet certified by MSC, BF shall ensure that CC FIP are in place in those fisheries or that they have entered into MSC full assessment. This commitment to using only MSC certified tuna leads us to **encourage our suppliers to participate in MSC certification initiatives** as the best way to help achieve the fishery environmental sustainability standards advocated by BF.

<sup>1</sup> According to WWF, we consider a FIP as credible and comprehensive when it is compliant with all the criteria of both definitions:

**Comprehensive FIP:** A FIP that addresses the full range of environmental challenges considered within the MSC Standard, with the aim of having the fishery perform at the level of an unconditional pass against the MSC standard. A comprehensive FIP needs to conform to the following criteria: a scoping document and MSC pre-assessment has been completed by an independent third-party auditor; an action plan has been established; the FIP has been publicly launched; the FIP has entered its implementation stage, that is stage 3 within FIP guidelines; the fishery is making progress according to the action plan designed to reach a level consistent with the MSC standard within the agreed time frame (max. 5 years); progress is to be evaluated by an external independent consultant periodically for the entire duration of the FIP.

**Credible FIP:** A FIP whose actions are transparent; complies with a process for clearly showing improvement in fishery performance; and can demonstrate fishery evaluation through a robust, independent assessment process and is rated "A" or "B" in [fishbase.org](https://www.fishbase.org).

**BF shall preferentially source tuna caught from selective fishing methods with a low 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 Exclusive Economic Zone (EEZ) of their flag state and participating in a FIP). BF is a proud founding member of the International Seafood Sustainability Foundation (ISSF) since 2009 and as such, both our fishing policy and acquisitions from third parties abide by the conservation measures and recommendations issued by the ISSF.

Furthermore, as leaders in the sector and aware of the challenge of having a 360° sustainability throughout our supply chain, we want to guarantee, through compliance with our corporate codes and policies on social and labor issues, the fulfilment and respect of the Human Rights of the people involved in our supply chain and of the communities in which we are present.



#### BF asks its suppliers to:

1. Comply with all existing and applicable local and international legislation. In particular, full compliance with the applicable legislation of the country of origin, and that of the European Union<sup>2</sup> must be considered a mandatory condition.
2. Comply with all applicable RFMO and ISSF conservation measures<sup>3</sup>.
3. For tuna caught by large-scale purse seiners (hereinafter, "LSPS"), 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.
4. For tuna caught by large-scale purse seiners, ensure that said LSPS are equipped with fully operational Automatic Identification Service (AIS) and Vessel Monitoring System (VMS), as required by flag state and RFMO regulations.
5. Comply with the "Dolphin Safe" program, as defined by the Earth Island Institute.
6. Do not use tuna caught in marine reserves or protected areas identified by and located within the EEZs of Coastal States that prohibit tuna catch.
7. Do not use tuna caught by longline vessels for BF products unless the fishery is MSC certified or in a comprehensive and credible FIP.
8. Comply with the Code of Ethics and Human Rights Policy of the Bolton Group.
9. Comply with the BF Code of Conduct for Suppliers.
10. Comply with the additional BF Code of Conduct for Tuna Suppliers (vessels) according to the following deadlines:
  - a. All large-scale purse seiners supplying BF by 2022
  - b. All vessels by 2024.

<sup>2</sup> Compliance with European Union legislation is required for the importation of foodstuffs for raw materials, semi-processed products and finished products that must enter the European Union.

<sup>3</sup> <https://issf-foundation.org/what-we-do/verification/conservation-measures-commitments/>



11. Report all information regarding tuna traceability and transparency, through the Bolton Supplier Workplace Portal when available, including fishing operations (fishing vessel, fishing trip, fishing gear, ocean, FAO area, etc.), transport and unloading (transshipment vessel, port of unloading, dates, etc.) and processing category (round fish, frozen loins or finished products), in sufficient time to obtain BF's approval for shipment.
12. Provide appropriate documentation (i.e. Catch Certificates, Captain Statements, RFMO registers, internal policies, third party audits, etc.) with the dual objective of ensuring full traceability of the products delivered to BF and also to fight against Illegal, Unreported and Unregulated (IUU) fishing.
13. Since BF is committed to have 100% of its tuna MSC certified/CC FIP and because BF believes that achieving the environmental sustainability levels required for MSC certification is the best operational goal we can adopt today, we encourage our suppliers to make public their commitment to support initiatives based on meeting the principles of the MSC certification and engaging in CC FIPs.
14. Collaborate with BF to verify compliance with this policy. BF supports a continuous improvement approach, side by side with our supplier family along the sustainability journey, whereby non-compliance will be addressed with incremental corrective action plans.



Photo credit: Tri Marine