# Friend of the Sea Standard

# FOS - Wild Sustainable Fishing Requirements

# **Friend of the Sea** www.friendofthesea.org

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

#### **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.

<u>Essential Requirements:</u> 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.

<u>Recommendations:</u> 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 S.A.C.

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

CFG INVESTMENTS S.A.C.

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

No. CFG Investments is a Stand-Alone company.

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

Head Office: Av. Manuel Olguín 325, Interior 1501, Santiago de Surco, Lima.

The Plants that ere remotely inspected during this recertification audit were located in:

CHICAMA NORTE PLANT: LOTE "A", MZ VI, ZONA INDUSTRIAL NORTE, PUERTO MALABRIGO, DISTRITO DE RAZURI, PROVINCIA DE ASCOPE, DEPARTAMENTO DE LA LIBERTAD.

CHIMBOTE SUR PLANT: LOTE ACUMULADO A-D, PASAJE COMUN Nº 180, ZONA INDUSTRIAL 27 DE OCTUBRE, DISTRITO DE CHIMBOTE, PROVINCIA DE SANTA, DEPARTAMENTO DE ANCASH:

# e) NAME AND CONTACTS OF THE PERSON WITHIN THE ORGANISATION RESPONSIBLE FOR THE AUDIT AND CONTACTS WITH THE AUDITOR:

Jessica Mejia - Coordinadora de Mejora Continua y Sistemas de Gestión Gerencia de Calidad

imejia@copeinca.com.pe

### f) FLEET TO BE AUDITED:

Name of the fishing vessel	Registration number	Vessel's flag	Fishing method	Capacity (MT)	Unloading harbour	Ship owner, if different from a)
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, Chica	ma, Chimbote, Cha	ncay, Pisco,	Tambo de Mora, l	Planchada		

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

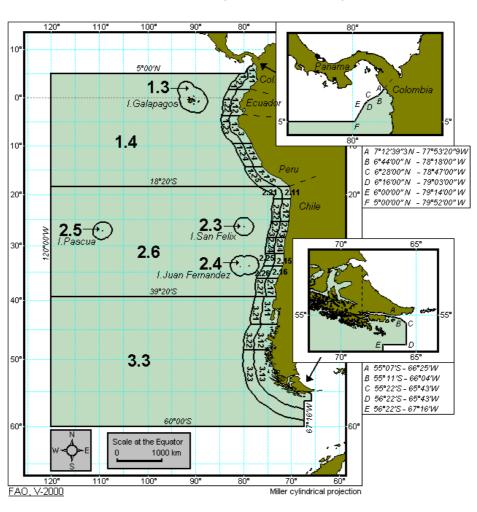
Name of the fishing vessel	Registration number	Unloading harbour	
Comanche II	CE-4052-PM	Bayovar, Chicama, Chimbote, Chancay, Pisco, Tambo de Mora, Planchada	
Alexandria I	CE-21260-PM	Bayovar, Chicama, Chimbote, Chancay, Pisco, Tambo de Mora, Planchada	

OBSERVATION: Because Covid Pandemic, this audit was done remotely. Only documental review was done by the auditor





**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 Area 87 (Pacific, Southeast):

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

Common Name	Scientific Name
Peruvian Anchoveta	Engraulis ringens

#### j) TOTAL NUMBER OF EMPLOYEES:

1169 employees in all CFG.

At the audited plant of Chicama Norte = 118 employees

At the audited plant of Chimbote Sur = 133 employees

#### k) ENVIRONMENTAL CERTIFICATIONS AND AWARDS

GMP, IFFO, BASC, FOS

#### I) STAKEHOLDERS INPUT:

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:

Letters were sent to the following stakeholders: *Erik Aanensen* at the company Skretting and *Angela Hernando Blotte* at the NGO WWF - World Wide Fund for Nature, PERU

#### m) ADDITIONAL INFORMATION:

CFG owns the following plants:

