



**Green Peace & Thai Union Agreement
Audit Policy Document
And
Standard Operating Procedures**

**For Audits Taking Place in 2019
Relating to 2018 Activities**
Version 2019/1

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Integrated Management of Natural Resources

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1 Introduction

In the summer of 2017, Green Peace (GP) announced it had reached an agreement with Thai Union Group PCL (TU), which committed to “measures that will tackle illegal fishing and overfishing, as well as improve the livelihoods of hundreds of thousands of workers throughout the company’s supply chains.” The announcement also stated that “Thai Union’s new commitments build upon its sustainability strategy [SeaChange®](#), including efforts to support best practice fisheries, improve other fisheries, reduce illegal and unethical practices in its global supply chains, and bring more responsibly-caught tuna to key markets.”

As part of the TU and GP Agreement (the Agreement), progress against the commitments must be independently audited on an annual basis. This document describes the audit protocol and is intended to cover activities from CY18 through the end of CY21. Following completion of each annual audit, a report will be issued and presented to GP and TU.

This document will be amended as required.

2 Program implementation

2.1 Participating Company Compliance

TU has committed to undergo independent auditing against all the commitments found in the Agreement. Tables 1-3 list the general commitment categories to be audited under this protocol, provides guidance regarding the required action and/or information, and describes the means of verification that will be used to assess conformance. TU and its suppliers are expected to voluntarily provide to MRAG Americas all the information required to complete the audits.

The audits will generally follow the principles of ISO 19011. The Program Manager ensures audits are compliant and consistent with the commitments listed in the Agreement. The following timeline is proposed for completing the audit of CY18 activities¹:

Activity	June 2019	July 2019	Aug 2019	Sept 2019	Oct 2019	Nov 2019
Draft Protocol						
Carryout Audit						
Complete Audit						
Present Report						
Finalize Report						

¹ Note that the schedule can likely be pushed two months earlier for the CY19 and CY20 audits.

3 Agreement Sections and Means of Verification

Table 1: Agreements on Longline Fishing, Audit Guidance and Means of Verification

Reference	Category	Category Guidance	Means of Verification	Frequency
1.1	Support of pole and line & best practice fishing by transitioning longline-caught product.	TU will transition 1500 tonnes of its longline-caught albacore supply to be sourced from pole and line and/or troll vessels by end of 2017 and increase this tonnage by 1000 tonnes each year until 2020, ending in a total increased volume of 4500 tones. This will be prioritized for utilization in the North American market.	<ul style="list-style-type: none"> - Auditor will review data from the quarterly RFMO reports TU submits as part of its participation in ISSF. This data will be compared to the agreed baseline(s) (i.e. previous calendar year's volume) for P&L and Troll. - Auditor will also review Thai Union documentation re utilization of p&l tuna for the North American market and report on how tuna from these gear types has been prioritized for that market. 	Annually
1.2	Bycatch mitigation best practice implementation plan	<p>TU's bycatch mitigation best practice and contains clear milestones and overall timeline estimates. Greenpeace will be provided an advanced draft to provide feedback and agree next steps.</p> <p>By the beginning of 2018, TU will ensure RFMO requirements on seabirds are being met in the WCPO and communicate and begin implementation of the best practice mitigation plan with suppliers.</p>	<ul style="list-style-type: none"> - Auditor will review TU progress against milestones. Auditor will look at internal communications and trainings, as well as public reports from National authorities and RFMOs relating to bycatch issues affecting vessels supplying to TU. --> this will be done from 2018 onward and documents/trainings will be referenced. 	Annually

