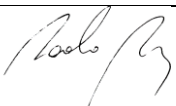


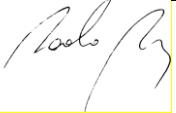


Friend of the Sea Standard

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	
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:

DALYAN SU ÜRÜNLERİ VE GIDA SAN. NAK. TİC.LTD.ŞTİ

b) NAME OF THE ORGANISATION REQUESTING THE AUDIT:

DALYAN SU ÜRÜNLERİ VE GIDA SAN. NAK. TİC.LTD.ŞTİ

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

YES. KOBİYALAR GROUP (KOPTUR AND DALYAN)

d) ADDRESS OF THE ORGANISATION TO BE AUDITED:

Head Office: Merkez Mah. Akmaz Küme Evleri No:42 , 61420 Trabzon / Turkey

Factory: Karaağaç Köyü Gevez Mevkii No:21/A Dikmen , Sinop / Turkey

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

BERAT ŞAHİN (RAW MATERIAL ACCEPTANCE RESPONSIBLE)

f) FLEET TO BE AUDITED:

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>
MALKOÇOĞLU ATIF KAPTAN	55 A 2418	Turkish	Double-water medium water trawl	GT 261 38,5 mtrs	Mainly SAMSUN	ATUF MALKOÇ VE ORTAKLARI
MALKOÇOĞLU ÖMER BABA	55 A 1970	Turkish	Double-water medium water trawl	GT 44 GRT 145 28,05 mtrs	Mainly SAMSUN	ATUF MALKOÇ VE ORTAKLARI
MALKOÇOĞLU BALIKÇILIK-1	55 A 2912	Turkish	Double-water medium water trawl	31.12 mtrs GT 53 GRT 176	Mainly SAMSUN	ATUF MALKOÇ VE ORTAKLARI
MALKOÇ BEY	55 A 1741	Turkish	Double-water medium water trawl	GRT 231 GT 70 30,22 mtrs	Mainly SAMSUN	ATUF MALKOÇ VE ORTAKLARI
MALKOÇOĞLU MUSTAFA REİS	55 A 1058	Turkish	Double-water medium water trawl	27.6 mtrs GT 32 GRT 107	Mainly SAMSUN	ŞAHİN BALIKÇILIK
ERGÜN KARDEŞLER BALIKÇILIK-1	61 A 1815	Turkish	Purse seiner	GT 39 GRT 127 27,6 mtrs	Mainly TRABZON	ERGÜN KARDEŞLER BALIKÇILIK
AKGÜN BALIKÇILIK-3	61 A 1153	Turkish	Purse seiner	52,2 mtrs GT 207 GRT 690	Mainly TRABZON	AKGÜN BALIKÇILIK
ŞAHİN BALIKÇILIK-2	61 A 2606	Turkish	Purse seiner	42 mtrs GT 171 GRT 590	Mainly TRABZON	ŞAHİN BALIKÇILIK
KÖROĞLU BALIKÇILIK	61 A 1392	Turkish	Purse seiner	45,32 mtrs GT 106 GRT 354	Mainly TRABZON	KÖROĞLU BALIKÇILIK

[illegible]

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
MALKOÇOĞLU ATIF KAPTAN	55 A 2418	Mainly SAMSUN
MALKOÇOĞLU ÖMER BABA	55 A 1970	Mainly SAMSUN
MALKOÇOĞLU BALIKÇILIK-1	55 A 2912	Mainly SAMSUN
MALKOÇ BEY	55 A 1741	Mainly SAMSUN
MALKOÇOĞLU MUSTAFA REİS	55 A 1058	Mainly SAMSUN
ERGÜN KARDEŞLER BALIKÇILIK-1	61 A 1815	Mainly TRABZON
AKGÜN BALIKÇILIK-3	61 A 1153	Mainly TRABZON
ŞAHİN BALIKÇILIK-2	61 A 2606	Mainly TRABZON
KÖROĞLU BALIKÇILIK	61 A 1392	Mainly TRABZON

9 vessels should have been visited as samples during the audit in accordance with the contract but only 6 vessels could be audited on site. Because the vessels are in the fishing area. Only the documentation for other 3 sample vessels has been evaluated.