- CHICAMA NORTE: LOTE "A", MZ VI, ZONA INDUSTRIAL NORTE, PUERTO MALABRIGO, DISTRITO DE RAZURI, PROVINCIA DE ASCOPE, DEPARTAMENTO DE LA LIBERTAD.;
- CHIMBOTE: LOTE ACUMULADO A-D, PASAJE COMUN N° 180, ZONA INDUSTRIAL 27 DE OCTUBRE, DISTRITO DE CHIMBOTE, PROVINCIA DE SANTA, DEPARTAMENTO DE ANCASH;
- TAMBO DE MORA: AV. INDUSTRIAL S/N EX FUNDO CANCHAMANA, DISTRITO DE TAMBO DE MORA, PROVINCIA DE CHINCHA, DEPARTAMENTO DE ICA, PERU;
- PISCO: MZ. G, LOTE 4 Y SUB LOTE 1 DE LA LOTIZACIÓN DE SANTA ELENA, LA MISMA QUE CORRESPONDE A LA CARRETERA PISCO PARACAS KM 15.5, DISTRITO DE PARACAS, PROVINCIA DE PISCO, DEPARTAMENTO DE ICA, PERU;
- PLANCHADA: ALTURA DEL KM 754 DE LA PANAMERICANA SUR, LOCALIDAD DE LA PLANCHADA, DISTRITO DE OCOÑA, PROVINCIA DE CAMANA, DEPARTAMENTO DE AREQUIPA, PERU

The audited plant of Chicama Norte has the following characteristics:

- Operation Capacity: 80 MT/H
- Area of the plant: 15,750 m<sup>2</sup>
- Area of storage product finished: 15,062 m<sup>2</sup>
- Employees: 118
- Fishmeal Storage Capacity: 8,000 MT
- Fish oil Storage Capacity: 1,010 MT

The audited plant of Chimbote Sur has the following characteristics:

- Operation Capacity: 80 MT/H
- Area of the plant: 15,750 m<sup>2</sup>
- Area of storage product finished: 15,062 m<sup>2</sup>
- Employees: 118
- Fishmeal Storage Capacity: 8,000 MT
- Fish oil Storage Capacity: 1,010 MT

In 2019, CFG plants altogether received 751,430 metric tons of anchoveta and produced 58,516.76 tons of fishmeal and 7,994.42 tons of fish oil.

The audited plant of Chicama Norte, received 165,406 metric tons of anchoveta and produced 16,788.88 tons of fishmeal and 2,780.81 tons of fish oil.

The audited plant of Chimbote Sur, received 61,523 metric tons of anchoveta and produced 15,284.88 tons of fishmeal and 2,642.70 tons of fish oil

Because of the Covid-19 pandemic, this audit was done remotely. The interviews were done online in live view with the Organization's representative, during the full length of the audit time.

- 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)

CERTIFICATION BODY: Rina Services Brazil	AUDIT TEAM:  Osires de Melo – Team Leader  Fernanda David – auditor in training	AUDIT START AND END DATE: Stage 1: July 6, 2020 Stage 2: July 13, 2020 and July 14, 2020
SIGNATURE OF AUDITOR:	NAME OF THE PERSON IN CHARGE OF THE ORGANISATION AND ACCOMPANYING THE AUDITOR DURING THE AUDIT:  Jessica Mejia - Coordinadora de Mejora Continua y Sistemas de Gestión Gerencia de Calidad  jmejia@copeinca.com.pe	AUDIT CODE:  Contract Number: 2019/CAMBR/630  File Number: 20 BQ 9 DF

#### 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	Paramet ers and informat ion	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	Y	The fishing of anchoveta in Peru is managed and controlled by the Peruvian Government, who establishes quotas and fishing seasons.  The IMARPE – Instituto del Mar del Peru is the agency who publishes researches and fishing data about the main economic species of the region.  The Peruvian government following IMARPE recommendations determines the fishing seasons and quotas.  The government authorizes the fishing seasons for anchoveta by issuing a decree from the Ministry of Production (PRODUCE). There are two fishing seasons yearly.

