



Thai Union Manufacturing Co., Ltd. & Thai Union Europe

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

Compliance Report (as of 20 December 2019, for activities in 2018)

General Audit Information

Please verify or complete the information in blue boxes.

Company Name	Thai Union Group, PLC
Affiliated Company Names	Chicken of the Sea
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MRAG Americas Auditor Name(s)	Ms. Erin Wilson Mr. Jason Anderson Mr. Jonah van Beijnen Mr. Oleg Martens
Audit Start Date	Week of August 19, 2019
Audit End Date	Preliminary audit results issued: Week of Nov 1st, 2019 Final audit results issued: Week of Dec 2nd, 2019
Time zone(s) for coordinating remote audit conference call	US (California) / Thailand
Language requirements for remote audit conference call	English

Conservation Measure	Current ¹
1.1 Transitioning longline product	IP
1.2 Bycatch mitigation & best practices	IP
1.3 Improving bycatch data sharing	OK
1.4 Increasing human & electronic observer coverage	IP
2.1 Moratorium on transshipment at sea	OK
2.2 At-sea transshipment conditions	IP
2.3 Limits on time at sea	IP
2.4 Monitoring, Control & Surveillance (MCS) / Transparency	IP
2.5 Enforcement & noncompliance	IP
2.6 Port Inspections / PSMS	IP
2.7 Data collection / traceability	IP
2.8 IMO numbers	OK
2.9 Observer recruitment	IP
2.10 Transport vessels / Reefer audits	NS
3.1(a) FAD reduction plan – Communications	IP
3.1(b) FAD reduction plan – 300 active max.	IP
3.1(c) FAD reduction plan – Internal procedure	OK
3.2 Deployment of non-entangling FADs	OK
3.3 Exclusive use on non-entangling & biodegradable FADs	OK
3.4 Increase of FAD-free offering	IP
3.5 Addressing supply vessels	OK
3.6 FAD-free verification pilot	OK
3.7 FAD management plans in FIPs	OK
3.8 Transparency of FAD use data	OK
3.9 Information for consumers	NS
3.10 RFMO regulations on FADs	OK

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

Audit purpose	
Audit objective	The purpose of this audit is to assess Thai Union’s compliance with all measures in place for the year of activity being audited.
Audit criteria	This audit covers all measures as defined in the Greenpeace and Thai Union: Audit Policy Document and Standard Operating Procedures, Version 2019/1.
Audit outcomes	The auditing serves as an assessment of conformance by Thai Union. Any significant gaps in conformance and where corrective actions may be necessary will be specified. Any actions taken pursuant to the results of the audit will be at the discretion of Greenpeace and Thai Union.
Purpose of this document	All auditors will follow this checklist for conducting Thai Union Compliance audits. The completed and approved copy of this checklist will serve as the audit report.
Other relevant documentation	Greenpeace & Thai Union Agreement: Audit Policy Document and Standard Operating Procedures, Version 2019/1.

Conformance with Commitments	
Non-conformances	During this first audit, MRAG Americas advises not to use the ‘conformance versus non-conformance’ grading system, which is typically used for mature audit programs. Indeed, during the initial year of a new audit program, and especially when firm due dates do not impact the period being audited, it is preferable to describe the actual situation, along with an assessment of whether a commitment has been met fully, is in progress, or has not been started. This approach provides stakeholders with the information they need to review progress on the Agreement and decide whether a grading system needs to be implemented for future reports.
Grading	MRAG Americas defines audit findings as follows: <ul style="list-style-type: none"> · Commitment Met (OK) – Thai Union has provided evidence of compliance with a measure. · Commitment In-Progress (IP) – Thai Union has demonstrated progress toward the 2020 commitment. · Commitment Not Started (NS) – Thai Union has not yet provided evidence that this commitment has been met, or that work is underway to meet the commitment.

<p>MRAG Americas’ procedures (applicable for audit reports starting in year 2, and based on the grading system agreed to between stakeholders)</p>	<p>MRAG Americas’ procedures for handling non-conformances for Thai Union are as follows:</p> <ul style="list-style-type: none"> · MRAG Americas substantiates conformance through documented evidence provided by Thai Union. · Where Thai Union cannot provide documented evidence of conformance with a conservation measure, a non-conformance must be issued. · All non-conformances must be graded either major or minor. · In the case of a non-conformance, Greenpeace and Thai Union may agree on a Corrective Action Response (CAR). The corrective actions must be in place, and evidence of addressing the condition must be supplied to MRAG Americas, within an agreed timescale, or a follow up audit may be required.
<p>Corrective Action Responses (CARs) (applicable for audit reports starting in year 2, and based on the grading system agreed to between stakeholders)</p>	<p>To rectify non-conformances, a CAR may be applied. The nature of the CAR is at Thai Union’s and Greenpeace’s discretion. MRAG Americas does not advise on what specific corrective action Thai Union may take but will assess whether the CAR is expected to address the non-conformance. MRAG Americas will also not provide advice with respect to any sanction that might be applied resulting from identified non-conformances. Such action will be at the discretion of Thai Union and Greenpeace.</p>

