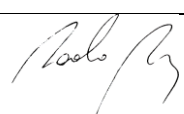
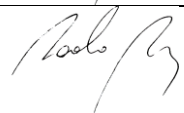
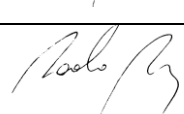
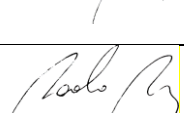


# Friend of the Sea Standard

## FOS - Wild Sustainable Fishing Requirements

**Friend of the Sea**  
[www.friendofthesea.org](http://www.friendofthesea.org)

REV	DATE	REASON	VALIDATION	APPROVAL
1	18/01/2013	First issue	Paolo Bray	
2	01/07/2015	Update	Paolo Bray	
3	30/09/2016	Standards update	Paolo Bray	
3.1	18/10/2017	Definitions and guidance to standards	Paolo Bray	

## Foreword

Friend of the Sea is a non-governmental organisation, which was established in 2008. Its aim is to safeguard the marine environment and its resources by incentivising a sustainable market and implementing specific conservation projects.

Friend of the Sea certification program allows assessment of fisheries and aquaculture products according to sustainability criteria and requirements. The certification, granted following an audit by independent certification bodies, ensures that a product complies with the sustainability requirements.

Requirements are classified as Essential, Important or Recommendations, according to their level of importance.

Essential Requirements: 100% conformity to essential requirements is mandatory in order for the certification body to certify the organisation's product. Any lack of compliance with these requirements will generate a Major Non Conformity and the organisation has to undertake effective corrective actions, to be implemented within three months from the issuing of the Non Conformity. The organisation shall provide satisfactory evidence to the certification body of correction of all major non conformities. Six months are allowed exclusively for correction of requirements 2.1 and 2.2, in consideration of their more complex nature.

Important Requirements: 100% conformity to important requirements is mandatory in order for the certification body to certify the organisation's product. Any lack of compliance with these requirements is to be considered as a Minor Non Conformity and the organisation has to propose effective corrective actions (declaration of intents and implementation plan), to be submitted to the certification body within three weeks from the issuing of the non conformity. This proposal shall also include a timetable concerning the implementation of each correction measure. Each proposed corrective action shall be fully implemented within the following 12 months.

Recommendations: Compliance with recommendations is not mandatory for the product to be certified. However compliance with recommendations will be verified during the audit and any deficiency will be included in the Audit Report as a recommendation. The organisation shall inform the certification body, during the following audit, regarding any corrective measures implemented.

Requirements which are not applicable to the audited organisation will be marked with 'N.A.'

## Description of the Organisation

This document shall only be filled out by personnel of the certification body in charge of the audit. It shall be filled out in English if spoken fluently.

**a) NAME OF THE ORGANISATION TO BE AUDITED:**

CFG INVESTMENTS LTD

**b) NAME OF THE ORGANISATION REQUESTING THE AUDIT:**

CFG INVESTMENTS LTD

**c) IS THE ORGANISATION TO BE AUDITED PART OF A GROUP? IF SO, PLEASE SPECIFY THE NAME OF THE GROUP AND LIST ALL MEMBERS:**

**d) ADDRESS OF THE ORGANISATION TO BE AUDITED:**

Calle Francisco Graña, 155, La Vitoria, Lima-PE

**d) NAME AND CONTACTS OF THE PERSON WITHIN THE ORGANISATION RESPONSIBLE FOR THE AUDIT AND CONTACTS WITH THE AUDITOR:**

Luis Ostaloza – Plant Superintendent: [lostolaza@copeinca.com.pe](mailto:lostolaza@copeinca.com.pe)

**f) FLEET TO BE AUDITED:**

<i>Name of the fishing vessel</i>	<i>Registration number</i>	<i>Vessel's flag</i>	<i>Fishing method</i>	<i>Capacity (MT)</i>	<i>Unloading harbour</i>	<i>Ship owner, if different from a)</i>
ALEJANDRIA I	CE-21260-PM	PERU	Purse Seine	385,37	Peruvian harbours (*)	
ALEJANDRIA II	PS-0612-PM	PERU	Purse Seine	388,88	Peruvian harbours (*)	
ALEJANDRIA III	CE-28645-PM	PERU	Purse Seine	461,70	Peruvian harbours (*)	
ALEJANDRIA VI	CE-10501-PM	PERU	Purse Seine	418,96	Peruvian harbours (*)	
ANDES 52	CE-29039-PM	PERU	Purse Seine	580,49	Peruvian harbours (*)	
BRYAN	CE-2796-CM	PERU	Purse Seine	243,43	Peruvian harbours (*)	
C&Z 8	CE-12518-PM	PERU	Purse Seine	392,48	Peruvian harbours (*)	
COMANCHE II	CE-4052-PM	PERU	Purse Seine	322,93	Peruvian harbours (*)	
COMANCHE III	CE-6613-PM	PERU	Purse Seine	395,35	Peruvian harbours (*)	
COMANCHE V	CE-2886-PM	PERU	Purse Seine	282,15	Peruvian harbours (*)	
DON MOISES	CO-3273-PM	PERU	Purse Seine	359,10	Peruvian harbours (*)	
ELISA	CO-21909-PM	PERU	Purse Seine	338,58	Peruvian harbours (*)	
JUANITA	CE-10552-PM	PERU	Purse Seine	255,95	Peruvian harbours (*)	
MARU	SE-9970-PM	PERU	Purse Seine	554,21	Peruvian harbours (*)	
SIMY 1	CO-20440-PM	PERU	Purse Seine	367,53	Peruvian harbours (*)	
SIMY 2	CO-20667-PM	PERU	Purse Seine	331,85	Peruvian harbours (*)	
SIMY 3	CO-05580-PM	PERU	Purse Seine	369,36	Peruvian harbours (*)	
SIMY 4	CE-0229-PM	PERU	Purse Seine	382,29	Peruvian harbours (*)	
SIMY 7	CE-2485-PM	PERU	Purse Seine	359,10	Peruvian harbours (*)	
TAMBO I	CE-0065-PM	PERU	Purse Seine	275,71	Peruvian harbours (*)	