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	IMARPE produces a large amount of data on the peruvian anchiveta (Engraulis ringens). There is a digital depository at Imarpe's website, free or consultation (http://www.imarpe.gob.pe/imarpe/).  Inspected the document issued by IMARPE: Oficio N°330-2020-IMARPE/PE remite el Informe sobre la "SITUACIÓN DEL STOCK NORTE-CENTRO DE LA ANCHOVETA PERUANA (Engraulis ringens) AL MES DE MAYO DE 2020 Y PERSPECTIVAS DE EXPLOTACIÓN PARA LA PRIMERA TEMPORADA DE PESCA DEL AÑO" (Anchoveta Stock Assessment for 2020). This document informs the Imparpe had calculated a biomass of anchoveta for the North-Center of Peru to be 10.11 million metric tons at 01 April 2020. T
					Inspected the document RESOLUCIÓN MINISTERIAL N° 147-2020-PRODUCE This document authorizes the First Fishing Season of Anchoveta in the Region North-Center to start on May 13 <sup>th</sup> , 2020.
1.1.2	The stock under consideration shall NOT be over-exploited.	Essential	F ≤ F <sub>msy</sub> within probability range of available stock assessments or at least F ≤ F <sub>lim</sub> (limit reference point – or its proxy)  If overfishing of a stock under consideration of a certified fishery occurs, the certification of this fishery is suspended		The IMARPE possesses research boats that do investigation cruises to do stock assessments prior to determine the start and duration of the fishing season and the quotas.  The stock status is assessed based on realtime 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 uring fishing seasons, to account for the rapid fluctuations in the natural biomass of this resource.  The last stock assessment on the Peruvian waters established an anchoveta stock of 10.11 million tons. The quota was then established to be 2,413 million metric tons for the first Season, starting on 13 May 2020 for North-center region.
1.1.3	The stock under consideration shall NOT be over-fished.	Essential	B ≥ B <sub>msy</sub> within probability range of available stock assessments or at least B>B <sub>lim</sub> (limit reference point - or its proxy).  If the stock under consideration of a certified fishery becomes overfished, the certification of this fishery is	Υ	The 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.  The last IMARPE stock assessments showed a Biomass estimation of 10.11 million tons for the first season of 2020.  In the interpretation of IMARPE, who issues the fishing quotas based on the constant monitoring of the stocks, <i>E.ringens</i> is not being overfished.

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	У	All research from IMARPE and the results of the investigation cruises are public and available at www.imarpe.gob.pe  Inspected the document RESOLUCIÓN MINISTERIAL N° 147-2020-PRODUCE This document authorizes the First Fishing Season of Anchoveta in the Region North-Center to start on May 13th, 2020.
1.2	Only applicable to small-scale and artisanal fisheries (i.e. it is not applicable to large-scale fisheries and fleets)  If the organisation complies with all the requirements of the standards in the present document and does not catch more than 10% of the total catch (weight) of the same target species in 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 these fields ONLY in case of negative answer to the 1.1 requirement. 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
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).  The same information regarding any associated enhancement activities is also collected and maintained.	Important	Data collection shall be in accordance with international standards (e.g. CWP and DSF in the High Seas, FAO Programme).  The data and analysis may include local, traditional or		The fishing method used by Copeinca is the purse seine. The net measures between 360 meters to 540m in length by 108 meters to 144 meters deep.  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.