CM	Category	Category Guidance	Gear Type	Means of Verification	Grade	Evidence	Auditor Comments
1.1	Support of pole and line & best practice fishing by transitioning longline-caught product.	TU will transition 1500 tonnes of its longline-caught albacore supply to be sourced from pole and line and/or troll vessels by end of 2017 and increase this tonnage by 1000 tonnes each year until 2020, ending in a total increased volume of 4500 tones. This will be prioritized for utilization in the North American	Longline	Auditor will review data from the quarterly RFMO reports TU submits as part of its participation in ISSF. This data will be compared to the agreed baseline(s) (i.e. previous calendar year’s volume) for P&L and Troll. Auditor will also review Thai Union documentation re utilization of p&l tuna for the North American market and report on how tuna from	IP	Analysis of quarterly RFMO reports Thai Union (TU) filed with the tuna RFMOs shows that globally in CY 2018, volumes of troll and pole-and-line caught tuna (which includes albacore) sourced by TU increased (as compared to CY 2017 figures). During the same period (CY 2017 to 2018), sales data provided by TU shows that additional volumes of troll and pole-and-line tuna was directed at the	Auditor notes that based on the figures provided it is hard to demonstrate that additional volumes of pole-and-line caught albacore are being prioritized for the North American market. TU did provide copies of internal email exchanges discussing the increase of pole-

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		market.		these gear types has been prioritized for that market.		North American market.	and-line tuna for the North American market, as well as emails to suppliers. However, the final volumes going to the North American market are likely demand-driven, and thus could be beyond TU's control. This merits further discussion between the parties to the Agreement.
1.2	Bycatch mitigation best practice implementation plan	<p>TU's bycatch mitigation and best practices implementation plan contains clear milestones and overall timeline estimates. Greenpeace will be provided an advanced draft to provide feedback and agree next steps.</p> <p>By the beginning of 2018, TU will ensure RFMO requirements on seabirds are being met in the WCPO and communicate and begin</p>	Longline	<p>Auditor will review TU progress against milestones. Auditor will look at internal communications and trainings, as well as public reports from National authorities and RFMOs relating to bycatch issues affecting vessels supplying to TU. --> this will be done from 2018 onward and documents/trainings will be referenced.</p> <p>Auditor uses findings from TU ISSF Annual Audit² to supplement this audit against milestones.</p>	IP	<p>TU indicated the bycatch mitigation plan is being drafted (as of Nov 2019) and would be ready in Q1 2020.</p> <p>Regarding how TU ensures RFMO requirements on seabirds are being met, TU shared the following steps:</p> <ol style="list-style-type: none"> 1. TU indicated that it asks all its longline suppliers to provide their bycatch mitigation policy at time of procurement, and that if suppliers fail to provide an adequate policy the purchase cannot go through. The same goes for 	Provide TU's bycatch mitigation and best practices implementation plan when available so auditor can evaluate if milestones are being reached.

² Using the 2019 audits for TU Europe and TU Manufacturing looking at 2018 activities.

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		implementation of the best practice mitigation plan with suppliers.		Auditor will assess a random sample (20% of a random quarter) of TU suppliers to determine whether they have received training re bycatch mitigation and best practices.		<p>suppliers' policies prohibiting shark finning (often combined with the general bycatch policy).</p> <p>2. TU requires suppliers to provide 'Letters of Guarantee', which indicate that they only use gear allowed by the RFMOs and that mitigate bycatch.</p> <p>3. TU indicated they review RFMO bycatch reports / meetings to verify the vessels they source from are not listed as having shark finned and/or failed to respect RFMO seabird requirements.</p> <p>Auditor reviewed quarterly RFMO reports for TU and notes that all large-scale longline vessels are on the Proactive Vessel Register (PVR) and in good standing with conservation measures applying to longline vessels under section 3 - Bycatch Mitigation.</p> <p>Auditor randomly selected 20% of the LL vessels TU sourced across different ocean areas in 2018 and obtained copies of each vessel's policy for bycatch</p>	

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						<p>mitigation, along with the Letters of Guarantee. All policies followed a similar format and demonstrate a general understanding of how to avoid seabird, shark and turtle interactions, including how to release these animals if caught, which materials (tori lines, circle hooks) to use and which fishing methods (setting at night and at depth) reduce interactions. Auditor notes that TU and its suppliers are aware that certain mitigation measures work better in some geographies than others, and this is reflected in the policies and training materials (from FIP and skipper workshops) reviewed by the auditor.</p> <p>TU also provided pictures of seabird streamer / tory lines installed aboard some of the longline vessels it sources from in the WCPO region, along with FIP reports for the Indian and Pacific oceans showing how crew are being trained in bycatch mitigation and release methods.</p>	
1.3	Improving bycatch data sharing	TU recognizes that bycatch data availability and sharing is weak	Longline	Auditor will review and report on TU advocacy efforts (2018 onward) as well as TU efforts	OK	TU provided 2018 advocacy letters to four tuna RFMOs (ICCAT, IOTC, WCPFC, IATTC)	While this measure is on-going and will also be reviewed during

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		<p>within the longline sector and will work with the fleets sourced from to share raw bycatch data with relevant RFMO scientific bodies and, work with scientists to ensure best practice data collection is taking place.</p>		<p>to help RFMOs process the data (if/when applicable). Auditor will spell out the types of letters/efforts for each audit year.</p>		<p>calling for improved data gathering from the longline fleets. These letters were either sent directly by TU or were letters sent by an NGO (i.e. WWF), on which TU was a co-signer.</p> <p>Auditor reviewed TU's "Supplier Ask" document, which states data should be shared with RFMOs no later than 4 months after the end of a fishing trip. TU noted that while transactions then occur directly between its suppliers and the RFMO Scientific Advisory Committees (SACs) or through their National Authority (i.e. which then transfer on to the RFMOs), it regularly asks SAC staff (during RFMO meetings) if their suppliers are providing complete data within the required timeline.</p> <p>TU provided Longline (LL) FIP reports for fleets in the Indian Ocean (IO) and Pacific Ocean (PO), where the topic of data sharing is being discussed. These reports also mention Electronic Monitoring Systems (EMS) trials on LL vessels, which TU is supporting, and through which better data and monitoring</p>	<p>the audit of 2019 activities, the evidence shared by TU for 2018 was sufficient to determine that it met the measure's goal for that calendar year.</p>