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 37.4.2

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

Common Name	Scientific Name
Anchovy	<i>Engraulis encrasicolus</i>

j) TOTAL NUMBER OF EMPLOYEES:

59

k) ENVIRONMENTAL CERTIFICATIONS AND AWARDS

ISO 14001 certification by Nissert

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:

The company purchased fish from 130 purse seiner vessels for the production of Fish meal and Fish oil produced in its own plant. The vessels subjected to certification are listed as an attachment to the report.

The harbors where vessels normally unload are the harbors from Hopa to Zonguldak/Eregli.


The fishing season for anchovy starts on the 1st September and stops on the 15th May.

Fish amount in the season: 2017 – 2018: 13.500.000 kg

Fish meal production in the season: 2017 – 2018: 2.900.000 kg

Fish oil production in the season 2017 – 2018: 1.900.000 kg

- **The Friend of the Sea project was introduced** (*If not, the auditor shall provide a short description*)
- **The organization 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 organization 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 Denizcilik ve Belgelendirme Ltd.Şti	AUDIT TEAM: Zehra ÇOKŞEN (Team Leader)	AUDIT START AND END DATE: 19.11.2018 (back office) 20-21-22.11.2018 (on-site audit)
SIGNATURE OF AUDITOR: 	NAME OF THE PERSON IN CHARGE OF THE ORGANISATION AND ACCOMPANYING THE AUDITOR DURING THE AUDIT: Çilem Gözde GÖBEL / Quality Control Manager Berat ŞAHİN / Raw Material Acceptance Responsible Ümit KOBYA / Raw Material Purchasing Responsible İsa SUCU / Quality Control Responsible Necmi AFYON / Fish Meal and Fish Oil Production Responsible	AUDIT CODE: Contract No: 2017/XTQ/116 File No: 2018 TQ 8 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	Parameters and information	Y/N	Comments
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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 organization collected data in accordance with</p> <ul style="list-style-type: none"> * FAO-General Fisheries Commission for the Mediterranean (GFCM) SAC (Scientific Advisory Committee) and Sub-Committee on Stock Assessment (SCSA) * JCR Scientific and Policy Reports of European Commission-Scientific, Technical and Economic Committee for Fisheries (STECF)- Black Sea assessments (STECF 15-16) * Turkish Statistical Organization * GFCM Working Group on the Black Sea (WGBS) - General Fisheries Commission For The Mediterranean - Report of the meeting of the subregional group on stock assessment in the Black Sea (SGSABS) - Bucharest, Romania, 14-16 January 2014 * European Union Ministry, Agriculture and Fish Presidency – European Parliament Report on Management of Fisheries in Black Sea now and in Future. * FAO, GFCM and CGPM Stock Assessment Report prepared by Ali Cemal Gücü (from Middle East Technical University). <p>Some stocks have been assessed by FAO-General Fisheries Commission for the Mediterranean (GFCM) SAC (Scientific Advisory Committee) and Sub-Committee on Stock Assessment (SCSA). GSA areas assessed were: GSA1, GSA3, GSA6, GSA7, GSA16, GSA17, GSA18, GSA22. In general these stocks showed a high variability and only in a few cases are showing decreasing trends in recent years.</p> <p>In the Black Sea, this species showed a sharp decline in 1989-1991 due to a combination of environmental problems and exploitation. The predatory species <i>Mnemiopsis leidyi</i> was brought into the Black Sea from ballast water and this species preyed upon the eggs of many native species in the Black Sea. Landings figures have been low since then and they are now showing a very gradual increase after <i>Boreo ovata</i>, a predator of <i>Mnemiopsis leidyi</i> (Isinibilir and Tarkan 1998), was also introduced again through ballast water.</p> <p>Turkish Statistical Organization annually updates the figures for quantities of caught fish per each species.</p> <p>For anchovies, the numbers show an increase since 2005 till 2006, an average constant value since 2006 till 2011 and a decrease in 2014. The latest results show the increase for 2015 and 2016 (See Annex 1)</p> <p>The species is defined as: Moderately exploited High biomass http://www.fao.org/3/a-ax799e.pdf The current exploitation rate (E=0.53) The latest data collected by the organization: *Fishery Management by Prof.Dr.Mustafa Sarı, published in June 2015.</p>
