

Methods of Risk Assessment to Fish Trading Companies (Agents) and Categories of Risk Levels

1. Methods of Risk Assessment to Fish Trading Companies (Agents)

Items of Risk	Criteria	Point(s)
Import/Export Performance	The annual average of total import/export value of the last three years is more than one billion US Dollars.	3
	The annual average of total import/export value of the last three years is more than fifty million US Dollars and under one billion US Dollars.	2
	The annual average of total import/export value of the last three years is under fifty million US Dollars	1
Trade Pattern	Purchasing/Selling of catches from distant water fishing vessels and the whole transactions are conducted abroad Taiwan.	3
	Consigning catches from distant water fishing vessels back to Taiwan for landing and selling and the whole transactions are conducted within Taiwan.	2
	Transactions of catches from inshore and offshore fishing vessels and the transactions are conducted within Taiwan.	1
Frequency of Inquiry from the European Union (EU) Member States.	The amount of European Union Catch Certificate (EUCC) applied by the fish trading company (agent) in the preceding year accounts for more than 50% of the total amount of EUCC that the Fisheries Agency receives inquiries from the EU for verification in the preceding year.	3
	The amount of EUCC applied by the fish trading company (agent) in the preceding year accounts for less than 50% of the total amount of EUCC that the Fisheries Agency receives inquiries from the EU for verification in the preceding year.	1
	The Fisheries Agency is not requested for a whole year by the EU to verify the EUCC applied by the fish trading company (agent) in the preceding year.	0
Amount of Catches Exported to the EU	The annual average export volume in the last three years is more than one hundred thousand tons.	3
	The annual average export volume in the last three years is less than one hundred thousand tons.	1
	No catch is exported to the EU in the last three years.	0

Processing	Catches are processed in foreign processing plants.	3
	Catches are processed in Taiwan processing plants.	2
	Catches are not processed.	1
Species Traded	Bluefin Tuna, Southern Bluefin Tuna, Bigeye Tuna, Swordfish and other species under catch statistical documents program.	3
	Species with quota allocation regulated by international fisheries organizations.	2
	Species without quota allocation regulated by international fisheries organizations.	1
Fishing Vessels Supplying Catches	Listed in illegal, unreported and unregulated (IUU) lists of regional fisheries management organizations (RFMOs), or flagged to red-card countries announced by the EU.	3
	Flagged to yellow-card countries announced by the EU.	2
	Not listed in the authorized lists of RFMOs.	1

Explanatory note: The ranking of point(s) for risk assessment is decided by the criteria with the highest points that the transactions of fish trading companies (agents) are related to. For the transaction that is not related to any of the criteria, the point is zero.

2. Categories of Risk Levels of Fish Trading Companies (Agents)

Risk Levels	High	Medium	Low
Grades of Points	17 points and above	11 points and above but under 17 points	Under 11 points
Auditing Frequency	At least once every year	At least once every two years	May be exempted from being audited

Report of the Fish Trading Company (Agent)

Name of the Fish Trading Company (Agent)		Tel No.	
Filled by		Fax No.	
Date		E-mail	

1. Internal Control Systems of Purchase and Sale

(1) Information Provided to the Auditing Authority

Item No.	Items	Conformable	Unconformable	Notes (Regarding unconformable items)
1	The code of conduct and SOP of purchase and sale of catches and fisheries products.			
2	The mechanism to deal with IUU catches and fisheries products detected.			
3	Other relevant archived information on trading catches and fisheries products that can prove the flow of traded catches and fisheries products.			

(2) Status of Implementation

Item No.	Items	Conformable	Unconformable	Notes (Regarding unconformable items)
1	Conducting training programs for internal staff and records of observing relevant domestic and international regulations			
2	Records of observing SOP of purchase and sale of catches and fisheries products			

3	Archives of relevant documents and bills of purchase and sale of catches and fisheries products			
4	Records of dealing with IUU catches and fisheries products detected.			