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						<p>could occur.</p> <p>TU indicated it has followed the course of actions described above because attempts to directly support RFMOs were declined due to conflict of interest concerns, with RFMOs stating it would be inappropriate for a private entity to fund such work.</p>	
1.4	Increasing human and electronic observer coverage	<p>TU will employ 100% observer coverage (human and e) on the longline vessels it sources from by 2020. TU is engaging with some of its key longline suppliers to trial the ability to increase the use of both human observers and e-observers with the intent to ensure 5% human coverage across fleets sourced from is met and to increase human observer coverage across vessels in TU's supply chain.</p> <p>The project is expected to start at the end of 2017 (baseline) and run for a one-year period. TU</p>	Longline	<p>Auditor will obtain TU report(s) on observer coverage, which can be compared to the agreed late-2017 baseline. Auditor will obtain total number of vessels declaring observers and note total number of vessels sourced from.</p> <p>Auditor will review randomly selected copies of human and e-observer contracts, comparing those to declared fishing trips.</p> <p>Auditor will review www.fisheryprogress.org for FIP progress re e-observer utilization.</p>	IP	<p>TU indicated that it does not maintain a formal report on observer coverage. This is because observer arrangements are made directly between the vessel companies and their National Authorities (or the RFMO), and this information is not consistently shared with TU. Rather, TU indicated that its strategy is to move toward sourcing 100% of LL tuna from vessels that use EMS.</p> <p>Auditor notes TU currently provides financial support to two (2) LL FIPs, one in the IO and one in the PO. In 2018, the installation of EMS systems in those 2 FIPs commenced, and TU provided auditor with various progress reports detailing which companies had been hired to install the equipment and collect</p>	<p>Auditor was unable to determine if the results of the trials across the two longline fleets have been shared with Greenpeace.</p>

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		<p>will share with GP the progress and outcome of trial.</p> <p>TU is also engaging in a FIP that will include e-observer requirements. TU will host a multi stakeholder roundtable to share results and seek opportunities to increase human observer recruitment.</p>				<p>the data, and which vessels the systems had been installed on. TU also indicated that 100% of the vessels in the 2 FIPs would have EMS on board either by the end of 2019 or in Q1 of 2020, with the intent being to shift 100% of LL sourcing to vessels engaged in FIPs and with either EMS or human observers on board by 2020.</p> <p>TU provided meeting agendas for FIPs it was engaged with in 2018, along with a list of stakeholders attending each of the meetings.</p> <p>Auditor notes that significant IO LL volumes were sourced from FIPs in 2018.</p>	
2.1	Moratorium on transshipment at sea	TU agrees to extend its moratorium on transshipment at sea across our entire tuna longline supply chains unless suppliers meet a strict set of conditions to ensure the critical issues surrounding the practice are addressed to our satisfaction, and immediately start working with their suppliers to implement	All	<p>Auditor reviews quarterly reports submitted by TU to RFMO(s) for declared transshipments and compares this to RFMO(s) transshipment records.</p> <p>Auditor determines whether vessel had human observer or e observer at time of transshipment (by looking at the Transshipment Declaration).</p>	OK	<p>Auditor reviewed all quarterly RFMO reports for 2018 and identified transshipments at sea (lat./long coordinates are provided in the reports). Auditor randomly selected a month in 2018 and requested that TU provide copies of all Transshipment Declarations (TDs) for the IOTC, WCPFC and IATTC (note: none were requested from ICCAT as none were identified for that period). When received from TU, those TDs</p>	<p>Based on previous experience with other tuna processors, there are enough LL-related TDs reports in any given month during a calendar year (CY). Therefore, auditor selected a random month for CY18, using this as a representative sample, and reviewed all TDs, across RFMOs</p>

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		this strict set of standards.				<p>were reviewed for completeness and compared to the dates reported in the quarterly reports. All dates matched and all TDs noted a human observer on board the carrier vessel (consistent with RFMO requirements).</p> <p>Auditor notes that copies of the TDs were not publicly available from the RFMOs.</p>	for that period.
2.2	At-sea transshipment conditions	<p>Thai Union will only source tuna from longline vessels that have human observers for vessels transshipping at sea. Thai Union will work to have a 3rd party observer specifically for ensuring compliance with Thai Union's vessel code of conduct on board the carrier / reefer vessel, in addition to the already required observer on the carrier/reefer. The longline vessel must allow the designated observer from the carrier to board and inspect the longline vessel at the sole discretion of the</p>	All	<p>Auditor looks at randomly selected transshipment declarations (provided by TU's suppliers) and verifies whether the observer on the catcher vessel and the carrier vessel have countersigned the report.</p> <p>Auditor reviews TU reports on effort(s) to develop and train a pool of 3rd party observers.</p>	IP	<p>Auditor requested and reviewed all TDs for trips taking place during a randomly selected month in 2018 for the IO, WCPO and EPO. None were requested for the AO as quarterly reports did not list at-sea transshipments for that month.</p> <p>The TDs were compared to data listed in the quarterly RFMO reports, and auditor verified that each TD contained the correct dates, lat/long coordinates, and an observer signature. Auditor notes the observer was always on the carrier vessel, and that RFMOs do not require the TDs to be countersigned by an observer on the catcher vessel (if one is present).</p> <p>TU provided its supplier ask</p>	Provide results of the IO pilot when ready, including conclusions re whether/how this could be scaled up.