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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>IUCN RED LIST - In the Mediterranean Sea, it shows strong spatio-temporal variability related to environmental conditions. There is an important fishery of frys (very young individuals) in some areas in the Mediterranean Sea. Its annual landings (tons) in the Mediterranean Sea (1996-2005), obtained from the FAO FISHSTAT Fisheries Statistical Database (2007): 83,412 (1996), 102,203 (1997) 86,708 (1998), 87,149 (1999), 104,159 (2000), 110,768 (2001), 104,748 (2002), 100,738 (2003), 109,449 (2004) and 107,909 (2005). Landings figures show a sharp decline around 1990 in the Black Sea (it apparently disappeared from the Azov Sea then but has since recovered). Figures in the Mediterranean Sea show strong fluctuations. Some stocks have been assessed by FAO-General Fisheries Commission for the Mediterranean (GFCM) SAC (Scientific Advisory Committee) and Sub-Committee on Stock Assessment (SCSA). GSA areas assessed were: GSA1, GSA3, GSA6, GSA7, GSA16, GSA17, GSA18, GSA22. In general these stocks showed a high variability and only in a few cases are showing decreasing trends in recent years.</p> <p>In the Black Sea, this species showed a sharp decline in 1989-1991 due to a combination of environmental problems and exploitation. The predatory species <i>Mnemiopsis leidyi</i> was brought into the Black Sea from ballast water and this species preyed upon the eggs of many native species in the Black Sea. Landings figures have been low since then and they are now showing a very gradual increase after <i>Boreo ovata</i>, a predator of <i>Mnemiopsis leidyi</i> (Isinibilir and Tarkan 1998), was also introduced again through ballast water.</p> <p>Turkish Statistical Organization annually updates the figures for quantities of caught fish per each species.</p> <p>For anchovies, the numbers show an increase since 2005 till 2006, an average constant value since 2006 till 2011 and a decrease in 2014. The latest results show the increase for 2015 and 2016 (See Annex 1)</p> <p>The species is defined as: Moderately exploited High biomass http://www.fao.org/3/a-ax799e.pdf The current exploitation rate (E=0.53) The latest data collected by the organization: *Fishery Management by Prof.Dr.Mustafa Sari, published in June2015.</p>
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1.1.2	The stock under consideration shall NOT be over-exploited.	Essential	<p>$F \leq F_{msy}$ within probability range of available stock assessments or at least $F \leq F_{lim}$ (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 SPECIES IS DEFINED AS: Moderately exploited High biomass http://www.fao.org/3/a-ax799e.pdf see above Scientific, Technical and economic Committee for Fisheries Black Sea assessments (STECF 15-16) The current exploitation rate ($E=0.53$), estimated based on the average $F[1:3]$ of the last 3 years, exceeds the precautionary threshold 0.4 recommended for small pelagic fish (Patterson, 1992). On the other hand, the high variance of the F estimates averaged over the last 5 years hampers to make meaningful short term predictions. General trend in the last ten years, however, indicates a slight decrease in the fisheries mortality.</p>
1.1.3	The stock under consideration shall NOT be over-Fished.	Essential	<p>$B \geq B_{msy}$ within probability range of available stock assessments or at least $B > B_{lim}$ (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>THE SPECIES IS DEFINED AS: Moderately exploited High biomass http://www.fao.org/3/a-ax799e.pdf see above From the JRC Scientific and Policy Reports Scientific, Technical and economic Committee for Fisheries Black Sea assessments (STECF 15-16) “The current exploitation rate ($E=0.53$), estimated based on the average $F[1:3]$ of the last 3 years, exceeds the precautionary threshold 0.4 recommended for small pelagic fish (Patterson, 1992). On the other hand, the high variance of the F estimates averaged over the last 5 years hampers to make meaningful short term predictions. General trend in the last ten years, however, indicates a slight decrease in the fisheries mortality”</p>
<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.</p> <p>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.</p>					
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	The methodology of assessment of the status and trends of the stock under consideration is made publicly available in a timely manner.