(3) Inventory Movement of Catches and Fisheries Products

Audited Period	From ____ (month) ____ (day) ____ (year) to ____ (month) ____ (day) ____ (year)								
Type of Fisheries									
Purchase Date	F/V	Flag	Species	Weight (kg)	Amount (USD)	Sales Date	Weight (kg)	Amount (USD)	Country of First Sales

(4) Documents on Traceability

The contract No. of purchase and sale of the lot audited:

Procedures	Items	Conformable	Unconformable	Inapplicable	Notes (Regarding unconformable and inapplicable items)
Operation	<p>Fishing vessels from which the catches/fisheries products were purchased comply with regulations on operation of flag/coastal States:</p> <ul style="list-style-type: none"> ● Operating with valid licenses ● Operating in authorized areas ● Listed in authorized lists of RFMOs ● Listed in EU SANCO list ● Not flagged to red-card 				

	<p>countries announced by the EU</p> <ul style="list-style-type: none"> ● Reporting vessel positions via Vessel Monitoring System (VMS) in accordance with relevant regulations ● Filling in rapid catch reports and catch logbooks or reporting catches via e-logbook, in accordance with relevant regulations 				
Transshipment	<p>Fishing vessels from which catches/fisheries products were purchased comply with regulations on transshipment (if no transshipment is conducted, please check the Inapplicable column.):</p> <ul style="list-style-type: none"> ● Obtaining prior authorization on transshipment ● Submission of transshipment declaration after the transshipment ● Carrier vessels are listed in authorized lists of RFMOs ● Cargo plans of carrier/cargo vessels can clearly distinguish catches and their 				

	quantities of different fishing vessels.				
Landing	<p>Fishing vessels from which catches/fisheries products were purchased comply with regulations on landing catches:</p> <ul style="list-style-type: none"> ● Obtaining prior authorization on landing ● Submission of landing declaration after the landing 				
Processing	<p>Catches/fisheries products purchased are in line with regulations of EU SANCO (for catches/fisheries products processed abroad Taiwan, please check the Inapplicable column):</p> <ul style="list-style-type: none"> ● Processing plants are SANCO authorized establishments. ● Processing plants record in detail the certificates of origin of catches and sheets of sale flow established by authorities of hygiene, so as to identify the origin of catches and control the quantity of the lot. ● For the imported raw fisheries material that is re-processed and exported to the 				

	EU, the certificates of hygiene and EUCC for every lot of the imported raw fisheries material issued by the competent authorities of exporting countries are kept.				
Purchase	<p>Relevant purchasing documents and bills of the origin of the lot of catches/fisheries products are archived:</p> <ul style="list-style-type: none"> ● Information of the seller and the purchaser, date and No. of the contract, items (species/specifications/unit price), estimated quantities, estimated date and place for loading (transshipment), estimated date and place for landing (delivering), and terms and conditions are recorded in detail in the contract. ● The fishing vessel, carrier/cargo vessel, species and quantities recorded in the tally sheet are consistent with 				

	<p>the landing declaration (applicable to landing at foreign ports).</p> <p>The fishing vessels, species and quantities recorded in the auction statement of the fishing market are consistent with the landing declaration (applicable to landing in Taiwan ports)</p> <ul style="list-style-type: none">● The date of reimbursement, No. of invoice, items (species/specifications/unit price), and quantities recorded in detail in the invoice of the seller or the settlement sheet of the purchaser are in consistent with the contract.				
Sale	<p>Relevant sale documents and bills of the origin of the lot of catches/fisheries products are archived:</p> <ul style="list-style-type: none">● Information of the seller and the purchaser, date and No. of the contract, items (species/specifications/unit price), estimated quantities, estimated date				