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		observer. Thai Union commits to initiating this program by the end of 2018, working with suppliers starting immediately to develop and train a pool of third-party observers.				document, which indicates that TU favors regional, national or 3 rd party observers. TU also shared emails showing efforts (primarily in FIPs) to train 3 rd party observers.	
2.3	Limits on time at sea	TU agrees to only source from vessels that spend a maximum of 9-months at sea before returning to port and allowing crew to access port services.	All	Auditor randomly selects 25% of vessels sourced from over a 12-month period and looks at TU RFMO reports to determine whether the vessel came to port at least every 9 months.	IP	Auditor randomly selected a 25% sample of vessels sourced from in 2018. Of these, 100% of PS, pole-and-line and troll gear types came back to port frequently (i.e. never more than a few days to a few weeks at a time). The majority of the longline vessels had sufficient AIS data points and/or other evidence (i.e. such as official documents signed by harbor masters or government unloading records) to demonstrate that they came back to port at least once every 9 months. The remainder of the LL vessels could not provide evidence they returned to port at least once every 9 months. They all appear to have an AIS system (i.e. they have an MMSI number, which generally indicates an AIS system has been installed), however a signal from their system has not been captured by IHS Maritime. When	TU needs to discuss with its suppliers why AIS signals are not being transmitted by some vessels. This could start with those vessels identified during this audit but should expand to the entire fleet. If AIS proves to be an incomplete way to determine if vessels return to port at least once every 9 months, then TU needs to present additional evidence (from suppliers) to show vessel(s) in port on specific dates.

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						the auditor contacted IHS Maritime about the matter, the response was that “stations” are located at all main ports, and that if vessel carries AIS 1 and comes within 5 nm of a station, then the signal will be registered. If the vessel carries AIS 2, then IHS’ satellite fleet can capture vessels globally, even if on the high seas.	
2.4	MCS / Transparency	TU agrees to require that any vessel authorized to transship at sea should have mandatory AIS or equivalent technology.	All	Auditor reviews list of all vessels sourced from and randomly selects 25% to verify that they have AIS or equivalent system installed and in operation at the time sourcing occurred. This will be done by looking at TU’s RFMO reports and the PVR.	IP	Per comments on measure 2.3 above, while all randomly selected vessels have an AIS system, it is unclear why a significant portion of this sample did not transmit a signal in 2018. When questioned by the auditor, IHS Maritime stands by its ability to capture signals (as long as the vessel is transmitting), would it be by land stations, neighboring vessels with similar technology (acting as relays) or satellites.	TU needs to contact its suppliers and ask for evidence of a functioning AIS, or equivalent (i.e. VMS), system aboard vessels for which IHS Maritime, or a competent National authority, has not recorded a signal in the last 12 months.
2.5	Enforcement and noncompliance	Any non-compliance by suppliers found through the social audit program will be addressed through a performance improvement program. For critical issues, such as forced labor, issues will require immediate	All	Auditor verifies that social audits have been conducted. Auditor notes which vessels have been audited, and highlights instances when the 'same' vessel has been subject to multiple audits within a 12-month period.	IP	TU sent summary reports of social audits carried out by Key Traceability for fleets covering the Atlantic, Indian and Pacific oceans. These being the ‘initial’ reports, they do not contain information regarding whether NCs have	The reports reviewed by the auditor represented the very first phase of the social audits and comprised the first 2 pages of each report (i.e. summary of findings). The auditor

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		resolution. For other issues an agreed program of performance improvement and a timeline will be agreed with the supplier. Any suppliers unwilling or unable to meet the TU standards will be suspended for a minimum of one year.		Auditor looks at year-end summary report and identifies vessels that have major non-conformances. Auditor then checks if those vessels have either (i) submitted and action plan, or (ii) successfully addressed the nonconformance(s).		<p>been addressed. This information is typically released in a 2nd report, which is issued after the 30-day remediation period.</p> <p>Based on the summary reports received to date, no vessel was found to be audited more than once over the last 12 months.</p>	will need to see follow-up reports (issued after the 30-day remediation period) to assess whether the performance improvement programs were enacted.
2.6	Port inspections / PSMA	TU recognizes the importance of the PSMA but also the challenges that some countries face to effectively implement its provisions, especially poorer coastal State nations. However, we strongly believe that the benefits greatly outweigh the costs, particularly given the well documented impacts and economic cost of IUU fishing to developing coastal States. We therefore encourage countries ratify the agreement and put in place the means to implement it. Ultimately our aim will be to only source fish transiting through ports	All	Auditor reviews advocacy efforts materials supplied by TU, as well as those found in the specialized press (i.e. FFA newsletter, Undercurrent News, etc.).	IP	<p>TU provided TU Europe & WWF Partnership reports for 2017 and 2018, showing TU's support for advocacy efforts on PSMA. This ranged from direct appeals to governments (Kenya, Tanzania) to signing on to general advocacy letters that WWF sent to RFMOs and/or shared during FAO meetings.</p> <p>Auditor could not find any PSMA related advocacy linked to TU in the specialized press (such as Seafood Source, Undercurrent News, or FFA newsletters).</p>	