1.2	<p><u>Only applicable to small-scale and artisanal fisheries (i.e. it is not applicable to large-scale fisheries and fleets)</u></p> <p>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.</p>	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.	N/A	Fishery is not small-scale and artisanal.
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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
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>There is current data 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). PR.01 Sustainable Fishing Procedure (06.01.2017 / Rev.1) defines the system by referring the national regulations and scientific researches.</p> <p>The latest data collected by the organization: Strategic Action Plan for the Environmental Protection and Rehabilitation of the Black Sea (Adopted in Sofia, Bulgaria, 17 April 2009). Turkey, Bulgaria, Georgia, Romania, Russian Federation, Ukraine are the participants. www.blacksea-commission.org</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 www.mpaglobal.n etc	Y	Regulation N.2012/65 of the Food, Agriculture and Animal Livestock Ministry identifies the protected areas for Mediterranean and Black Sea. The protected areas are identified by coordinates and maps (Map 42, Map 43). (See Annex 2.2) The coordinates are recorded on the GPS system of each vessel so that the violation is warned and recorded. Cost guards check regularly the roots and lights are placed near the areas as a warning.
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 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	Purse seine does not affect the sea bed because they catch the schools at the mid-water level.
The auditor 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.	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 organisation has conducted an assessment of the impact of its activities on essential habitats for the stock under consideration and on habitats vulnerable to damage by the fishing gear. PR.01 Sustainable Fishing Procedure (06.01.2017 / Rev.1) is in place related to the subject.
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 www.iucnredlist.org.</p>	Y	<p>No turtles and seal dogs are present in the fishing zone, or other turtle species. Very seldom they take sharks but not from IUCN red list; in such a case, if the animal is dead, the ministry is informed. All the matter is regulated by the competent Ministry.</p> <p>For any other kind of protected species involuntary catches, the captain has to declare to the competent authority.</p> <p>Turkish authority performs regular checks on boats coming to the harbour; in the items controlled they introduce also the check of protected species.</p> <p>PR.02 Procedure related to Accidental Catch & Bycatch and Discard(26.12.2016/rev.0), PR.03. LS.01 IUCN Red list of endangered species (03.09.2018/rev.0) is in place related to the subject.</p> <p>The organization has The IUCN Red List of Threatened Species ISSN 2307-8235 (online) IUCN 2008: T198568A15546291. Assessment related to <i>Engraulis encrasicolus</i>, European Anchovy by Tous, P.et al.</p>
3.1.1	The organization 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>The organization collects and maintains current data and information about the fishery on endangered species, catches and discards.</p> <p>PR.02 Procedure related to Accidental Catch & Bycatch and Discard(26.12.2016/rev.0) and PR.03 Endangered Species Procedure (03.09.2018/rev.1) describe all the precautions related to fishery on endangered species, catches and discards by referring the national regulations and scientific researches.</p>
<p><i>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. The auditor shall provide a final document that shows if any of the accidentally caught species is included in the IUCN list.</i></p>					
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	PR.02 Procedure related to Accidental Catch & Bycatch and Discard(26.12.2016/rev.0) gives the information related to the level of discard (in weight). It is not over 8% of total catch by weight.