Reference	Category	Category Guidance	Means of Verification	Frequency
			<ul style="list-style-type: none"> - Auditor uses findings from TU ISSF Annual Audit to supplement this audit against milestones. - Auditor will assess a random sample (20% of a random quarter) of TU suppliers to determine whether they have received training re bycatch mitigation and best practices. 	
1.3	Improving bycatch data sharing	TU recognizes that bycatch data availability and sharing is weak within the longline sector and will work with the fleets sourced from to share raw bycatch data with relevant RFMO scientific bodies and, work with scientists to ensure best practice data collection is taking place.	<ul style="list-style-type: none"> - Auditor will review and report on TU advocacy efforts (2018 onward) as well as TU efforts to help RFMOs process the data (if/when applicable). Auditor will spell out the types of letters/efforts for each audit year. 	Quarterly
1.4	Increasing human and electronic observer coverage	<p>TU will employ 100% observer coverage (human and e) on the longline vessels it sources from by 2020. TU is engaging with some of its key longline suppliers to trial the ability to increase the use of both human observers and e-observers with the intent to ensure 5% human coverage across fleets sourced from is met and to increase human observer coverage across vessels in TU's supply chain.</p> <p>The project is expected to start at the end of 2017 (baseline) and run for a one-year period. TU will share with GP the progress and outcome of trial.</p>	<ul style="list-style-type: none"> - Auditor will obtain TU report(s) on observer coverage, which can be compared to the agreed late-2017 baseline. Auditor will obtain total number of vessels declaring observers and note total number of vessels sourced from. - Auditor will review randomly selected copies of human and e-observer contracts, comparing those to declared fishing trips. 	Annually

Reference	Category	Category Guidance	Means of Verification	Frequency
		TU is also engaging in a FIP that will include e-observer requirements. TU will host a multi stakeholder roundtable to share results and seek opportunities to increase human observer recruitment.	- Auditor will review www.fisheryprogress.org for FIP progress re e-observer utilization.	

Table 2: Agreements on Transshipment at Sea, Audit Guidance and Means of Verification

Reference	Category	Category Guidance	Means of Verification	Frequency
2.1	Moratorium on transshipment at sea	TU agrees to extend its moratorium on transshipment at sea across our entire tuna longline supply chains unless suppliers meet a strict set of conditions to ensure the critical issues surrounding the practice are addressed to our satisfaction, and immediately start working with their suppliers to implement this strict set of standards.	<ul style="list-style-type: none"> - Auditor reviews quarterly reports submitted by TU to RFMO(s) for declared transshipments and compares this to RFMO(s) transshipment records. - Auditor determines whether vessel had human observer or e observer at time of transshipment (by looking at the Transshipment Declaration). 	Quarterly
2.2	At-sea transshipment conditions	Thai Union will only source tuna from longline vessels that have human observers for vessels transshipping at sea. Thai Union will work to have a 3rd party observer specifically for ensuring compliance with Thai Union’s vessel code of conduct on board the carrier / reefer vessel, in addition to the already required observer on the carrier/reefer. The longline vessel must allow the designated observer from the carrier to board and inspect the longline vessel at the sole discretion of the observer. Thai Union commits to initiating this program by the end of 2018, working with suppliers starting	<ul style="list-style-type: none"> - Auditor looks at randomly selected transshipment declarations (provided by TU's suppliers) and verifies whether the observer on the catcher vessel and the carrier vessel have countersigned the report. - Auditor reviews TU reports on effort(s) to develop and train a pool of 3rd party observers. 	Annually

Reference	Category	Category Guidance	Means of Verification	Frequency
		immediately to develop and train a pool of third-party observers.		
2.3	Limits on time at sea	TU agrees to only source from vessels that spend a maximum of 9-months at sea before returning to port and allowing crew to access port services.	- Auditor randomly selects 25% of vessels sourced from over a 12-month period and looks at TU RFMO reports to determine whether the vessel came to port at least every 9 months.	Annually
2.4	MCS/Transparency	TU agrees to require that any vessel authorized to transship at sea should have mandatory AIS or equivalent technology.	- Auditor reviews list of all vessels sourced from and randomly selects 25% to verify that they have AIS or equivalent system installed and in operation at the time sourcing occurred. This will be done by looking at TU's RFMO reports and the PVR.	Annually
2.5	Enforcement and noncompliance	Any non-compliance by suppliers found through the social audit program will be addressed through a performance improvement program. For critical issues, such as forced labor, issues will require immediate resolution. For other issues an agreed program of performance improvement and a timeline will be agreed with the supplier. Any suppliers unwilling or unable to meet the TU standards will be suspended for a minimum of one year.	- Auditor verifies that social audits have been conducted. - Auditor notes which vessels have been audited, and highlights instances when the 'same' vessel has been subject to multiple audits within a 12-month period. - Auditor looks at year-end summary report and identifies vessels that have major non-conformances. Auditor then checks if those vessels have either (i) submitted and action	Annually