(\*) Bayovar, Chicama, Chimbote, Chancay, Pisco, Tambo de Mora, Planchada

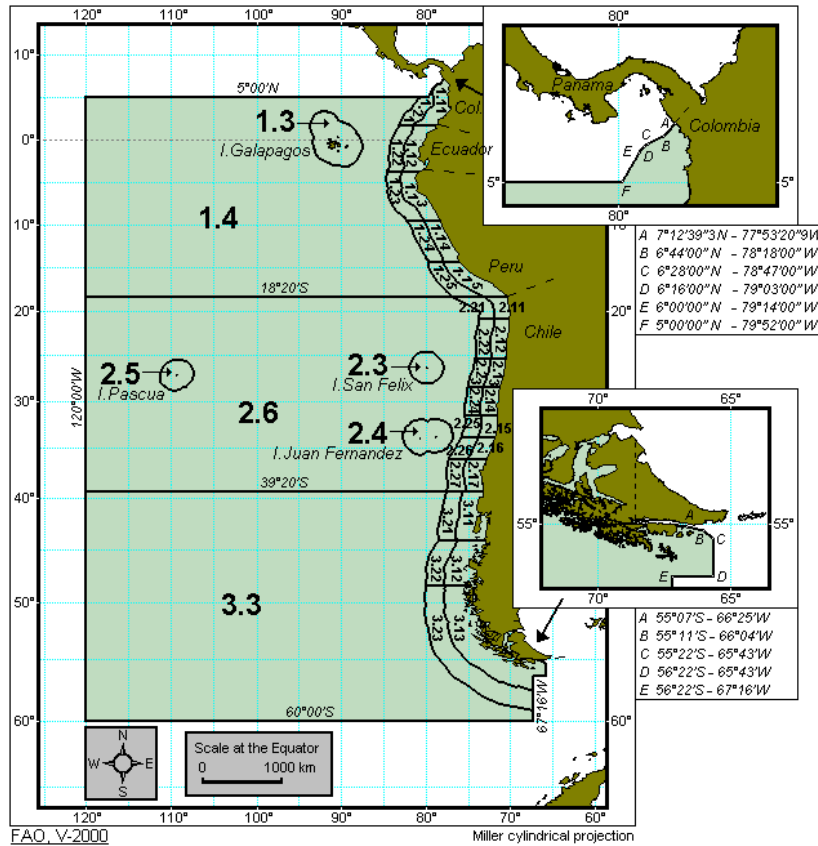
**g) VESSELS AUDITED ON SITE** (the auditor shall list the vessels which have actually been audited on site as sample representing the fleet):

<b>Name of the fishing vessel</b>	<b>Registration number</b>	<b>Unloading harbour</b>
<i>Andes 52</i>	<i>CE-29039-PM</i>	<i>Bayovar, Chicama, Chimbote, Chancay, Pisco, Tambo de Mora, Planchada</i>
<i>Maru</i>	<i>SE-9970-PM</i>	<i>Bayovar, Chicama, Chimbote, Chancay, Pisco, Tambo de Mora, Planchada</i>

**Note from the auditor:** Only 2 fishing vessels were available for inspection during the time of the onsite audit. However, these vessels had their documents thoroughly inspected and verified, including documents of the crewmen.

**h) FISHING ZONE** (Coordinates and/or FAO area and/or subarea and/or ICES area and/or EEZ. If available, please include a map.):

FAO 87



**i) COMMON AND SCIENTIFIC NAME OF THE SPECIES TO BE AUDITED:**

Common Name	Scientific Name
Peruvian Anchoveta	<i>Engraulis ringens</i>

**j) TOTAL NUMBER OF EMPLOYEES**

1520 employees in all CFG;

At the audit plants: PISCO = 141 employees and Tambo de Mora = 157 employees

**k) ENVIRONMENTAL CERTIFICATIONS AND AWARDS**

GMP, IFFO, BASC, FOS

**I) STAKEHOLDERS ENGAGEMENT:**

*Before or during the audit, the CB shall inform all the relevant stakeholders about the audit of the applicant organisation and recommend their input. Please provide the list of all contacted stakeholders below:*


**m) ADDITIONAL INFORMATION:****Pisco plant:**

- Operation Capacity: 110 MT/H
- Area of plant: 19, 039.19 m<sup>2</sup>
- Area of storage product finished: 69, 498.69 m<sup>2</sup>
- Employees: 141
- Discharge Pumps: 2 Discharge units. Vacuum System
- Fishmeal Storage Capacity: 20,000 MT
- Fish oil Storage Capacity : 3,410 MT

**Tambo de Mora Plant**

- Operation Capacity : 177 MT/H
- Area of plant : 25,553 m<sup>2</sup>
- Employees : 157
- Discharge Pumps : 02 lines
- Port of loading : Callao
- Fishmeal Storage Capacity : 9000 MT
- Fish oil Storage Capacity : 2000 MT

- The Friend of the Sea project was introduced** (*If not, the auditor shall provide a short description*)
- The organisation and the ship owners were informed of the opportunity, in case of approval, of using the Friend of the Sea logo on the certified products**
- The organisation has a document qualifying and confirming the roles of the staff carrying out the audit**
- The duration of the audit was agreed upon**
- The information included in the Preliminary Information Form (PIF) has been confirmed** (in case of changes to the PIF, an updated version has to be promptly provided)

<b>CERTIFICATION BODY:</b>  Rina Services Brazil	<b>AUDIT TEAM:</b>  Osires de Melo – Team Leader	<b>AUDIT START AND END DATE:</b> Phase 1 = May2, 2019 Phase 2 = June 26, 27 and 28, 2019
<b>SIGNATURE OF AUDITOR:</b>  	<b>NAME OF THE PERSON IN CHARGE OF THE ORGANISATION AND ACCOMPANYING THE AUDITOR DURING THE AUDIT:</b>  <b>Sofia Pareja Descalzi</b> - Head of Quality Management	<b>AUDIT CODE:</b>



## NOTES TO THE AUDITOR

- 1) The auditor shall fill out all fields in the checklist.
- 2) Checklist compilation guidelines are highlighted in the blue boxes.
- 3) The Auditor shall provide an explanation when requirements are not applicable.
- 4) The Auditor shall write YES when the organisation complies with a requirement and NO when it does not.
- 5) The Auditor shall comment and explain the positive or negative answers. Simple "YES," "NO," or "N.A." are insufficient.
- 6) Each relevant document shall be added to the final audit report in a separate and numbered attachment.
- 7) Photographic evidences added to the checklist or attached are appreciated.
  
- 8) In the present document '*organisation*' is used to refer to the unit of certification.