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	N/A	The fisheries are not for Tuna.
3.3.2	The fleet shall use non entangling FADs only, to avoid entanglement of sharks, turtles and other non-target species. Only applicable to fisheries and fleet targeting tuna. N/A to fisheries targeting any other species	Important	Audit shall collect evidence including pictures of FADs, purchase invoices with technical specifications to prove compliance.	N/A	The fisheries are not for Tuna.

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. (See Annex 4.1)
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)					
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.itfseafarers.org/foc-registries.cfm).	Y	There are not FOC vessels. All the fleets are recorded on the Turkish register.
The Auditor shall verify according to the website http://www.itfseafarers.org/foc-registries.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:OJ.L_.2015.199.01.0012.01.EN.G	Y	The fleet does not include IUU (illegal, unreported, unregulated) fishing vessels.

The auditor shall verify that the vessels are not listed in EU IUU vessel list(http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2015.199.01.0012.01.ENG), or in the IUU vessel list made available by the competent RFMO.

4.4	<p>The fleet shall be "Dolphin Safe" approved by the Earth Island Institute.</p> <p>Only applicable to fisheries and fleet targeting tuna. N/A to fisheries targeting any other species</p>	Essential	<p>The organisation shall be included in the Dolphin-Safe list of the Earth Island Institute: www.dolphinsafe-tuna.org</p>	N/A	The fisheries are not for Tuna.
<p>The Auditor shall verify the conformity on the list www.dolphinsafetuna.org or else the company shall sign the EII DS Policy and a copy shall be included in the audit report</p>					
4.5	<p>The organisation complies with national and international fisheries regulations.</p> <p>Compliance with the following regulations in particular has to be confirmed and verified:</p>	Essential	<p>Countries' fisheries laws are available on the website FAO http://www.fao.org/faolex/en/</p> <p>The auditor shall specify applicable indicators.</p>	Y	<p>The Organization complies with national and international regulations.</p> <p>http://www.fao.org/faolex/country-profiles/general-profile/en/?iso3=TUR</p>
4.5.1	TAC (Total Allowable Catches)	Essential	<p>Countries' fisheries laws are available on the website FAO http://www.fao.org/faolex/en/</p> <p>The auditor shall specify applicable limits.</p>	Y	<p>Turkish regulation doesn't establish quota by the moment but the measure is going to be introduced.</p> <p>Daily quantity of catching is recorded on an online government system named as SUBIS. At the first step; a government organization Seafood Cooperative at the harbor gives all the information to the branch office of the Ministry. The personnel in the ministry branch office access all the information to SUBIS. After the caught fish is weighed in the factory, the company records exact amount of fish to SUBIS. So all of the fish quantity caught can be followed up by the authorities.</p>
4.5.2	Use of a logbook	Essential	<p>Countries' fisheries laws are available on the website FAO http://www.fao.org/faolex/en/</p> <p>The auditor shall specify applicable indicators.</p>	Y	<p>The log books are regularly filled in each applicable part.</p> <p>See Annex 4.5.2</p>
4.5.3	Minimum net mesh size	Essential	<p>Countries' fisheries laws are available on the website FAO http://www.fao.org/faolex/en/</p> <p>The auditor shall specify applicable indicators.</p>	Y	<p>Mesh sizes are below:</p> <p>7/9 mm upper side (70%), 15/18 mm central side (20%), 40 mm Bottom side (10%)</p>