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 www.mpaglobal.n etc	Y	The Ministry if production, PRODUCE issues alerts with coordinates of marin protected areas. These areas are plotte in the navigation equipment of the fishin boats.  The fishing fleet complies with the limit of the fishing zone determined by th Peruvian Government.  Fishing must occur only after a 5 mile line distant form the shore.  During the fishing season some fishin areas can be declared temporaril forbidden if the occurrence of juvenile gets above 10% of the catch. See 2.5.1
Th	ditan thursel was dans as senting value to	ha Catallita Cant	wal Coatana an tha co	/	u valid alta mativa avidanaa aball
	ditor, through random sampling, using the that the fishing activity is not carried out				
	ntion from local Control Authorities shall				
area (r	efer to www.mpaglobal.org).				
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 touch the bottom of the sea.  Inspected the document 2.2 RM Nº 225_2001_PE_dimensiones de las redes de cerco en función a su capacidade.
The Au	ditor shall collect conformity evidence.				
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.	Recommenda tion	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	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.
The Au	ditor shall provide evidence referring to	all available stu	dies.		
2.5	In the case of enhanced fisheries that involve aquaculture activities, the organisation is assessed also against FOS Aquaculture standards	Essential	Full compliance with FOS-Aqua standards	NA	This is not an enhanced fishery.
2.5.1	Natural reproductive stock components of enhanced stocks are not overfished nor substantially displaced by stocked components.	Essential	The displacement shall not result in a reduction of the natural reproductive stock component below abundance-based target reference points (or their proxies).	Y	The number of juveniles captured is recorded in a logbook FORMATO DE REPORTE DE INCIDENCIA DE JUVENILES. This information is passed to the Ministry of Production (PRODUCE) and Imarpe, who monitors the reproduction season and declares the stop and beginning of each fishing season.
2.5.2	Management objectives are in place that seek to avoid significant negative impacts of enhancement activities on the natural reproductive stock component of the stock under consideration and any other wild stocks from which the organisms for stocking are being removed.	Essential	Target Reference points or their proxies.	Y	The stock assessment is made by Imarpe and Ministry of Production establishes the fishing seasons and quotas

Enhanced fisheries are fisheries supported by activities aimed at supplementing the recruitment and raising the total production of a fishery beyond a level supported by natural processes (FAO Technical Guidelines for Responsible Fisheries. Inland fisheries. No 6. Rome, FAO 1997.

# **3 GEAR SELECTIVITY**

No.	Requirement	Level	Parameters and information	Y/N	Comments
3.1	Accidental catches (bycatch) shall not include species listed in the IUCN red list of endangered species as Vulnerable or higher risk.  The IUCN assessment shall have been carried out no more than 10 years before.	Important	Bycatch studies shall have been carried out by the relevant bodies (FAO or RFMOs or National Authorities or Universities) and they shall provide information	У	Very little bycatch occurs. All bycatch is recorded at the <i>Bitacora de Pesca</i> (Fishing logbook) of every audited fishing boat.  Currently, the most bycatch is composed of littl shrimps ( <i>Pleurocondes monodon</i> )  Caballa also was recorded in the logbooks this season.
3.1.1	The organisation collects and maintains current data and/or other information about the effects of the fishery and associated enhancement activities (if any) on endangered species, nontarget catches and discards.	Essential	Traditional, fisher or community knowledge can be used as reference, provided its validity can be objectively verified	У	Imarpe has a few 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.  The fishing method used is the Purse Seine, where the net is closed into a circle, 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.
effect		The informati	ion included in the	list sha	nught accidentally, and an assessment of to all be compared with the accidental catches with the database of the IUCN red list

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  The Document I Encuentro Simar 25, 26 y 27 Marzo, 2019 (I Simar Meeting, 15, 26 and 27 March 2019) was inspected.
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.  Only applicable to fisheries and fleet targeting tuna. N/A to fisheries targeting any other species	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	Important	Audit shall	NA	There is no tuna fishing in the scope of this
	FADs only, to avoid entanglement of		collect evidence		audit.
	sharks, turtles and other non-target		including		
	species.		pictures of		
			FADs, purchase		
	Only applicable to fisheries and		invoices with		
	fleet targeting tuna. N/A to		technical		
	fisheries targeting any other		specifications to		
	species		prove		
			compliance.		

### **4 LEGAL CONFORMITY**

N°	Requirement	Level	Parameters and information	Y/N	Comments
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 (Alexandria I and Comanche II).
					number. The Auditor shall collect on (copies of photos of the documents)
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 (http://www.itfs eafarers.org/focregistries.cfm).	Y	All vessels are registered to the country of Peru.  Peru has not been declared FOCs (Flags of Convenience) by the ITF's (International Transport Workers' Federation) Fair Practices Committee.  The auditor Verified on the IFS site that Peru is not listed as Nation with flag of convenience.
The Audit	tor shall verify according to the web	site http://w	ww.itfseafarers.org	/foc-regi	istries.cfm.
4.3	The fleet does not include IUU (illegal, unreported, unregulated) fishing vessels.	Essential	The vessels cannot be included in the list http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:0 J.L.2015.199. 01.0012.01.EN G	Y	Inspected on the Eur-lex website that no vessel of CFG's fishing fleet is reported as illegal, unreported or unregulated.