### **1 STOCK STATUS**

No.	Requirement	Level	Parameters and information	Y/N	Comments
1.1	The state of the stock under consideration shall be assessed by the fisheries management organisation.	Essential	The fishery shall demonstrate to collect data in accordance with applicable international standards (e.g. Coordinating Working Party on Fishery Statistics, the FAO Guidelines for the routine collection of capture fishery data, FAO Fisheries Technical Paper No. 382; Deep Sea Fishery (DSF) in the High Seas, FAO Programme).	Y	<p>The fishing of anchoveta in Peru is managed and controlled by the Peruvian Government, who establishes quotas and fishing seasons.</p> <p>The IMARPE – Instituto del Mar del Peru is the agency who publishes researches and fishing data about the main economic species of the region.</p> <p>The Peruvian government following IMARPE recommendations determines the fishing seasons and quotas.</p> <p>The government authorizes the fishing seasons for anchoveta by issuing a decree from the Ministry of Production (PRODUCE). There are two fishing seasons. The first is from mid-April to July, and the second is from November to December/January.</p>

**The fisheries management organisation is an institution responsible for fisheries management, including the formulation of rules governing fishing activities. The fishery management organisation may also be responsible for collection of information, its analysis stock assessment, monitoring, control and surveillance.**

**FAO 1997: FAO Technical Guidelines for Responsible Fisheries.**

1.1.1	The stock under consideration shall NOT be data deficient	Essential		Y	<p>IMARPE produces a large amount of data on the two species on the scope of this audit.</p> <p>There is a digital depository at Imarpe's website, free or consultation (<a href="http://www.imarpe.gob.pe/imarpe/">http://www.imarpe.gob.pe/imarpe/</a>).</p> <p>Inspected the following documents:</p> <ul style="list-style-type: none"> <li>• Anexo ds010-2009_Metodología de cálculo;</li> <li>• DS008-2016-PRODUCE Fortalecimiento ROP anchoveta;</li> <li>• DS012-2001-Reglamento de la ley de Pesca;</li> <li>• DS 024-2016 PRODUCE_Control y vigilancia anchoveta;</li> <li>• DS026 -2003 PRODUCE;</li> <li>• DS 026-2016 medidas PRODUCE contra pesca ilegal;</li> <li>• DS009-2009-Metodología de cálculo de PMCE y LMCE zona sur;</li> <li>• Ley de cuotas 1084_2009; Ley general de pesca 25977;</li> <li>• Ordenamiento Pesquero anchoveta 010-2010_Artesanal;</li> <li>• Resolución Tallas mínimas de Captura_209_2001_PRODUCE;</li> <li>• RM N° 225_2001_PE dimensiones de las redes de cerco en función a su capacidad;</li> <li>• RM 376-2016-produce_Plan de conservación anchoveta_medios digitales_Oct 2016;</li> <li>• RESOLUCIÓN MINISTERIAL N° 162-2019-PRODUCE;</li> <li>• "Situación del Stock Norte-Centro de la Anchoveta Peruana al 1 de Abril de 2019 y perspectivas de explotación de la primera temporada de pesca de 2019".</li> </ul>
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1.1.2	The stock under consideration shall NOT be over-exploited.	Essential	<p><math>F \leq F_{msy}</math> within probability range of available stock assessments or at least <math>F \leq F_{lim}</math> (limit reference point – or its proxy)</p> <p>If overfishing of a stock under consideration of a certified fishery occurs, the certification of this fishery is suspended or revoked.</p>	Y	<p>The IMARPE possesses research boats that do investigation cruises to do a stock assessment prior the determination of the start and duration of the fishing season and the quotas.</p> <p>Stock assessment models are not used and fishing mortality or exploitation rates are not publicly available in the last years.</p> <p>Stock status is assessed based on real-time monitoring; which consists on direct biomass estimates and distribution from acoustic surveys prior each fishing season, and monitoring of oceanographic conditions, samplings for size structure and reproductive and somatic conditions, before and during fishing seasons, to account for the rapid fluctuations in the natural biomass of this resource.</p> <p>Inspected the RESOLUCIÓN MINISTERIAL N° 162-2019-PRODUCE, that using the data collected by Imarpe which determined that the anchoveta biomass for the North-Center Region to be 7 million tons, established a quota for the Season 1, 2018 of North-center region (from April 28 th), = 2.1 million tons.</p>
1.1.3	The stock under consideration shall NOT be over-Fished.	Essential	<p><math>B \geq B_{msy}</math> within probability range of available stock assessments or at least <math>B &gt; B_{lim}</math> (limit reference point – or its proxy).</p> <p>If the stock under consideration of a certified fishery becomes overfished, the certification of this fishery is suspended or revoked.</p>	Y	<p>Stock assessment models are not used and fishing mortality or exploitation rates are not publicly available in the last years. stock status is assessed based on real-time monitoring; which consists on direct biomass estimates and distribution from acoustic surveys prior each fishing season, and monitoring of oceanographic conditions, samplings for size structure and reproductive and somatic conditions, before and during fishing seasons, to account for the rapid fluctuations in the natural biomass of this resource.</p> <p>The warm ocean current called El Niño has great influence on the reproductive habits of the anchoveta and caballa as well as on the fish availability for fishing at proper depths.</p> <p>The last IMARPE assessments showed that even with the occurrence of an El Niño, the reproductive fraction of the stock of anchoveta was of 20.5%, a superior value above the average before each first season. The Biomass estimation for the first season of 2017 was 10.86 million tons. A value 35% higher than the previous year for anchoveta.</p> <p>Inspected the documents: "Situación del Stock Norte-Centro de la Anchoveta Peruana al 1 de Abril de 2019 y perspectivas de explotación de la primera temporada de pesca de 2019".</p>

All the requirements related to the current status and trend of the stock under assessment shall include data of bycatch, discards, unobserved mortality, incidental mortality, unreported catch, and catch outside of the unit of certification.

Up-to-date data and/or information on the stock status is available from one of the following: FAO, Regional Fisheries Management Organisation, Marine Research National Authority, University, other independent research institute.

Other information may include generic evidence based on similar stocks, when specific information on the stock under consideration is not available, providing there is low risk to the stock under consideration in accordance with the Precautionary Approach.

1.1.4	The methodology of assessment of the status and trends of the stock under consideration shall be made publicly available in a timely manner.	Essential	Documental evidence	Y	All research from IMARPE and the results of the investigation cruises are public and available at <a href="http://www.imarpe.gob.pe">www.imarpe.gob.pe</a>  Inspected the documents: "Situación del Stock Norte-Centro de la Anchoqueta Peruana al 1 de Abril de 2019 y perspectivas de explotación de la primera temporada de pesca de 2019".  Resolución Ministerial Nro162-2019-PRODUCE. Autorizing the start of the first fishing season of 2019.
1.2	<u>Only applicable to small-scale and artisanal fisheries (i.e. it is not applicable to large-scale fisheries and fleets)</u>  If the organisation complies with all the requirements of the standard in the present document and does not catch more than 10% of the total catch (weight) of the stock under consideration, requirements 1.1.2., 1.1.3. do not apply.	Essential	Weight of catches by fishery with same fishing method as the one under assessment is not over 10% of total catch from the same stock.	NA	THIS IS NOT A SMALL-SCALE OPERATION.