4.5.4	Net size	Essential	Countries' fisheries laws are available on the website FAO http://www.fao.org/faolex/en/ The auditor shall specify applicable indicators.	Y	Net sizes are below: Depth: 90 mariner's measurements (164 m) Length: 1200 m
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/ The auditor shall specify applicable indicators.	Y	IUCN RED LIST - In the Black Sea and Azov Sea, there are minimum catch sizes: 6.5 cm (Georgia and Ukraine), 7 cm (Romania), 8 cm (Bulgaria) and 9 cm (Turkey). In the Black Sea, minimum catch size is 10 cm (Unsal 1989). In the Mediterranean Sea, the minimum catch size set by the General Fisheries Commission for the Mediterranean (GFCM) is 9 cm. In some cases there are national efforts to control the fisheries (e.g., time and area closures).
4.5.6	Distance from the shore	Essential	Countries' fisheries laws are available on the website FAO http://www.fao.org/faolex/en/	Y	The minimum allowable depth for Purse seine is 24 meters according to Turkish regulation. It is not declared as "distance from the shore".
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/ The auditor shall specify applicable measures.	Y	The type of gear is quite selective - the mesh size is controlled by the Ministry in order to ensure that the mesh size is appropriate to the specie (purse seine). PR.02 (26.12.2016/rev.0) describes all the precautions for reduction of accidental catches by referring the national regulations and scientific researches.
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	No fishing is allowed in protected area. Regulation N.2012/65 of the Food, Agriculture and Animal Livestock Ministry identifies the protected areas for Mediterranean and Black Sea. The protected areas are identified by coordinates and maps (See Annex 2.2 - Map 42, Map 43). The coordinates are recorded on the GPS system of each vessel so that the violation is warned and recorded. Turkish Coast Guards check regularly the roots and lights are placed near the areas as a warning.
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/ The auditor shall specify applicable indicators.	Y	The forbidden gears cannot be used. The use of chemical substances and explosives is forbidden by the authorities. The boats are always controlled by Turkish Coast Guard and Food, Agriculture and Animal Livestock Ministry.

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	<p>The organization shall provide a copy of the FMP.</p> <p>A map of existing RFMOs is available at http://www.fao.org/figis/geoserver/factsheets/rfbs.html</p> <p>In addition, national fishery ministries and authorities can be considered, e.g. Fisheries Management Organisations (FMO).</p>	Y	General Directorate of Fisheries And Aquaculture (inferior to "Food, Agriculture and Animal Livestock Ministry") is the legal authority in Turkey. Berat ŞAHİN is responsible from Fishery Management System according to Assignment Letter with the date of 02.01.2017. (See Annex 5.1.1.a). He is the contact person with the legal authorities. The legal authorities conduct inspections very frequently.
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>There is a regulation related to small scale fishing communities in the country. http://www.tarim.gov.tr/BSGM/Duyuru/65/4_2-Numarali-Amator-Amacli-Su-Urunleri-Avciliginin-Duzenlenmesi-Hakkinda-Tebliğ-no-2016_36-Resmi-Gazetede-yayimlanmistir</p> <p>There must be special equipment for Anchovy fishing. The small scale fishing is not suitable for anchovy. Purse seine anchovy fishing is allowed only for the boats bigger than 12 m according to Turkish Regulation no: 1380 / subregulation no: 2012/65. http://www.mevzuat.gov.tr/Metin.Aspx?MevzuatKod=9.5.22750&MevzuatIliski=0&sourceXmlSearch=2016/35</p> <p>Turkish Coast Guard is controlling the vessels strictly.</p> <p>The organization has "Sustainable Fishing Policy". See Annex 5.1.1b</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	<p>The fishery management organization convenes at least yearly to update its management advices according to the most updated data according to PR.19 Management Review Procedure (31.07.2015/rev.1). They have a meeting schedule prepared for 2018-2019 season. The last MR meeting was on 11.03.2018. See Annex 5.1.1c</p>

