

RESPONSIBLE SEAFOOD SOURCING POLICY

Overview

Background:

As one of Scotland's leading producers of quality smoked salmon and peeled scampi cores, at Associated Seafoods Ltd (ASL) we are aware of the importance of sourcing seafood that has been responsibly caught or farmed.

We believe that we have an obligation to ourselves, and to our customers and consumers to ensure that integrity and best practice is maintained within our supply chains and we strive to do this through the measures outlined in this policy.

Purpose:

To ensure that all seafood sourced by ASL has been caught or farmed in line with national and international regulations; is sourced from suppliers that are committed to and are able to demonstrate that they are operating legally and in compliance with industry best practice measures to ensure responsible production.

Scope:

The procurement of all fresh and frozen seafood including, but not limited to, wild caught *Nephrops norvegicus*, farmed Scottish Atlantic salmon, and wild Alaskan Pacific salmon. The following policy relates to the United Nations Sustainable Development Goals; 14: Life Below Water and 8: Decent Work and Economic Growth.



Responsibility:

Corporate Social Responsibility Coordinator

- Approve or refuse the use of seafood sources based on the outcome of sustainability and ethical risk assessments or credible independent expert advice
- Work with customers, fisheries, processors, and aquaculture operations within the supply chain to drive continuous improvement

Technical Department

- The approval of all raw materials
- Ensuring the relevant certification and/or accreditation documentation is received and kept up-to-date.

Procurement

- Ensure that only approved products are sourced from approved suppliers. Approved Supplier and Raw Materials/Ingredients logs can be found in the Technical Department

Relevant Documentation:

PGEN 003 Procedure for the Approval and Management of Raw Material and Packaging Suppliers

Content:

1. Risk Assessment:

- 1.1. Every fishery or farming operation will be risk assessed in terms of sustainability and ethical trade prior to the development of new products to ensure that the ASL Responsible Seafood Policy requirements are met.

- 1.2. Every fishery or farming operation will be continuously monitored, and an annual sustainability risk review will be conducted by the Corporate Social Responsibility Coordinator for each source based on species, catch area, and catch method.
 - 1.3. A new risk assessment will be re-conducted following any significant changes to the supply chain or processes (e.g. changes of ownership, new or different infrastructure, or processing/product handling technologies used).
 - 1.4. All seafood within the ASL supply chain must meet the criteria for a 'Responsibly Sourced' claim in line with the Sustainable Seafood Coalition's (SSC) Voluntary Codes of Conduct. <https://www.sustainableseafoodcoalition.org/codes-of-conduct/>
 - 1.5. Every fishery or farming operation will be risk assessed to ensure that all seafood is compliant with the SSC requirements to meet a responsibility claim.
 - 1.6. If there is an improvement requirement highlighted by the sustainability risk assessment, ongoing sourcing is premised on a credible improvement initiative being in place. Where appropriate to ensure ongoing sourcing, ASL commits to working with customers, suppliers and other relevant stakeholders to help develop credible improvement plans for the source of the product.
2. Illegal, Unregulated and Unreported (IUU) Seafood:
- 2.1. IUU practices are those where fishing or farming operations are conducted in contravention of legal conservation and management measures. IUU hinders scientific assessments, impairs stock management measures, threatens biological sustainability and distorts markets. ASL condemns the use of illegal practices, which have no place in a modern, sustainable and responsible seafood industry.

ASL shall take all reasonable precautions to mitigate the risk that IUU fishery material may be entering our supply chain.
 - 2.2. We will never knowingly purchase material or deal with suppliers implicated in practices including, but not limited to:
 - Fishing without a licence or legal authority
 - Non or mis-reporting of catches
 - Exceeding quota limits
 - Fishing outside prescribed areas
 - Ignoring size regulations
 - Use of banned fishing methods
 - 2.2.1. ASL will deal only with suppliers who operate in an open and responsible manner and are able to demonstrate compliance with all the relevant national and international regulations.
 - 2.2.2. ASL will never knowingly purchase or handle fish or shellfish caught by fishing vessels listed on the Illegal, Unreported and Unregulated (IUU) vessel blacklists.
 - 2.3. ASL recognises and endorses the Environmental Justice Foundation's 10 principles for global transparency in seafood supply chains. <https://ejfoundation.org/what-we-do/oceans/transparency>