	<p>and place for loading (transshipment), estimated date and place for landing (delivering), and terms and conditions are recorded in detail in the contract.</p> <ul style="list-style-type: none">● The date of reimbursement, No. of invoice, items (species/specifications/unit price), and quantities recorded in detail in the invoice of the seller or the settlement sheet of the purchaser are in consistent with the contract.● Information of the seller and the purchaser, species, date and place for loading (transshipment), and place for landing (delivering) recorded in the bill of lading are consistent with the contract. The name of carrier/cargo vessel is consistent with the 10th column of EUCC.● The consignee or notify party, species and quantities recorded in the				
--	--	--	--	--	--

	declaration form of the importing country are consistent with the bill of lading.				
EUCC	<p>Columns of the EUCC are filled out in detail and accurately.</p> <ul style="list-style-type: none">● Information on fishing vessel, fishing license, species and quantities of column 2 and 3 are consistent with the operation information. The custom tariff code of the product is in accordance with the tariff No. in the Standard Classification of Exported/Imported Goods of the Republic of China promulgated by the Bureau of Foreign Trade.● Column 5 is signed by the master of the fishing vessel or his/her representative.● Fill in either column 6 (transshipment at sea) or column 7 (transshipment in port) depending on the modes of transshipment. Information on transshipment				

	<p>date, port and carrier vessel is consistent with transshipment or landing declaration.</p> <ul style="list-style-type: none"> ● Information on exporter in the column 8 is consistent with that of shipper in the bill of lading. The date shall be the date of application, and before the date of authority stamp in the column 9. ● The exporter in the column 10 is consistent with the column 8. For exportation of species with catch certificates, such as frozen bigeye tuna and swordfish, the exporter of the statistical document is consistent with that of EUCC. 				
--	--	--	--	--	--

2. Further Actions for Rectification

Items Identified by the Fisheries Agency for Rectification	Actions Taken by the Fish Trading Company (Agent) for Rectification

Field Audit Form

Name of the Audited Fish Trading Company (Agent)				Date of Audit	mm/dd/yy
Auditing Authority and Personnel					
Field Audit of the Fish Trading Company (Agent)					
Items for Audit			Results		
			Conformable	Unconformable	Item(s) w/t defect and improvement
The Internal Control System of Purchase and Sale of the Audited Company (Agent)	Information Provided to the Authority	Code of conduct and SOP			
		Mechanism to deal with IUU catches and fisheries products detected			
		Other relevant information			
	Status of Implementation	Collection of laws and regulations and staff training			
		Code of conduct and SOP			
		Archive maintenance			
		Mechanism to deal with IUU			

		catches and fisheries products detected			
	Inventory Movement of Catches and Fisheries Products				
	Documents on Traceability	Operation			
		Transshipment			
		Landing			
		Processing			
		Purchase			
		Sale			
		EUCC			
Others					

Note: This form shall be written in duplicate. The audited fish trading company (agent) and the auditing authority shall hold each copy respectively after the signing of both Audit Squad Unit and the representative of the audited company (agent).

Signature of the Audit Squad Unit:	Signatures of the representative of the audited fish trading company (agent) and attendees:

Recommendations on Further Actions

Name of the Audited Fish Trading Company (Agent)		Date of Audit	mm/dd/yy
Item(s) with Defect and Improvement	Improvements Made by the Fish Trading Company (Agent)		Reviewed by the Auditing Authority

Notes :

This form shall be written in duplicate and the fish trading company (agent) and the auditing authority shall hold each copy respectively.

Please reply to the auditing authority the “Improvements Made by the Fish Trading Company (Agent)” before ____ (month) ____ (date), ____ (year).

The Audit Squad Unit conducts review on ____ (month) ____ (date), ____ (year), and the comments are listed in above form with the result as follow:

- ☐ Item(s) with defect rectified
- ☐ Item(s) with defect remained, recorded for _____time(s)

If records of defect are more than 3 times, the Audit Squad Unit may increase the auditing frequency.

Starting from January 1st, 2016, for fish trading companies (agents) with records of defect for more than 3 times in 1 year, the Fisheries Agency may restrict the trading companies (agents) from selling or being assigned to sell catches and fisheries products pursuant to relevant regulations.

For fish trading companies (agents) with no record of defect within 3 consecutive years, they may be exempted from being audited in the next year

The scheduled date for next audit: _____(year) _____(month)