**The auditor shall fill-in requirement 1.2 ONLY in case of negative answer to the requirement 1.1.**

**The aim of this requirement is to allow certification of small-scale artisanal and/or traditional fisheries targeting stocks which might have been overfished by bigger scale vessels and fisheries.**

**Small-scale fisheries are here intended as those using fishing crafts with size < 24 m and/or engine <375 kW.**

**Large-scale fisheries are intended as those using fishing crafts with size ≥ 24 m, engine ≥375 kW, vessels with freezing facilities and/or factory vessels (i.e. ocean-going vessels with on-board facilities for processing and freezing).**

## **2 ECOSYSTEM and HABITAT IMPACT**

No.	Requirement	Level	Parameters and Information	Y/N	Comments
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2.1	Current data and/or other information are collected and updated about the effects of the fishery under assessment on the ecosystem structure and habitats vulnerable to damage by fishing gear, also considering the role of the stock in the food web (e.g. key prey or predator species).	Important	<p>Data collection shall be in accordance with international standards (e.g. CWP and DSF in the High Seas, FAO Programme).</p> <p>The data and analysis may include local, traditional or indigenous knowledge and research, providing its validity can be objectively verified.</p> <p>The methodology and results of the analysis of the most probable adverse impacts of the unit of certification on the ecosystem are made publicly available in a timely manner, respecting confidentiality where appropriate.</p>	Y	<p>The fishing method used by CFG is the purse seine. The net measures between 360 meters to 540m in length by 108 meters to 144 meters deep.</p> <p>The fishing is done on areas at 5 miles minimum distance from the shore. In this area, the sea bottom is much deeper than the depth of the nets. The nets almost never touch the bottom of the ocean.</p>
2.2	The fishery or fleet complies with Marine Protected Areas regulation.	Essential	Verify compliance also by use of VMS and plotters tracking and World database <a href="http://www.mpaglobal.org">www.mpaglobal.org</a> etc	Y	<p>The Ministry of production – PRODUCE, issues alerts with coordinates of marine protected areas. These areas are plotted in the navigation equipment of the fishing boats.</p> <p>The fishing fleet complies with the limits of the fishing zone determined by the Peruvian Government. Fishing must occur only after a 5 miles line distant of the shore.</p> <p>Inspected the maps and GPS screens of the sampled fishing vessels.</p>
<p><b>The auditor, through random sampling, using the Satellite Control System on the vessels or valid alternative evidence, shall verify that the fishing activity is not carried out in infringement of Marine Protected Areas (MPA). Alternatively an official declaration from local Control Authorities shall be produced. The Auditor shall provide a list of Protected Marine Areas in the area (refer to <a href="http://www.mpaglobal.org">www.mpaglobal.org</a>).</b></p>					
2.3	The fishery or fleet shall use fishing gears that do not affect the seabed unless proven that such impact is negligible.	Essential	The seabed and benthic communities shall return to their original conditions within a maximum of 30 days from the impact of the fishing gear on the seabed.	Y	The fishing fleet operates after the limit of 5 miles from the shore, where the depth is over 90 meters. In these areas, the nets never touches the bottom of the sea.
<p><b>The auditor shall collect conformity evidence.</b></p>					

2.4	The organisation has requested or conducted an assessment of the impact of its fishing activities on essential habitats for the stock under consideration and on habitats vulnerable to damage by the fishing gear.	Recommendation	Studies made available by the competent FMO can be used. These studies shall consider the impact of the fishery on the ecosystem and shall be considered when producing management advice.	Y	The organization has a fishing management team and control, located in the head office in Lima, who analyses in detail all the documents and regulations imposed by the Peruvian regulatory agencies (PRODUCE and IMARPE) to take their decisions and plan the fishing of each season.  See 2.2 above.
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**The Auditor shall provide evidence referring to all available studies.**

### **3 GEAR SELECTIVITY**

No.	Requirement	Level	Parameters and information	Y/N	Comments
3.1	<p>Accidental catches (bycatch) shall not include species listed in the IUCN red list of endangered species as Vulnerable or higher risk.</p> <p>The IUCN assessment shall have been carried out no more than 10 years before.</p>	Important	<p>Bycatch studies shall have been carried out by the relevant bodies (FAO or RFMOs or National Authorities or Universities) and they shall provide information regarding level of bycatch and bycaught species</p> <p>These studies shall not indicate the presence of species vulnerable or higher risk among the regularly caught (over 0.25% of total weight) species according to <a href="http://www.iucnredlist.org">www.iucnredlist.org</a>.</p>	Y	<p>Very little bycatch occurs. All bycatch is recorded at the <i>Bitacora de Pesca</i> (Fishing logbook) of every fishing boat.</p> <p>Currently, the most bycatch is composed of little shrimps (<i>Pleurocondes monodon</i>)</p>
3.1.1	The organisation collects and maintains current data and/or other information about the effects of the fishery on endangered species, non-target catches and discards.	Essential	Traditional, fisher or community knowledge can be used as reference, provided its validity can be objectively verified	Y	<p>Imarpe has a number of research boats that do investigations about the target species on the Peruvian ocean in order to do an assessment of their stocks to release the fishing quotas.</p> <p>The fishing method used is the Purse Seine, where the net is closed into a circle, in order to catch the fish. The fish caught in the net is pumped up to the boat. On the tip of the pumping tube, there is a metal excluder to avoid the suction of bigger fish or mammals. Whenever a smaller predator, mammal or turtle is sucked up to the boat, they are released back to the ocean.</p>

**The auditor shall obtain records kept by the organisation of the species that are caught accidentally, and an assessment of the effects of the fishery on non-target stocks. The information included in the list shall be compared with the accidental catches actually occurred on site at the time of unloading. The list shall also be compared with the database of the IUCN red list [www.redlist.org](http://www.redlist.org). The auditor shall provide a final document that shows if any of the accidentally caught species is included in the IUCN list.**

3.2	The level of discard shall not be over 8% of total catch (in weight).	Essential	Discards are bycaught species which are not used for human consumption not for fish meal or fish oil production.	Y	According to the sampling done by the organization and Produce`s inspectors the bycatch is below 5% of the total. There are no discards, though. The Organization has a joint program with WWF called Simar to teach the fishermen to deal with bycatch
3.3.1	The fleet or fishery shall provide a census of number of all fish aggregating devices (FADs) deployed during the previous 12 months and shall report on a yearly basis to Friend of the Sea regarding FADs deployment per vessel.  <b>Only applicable to fisheries and fleet targeting tuna. N/A to fisheries targeting any other species</b>	Important	Auditor shall collect the data provided by the fleet or fishery and attach it to the audit report	NA	There is no tuna fishing in the scope of this audit.
3.3.2	The fleet shall use non entangling FADs only, to avoid entanglement of sharks, turtles and other non-target species.  <b>Only applicable to fisheries and fleet targeting tuna. N/A to fisheries targeting any other species</b>	Important	Audit shall collect evidence including pictures of FADs, purchase invoices with technical specifications to prove compliance.	NA	There is no tuna fishing in the scope of this audit.