- 2.4. ASL is committed to working with the PAS 1550 toolbox in order to inform our risk based decisions and to mitigate the IUU and ethical risks within our seafood supply chains.
- 2.5. ASL will only accept seafood that is larger than the mandatory minimum conservation reference size (MCRS).
3. Endangered, Threatened and Protected Species:
 - 3.1. Avoidance of Endangered Species
 - 3.1.1. ASL has clearly defined exclusions from our product range. These are products and practices which we will not support in any of our commercial operations. At present this includes:
 - 3.1.1..1. The sale or purchase of species which appear as 'endangered' or 'critically endangered' in the IUCN*¹ red list or CITES Appendices*².
 - 3.1.1..2. Trading with any business directly involved in the targeted capture and/or the commercial slaughter of non-seafood species such as marine mammals, sea turtles or are involved in the practice of shark finning
 - 3.2. Supporting Healthy Fish Stocks
 - 3.2.1. ASL will source seafood from healthy stocks, which where possible are independently verified as such by Global Seafood Sustainability Initiative (GSSI) benchmarked third party sustainability standards (e.g. the Marine Stewardship Council (MSC) certification – a global scheme certifying the sustainability of wild-capture fisheries).
 - 3.2.2. ASL is actively engaged with an ongoing Fisheries Improvement Project alongside other industry stakeholders and interested parties, with the aim of achieving MSC certification for Scottish *Nephrops norvegicus*.
4. Social and Ethical Standards at Sea:
 - 4.1. Prior to supply, all suppliers are required to complete a Self-Assessment Questionnaire which contains relevant questions regarding Ethical Trade in the supply chain.
 - 4.2. All suppliers must adhere to the ASL Supplier Code of Conduct.
<https://www.associatedseafoods.com/our-policies>
 - 4.3. ASL recognises that the Responsible Fishing Vessel Standard (RFVS) scheme is an important development in assuring good practice at sea, especially with respect to labour standards and health & safety of fishers in alignment with the criteria established by International Labour Organization Convention 188.
 - 4.4. ASL encourages all fishing vessels within the supply chain to be at minimum, actively engaged in the process of RFVS certification and will encourage international supply vessels to do the same when the scheme is available to them.

*¹ International Union for Conservation of Nature and Natural Resources. See <http://iucnredlist.org/>

*² Convention on International Trade in Endangered Species of Wild Fauna and Flora. See <https://www.cites.org/eng/app/appendices.php>

5. Fishing Gear Impacts, Waste and Discards:
 - 5.1. ASL supports the use, development and innovation of fishing gears that have lower impacts on the marine environment and are more selective towards the target capture species through the avoidance of non-target catch.
 - 5.2. Where environmental impacts from fishing gear are higher, fisheries should be MSC certified or be able to demonstrate best practice operation to minimise or improve the impacts (i.e. through active participation in a FIP).
 - 5.3. ASL will not accept any species that come from fisheries or farms that are involved in irreversible damage to the marine environment.
 - 5.4. ASL does not approve of, nor sources seafood from fisheries that are involved in the use of destructive fishing methods such as the use of dynamite and poison.
 - 5.5. Abandoned, lost or discarded fishing gear (ALDFG) from both wild capture fisheries and fish farms impact marine wildlife, habitats and fish stocks. Suppliers of ASL should be aware of and compliant with the Global Ghost Gear Initiative's best practice framework for the management of fishing gear. <https://www.ghostgear.org/resources>
 - 5.6. ASL supports and encourages our supply chain vessels to participate in innovative schemes such as Fishing for Litter or those of a similar nature tackling marine pollution.
6. Protected Marine Habitats:
 - 6.1. ASL will only source from fisheries or farms that respect prescribed legal fishing areas.
 - 6.2. No wild caught seafood will be accepted from fishing vessels that actively operate in legally recognised marine protected areas or no-take zones (e.g. Natura 2000 Habitats Directive zones).
 - 6.3. Suppliers of ASL should comply with recognised conservation objectives and regulations if fishing or farm activities are taking place within sensitive areas.
7. Responsible Aquaculture:
 - 7.1. All fish farms within the ASL supply chain must be certified to GSSI benchmarked third party standards (such as Aquaculture Stewardship Council, Global GAP or GAA Best Aquaculture Practice).
 - 7.2. The farmed salmon feed that is fed to fish supplied to ASL shall be from a responsible source with the species not classed as 'endangered' or 'critically endangered' on the IUCN Red list or CITES Appendices.
 - 7.2.1. The feed shall be certified to the MarinTrust standard or otherwise stated.
 - 7.2.2. The feed shall not contain any mammalian or avian by-products
 - 7.3. No farmed species that has been directly subjected to genetic modification (GM) will be accepted

8. Traceability:

- 8.1. At ASL we believe full traceability throughout the supply chain from vessel (or known group of vessels) or farm to plate, is of vital importance to ensure that every aspect product legality, integrity and quality is maintained.
- 8.2. We make every effort to ensure that all wild seafood purchases are traceable back to the catch vessel or a known group of vessels along with the specific area of catch (for example, FAO Major Fishing Areas or those defined by the International Council for the Exploration of the Seas (ICES)).
- 8.3. We will ensure that the supply of all farmed fish is accompanied with detailed harvest sheets allowing traceability back to farm site and where possible cage number(s).
- 8.4. We believe in transparency in our supply chain and openly disclose the origin of our seafood on our website.