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		belonging to countries that are fully implementing the PSMA.					
2.7	Data collection / traceability	TU is committed to full digital traceability, from catch to consumption. Traceability is the backbone of sustainability and responsible sourcing. E-logbooks and e-CDT are the future of digital traceability and TU will support trials and regulator commitment to moving from paper based to electronic systems.	All	<p>Auditor reviews result of the annual traceability exercise carried out as part of the annual PC audits.</p> <p>Auditor reviews TU reports on the use of E-logbooks and e-CDT.</p> <p>An additional 4 tuna can/pouch codes (beyond those already selected during the PC audits) will be selected at random (globally and off the shelf at retailers) to carry out traceability exercises.</p>	IP	<p>During the 2018 audit year (Q4 2017 thru Q3 2018), TU Europe and TU Manufacturing successfully completed the traceability exercise carried out as part of TU's participation in ISSF. All the information was provided electronically by TU. During this audit exercise, an additional 4 product codes were randomly selected from TU Europe and TU manufacturing's RFMO reports. The traceability exercise for each concluded that TU is capable of tracing fish through every step of the supply chain, from the catcher vessel to retail sale.</p> <p>TU indicated it does not issue reports on the use of e-logbooks by its suppliers. Rather, TU indicated it supports e-logbook and e-CDT efforts across various geographies and provided a list of tuna FIPs it sources from and where it supports efforts for the uptake of e-CDT. Auditor reviewed FIP action plans and found that except for 2 pole-and-line FIPs, all others cover the need for EMS and improved</p>	Auditor notes that while the fleets might be able to collect data electronically, the National Authority might not have the capacity to receive the data.

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						<p>data reporting through e-logbooks and e-CDT.</p> <p>TU provided a list of fleets that use e-reporting and described how the information is first sent to each fleets' National Authority, before being forwarded onto the RFMO (within 4 months of the end of a fishing trip). TU explained that in some geographies (mainly West Africa), the smaller gear types (i.e. pole-and-line) still use paper logbooks, which is what ICCAT requires. In those instances, TU indicated it is in discussions with suppliers regarding whether e-reporting could be feasible (i.e. cost effective to install, maintain, manage).</p>	
2.8	IMO Numbers	Thai Union will require that all vessels it sources from capable of receiving an IMO number obtain one, and all other vessels will be required to have a UVI or equivalent registration number.	All	Auditor reviews vessel list from quarterly RFMO reports and ensures that all have an IMO or UVI number.	OK	<p>Auditor reviewed all RFMO reports for 2018 and found that all vessels capable of receiving an IMO or UVI, had a correct number listed.</p> <p>TU noted, and auditor confirmed during the review, that some smaller vessels only operate within their national EEZs and do not qualify for an IMO number. In those cases, TU requires purse seine vessels over 30GT to provide a UVI (per ISSF CM 4.2),</p>	Auditor notes that verification of national registration numbers can be difficult at times. National authorities do not always keep publicly available national registries, and when they do, those can oftentimes be outdated. Therefore, the only way to verify that a registration

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						and for smaller PS vessels and other gear types, TU asks supplier for proof that vessel is properly registered (such as through providing a valid fishing license) with the national authority. Auditor randomly sampled 25% of those vessels for Q2 of 2018 across the 4 RFMOs, and all had a valid UVI or national registration number.	number is official is to obtain a copy of the fishing license, national registration, which is what was done during this exercise for smaller vessels that did not have UVI numbers.
2.9	Observer recruitment	Thai Union will preferentially source from vessels employing regional observers, and where regional observers are not available, will employ national or independent third- party observers.	All	<p>Auditor reviews TU procedure (if available), observer contracts (financials should be redacted), and list of observers active across the vessels TU sourced from.</p> <p>Auditor reviews TU annual public ISSF audit results.</p> <p>Auditor reviews www.fisheryprogress.org for FIP updates/reports.</p>	IP	<p>TU provided its “Supplier Asks” document, advocacy letters (to RFMOs) and reports from workshops it funded as well as FIP workshop reports, which demonstrate a sustained ask for regional observers (when possible).</p> <p>Auditor reviewed quarterly RFMO reports and notes that all PS vessels TU sources from are in good standing on the PVR for the observer requirement.</p> <p>Using www.fisheryprogress.org, auditor reviewed all tuna FIPs TU is involved in, and found that with the exception of pole-and-line FIPs in the Eastern Atlantic, each had an action plan specifically calling for the use of regional/national/3rd party observers and most pushing for</p>	<p>Because the auditor could not review a list of observers active across the vessels TU sourced from, it is unclear if ‘preferential sourcing’ occurred from vessels that use regional observers and/or if the latter are not available, from vessels that employ national or independent third-party observers. Evidence shared by TU show that is their intent, but we will need to review a list of observers during the next audit effort to determine if this is in fact happening on the water.</p>

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						<p>the increased use of EMS (viewed as more reliable and cost efficient). Re the 2 pole-and-line FIPs, the lack of observer language is perhaps due to the fact that Ghana requires observers for all trips.</p> <p>TU did not provide a list of observers active on the vessels it sources from as that information is kept between the suppliers and the National or RFMO authorities.</p>	
2.10	Transport Vessels / Reefers audits	Thai Union will implement an audit scheme for carriers transshipping at- sea, starting in 2018 (Note: this requirement will not apply to vessels that transship in port).	All	Auditor reviews transshipment declarations provided by TU suppliers.	NS	<p>Auditor reviewed copies of all TDs from vessels having declared at sea transshipments during a randomly selected month in CY18 (see measure 2.1). Each document contained all the required information and signatures, allowing for identification of the catcher and carrier vessels, time frame, fish volumes, and individuals involved.</p> <p>TU sent copy of MOU with consultancy to run a pilot project in an RFMO during Q1 of 2020 to have an auditor onboard a supplying vessel, thus allowing (i) more than 1 longline vessel to be observed during 1 trip, and (ii) the observer not</p>	Provide pilot project report once it becomes available.