Reference	Category	Category Guidance	Means of Verification	Frequency
			plan, or (ii) successfully addressed the nonconformance(s).	
2.6	Port inspections / PSMA	TU recognizes the importance of the PSMA but also the challenges that some countries face to effectively implement its provisions, especially poorer coastal State nations. However, we strongly believe that the benefits greatly outweigh the costs, particularly given the well documented impacts and economic cost of IUU fishing to developing coastal States. We therefore encourage countries ratify the agreement and put in place the means to implement it. Ultimately our aim will be to only source fish transiting through ports belonging to countries that are fully implementing the PSMA.	<ul style="list-style-type: none"> - Auditor reviews advocacy efforts materials supplied by TU, as well as those found in the specialized press (i.e. FFA newsletter, Undercurrent News, etc.) 	Quarterly
2.7	Data collection / traceability	TU is committed to full digital traceability, from catch to consumption. Traceability is the backbone of sustainability and responsible sourcing. E-logbooks and e-CDT are the future of digital traceability and TU will support trials and regulator commitment to moving from paper based to electronic systems.	<ul style="list-style-type: none"> - Auditor reviews result of the annual traceability exercise carried out as part of the annual PC audits. - Auditor reviews TU reports on the use of E-logbooks and e-CDT. - An additional 4 tuna can/pouch codes (beyond those already selected during the PC audits) will be selected at random (globally and off the shelf at retailers) to carry out traceability exercises. 	Annually

Reference	Category	Category Guidance	Means of Verification	Frequency
2.8	IMO Numbers	Thai Union will require that all vessels it sources from capable of receiving an IMO number obtain one, and all other vessels will be required to have a UVI or equivalent registration number.	- Auditor reviews vessel list from quarterly RFMO reports and ensures that all have an IMO or UVI number.	Quarterly
2.9	Observer recruitment	Thai Union will preferentially source from vessels employing regional observers, and where regional observers are not available, will employ national or independent third- party observers.	- Auditor reviews TU procedure (if available), observer contracts (financials should be redacted), and list of observers active across the vessels TU sourced from. - Auditor reviews TU annual public ISSF audit results. - Auditor reviews www.fisheryprogress.org for FIP updates/reports.	Annually
2.10	Transport Vessels / Reefers audits	Thai Union will implement an audit scheme for carriers transshipping at- sea, starting in 2018 (Note: this requirement will not apply to vessels that transship in port).	Auditor reviews transshipment declarations provided by TU suppliers.	Annually

Table 3: Agreements on Fish Aggregating Devices (FADs), Audit Guidance and Means of Verification

Reference	Category	Category Guidance	Means of Verification	Frequency
3.1(a)	FAD reduction plan - By 31/12/2020 we will:	Reduce the numbers of FADs we use by committing to not source from vessels that utilize more than 300 active FADs as a maximum. TU will be clear with all of its supplying fleets currently using less than 300 FADs that they do not want to see any growth in the numbers of FADs used.	- Auditor reviews TU communications / policy to suppliers indicating no more than 300 FADs (active w/ buoys) per vessel can be utilized within a 12-month period.	Annually

Reference	Category	Category Guidance	Means of Verification	Frequency
			<ul style="list-style-type: none"> - If vessel operates within a fleet, auditor determines whether the total number of FADs declared by the fleet equals to no more than 300 FADs on a per vessel basis. 	
3.1(b)		Based on TU's aggregated current use, this represents an estimated reduction of active FADs for TU suppliers in the Indian Ocean of 30%, in the W&CP of 57% and in the Atlantic of 40% and overall of 50% based on 2016/17 levels. (Based on TU data shared with GP in June 2017).	<ul style="list-style-type: none"> - Auditor looks at FAD sets data (supplied by TU) for all of TU's suppliers, and randomly selects suppliers to verify that no more than 300 FADs per vessel have been utilized. 	Annually
3.1(c)		TU will review the scientific data on stock status and available technologies to inform future direction of FAD management, seeking further reductions in FAD numbers where that is supported by scientific evidence.	<ul style="list-style-type: none"> - During year 1 (CY18), if procedure exists, auditor reviews it for consistency with commitment. - During subsequent years, auditor reviews internal memos and other TU documentation to assess whether any progress has been made based on what has been laid out in the initial procedure. 	Annually
3.2	Agreement to only deploy non- entangling FADs from large seiners	<p>By 30/06/2017 all large-scale purse seiner vessels must have a policy to deploy non-entangling FADs, with the aim to only deploy non-entangling FADS by 31/03/2018.</p> <p>1. By 18/04/2017 all large-scale purse seiner vessels must have a policy to deploy non-entangling FADs.</p>	<ul style="list-style-type: none"> - Auditor reviews supplier policies on the deployment and build design of NE FADs. - Auditor reviews FIP reports re FAD design and deployments + whether any observer reports 	Annually