## **4 LEGAL CONFORMITY**

<b>N°</b>	<b>Requirement</b>	<b>Level</b>	<b>Parameters and information</b>	<b>Y/N</b>	<b>Comments</b>
4.1	All fishing vessels shall be officially registered.	Essential	Vessel registration and fishing license inspection.	Y	All fishing vessels are officially registered, Inspected the registries of all audited fishing vessels (Maru, Andes 52, Simmy 3 and Tambo I)
<b><i>The Auditor shall request a list of all the fishing boats and the respective registration number. The Auditor shall collect on site all the documents concerning the registration of at least 10%of the audited boats (copies of photos of the documents)</i></b>					
4.2	The fleet does not include vessels with a flag of convenience.	Essential	The auditor shall verify that each vessel is not registered to another Nation identified as Flag of Convenience ( <a href="http://www.itfseafarers.org/foc-registries.cfm">http://www.itfseafarers.org/foc-registries.cfm</a> ).	Y	All vessels are Peruvian Flagged
<b><i>The Auditor shall verify according to the website <a href="http://www.itfseafarers.org/foc-registries.cfm">http://www.itfseafarers.org/foc-registries.cfm</a>.</i></b>					



4.3	The fleet does not include IUU (illegal, unreported, unregulated) fishing vessels.	Essential	The vessels cannot be included in the list <a href="http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2015.199.01.0012.01.ENG">http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2015.199.01.0012.01.ENG</a>		There is no vessel on the IUU list.
<p><b>The auditor shall verify that the vessels are not listed in EU IUU vessel list(<a href="http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2015.199.01.0012.01.ENG">http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2015.199.01.0012.01.ENG</a>), or in the IUU vessel list made available by the competent RFMO.</b></p>					
4.4	The fleet shall be "Dolphin Safe" approved by the Earth Island Institute.  <b>Only applicable to fisheries and fleet targeting tuna. N/A to fisheries targeting any other species</b>	Essential	The organisation shall be included in the Dolphin-Safe list of the Earth Island Institute: <a href="http://www.dolphinsafetuna.org">www.dolphinsafetuna.org</a>	NA	There is no tuna fishing in the scope of this audit.
<p><b>The Auditor shall verify the conformity on the list <a href="http://www.dolphinsafetuna.org">www.dolphinsafetuna.org</a> or else the company shall sign the EII DS Policy and a copy shall be included in the audit report</b></p>					
4.5	The organisation complies with national and international fisheries regulations.  Compliance with the following regulations in particular has to be confirmed and verified:	Essential	Countries' fisheries laws are available on the website FAO <a href="http://www.fao.org/faolex/en/">http://www.fao.org/faolex/en/</a>  <b>The auditor shall specify applicable indicators.</b>		
4.5.1	TAC (Total Allowable Catches)	Essential	Countries' fisheries laws are available on the website FAO <a href="http://www.fao.org/faolex/en/">http://www.fao.org/faolex/en/</a>  <b>The auditor shall specify applicable limits.</b>	Y	The TAC is determined by the Ministry of Production – PRODUCE, after IMARPE recommendations. The Ministry publishes the quota prior to the start of each fishing season.  For 2019 for the North-Center Region to be 7 million tons, established a quota for the Season 1, 2018 of North-center region (from April 28 <sup>th</sup> ), = 2.1 million tons.
4.5.2	Use of a logbook	Essential	Countries' fisheries laws are available on the website FAO <a href="http://www.fao.org/faolex/en/">http://www.fao.org/faolex/en/</a>  <b>The auditor shall specify applicable indicators.</b>	Y	Each vessel uses the Logbook, called BITACORA DE NAVIGACIÓN, which is regularly filled and available.  Inspected the logbooks of all audited vessels.

4.5.3	Minimum net mesh size	Essential	Countries' fisheries laws are available on the website FAO <a href="http://www.fao.org/faolex/en/">http://www.fao.org/faolex/en/</a>  <b>The auditor shall specify applicable indicators.</b>	Y	Inspected the Resolution ministerial 440-2016=Produce, art 9, A, a.2 establishes a mesh size of 0.5" (13mm) for the fishing of anchoveta.
4.5.4	Net size	Essential	Countries' fisheries laws are available on the website FAO <a href="http://www.fao.org/faolex/en/">http://www.fao.org/faolex/en/</a>  <b>The auditor shall specify applicable indicators.</b>	Y	The Purse Seine nets have the sizes between 360 meters to 540m in length by 108 meters to 144 meters deep.  Inspected the document" Resolución Ministerial Nº 225_2001_PE", which regulates the maximum net length according with the boat storage capacity.
4.5.5	Minimum legal size of the target species	Essential	Countries' fisheries laws are available on the website FAO <a href="http://www.fao.org/faolex/en/">http://www.fao.org/faolex/en/</a>  <b>The auditor shall specify applicable indicators.</b>	Y	Inspected the Resolución Ministerial 262-2011-produce, art 1 establishes the minimum size for anchoveta to be 12cm in length.
4.5.6	Distance from the shore	Essential	Countries' fisheries laws are available on the website FAO <a href="http://www.fao.org/faolex/en/">http://www.fao.org/faolex/en/</a>	Y	The fishing boats must operate at 5 miles of distance from the coast, according to the Article 5 of the document "Resolución Ministerial 440-2016-PRODUCE" issued before the start of the fishing season.  The auditor inspected this document
4.5.7	Measures for the reduction of accidental catches	Essential	Countries' fisheries laws are available on the website FAO <a href="http://www.fao.org/faolex/en/">http://www.fao.org/faolex/en/</a>  <b>The auditor shall specify applicable measures.</b>	Y	The main measures are the minimum mesh size, the fishing method (purse seine), and the excluder on the tip of the fish pump.