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						having to stay on board a longline vessel for months at a time. This is viewed as a potential cost-effective and more practical way to increase human observer interactions with LL vessels. Human observer reports remain necessary for biological sampling purposes and to serve as verification of the effectiveness of EMS generated reports.	
3.1(a)	FAD reduction plan - By 31/12/2020 we will:	Reduce the numbers of FADs we use by committing to not source from vessels that utilize more than 300 active FADs as a maximum. TU will be clear with all of its supplying fleets currently using less than 300 FADs that they do not want to see any growth in the numbers of FADs used.	Purse Seine	<p>Auditor reviews TU communications / policy to suppliers indicating no more than 300 FADs (active w/ buoys) per vessel can be utilized within a 12-month period.</p> <p>If vessel operates within a fleet, auditor determines whether the total number of FADs declared by the fleet equals to no more than 300 FADs on a per vessel basis.</p>	IP	<p>Auditor reviewed TU's 'supplier asks' document, which states that it encourages its suppliers to respect the 300 FADs per vessel per 12-month period limits.</p> <p>TU provided supplier statements regarding total number of FADs per vessel, with some fleets indicating that no more than 300 FADs/vessel were used in 2018, while others indicated that no more than 350 FADs/vessel were used in 2018. TU indicated those suppliers understood that this number needed to be brought down to 300 by 2020. Several of TU's main suppliers provided statements re the fact that they respect RFMO and National regulations on the</p>	<p>Auditor notes that unless all active FADs are being tracked and reported back to the RFMOs (which is what the Orthongel initiative is doing), it is impossible to know if FAD limits are being respected. During the next audit, it will be interesting to review the updated Orthongel report and to see if similar reports become available from groups such as OPAGAC as well as entities operating in the Western and Eastern Pacific regions.</p>

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						<p>permitted number of active FADs per vessel.</p> <p>TU noted that through its participation in the ISSF Implementation meetings, as well as ISSA and ISSF Board meetings, it has supported discussions on limiting the total number of FADs per vessel per calendar year, along with other efforts to only deploy non-entangling FADs made out of biodegradable materials. TU provided evidence (emails, formal signed statements) that it participated in, and supported the FAD management agenda during, RFMO annual meetings as part of delegations from Thailand, Seychelles, Ghana and the USA. More specifically, TU provided some evidence (emails and copy of proposal draft) to show it supported a Seychelles proposal to reduce the FAD numbers over the years, from no limit to 550 then 325, and finally 300 (in 2019).</p> <p>TU provided various emails demonstrating advocacy and facilitating efforts with the EU, Thailand and supplying countries (Ghana, Seychelles) to advance FAD management issues, reduce</p>	

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						the number of supplying vessels, and improve data sharing. Finally, TU sent workshop reports from engagements with FAO-ABNJ on FADs, EMS, and FAD management plans and supported most projects.	
3.1(b)		Based on TU's aggregated current use, this represents an estimated reduction of active FADs for TU suppliers in the Indian Ocean of 30%, in the W&CP of 57% and in the Atlantic of 40% and overall of 50% based on 2016/17 levels. (Based on TU data shared with GP in June 2017).	Purse Seine	Auditor looks at FAD sets data (supplied by TU) for all of TU's suppliers, and randomly selects suppliers to verify that no more than 300 FADs per vessel have been utilized.	IP	With TU's support, auditor contacted 3 fleets and a trader operating in ICCAT, IOTC, WCPFC and IATTC for FAD sets data and evidence of the # of FADs per vessel and fleet. Two of the fleets indicated they participated in an effort led by Orthongel, provided reports and a detailed list indicating how many active FADs had been attached to each vessel in 2018. All of the vessels were below the 300 active FAD limit. The third fleet indicated they respected the FAD limits in effect in the RFMOs were they operated and were aware of TU's 300 FAD limit by 2020. However, they did not provide the number of FADs used by each of their vessels. The trader indicated they had informed all their suppliers about TU's 2020 requirement and monitored RFMO compliance committee reports for any supplier that did not respect FAD limits. However,	Auditor notes that RFMOs have indicated FAD numbers will evolve as follows: ICCAT: 2019 = 500 active FAD limit per vessel, 1 st January 2020 limit will be = 350 active FADs per vessel, and 1 st January 2021 limit will be = 300 active FADs per vessel. WCPFC: In 2018 = 350 FAD limit per vessel (effective in 2019), but no further reductions being envisaged. IOTC: In 2019 = 325 FAD limit per vessel, but no further reductions being envisaged. IATTC: Has a rule