Reference	Category	Category Guidance	Means of Verification	Frequency
		2. By April 2018, purchase from large purse seiners will deploy only non-entangling FADs.	mention FADs and the design(s) being used.	
3.3	Exclusive use of non-entangling and biodegradable FADs	<p>By 31/12/2020 all vessels we purchase from will deploy only non-entangling FADs. TU commits to move the fleets from which they source towards fully biodegradable FADs, and to be an early adopter of scientifically proven fully biodegradable FAD materials / technologies (excepting the buoy).</p> <p>1. Target: By 31/12/2020 all vessels Thai Union purchases from will deploy only non- entangling FADs. 2. For large scale purse seiners it will be April 2018.</p>	<ul style="list-style-type: none"> - Auditor reviews TU procurement policy. - Auditor asks randomly selected suppliers (contacts facilitated by TU) for FAD build schematics, including a description of materials being used. 	Annually
3.4	Increase of FAD free offering	<p>TU agree to double their current offering of verified FAD-free products in 5 key European markets (figures below) and double their global offering of verified FAD free products (figures below) by 2020.</p> <p>European market increases from 2017 - 2020: France 21% to 40%; UK 8% to 16%; Italy 10% to 20%; NL 4% to 8%; Denmark 4% to 8%; global increase 11% to 22% (with a nonpublic target of 25% globally by 2020).</p> <p>Note: On the French target and global 25% target we agree to track progress together to ensure the best chance of meeting this target and discuss any changes in TU's ability to meet these targets.</p>	<ul style="list-style-type: none"> - Auditor reviews data volunteered by TU and determines % of FAD free product (tonnage), then compares this to baseline volume (CY17) to determine % increase. - During traceability exercise, auditor verifies if 'FAD-free' product can be traced back to FAD closure period in WCPO. 	Annually

Reference	Category	Category Guidance	Means of Verification	Frequency
3.5	Addressing Supply Vessels	TU supports the IOTC's initiative to address the subject of supply vessels as it relates to overcapacity and overfishing. We encourage other RFMOs to develop a scientific basis for decisions on the impact of supply vessels on fish stocks, and appropriate regulation. TU commits to asking all of their supplying fleets to immediately begin providing accurate data to the relevant RFMO on their current use of supply vessels and call on RFMOs to expedite analysis on the impact of supply vessels on capacity in the IO and Pacific.	- Auditor verifies advocacy effort materials supplied by TU and/or which can be found in the specialized press.	Annually
3.6	FAD free verification pilot	TU will initiate a trial on FAD Free verification in the Indian Ocean, with the aim of verifying the supply of FAD- free fish into the European markets. This trial will consist of two parts: That which has 3rd Party certification: this means catches are segregated in specific hatches which is reported by the Observer on board in their report. It is shown in the hatch plan of the vessel and noted in the log book. That which does not have 3rd Party certification yet: we ask for copy of the hatch plan where FF tuna is placed. We will also ask for a copy of the log book where we could see it is recorded as FF.	- Auditor reviews FAD-free pilot report/results for consistency with the commitment's desired outputs. - If TU is able to obtain them, auditor also reviews copies of the certificate and the Captain's Statement re in which hold(s) the FAD-free fish was stored.	Annually
3.7	FAD management plans in FIPs	For each tuna FIP in which TU are active where FADs are utilized, a FAD management plan will be developed which will include better regulation by coastal states and RFMOs, and mapping of the number of FADs deployed to measure reduction progress.	- Auditor reviews FIPs on www.fisheryprogress.org and determines whether the FAD management plan is present.	Annually
3.8	Transparency of FAD use data	U recognize the value of reliable and accessible data on FAD use in improving understanding and	- Auditor reviews TU communications with suppliers	Annually