4.5.8	No fishing in protected habitats	Essential	Countries' fisheries laws are available on the website FAO <a href="http://www.fao.org/faolex/en/">http://www.fao.org/faolex/en/</a>  <b>The auditor shall specify applicable indicators.</b>	Y	The PRODUCE publications state that the fishing operations must occur according to the DECRETO SUPREMO number 024-2009-MINAM, which establishes the fishing out of protected areas. These areas are marked on the maps on board of each fishing vessel. All fishing boats in Peru are real time monitored by the Ministry of Production by GPS.  The fishing fleet must inform PRODUCE the occurrence of juveniles.  If the fishing fleet starts reporting a high occurrence (30%) of juveniles in a specific fishing zone, PRODUCE issues a fishing ban for that zone that can last a few days or weeks or until the occurrence of juveniles' retreats.
4.5.9	Use of forbidden gears, chemical substances and explosives	Essential	Countries' fisheries laws are available on the website FAO <a href="http://www.fao.org/faolex/en/">http://www.fao.org/faolex/en/</a>  <b>The auditor shall specify applicable indicators.</b>	Y	No forbidden gears are used by the fleet. Purse Seine is the only fishing method.  Inspected the fishing vessels.

**The auditor shall verify, according to fisheries national and international regulations, that the aforementioned legal requirements are met and provide an exhaustive report with reference to the law. Where possible, the auditor shall provide documents and photographs. A detailed description of the fishing regulation concerning each Country is available on FAO's website <http://www.fao.org/faolex/en/>**

## 5 – FISHERY MANAGEMENT

No.	Requirement	Level	Parameters and information	Y/N	Comments
5.1.1a	A fishery management organisation, that holds a legal mandate in compliance with national and international laws, manages, by means of a Fishery Management Plan (FMP), the fishery of which the fishery or fleet under audit is a part.	Essential	The organization shall provide a copy of the FMP.  A map of existing RFMOs is available at <a href="http://www.fao.org/figis/geoserver/factsheets/rfbs.html">http://www.fao.org/figis/geoserver/factsheets/rfbs.html</a>  In addition, national fishery ministries and authorities can be considered, e.g. Fisheries Management Organisations (FMO).	Y	Peruvian fisheries are regulated and monitored by the Ministry of Production, based on researches and investigations made by the IMARPE, establishes fishing quotas after the interpretations of the data collected by their research boats on their Cruceros de Investigación (investigation cruises) to do stock assessment and biomass age, reproduction status and etc.

5.1.1b	<p>If the stock under consideration is a transboundary fish stock, straddling fish stock, highly migratory fish stock or high seas fish stock, a bilateral, sub regional or regional fisheries organisation or arrangement is in place.</p> <p>States and entities in the arrangement shall collaborate in the management of the whole stock unit and bycaught or discarded species over their entire area of distribution.</p> <p>The arrangement shall ensure the rights of the small-scale fishing communities are granted.</p>	Essential	<p>Evidence of conformity.</p> <p>In case this is not applicable, provide justification.</p>	Y	<p>The Peruvian Anchoveta is not a transboundary stock. The IMARPE does the stock assessment by Regions, taking into consideration the industrial fishing activities and its limits.</p> <p>The stock is monitored by PRODUCE and the industrial boats can only fish after the 5 miles from the coast boundary. Small, scale fisherman can fish in this 5 mile zone.</p> <p>Small-scale fishing is regulated by the document "Decreto Supremo (DS) number 010-2010-Produce".</p> <p>This auditor inspected this document.</p>
5.1.1c	The fishery management organisation convenes regularly to update its management advices according to the most updated data.	Essential	Evidence of meetings frequency.	Y	The Ministry of Production issues at least 2 decrees per year. Prior to this Produce meets with Imarpe to evaluate its studies to establish the quotas and fishing seasons periods.
<p><b>The Auditor shall verify and describe briefly the legal and administrative structure in force and provide the evidence of compliance with local laws and regulations.</b></p> <p><b>The fishing company or organisation may also be part of traditional or community system of management of the stock, provided their performance can be objectively verified.</b></p>					
5.1.2	The fisheries management system (FMS) under which the fishery or fleet under audit is managed shall be <b>both</b> participatory and transparent, to the extent permitted by national laws and regulations.	Essential	<p>Information and advice used in FMS decision-making is publicly available. A consultation process regularly seeks and considers relevant information.</p> <p>Consultation with Deep Sea fishers shall be carried out when applicable.</p>	Y	IMARPE makes public the results of its investigations at the website <a href="http://www.imarpe.gov.pr">www.imarpe.gov.pr</a> .
5.1.3	Small-scale fishing communities and deep-sea fishers shall be involved in the planning and implementation of management measures affecting their livelihood, as appropriate.	Important	<p>Evidence of involvement of local communities.</p> <p><i>E.g.</i> monitoring and control of fishing activities, protected areas</p>	Y	Small-scale fishing or artisanal communities and commercial fisheries provide information about their fishing activities to PRODUCE, to help the data collection for decision making from the Government.
5.2.1	A precautionary approach is applied through the FMS to protect the target stock and its habitat and preserve the marine environment.	Important	Procedure and evidence of conformity.	Y	PRODUCE updates regularly its fishing policies to follow IMARPE's stock assessments and sustainability recommendations.

5.2.2	Management measures specify the actions to be taken in the event that the status of the stock under consideration (with special consideration to deep-sea stocks) drops below a level consistent with achieving management objectives.  These measures shall prompt the restoration of the stock to such levels within a reasonable timeframe.	Important	Procedure indicating target reference points and timeframe.	Y	According to the results obtained after the research trips mentioned on 5.1.1a, IMARPE issues reports with recommendations to the PRODUCE to guide the fishing quotas. Imarpe's inspectors on board of several fishing vessels record the occurrence of juveniles. If this occurrence is above 30%, the fishing can be ordered to stop in determined fishing zone. The period of this stop is variable.
5.2.3	Efficacy of management measures and their possible interactions is kept under continuous review.	Essential	Evidence of periodical reviews of the management measures shall be provided.	Y	The authorization of a next fishing season made by PRODUCE is based on the results of the previous one and the results of the IMARPE acoustic investigation cruises and stock assessments and analysis of recruitment and stock recovery.