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						they admitted they did not know how many FADs each vessel used in 2018, and noted it was unlikely they could get that information from their suppliers.	limiting FADs per vessel at 425, 300, 200 depending on vessel class. No discussion on further reductions.
3.1(c)		TU will review the scientific data on stock status and available technologies to inform future direction of FAD management, seeking further reductions in FAD numbers where that is supported by scientific evidence.	Purse Seine	<p>During year 1 (CY18), if procedure exists, auditor reviews it for consistency with commitment.</p> <p>During subsequent years, auditor reviews internal memos and other TU documentation to assess whether any progress has been made based on what has been laid out in the initial procedure.</p>	OK	TU indicated it has not developed a specific procedure and instead supports the findings of ISSF's Scientific Advisory Committee (SAC) led by Dr. Victor Restrepo. In 2018, based on SAC findings, various advocacy letters were sent by TU to RFMOs and governments. In 2019, the RFMO Best Practices on FAD Management snapshot , and Recommended Best Practices in FAD Management were released and shared by TU with its suppliers, and will be used for future advocacy efforts.	
3.2	Agreement to only deploy non-entangling FADs from large seiners	<p>By 30/06/2017 all large-scale purse seiner vessels must have a policy to deploy non-entangling FADs, with the aim to only deploy non-entangling FADS by 31/03/2018.</p> <p>1. By 18/04/2017 all large-scale purse seiner vessels must have a</p>	Purse Seine	<p>Auditor reviews supplier policies on the deployment and build design of NE FADs.</p> <p>Auditor reviews FIP reports re FAD design and deployments + whether any observer reports mention FADs and the design(s) being used.</p>	OK	<p>TU only sources from large-scale purse seiners (LSPS) that are listed on the PVR and have a green check for CM 3.5. TU checks PVR monthly to verify vessels remain in good standing.</p> <p>TU provided FAD build schematics for randomly selected vessels/fleets. While those vary in the level of detail, all show the basic requirements</p>	

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		<p>policy to deploy non-entangling FADs.</p> <p>2. By April 2018, purchase from large purse seiners will deploy only non-entangling FADs.</p>				<p>of using non-entangling materials. Some provide instructions for using biodegradable materials in lieu of nylon and Styrofoam.</p> <p>Auditor also reviewed the FIPs where LSPS vessels are involved. The FIP pages, on www.fisheryprogress.org, each show a FAD Management plan and guidelines for how to build non-entangling FADs.</p>	
3.3	Exclusive use of non-entangling and biodegradable FADs	<p>By 31/12/2020 all vessels we purchase from will deploy only non-entangling FADs. TU commits to move the fleets from which they source towards fully biodegradable FADs, and to be an early adopter of scientifically proven fully biodegradable FAD materials / technologies (excepting the buoy).</p> <p>1. Target: By 31/12/2020 all vessels Thai Union purchases from will deploy only non-entangling FADs.</p> <p>2. For large scale purse</p>	All	<p>Auditor reviews TU procurement policy.</p> <p>Auditor asks randomly selected suppliers (contacts facilitated by TU) for FAD build schematics, including a description of materials being used.</p>	OK	<p>All purse seine and support vessels (supply & tender) that TU sources from are listed on the PVR and in good standing for CM 3.5, which calls for vessel companies to have a policy on non-entangling FADs that, at a minimum, respect the best practices build guidelines.</p> <p>FAD build schematics and policies were obtained from a different randomly selected supplier in the Atlantic, Indian and Pacific oceans, and while these varied in the level of detail, all call for non-entangling designs and some call for use of biodegradable materials.</p>	<p>Auditor notes that until EMS technology improves, it remains very difficult to know if all deployed FADs are non-entangling and/or made of biodegradable materials. Therefore, auditor looked at RFMO compliance committee reports during 2018 to see if any vessels TU had sourced from was listed for FAD violations, but none were found, and auditor further notes that RFMOs report very little on this topic.</p>

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		seiners it will be April 2018.					
3.4	Increase of FAD free offering	<p>TU agree to double their current offering of verified FAD-free products in 5 key European markets (figures below) and double their global offering of verified FAD free products (figures below) by 2020.</p> <p>European market increases from 2017 - 2020: France 21% to 40%; UK 8% to 16%; Italy 10% to 20%; NL 4% to 8%; Denmark 4% to 8%; global increase 11% to 22% (with a nonpublic target of 25% globally by 2020).</p> <p>Note: On the French target and global 25% target we agree to track progress together to ensure the best chance of meeting this target and discuss any changes in TU's ability to meet these targets.</p>	Purse Seine	<p>Auditor reviews data volunteered by TU and determines % of FAD free product (tonnage), then compares this to baseline volume (CY17) to determine % increase.</p> <p>During traceability exercise, auditor verifies if 'FAD-free' product can be traced back to FAD closure period in WCPO.</p>	IP	<p>TU provided figures showing where its global FAD-free offering stood in 2018. TU added that the IOTC resolution for reducing the catch of yellowfin tuna resulted in the fleets not targeting free schools, which are typically composed of larger yellowfin in this region, reducing the overall availability of FAD-free tuna.</p> <p>Percentages of FAD-free offering for the EU countries for 2018 were also reported.</p> <p>No FAD-free product was randomly selected as part of the traceability exercise.</p>	<p>Some of the FAD-free offering figures have progressed toward the 2020 goal, and in some cases exceeded the goals set in 2017.</p> <p>However, percentages have decreased (from the 2017 established baseline) for other geographies. Considering the IOTC resolution remains in effect and the fleets continue to avoid free schools, TU will need to find new sources of FAD-free tuna in order to meet the 2020 targets.</p> <p>TU needs to share its strategy on how it intends to meet its 2020 targets considering the 2018 results and the continued IO resolution on yellowfin tuna.</p> <p>Lastly, per comments</p>