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">http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L</a> .2015.199.01.0012.01.ENG), or in the IUU vessel list made available by the competent RFMO.

4.4	The fleet shall be "Dolphin Safe" approved by the Earth Island Institute.  Only applicable to fisheries and fleet targeting tuna. N/A to fisheries targeting any other species	Essential	The organisation shall be included in the Dolphin-Safe list of the Earth Island Institute:  www.dolphinsafe tuna.org	NA	There is no tuna fishing in the scope of this audit.
	for shall verify the conformity on the by shall be included in the audit repo		olphinsafetuna.org o	r else the	e company shall sign the EII DS Policy
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 http://www.fao. org/faolex/en/  The auditor shall specify applicable indicators.	Y	
4.5.1	TAC (Total Allowable Catches)	Essential	Countries' fisheries laws are available on the website FAO http://www.fao. org/faolex/en/  The auditor shall specify applicable limits.	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 the first fishing season of 2020 the TAC was 4.413 million tons for the North-Center region.  The TAC to CFG in the First Fishing Season of 2020 was 148,835 metric tons.  Inspected the Spreadsheet MAXIMUM PORCENTAGE OF CATCH LIMIT BY VESSEL - NORTH/CENTER, with the details of the TAC per fishing Vessel belonging to CFG.
4.5.2	Use of a logbook	Essential	Countries' fisheries laws are available on the website FAO http://www.fao. org/faolex/en/  The auditor shall specify applicable indicators.	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 http://www.fao. org/faolex/en/  The auditor shall specify applicable indicators.	Y	Inspected the document: Resolución ministerial 440-2016 Produce, art 9, A, a.2 which establishes a mesh size of 0.5" (13 mm) for the fishing of anchoveta.

4.5.4	Net size	Essential	Countries' fisheries laws are available on the website FAO http://www.fao.	У	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
			org/faolex/en/ The auditor shall specify applicable indicators.		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 http://www.fao. org/faolex/en/	У	The Document Resolución Ministerial 262-2011-Produce, art 1 establishes the minimum size for anchoveta to be 12 cm in length.  This document was inspected.
			The auditor shall specify applicable indicators.		
4.5.6	Distance from the shore	Essential	Countries' fisheries laws are available on the website FAO http://www.fao. org/faolex/en/	У	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 if 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 http://www.fao. org/faolex/en/	Y	The main measures are the mesh size, the fishing method (purse seine), and the excluder on the tip of the fish pump.
			The auditor shall specify applicable measures.		
4.5.8	No fishing in protected habitats	Essential	Countries' fisheries laws are available on the website FAO http://www.fao. org/faolex/en/  The auditor shall specify applicable indicators.	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.  See 1.1.1  The fishing fleet must inform PRODUCE the occurrence of juveniles.
					If the fishing fleet starts reporting a high occurrence 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 http://www.fao. org/faolex/en/	Y	No forbidden gears are used by the fleet.  The fishing method Purse Seine is the only fishing method.
			The auditor shall specify applicable indicators.		

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 <a href="http://www.fao.org/faolex/en/">http://www.fao.org/faolex/en/</a>

#### 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 http://www.fa o.org/figis/ge oserver/factsh eets/rfbs.html  In addition,	Y	Peruvian fisheries are regulated and monitored by the Ministry of Production, based on researches and investigations made by the IMARPE, who employs 3 big boats and 11 smaller size boats to do CRUCEROS (investigation cruises) to do stock assessment and biomass age, reproduction status and establishes fishing quotas after the interpretations of the data collected.  Produce authorizes the Pesca Exploratória to verify and confirm the numbers from the Cruceros. This exploratory fishing is done by the Industrial fishing vessels and the fish caught is discounted from their fishing quotas. This exploratory fishing lasts around 10 days.
5.1.1b	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.  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.  The arrangement shall ensure the rights of the small-scale fishing communities are granted.	Essential	Evidence of conformity.  In case this is not applicable, provide justification.	Y	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.  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.  Small-scale fishing is regulated by the document "Decreto Supremo (DS) number 010-2010-Produce".  This auditor inspected this document.
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 if 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.