**The auditor shall verify if the Country the flag of the fishing company refers to has ratified the FAO Code of conduct. Otherwise the organisation shall include a precautionary approach in their procedures, including a risk assessment procedure.**

5.3	The compliance with fishery regulations is achieved through monitoring, surveillance, control and enforcement.	Essential	Procedure and evidence of monitoring and control by the fishery management authority.	Y	The Peruvian fishing companies must comply with all all laws, Decrees, Regulations and Information listed on Section 1. Apart of that the Peruvian fishing vessels are real time monitored by Satellite. All fishing boats can be seen on the GPS screen by the Ministry of Production.
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**The Auditor shall describe briefly the monitoring, surveillance, control, and application methods and provide the evidences of the activities undertaken by the fishery enforcement system to ensure compliance.**

5.4	The fleet or fishery shall record bycatch during every fishing trip.	Essential	Procedure and evidence of recording during at least one fishing trip.	Y	The bycatch is recorded in the Fishing Logbooks.  Inspected the logbooks of the audit fishing vessels. See 3.1
5.5	The fleet or fishery shall record discards.	Essential	Procedure and evidence of conformity	Y	There are no discards. Everything that is caught is used. However, the fleet must inform the Company's fishery management immediately by radio the occurrence of juveniles or other species caught on the net. The Fishing control register this information in a Software called CFO – Catching Fish On-line.
5.5.1	Bycatch and discard data shall be made publicly available by either the FMO or the organisation.	Recommendation	Procedure and evidence of conformity	Y	Important bycatch is informed by the company to the Ministry of Production.  See 5.5 above

**The auditor shall attach copies of the bycatch and discards reports to the audit report.**

5.6	A management system to prevent possible accidental catch and significant negative impacts of endangered species shall be in place.	Essential	Procedure, performance indicators and evidence of conformity.	Y	An excluder is located at the tip of the sucking tube to prevent large species to be pumped up along with the anchovetas.
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5.7	The organisation implements a management program to reduce the accidental catch of non-target species, including procedures for the release of live animals under conditions that guarantee high chances of survival.	Essential	Procedure, performance indicators, and evidence of conformity.	Y	Due to the characteristics of the fish schools, very few non targeted species are caught when the purse seine net is closed.  The organization is implementing a program with the participation of WWF called SIMAR with the objective to minimize the environmental impact of the fisheries, to monitor the accidental capture and sighting of endangered species, to reduce the death of these animals and to develop research subjects based on these registries.  The training of the personnel is already started. The fishing vessels Captain`s were the first ones.
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***The auditor shall provide documental evidence that the organisation collects data to assess the impact of the fishing activities on non-target species and endangered fauna (i.e. IUCN listed). The data collection shall address specific outcome indicator(s) consistent with achieving management objectives.***

5.8	The fleet is equipped with measures that guarantee a quick retrieval of lost fishing gears to avoid 'ghost fishing'.	Essential	Procedure and evidence of conformity.	Y	The net never touches the bottom of the sea. The nets are constructed in a way that they can be ripped but not teared. During interviews, captains declared they never had lost a net of part of a net.
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***The auditor shall obtain a copy of the procedures.***

5.9	The fleet has a full-time on-board independent observer who reports compliance with Friend of the Sea requirements. In alternative a CCTVs system has been deployed and it is accessible by the auditor to verify compliance with Friend of the Sea requirements.  <b>Only applicable to large-scale vessels and fleets. Not applicable to small-scale artisanal fisheries.</b>	Important	Documental evidence of employment. At least one monthly report of the on-board inspector.	NA	There are no freezer vessels on the fishing fleet.
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***The auditor shall verify the presence of the observer(s) and obtain their CV and contacts. See definition for large-scale fisheries in section 1.***

5.10	Outcome indicator(s), including target and limit reference points, are defined for all management objectives related to the conservation of the stock under consideration.  Management objectives take into account the best scientific evidence available	Essential	Target reference points. e.g maximum sustainable yield (MSY, or a suitable proxy) or a lesser fishing mortality if that is applicable to the fishery.  Marine resources exploited in deep-sea fisheries in the high seas have low productivity, thus biological reference points shall be set to ensure long term sustainability.	Y	See Section 1.  The fishing of targeted species Peruvian Anchoveta ( <i>Engraulis ringens</i> ) is done following IMARPE researches and publications.
5.11	There are clear management objectives, outcome indicators and measures defined and periodically reviewed by means of risk assessment to avoid, minimize, or mitigate impacts on:	Essential	Procedure, outcome indicators, action taken and outcomes.		
5.11.1	Essential habitats for the stock of consideration, and vulnerable ecosystems, including those potentially impacted by Deep-Sea fisheries			Y	The fishing must follow PRODUCE` s resolutions, which states that industrial fishing must occur only after the 5 miles line from the coast. The quantity of juveniles is also monitored and immediately informed by radio to the organization` s fishing Control on Lima.
5.11.2	Endangered species			Y	The species of the scope of this audit, <i>E. ringens</i> , is considered as "Least Concern" at the IUCN red list.
5.11.3	Non-target stocks			Y	The main catches are of <i>E. ringens</i> .
5.11.4	Dependent predators and/or preys			Y	<i>Scomber japonicus</i> (caballa) is the main predator of anchoveta ( <i>E. ringens</i> ). No records of other aquatic predators were found on the logbooks inspected. The occurrence of bird attacks is recorded on the logbooks. <i>E. ringens</i> feeds on phytoplankton.
5.11.5	Ecosystem structure and processes			Y	The fishing occurs after the 5 miles from the coastline, respecting the protected areas mentioned in 4.5.8.
5.12	A yearly reviewed Ecosystem Approach to Fisheries is in place	Recommended	Documental evidence	Y	The Ministry of Production meets regularly to evaluate the fishing season and to issue the resolutions. See 5.2.2 and 5.2.3
5.13	Fisheries management approaches, plans and strategies are an integral part of integrated coastal management, and/or ocean management for oceanic fisheries.	Recommended	Documental evidence	Y	See Sections 1,2 and 4

**The auditor shall provide evidence of the reference values targeted and implemented. These can, in some cases, be threshold reference limits and precaution limits set by regional bodies.**

**The management measures implemented by the management system of the organisation shall be based on the best available scientific evidence. Any traditional or scientific knowledge can be used within the management system, given that it can be objectively verified by the auditor**