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 both 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 regularly seeks and considers relevant information. Consultation with Deep Sea fishers shall be carried out when applicable.	Y	All legal transport certificates and other legal documents are reachable in accordance with the customer requirements. All of the details related to the fishes caught are recorded on obligatory online data access system (SUBIS). The company has to give the information periodically to Turkish Statistical Institution.
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	Evidence of involvement of local communities. <i>E.g.</i> monitoring and control of fishing activities, protected areas	Y	Sea Food Cooperative is the local responsible community. The organization is attending to the workshops frequently. Small scale fishing communities' rights are under guarantee with the national regulations. Agriculture and Animal Livestock Ministry identifies the protected areas for Mediterranean and Black Sea. The protected areas are identified by coordinates and maps (See Annex 2.2 - Map 42, Map 43). The coordinates are recorded on the GPS system of each vessel so that the violation is warned and recorded. Turkish Coast Guards check regularly the roots and lights are placed near the areas as a warning.
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	PR.01 Sustainable Fishing Procedure (06.01.2018/rev.1), PR.02 Procedure related to Accidental Catch & Discard(26.12.2016/rev.0), PR.03 Endangered Species Procedure (03.09.2017/rev.1), PR.05 Procedure for Prevention of Ghost Fishing (26.12.2016/rev.0) describe the precautionary approach is undertaken to protect the target stock and its habitat and safeguard the marine environment by referring the national regulations and scientific researches. There is a law related to protocol on protection of environment and biological variety of Black Sea. https://www.tbmm.gov.tr/kanunlar/k5212.html

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	PR.01 Sustainable Fishing Procedure (06.01.2018/Rev.1) describes the system. Management Objectives are established yearly and followed up every three months according to the procedure.
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	Management Objectives are established yearly and followed up every three months during the season (from September to May) according to PR.01 Sustainable Fishing Procedure (06.01.2018/Rev.1). Periodical reviews on 03.10.2017, 02.01.2018, 09.04.2018 and 08.10.2018 have been seen and found adequate. See Annex 5.2.3
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	It has been explained in the sections and evidences are added to the report as attachments. PR.01 Sustainable Fishing Procedure (06.01.2018/Rev.1), PR.02 Procedure related to Accidental Catch, Bycatch & Discard (26.12.2016/rev.0), PR.03 Endangered Species Procedure (03.09.2018/rev.1), PR.05 Procedure for Prevention of Ghost Fishing (06.01.2018/Rev.1) are the documental evidences for the compliance. They referee the national regulations and scientific researches.
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	PR.02 Procedure related to Accidental Catch, Bycatch & Discard (26.12.2016/rev.0) describes the recording bycatch. PR.02.FR.01 Accidental Catch Control Form is used for recording. See Annex 5.4
5.5	The fleet or fishery shall record discards.	Essential	Procedure and evidence of conformity	Y	PR.02 Procedure related to Accidental Catch, Bycatch & Discard (26.12.2016/rev.0) describes the recording bycatch. PR.02.FR.01 Accidental Catch Control Form is used for recording. See Annex 5.4
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	Bycatch and discard data is made publicly available by the organization.
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	PR.02 Procedure related to Accidental Catch, Bycatch & Discard (26.12.2016 /rev.0) and PR.03 Procedure related to Endangered Species(26.12.2016 /rev.0) define the system to prevent possible accidental catch and significant negative impacts of endangered species. Performance indicator is set for 2018 as " Accidental catch and significant negative impacts of endangered species must not exist"