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.

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.

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	Information and advice used in FMS decision- making is publicly available. A consultation process	Y	The investigations mad by IMARPE is public. Occasionally, IMARPE does investigation fishing trips with the commercial fishing boats, called Pesca Exploratória.  All the results are shared with the fishing companies and made public.
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	regularly  Evidence of involvement of local communities.  E.g. monitoring and control of fishing activities,	Y	Small-scale fishing communities and commercial fisheries provide information about their fishing activities to the Ministry of Production, 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	The PRODUCE is regularly updating its fishing policies.
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 10%, 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.
	ditor shall verify if the Country the flag of lanisation shall include a precautionary ap				
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.
	ditor shall describe briefly the monitoring ivities undertaken by the fishery enforcen				, ,

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
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.
Bycatch and discard data shall be made publicly available by either the FMO or the organisation.	Recommendatio n	Procedure and evidence of conformity	Y	Important bycatch is informed by the company to the Ministry of Production. See 5.5 above
ditor shall attach copies of the bycatch an	nd discards repor	ts to the audit re	eport.	
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.
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.
n-target species and endangered fauna (i.	e. IUCN listed). 1			
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.	У	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.
ditor shall obtain a copy of the procedure	s.			
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	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.
	Dycatch and discard data shall be made publicly available by either the FMO or the organisation.  ditor shall attach copies of the bycatch are A management system to prevent possible accidental catch and significant negative impacts of endangered species shall be in place.  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.  The fleet is equipped with measures that guarantee a quick retrieval of lost fishing gears to avoid 'ghost fishing'.  ditor shall obtain a copy of the procedure of the fleet has a full-time on-board independent observer who reports compliance with Friend of the Sea	ditor shall attach copies of the bycatch and discards report  A management system to prevent possible accidental catch and significant negative impacts of endangered species shall be in place.  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.  The fleet is equipped with measures that guarantee a quick retrieval of lost fishing gears to avoid 'ghost fishing'.  The fleet has a full-time on-board independent observer who reports compliance with Friend of the Sea	during every fishing trip.    Several content of the procedure of conformity	during every fishing trip.  The fleet or fishery shall record discards.  Bycatch and discard data shall be made publicly available by either the FMO or the organisation.  Bycatch and discard data shall be made publicly available by either the FMO or the organisation.  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.  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.  The fleet is equipped with measures that guarantee a quick retrieval of lost fishing gears to avoid 'ghost fishing'.  Essential Procedure, performance indicators, and evidence of conformity.

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	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 occurs 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				Scomber japonicus (caballa) is the main predator of anchoveta (E. ringens). No records of other aquatic predators were found on the logbooks inspected. The occurrence of bird attacks is recorded on the logbooks. E. ringens feeds on phytoplankton.
5.11.5	Ecosystem structure and processes				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
	iter shall provide evidence of the reference				

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

# **<u>6 WASTE MANAGEMENT</u>**

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	Plastic and paper are donated to whom comes to collect. The organization has bins for separate the residues on board and at the plant areas. The boats have a procedure for solid residues. Used oils are stored in cylinders to be reused at the maintenance. There is a plan to refine this oil to be reused. Inspected garbage separation on the boats and on the plant. The company has a policy to do recycling of all materials possible.  Inspected the Document GAM-PRO-005-Gestión Integral de Residuos Peligrosos y non Peligrosos, aiming the following tasks:  Segregate the residues; Appropriate storage; Appropriate transport; Definition of responsibilities; Safety procedures; Safe destinations.  Inspected a Commitment Letter from the Asociación de Reclicladores de Puerto Malabrigo (Puerto Malabrigo Recyclers Association) for Solid Residues Collection, date February 9, 2018.  Inspected the Cerificate issued by the NGO Quiero Todo Verde, in September 11, 2019, for the Good Environmetal Practices of CFG by donation Plastic Bottles from Chicama Norte Plant and Chimbote Sur.
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	The organization has in place the procedure GAM-COR-001 MANUAL DE BPA EN ACTIVIDADES MARITIMAS V02 OPP-PRO-012 Procedimiento ante incidentes en despacho de combustible v02 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.
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	Only low-toxicity and/or biodegradable cleaning chemical products are used on onboard.
6.4	The organisation does not use CFC, HCFC, HFC or other refrigerants that cause ozone depletion.  Only applicable to large-scale vessels	Essential	Procedure and evidence of conformity.	Y	Ammonia is used as refrigeration gas. Ammonia does not cause ozone depletion

