

## Responsible sourcing of Crustaceans: wild and farmed.

### Introduction

Waitrose & Partners is committed to the responsible sourcing of our seafood, including crustaceans. Crustaceans are water dwelling animals which have a hard, segmented body known as an exoskeleton and include prawns, crabs, and lobsters (all known as ‘decapod’ crustaceans). Fish and shellfish (including decapod crustaceans) welfare is important to us, our customers and our suppliers. To promote their welfare, we:

- Share best practice with all stakeholders globally, including for example our zero tolerance for prawn broodstock eyestalk ablation,
- Set a better industry standard, including contributing to the development of a decapod crustacean specific industry code of practice,
- Continuously develop our own standards: we have formed a joint Waitrose-supplier working group on wild and farmed seafood welfare (Fish Forum).
- Push for continuous improvement in our supply chains, such as developing species-specific requirements to be verified through an on- farm second party audit (the prawn Responsible Efficient Production (REP) index).
- Require supplier compliance with the GGGI best practice framework for ghost gear.
- Show leadership by engaging with NGOs and experts in innovation projects that will improve welfare

All of the decapod crustaceans sourced for our own brand products come from responsibly managed fisheries and farms. After research proved that decapod crustaceans and cephalopod molluscs (e.g. octopus) are sentient (they have the capacity to experience feelings such as pleasure or pain) during 2022, we welcomed the [UK government passing legislation that recognises them as sentient beings](#). Waitrose is committed to ensuring all of our sourced shellfish, including decapod crustaceans, are responsibly sourced and that we continuously improve animal welfare standards in our supply chains.

The Senior Aquaculture and Fisheries manager, along with the Waitrose Farming Partnership Fish Forum (WFP FF- see more details below), are charged with the overall responsibility for animal welfare in our seafood supply chains. The John Lewis Partnership Ethics and Sustainability Committee, which includes Executive Directors and Directors of both Waitrose and Partners and John Lewis and Partners, has oversight of our ethics and sustainability strategy and priority issues, including animal welfare. We take any non compliance of our animal welfare policies very seriously – breaches can lead to the removal of farms or fisheries from the Waitrose & Partners supply chain.

### Scope of policy

Our responsible sourcing of fish and shellfish policy (hereafter referred to as seafood sourcing policy) applies to Waitrose & Partners branded:

- Fish and shellfish sold as such;
- Added value chilled, frozen and ambient (canned) fish products.
- Branded fish or shellfish products sold within Waitrose & Partners and John Lewis & Partners branded hampers
- Branded Exclusives sold prepacked, loose on counters or Waitrose Entertaining
- Branded canned tuna

Unless otherwise stated for specific sections, the geographic scope of our policy is global and applies to all species we source.

## **How our policies are implemented**

All our policies are subject to our Regulatory Policy Framework, which provides oversight of regulatory policy and procedures for the John Lewis Partnership. This operates via a standardised approval process involving a number of stakeholders, including: policy working groups and our Regulatory Policy Steering Group. Policies are disseminated to our suppliers through a dedicated virtual system, on which all direct suppliers must be registered allowing them to receive notifications of any changes to existing policies or new policies. It is the joint responsibility of our direct suppliers, the Senior Aquaculture and Fisheries manager and the Fish Technical Manager to implement our seafood sourcing policy and the elements of our welfare policy that apply to our seafood. Our Technical Audits, conducted by a third party external auditor, verify compliance. Policies are reviewed annually and subject to version control.

Compliance with our policies (including those covering decapod crustacean welfare) is a contractual obligation for all suppliers, for all species, and geographies, and products (i.e. those covered by the scope of the policy). We have specific procedures for any non-compliance with our policies and we respond quickly to such incidents. In the most severe cases, non-compliance can result in suspension of supply or termination of contract, making the supplier ineligible to supply Waitrose in the future.