Reference	Category	Category Guidance	Means of Verification	Frequency
		managing the impacts of FADs. As such, TU will ask and expect all of the fleets / purse seiners it sources from to share their data on FADs with RFMO Scientific Committees within 4 months of the end of the fishing trip. TU will ask and expect all of the fleets they source from to share data in this way and be clear with them that they see this becoming a required standard for TU. TU will urge all of the RFMOs to step up their ability to be able to receive and utilize such data in the management of FADs.	and RFMOs regarding the utilization of FAD data.	
3.9	Information for Consumers	Thai Union will provide more details on FAD free tuna on the can tracker websites to improve the understanding of consumers of the products they are buying.	- Auditor reviews can tracker site(s) for presence of information on 'FAD-free' tuna.	Annually
3.10	RFMO Regulations on FADs	TU agree to maintain their own targets while they remain stronger, but publicly support any RFMO action plans that attempt to further reduce the use of FADs.	- Auditor reviews public communications from TU re its support for RFMO FAD management plans.	Annually

3.1 Audit Determination and Reporting

The auditing described in this document serves as an assessment of TU's progress against its public commitments. MRAG Americas will report on what evidence was received and what this means with regards to each commitment and associated timeline (if any). Decisions regarding any potential departures or delays from the initial commitments are to be discussed solely between the parties to the agreement.

3.1.1 Audit Reports

The audit reports will be provided directly to Green Peace and Thai Union Group PCL during an annual presentation by the MRAG Americas Manager, and subsequently sent via email notification. Final versions of the reports will be available within two weeks of the presentation.

4 Annex 1. Audit Program Policy

4.1 Overall Audit Policy

It is the policy of MRAG Americas to ensure that its audit operations are consistent with defined standards and procedures to maintain the highest appropriate level of quality. To this end, MRAG Americas undertakes audits per the standards and procedures described in this manual and only within the scope of the commitments outlined in the GP & TU Agreement. MRAG Americas has developed this document and its auditing procedures with guidance from ISO/IEC 17065:2012(E).

Specifically, it is the policy of MRAG Americas to ensure that:

- All audits meet these documented standards for independence, accuracy, precision, representativeness, comparability, and suitability to their intended purposes;
- All audits are verifiable and defensible, and all components related to their generation are properly documented;
- Data integrity is maintained and documented;
- Data confidentiality is maintained;
- Audit Program reviews are conducted on a scheduled and documented basis;
- Managers, supervisors, and staff throughout MRAG Americas, and its contractors, understand their roles in managing quality; receive the training necessary to meet quality standards for job tasks; and are encouraged to identify and suggest improvements to the program.

4.2 Program Manager

In all respects, the Program Manager (Mr. Oleg Martens) is responsible for ensuring that the content of this manual is followed. The Program Manager is the main contact point at MRAG Americas for audit-related queries and drives the MRAG Americas program.

The Program Manager's main responsibilities include:

- a) Organizing and coordinating the audits for MRAG Americas;
- b) Supervising assessment teams;

- c) Ensuring quality assurance of documentation;
- d) Maintenance of data confidentiality;
- e) Regularly convening MRAG Americas senior management for review and oversight; and
- f) Identifying potential conflicts of interest.

The Program Manager ensures the audit policy and systems are amended and updated as necessary and is responsible for ensuring changes and improvements are captured and communicated to auditors for implementation in subsequent assessments, as appropriate.

4.3 Assessment Team

MRAG Americas selects auditors based on their competence, training, qualifications, and experience for an Assessment Team (or individual) to conduct audits. All personnel involved in the audit are provided with and briefed on up-to-date documentation for auditors. Documentation includes:

- a) Contractual obligations on auditors, including requirements to report actual and potential conflicts of interest and to maintain confidentiality;
- b) Specification of division of responsibilities between auditors;
- c) Procedures to be undertaken by auditors;
 - prior to audits;
 - during onsite audits;
 - after audits, e.g., specification of responsibilities and recommended schedules for report writing; and
- d) Information about the overall role of the auditor and audit process in maintaining the integrity of the conservation measures.

Any person engaged by MRAG Americas as an auditor for this audit program has:

- received a copy of this document;
- received sufficient training in the correct procedures and requirements for these audits;
- received a copy of the GP & TU Agreement Audit Checklist;
- received a copy of ISO 19011 Standard;
- sufficiently demonstrated their performance and capabilities to the appropriate level prior to conducting solo audits; and
- signed an MRAG Americas contract (either as an employee or contractor), which includes terms of reference, conflict of interest, confidentiality, a Statement of Non-Disclosure, timing, and responsibilities of the assessor.