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 parameters:  1. incoming		The company records and follows very closely the consumption of all types of energy sources.  Inspected the Spreadsheet "Consumo Diesel Embarcaciones" (Diesel Consumption of the Fishing Vessels) 2019 and 2010" what the fuel consumption of all CFG fishing Vessels.  Inspected the Spreadsheed "Consumo de Energia Eléctrica Chicama Norte", with a consumption of 839,650 Kw/h in 2020, until July 12th.
7.2	The organisation should calculate its carbon footprint per product unit and engage to reduce it every year.  Itior shall request copies of the registers.	Recommendat ion		N	The organization does not calculate is Carbon Footprint.

# **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: http://www.ilo. org/global/stan dards/introduct ion-to- international- labour- standards/lang - -en/index.htm		The minimal age in Peru is 18 years old. At CFG, Plant Chicama Norte, the youngest worker is CARLOS DANIEL LUNA VICTORIA FLORIAN, born in 27-06- 1998, 22 years old, Warehouse worker. Evidenced the personal file of this employee. Inspected the employee's contract with the organization, Signed on 26 June, 2020.
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.		The minimum wage in Peru is 930 soles per month. At CFG, Chicama Norte Plant, the lowest pay is for the employee number 305529, C. A. S., Driver, earning 1,575.00 soles per month.  Inspected the pay slip of this employee, from the period 21/05/2020 to 05/06/2020
8.1.3	grant employees access to healthcare	Essential			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 - Pacifico Seguros). In this case, the organization pays the equivalent to 30% of the total and the employee the 70%.  Evidenced the payslip of worker from Chicama Norte plant number 305529, with the payment of the National health plan.

8.1.4	apply safety measures required by the law	Essential	У	The Organization provides PPE's free of charge.
				At the Chicama Norte Plant, it was
				evidenced the Safety training record Codig GTH-FOR-319, Registro de Asistencia –
				Induccion, Capacitacion, Entreinamiento, Simulacros de emergencia y Otros, with the subject Eyesight protection dated
				18/09/2019. Presence list with 53 participants, among them were: Dorina
				Jourdain Vazquez Ascoy, Alfredo Valencia Mansilla and Luis Ramos Prado.
				Inspected the Document "Programa Annua
				de Capacitaciones de Seguridad Y Salud Ocupacional"(Annual program of Training in
				Occupational Safety and Health), Codigo GSS-FOR-078, Version 02, with all the Traing scheduled for 2020 at CFG.
<b>T</b> I - A				-
	uditor shall verify the compliance with the bservation.	requirements through d	iocumentai evi	dence (work contract samples) and on-
Furthe	er comments:			
CONG	CLUSIONS:			
The A	Auditor shall fill out the follo	wing fields		
■ The	e fleet COMPLIES with Fr	iend of the Se	a require	ements
□ Th	e fleet DOES NOT COMPL	Y with Friend	of the Se	a requirements
MAJ	OR NON CONFORMITIES (to	be corrected v	vithin 3 m	onths)
List r	major non conformities			
	•			
	OR NON CONFORMITIES (c	orrective plan t	o be prod	uced within 3 weeks
and	correction within 1 year)			
List r	minor non conformities			
REC	OMMENDATIONS (to be cor	nmunicated wit	hin the ne	ext inspection)
	OMMENDATIONS (to be cor	nmunicated wit	hin the ne	ext inspection)
	OMMENDATIONS (to be correcommendations	nmunicated wit	hin the ne	ext inspection)
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