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							in measure 3.6, auditor notes that current FAD-free certification efforts are not full proof and that it is likely to remain this way until EMS technology can provide for this service.
3.5	Addressing Supply Vessels	TU supports the IOTC's initiative to address the subject of supply vessels as it relates to overcapacity and overfishing. We encourage other RFMOs to develop a scientific basis for decisions on the impact of supply vessels on fish stocks, and appropriate regulation. TU commits to asking all of their supplying fleets to immediately begin providing accurate data to the relevant RFMO on their current use of supply vessels and call on RFMOs to expedite analysis on the impact of supply vessels on capacity in the IO and Pacific.	Supply Vessels	Auditor verifies advocacy effort materials supplied by TU and/or which can be found in the specialized press.	OK	Auditor reviewed emails, advocacy letters and the 'supplier asks' document, which show sustained efforts in 2018 to limit/reduce the number of supply vessels in the Indian Ocean, and the request for data on the use of supply vessels to be shared with RFMOs no later than 4 months after a vessel has returned to port.	

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3.6	FAD free verification pilot	<p>TU will initiate a trial on FAD Free verification in the Indian Ocean, with the aim of verifying the supply of FAD- free fish into the European markets. This trial will consist of two parts:</p> <p>That which has 3rd Party certification: this means catches are segregated in specific hatches which is reported by the Observer on board in their report. It is shown in the hatch plan of the vessel and noted in the logbook.</p> <p>That which does not have 3rd Party certification yet: we ask for copy of the hatch plan where FF tuna is placed. We will also ask for a copy of the logbook where we could see it is recorded as FF.</p>	Purse Seine	<p>Auditor reviews FAD-free pilot report/results for consistency with the commitment's desired outputs.</p> <p>If TU is able to obtain them, auditor also reviews copies of the certificate and the Captain's Statement re in which hold(s) the FAD-free fish was stored.</p>	OK	<p>TU supported trials across several fleets in the Indian Ocean region in 2018-2019.</p> <p>Auditor reviewed emails and FAD-free certificates provided for fleets in the Indian Ocean. Certificates were issued by Bureau Veritas and SCS/Friends of the Sea and provided information and schematics regarding how the FAD-free catch is being kept separate from other catch. Logbooks/captain statements for the vessels named in the reports were also provided, which allowed auditor to cross-reference documents.</p> <p>Auditor notes that neither Bureau Veritas, nor SCS, have staff on the vessels during fishing trips, and therefore rely on the observer report and Captain Statement to issue their certificates. This approach has some weaknesses, which will likely remain until effective EMS is in place.</p>	
3.7	FAD management plans in FIPs	For each tuna FIP in which TU are active, and where FADs are utilized, a FAD management plan will be developed which	Purse Seine	Auditor reviews FIPs on www.fisheryprogress.org and determines whether the FAD management plan is present.	OK	TU provided a list of all the tuna FIPs it financially supported and/or sourced from. Review of the FIPs on www.fisheryprogress.org found	

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		will include better regulation by coastal states and RFMOs, and mapping of the number of FADs deployed to measure reduction progress.				that all purse seine FIPs had a FAD Management Plan published, which covered improved regulations in coastal states and RFMOs, and efforts to map/quantify the number of FADs being utilized.	
3.8	Transparency of FAD use data	TU recognizes the value of reliable and accessible data on FAD use in improving understanding and managing the impacts of FADs. As such, TU will ask and expect all of the fleets / purse seiners it sources from to share their data on FADs with RFMO Scientific Committees within 4 months of the end of the fishing trip. TU will ask and expect all of the fleets they source from to share data in this way and be clear with them that they see this becoming a required standard for TU. TU will urge all of the RFMOs to step up their ability to be able to receive and utilize such data in the management of FADs.	Purse Seine	Auditor reviews TU communications with suppliers and RFMOs regarding the utilization of FAD data.	OK	<p>Auditor reviewed emails and TU's 'supplier ask' document, which indicated that FAD data should be shared no later than 4 months after the end of the fishing trip.</p> <p>Auditor also reviewed various emails and advocacy letters co-signed by TU, asking RFMOs and National Authorities to improve FAD management and their ability to review, and act upon, FAD data.</p>	

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3.9	Information for Consumers	Thai Union will provide more details on FAD free tuna on the can tracker websites to improve the understanding of consumers of the products they are buying.	Purse Seine	Auditor reviews can tracker site(s) for presence of information on 'FAD-free' tuna.	NS	Auditor reviewed can tracker sites in the US, UK, Netherlands and France. None contained FAD free information.	While auditor understands that FAD free information can be provided to consumers upon request, and that FAD free language can be found on TU's website, neither meets the intent of this measure.
3.10	RFMO Regulations on FADs	TU agree to maintain their own targets while they remain stronger, but publicly support any RFMO action plans that attempt to further reduce the use of FADs.	Purse Seine	Auditor reviews public communications from TU re its support for RFMO FAD management plans.	OK	TU provided 2018 direct letters to ICCAT, IOTC, WCPFC and IATTC expressing support for strengthened FAD management and FAD reduction efforts. TU also provided copies of ISSF and WWF letters it had co-signed, that also expressed support for strong FAD management.	

END OF REPORT