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	PR.02 Procedure related to Accidental Catch, Bycatch & Discard (26.12.2016 /rev.0) defines the system 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. Performance indicator is set for 2018-2019 season as "Accidental catch of non-target species will be 0". See Annex 5.7 PR.02.F.01 Accidental Catch of Non-target Species Follow up Form is used for recording the possible accidental catches. See Annex 5.4
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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	PR.05 Procedure for Prevention of Ghost Fishing (06.01.2018/Rev.1) describes the measures that guarantee a quick retrieval of lost fishing devices to avoid "ghost fishing". PR.05.FR.01 Protocol for Fishing Equipment Control after Fishing is used for recording the measures for ghost fishing. See Annex 5.8
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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. Only applicable to large-scale vessels and fleets. Not applicable to small-scale artisanal fisheries.	Important	Documental evidence of employment. At least one monthly report of the on-board inspector.	N/A	There are no freezer vessels.
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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	The organization has established Outcome Indicators including Target Limit reference points. Outcome indicators are defined in PR.03.PL.01 Performance Indicators. See Annex 5.10a
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.	Y	Management Objectives are established yearly and followed up every three months according to PR.01 Sustainable Fishing Procedure (26.12.2016/rev.0). Periodical reviews on 03.10.2017, 02.01.2018, 09.04.2018 and 08.10.2018 have been seen and found adequate. See Annex 5.2.3
5.11.1	Essential habitats for the stock of consideration, and vulnerable ecosystems, including those potentially impacted by Deep-Sea fisheries			N/A	There are no Deep-Sea fisheries in the system.
5.11.2	Endangered species			Y	See Annex 5.2.3
5.11.3	Non-target stocks			Y	See Annex 5.2.3
5.11.4	Dependent predators and/or preys			Y	See Annex 5.2.3
5.11.5	Ecosystem structure and processes			Y	See Annex 5.2.3
5.12	A yearly reviewed Ecosystem Approach to Fisheries is in place	Recommended	Documental evidence	Y	MR Meeting implemented on 11.03.2018 covers the yearly reviewed Ecosystem Approach to Fisheries.
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	Fisheries management approaches, plans and strategies are an integral part of integrated coastal management.

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	PR.06 Waste Management Procedure (06.10.2017/Rev.1) describes recycles re-uses or re-processes all materials used during fishing, conservation and transport of the fish up to the selling point.
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	PR.06 Waste Management Procedure (06.10.2017/Rev.1) includes measures to prevent dispersion of waste in the sea (including fuels and lubricants and plastic matter). The boats have "Maritime Affairs and Communications International Oil Pollution Prevention certificate" from Ministry of Transport as an obligation. See Annex 6.2 Waste transfers are recorded on "Transfer Form for Wastes Generated by Ships (Marpol 73 / 78 Annex-1,4,5)". See Annex 6.2
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	The fishery uses all available nontoxic products according to PR.06 Waste Management Procedure (06.10.2017/Rev.1).
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	The company does not use CFC, HCFC, HFC or other refrigerants that cause ozone depletion according to PR.06 Waste Management Procedure (06.10.2017/Rev.1).

**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
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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 energy sources (renewable or not) 2. energy consumption per process line (fishing, processing, transport)	Y	The fishery is recording on a special register all the fuel consumption monitoring engine consumption that is supplying energy to the boats. The energy consumption of the plant has been declared by the company. See Annex 7.1
7.2	The organisation should calculate its carbon footprint per product unit and engage to reduce it every year.	Recommendation		N	The organization did 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:				The company has Social Responsibility Policy.
8.1.1	compliance with national regulations and ILO on child labour	Essential	Refer to ILO: http://www.ilo.org/global/standards/introduction-to-international-labour-standards/lang-en/index.htm		Contract with employees are agreed with the national labour law n.4857, n.6331. According to the national laws it is forbidden to have child employee in the country. The youngest employee in the factory is 21 years old.
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.		Minimum legal wage 2.029,50 TL (Gross); 1.604,12 TL (Net) between 01.01.2018 and 31.12.2018. The organization knows the minimum wage in the country. Contract with employees are agreed with the national labour law n.4857, n.6331. Two employees work contracts have been seen. The salary of the employee with the contract dated as 16.01.2018 was 1.604,12 TL Turkish liras. The salary with the contract date was 19.01.2018 was 1.604,12 TL net.
8.1.3	grant employees access to healthcare	Essential			The company has provided a complete health and end life insurance for all employees with the national labour law n.4857

8.1.4	apply safety measures required by the law	Essential			All safety measures are required by the main law in the country. Legal requirement is "Work Safety Law numbered as 6331". The organization applies all the safety requirements according to this law.
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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

☒ **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)

List recommendations

7.2. The organization did not calculate its carbon footprint.