4.4 Auditor training

Audits are carried out by fully trained MRAG Americas auditors. These auditors are experienced in other audit programs and will be provided with audit training to ensure they fully understand the specific audit criteria pertaining to the commitments in the Agreement.

The training program will include:

- Desktop training (remote);
- Shadow audit(s) observing an MRAG Americas experienced auditor;
- Annual refresher training; and
- Performance review audits by an MRAG Americas experienced auditor.

4.5 Documentation and Means of Verification

Document control procedures are used to ensure accurate tracking and management of all documentation utilized during audits. Other than documents requiring an original signature, such as contracts with clients, which may be kept in both paper and electronic formats, MRAG Americas keeps electronic versions of documents for official record keeping.

Copies of vessel and company documentation (either electronic or hard copy) are considered acceptable audit evidence. In some instances, for example in the case of commercially sensitive documents, sighting of a document on a computer screen during a webinar session (i.e. using screen sharing) may be an option².

MRAG Americas will use the Agreement audit checklist for all audits. The completed and reviewed audit checklist will also serve as the audit report. A copy of the audit report will be provided to both Thai Union and Green Peace.

MRAG Americas will endeavor to allocate auditors who speak the language in common use at the location being audited. Translation of audit evidence into English and/or audit reports from English into the language of the company will be the responsibility of Thai Union and Green Peace.

4.6 Confidentiality and data security

4.6.1 Confidentiality

MRAG Americas limits access to confidential data to employees and contract auditors authorized to work on specific audits. MRAG Americas understands that the fishing, management, and/or processing operations they assess may include proprietary strategies, locations, data, and business information and practices. All MRAG Americas employees involved in these audits, including office personnel and individuals participating in subcontracts (e.g. contract auditors) sign a binding confidentiality/non-disclosure agreement in which they undertake not to discuss or communicate any confidential information to third parties other than as required within MRAG Americas as a normal part of the audit program. Data are not to be released, reproduced, distributed, or published without prior approval of Thai Union. MRAG Americas follows strict data management procedures to protect the confidentiality of audit information. MRAG does not publish any form of audit data.

MRAG Americas reserves the right to disclose Confidential Information to its responsible employees and individuals participating in subcontracts with a *bona fide* need to know such Confidential Information. Recipients are informed that the information is confidential and is for the sole purpose of the specific project. MRAG Americas may disclose Confidential Information if and to the extent that such disclosure is required by applicable law, provided that they use reasonable efforts to limit the disclosure by means of a protective order or a request for confidential treatment and provide the owners of the information (i.e. the PC) a reasonable opportunity to review the disclosure before it is made, and to interpose its own objection to the disclosure.

² The decision regarding whether sighting of a document in this way is acceptable will be made by the Auditor following policy advice from MRAG Americas. This will depend on the nature of the document and the conservation measure or commitment for which it is being used as evidence of conformance.

4.6.2 Data Security

TU data and/or open computer files will not be left unattended and confidential data are gathered from output devices immediately. Any data output not included in reports sent to TU and GP are shredded immediately. MRAG uses a multi-user network of computers. MRAG will ensure security of the network with a three-level approach. The original networking software will contain firewall code that will protect the network from unauthorized access. Access to all network terminals is by password only.

All computer files associated with, or containing, confidential data are stored only in directories on a system that is password-protected, and only authorized personnel have access to system passwords. Each authorized employee will have a unique password and passwords will allow access to only select files. The Program Manager is responsible for maintaining data security.

4.7 Compliance with legal requirements

MRAG Americas complies with all legal requirements in the countries in which the company operates and key personnel have demonstrable understanding of such legislation and regulations.

Should MRAG Americas become aware at any time that legal proceedings have been instigated or other allegations concerning the legal compliance of MRAG Americas activities associated with this program arise, we shall notify Green Peace and Thai Union as soon as is practicable and within a maximum of seven days. MRAG Americas shall advise Green Peace and Thai Union of the outcome of any such proceedings or allegations.

4.8 Program Review

Program review for the Agreement audits will occur annually. The Program Manager will also conduct ongoing program reviews (on a minimum annual basis) to ensure program activities are as effective and efficient as practicable to achieve program outcomes.