## **6 WASTE MANAGEMENT**

No.	Requirement	Level	Parameters and information	Y/N	Comments
6.1	The organisation recycles, re-uses or re-processes all materials used during fishing, conservation and transport of the fish up to the selling point, including packaging.	Essential	Procedure and evidence of conformity.	Y	<p>Plastic and paper are donated to whom comes to collect.</p> <p>The organization has bins for separate the residues on board and at the plant areas.</p> <p>The boats have a procedure for solid residues.</p> <p>Used oils are stored in cylinders to be reused at the maintenance. There is a plan to refine this oil to be reused.</p> <p>Inspected garbage separation on the boats and on the plant. The company has a policy to do recycling of all materials possible.</p> <p>Inspected the Document GAM-PRO-005-Gestión Integral de Residuos Peligrosos y non Peligrosos, aiming the following tasks:</p> <ul style="list-style-type: none"> <li>- Segregate the residues;</li> <li>- Appropriate storage;</li> <li>- Appropriate transport;</li> <li>- Definition of responsibilities;</li> <li>- Safety procedures;</li> <li>- Safe destinations.</li> </ul> <p>The CFG plant at Tambo de Mora has an agreement with a NGO called Ciudad Saludable, to collect the recyclable material produced by the plant and the fishing vessels, such as office paper, newspapers, magazines, Cardboard, plastic bottles, plastic film, EVA, pvc tubes, glass, organic residues from the restaurant.</p> <p>This agreement was inspected.</p>
6.2	The organisation implements measures to prevent dispersion of waste at sea (including fuels and lubricants and plastic materials)	Essential	Procedure and evidence of conformity.	Y	<p>The organization has in place the procedure GAM-COR-001 MANUAL DE BPA EN ACTIVIDADES MARITIMAS V01 OPP-PRO-012 <i>Procedimiento ante incidentes en despacho de combustible</i> v02</p> <p>All the lubricants and used oil on the fishing boats are stored on board in tanks. These tanks are emptied when the boats come to unload the fish. Nothing is dispersed at sea.</p>
6.3	The organisation utilises all the chemical non-toxic alternatives available in order to reduce the use of toxic, persistent or bio-accumulating substances.	Essential	Procedure and evidence of conformity.	Y	<p>Only low-toxicity and biodegradable cleaning chemical products are used on onboard.</p>
6.4	The organisation does not use CFC, HCFC, HFC or other refrigerants that cause ozone depletion.  <i>Only applicable to large-scale vessels</i>	Essential	Procedure and evidence of conformity.	Y	<p>Only ammonia is used as refrigeration gas. Ammonia does not cause ozone depletion</p>

**The auditor shall provide procedures complete with photographic evidence. See definition of large-scale fisheries in section 1.**

## **7 ENERGY MANAGEMENT**

No.	Requirement	Level	Parameters and information	Y/N	Comments



7.1	The organisation shall keep a register of all energy sources and their use, updated at least once a year.	Essential	Energy consumption records, which shall be created at least once a year shall be included in the procedure.  At minimum, the register shall include the following <b>parameters:</b> 1. incoming energy sources (renewable or not) 2. energy consumption per process line (fishing, processing, transport)	Y	The company records and follows very closely the consumption of all types of energy sources.  Inspected the Spreadsheet "Consumo de Petroleo 2018" wht the fuel consumption of all CFG fishing Vessels in the year 2018, showing a total of 2,275,621 gallons of diesel.  Inspected the Spreadsheet "Consumo de Energia Eléctrica Año 2018", with a consumption of 2,095,708.74 Kw/h by the Pisco Plant.  Inspected the Spreadsheet "Consumo de Gas Natural 2018", showing a consumption of 175,558 m <sup>3</sup> of natural gas by the Pisco plant.
7.2	The organisation should calculate its carbon footprint per product unit and engage to reduce it every year.	Recommendation		N	The organization does not calculate its carbon footprint.

**The auditor shall review copies of the registers.**

## **8 SOCIAL ACCOUNTABILITY**

No.	Requirement	Level	Parameters and information	Y/N	Comments
8.1	The Organisation shall respect human rights, complying with the following requirements:				
8.1.1	compliance with national regulations and ILO on child labour.	Essential	Refer to ILO: <a href="http://www.ilo.org/global/standards/introduction-to-international-labour-standards/lang-en/index.htm">http://www.ilo.org/global/standards/introduction-to-international-labour-standards/lang-en/index.htm</a>	Y	The minimal age in Peru is 18 years old. At CFG, Plant Pisco, the youngest worker is Christopher Laura Moreno. born is 1 March 1996, 23 years old, Electrician. Evidenced the personal file of this employee. Inspected the employee's contract with the organization, Signed on 09/04/2019.  At CFG at Tambo de Mora Plant the youngest employee is Paul Ben-Omí Carrion, Operational aid, 20 years old, born in 18/12/1998. Evidenced the personal file of this employee. Inspected the employee's contract with the organization, Signed on 27/04/2019.
8.1.2	pay the employees adequate salaries compliant at least with minimum legal wages	Essential	Minimum wages vary depending on the country. The Auditor shall verify that the organisation knows the minimum wage.	y	The minimum wage in Peru is 930 soles per month. At CFG, Pisco Plant, the lowest pay is for the employee number 00302337, N.M.M.A., Driver, earning 2,345.00 soles per month.  Inspected the pay slip of this employee, from the period 06/06/2019 to 20/06/2019  At the Tambo de Mora Plant, the lowest pay is to the employee Luis Henrique Pauyac Murrieta, Fishmeal Bagger, with a salary of 2,085.00 soles per month. Inspected the pay slip of this employee, from the period 06/06/2019 to 20/06/2019.

8.1.3	grant employees access to healthcare	Essential		<p>y</p> <p>The organization pays 100% of the National healthcare plan (from the Government), equal a 9% of the workers salary. Optionally to any worker there is a Private health plan, provided by the company EPS – Empresa Prestadora de Servicios de Salud - Pacífico Seguros). In this case, the organization pays the equivalent to 30% of the total and the employee the 70%.</p> <p>Evidenced the payslip of worker from Pisco plant number 00302337, with the payment of the National health plan.</p> <p>Evidenced the payslip of worker from Tambo de Mora Plant number 00305055, with the payment of the National health plan.</p>
8.1.4	apply safety measures required by the law	Essential		<p>y</p> <p>The Organization provides PPE's free of charge.</p> <p>At the Pisco Plant, it was evidenced safety training record Codigo GTH-FOR-319, Registro de Asistencia – Induccion, Capacitacion, Entrenamiento, Simulacros de emergencia y Otros, with the subject Inducción General de SSO dated 21/05/2019, for employees numbers 70123871, 44793604, 45917863, 48154233.</p> <p>At the Tambo de Mora Plant, it was evidenced safety training record Codigo GTH-FOR-319, Registro de Asistencia – Induccion, Capacitacion, Entrenamiento, Simulacros de emergencia y Otros, with the subject Uso de Productos Quimicos dated 21/03/2019, for employees numbers 21489202, 42602748, 22313438, 2181447, 71451616 and 6 more.</p>

**The auditor shall verify the compliance with the requirements through documental evidence (work contract samples) and on-site observation.**

Further comments:

**CONCLUSIONS:**

The Auditor shall fill out the following fields

**X The fleet COMPLIES with Friend of the Sea requirements**

**The fleet DOES NOT COMPLY with Friend of the Sea requirements**

**MAJOR NON CONFORMITIES (to be corrected within 3 months)**

*List major non conformities*

**MINOR NON CONFORMITIES (corrective plan to be produced within 3 weeks and correction within 1 year)**

*List minor non conformities*

**RECOMMENDATIONS (to be communicated within the next inspection)**

*7.2 – The organization does not calculate its carbon footprint.*