## **Certification**

All of our farmed fish and shellfish are independently certified to at least one recognised third-party standard (the scope of which includes processing facilities, farms, hatcheries, transport, and feed mills). The following third party certification schemes are recognised for farmed shellfish: Aquaculture Stewardship Council (ASC), Global G.A.P., Global Aquaculture Alliance Best Aquaculture Practice (GAABAP), Naturland Organic and Friends of the Sea.

## **Waitrose Farming Partnership Fish Forum**

The Waitrose Fish Forum is a strategic working group for key Waitrose supplying companies to work towards and facilitate the implementation of Waitrose policies for Aquaculture and Fisheries. It offers all members the opportunity to discuss current topics, best practice and all future challenges. All farmed and wild caught fish and shellfish topics are covered; including but not limited to, training, data reporting, and welfare standards. Since establishing the Fish Forum, we continue to have influence with collaborative project work to improve welfare practices within the industry.

All farmed and wild caught species (including decapod crustaceans) and the global geographies from where species are sourced are currently included in the scope of this group's work. The Fish Forum meets quarterly, and has a formal chair. The Fish Forum currently has two working groups; one on fish and shellfish feed, and one on fish and shellfish welfare (both wild and farmed). The membership of our working groups includes technical, ethical and sustainability experts, who set targets and timebound milestones for collective actions to drive forward Waitrose policies in these spaces. These plans are then approved by the Steering Group (which consists of supplier senior level representatives, such as Commercial and Managing Directors, to CEO level) who hold the working groups accountable for progress and guide them through challenges and opportunities. Outputs from both the Working Groups and Steering Group are implemented throughout the rest of the supply chain where relevant.

The members of the Steering Group include nine main seafood suppliers, and 19 Waitrose Partners.

Waitrose publishes its objectives and targets for the management of seafood (including decapod crustacean) welfare on this webpage and in our annual E&S report, for example on eyestalk ablation.

### **Waitrose bespoke prawn ‘feet on the farm’ assessment**

We have developed a warm water farmed prawn aquaculture Responsible Efficient Production (REP) index: an audit standard that requires feet on the farm assessment to verify compliance. It is currently within its pilot phase, where we are seeking feedback from both suppliers and experts. Once completed it will be required to be implemented by every supplying farm site before they can be approved and will be audited annually by our first tier suppliers for current supply chains. The REP encompasses prawn welfare requirements including a detailed health and welfare plan, where indicators are to be checked daily onsite by the prawn farmers. These indicators include swimming behaviour, mortalities, feeding behaviour, and shrimp visual inspections.

### **Feed**

All raw materials used for the production of fish meal or fish oil, for aquaculture operations must come from suppliers that are accredited to the recognised third party certification schemes as described above, and including Marin Trust.

### **Mutilation**

Waitrose has a strict policy prohibiting eyestalk ablation in shrimp (prawn) broodstock reproduction.

This is implemented through direct communication with our suppliers, through the Senior Aquaculture and Fisheries Manager, our Fish Technical Manager and the relevant Commercial Manager, as well as being highlighted via the Fish Forum. We also have supplier conditions of purchase which all suppliers must sign up to when they agree to conditions of purchase in our purchasing system; this includes our zero tolerance of eyestalk ablation in our farmed warm water prawn broodstock reproduction. These conditions apply to all existing and any potential new suppliers (who have to first be approved through a rigorous process by the fisheries team).

Working together, Stirling University, the Seajoy Group, and the Global Aquaculture Alliance, and Labeyrie Fine Foods (a strategic supplier of prawns), co-funded a research project which demonstrated that eyestalk ablation in prawns was not only unnecessary but also potentially counter-productive. This pioneering research was awarded the GAA (Global Aquaculture Alliance) innovation award in 2020, and has acted as both an incentive and enabler for the phasing out of this practice in our supplying hatcheries.

Suppliers who are unable to meet our policy requirement on ablation are currently allowed a derogation to the policy on the strict condition that they are working to phase out the practice and all ablation of farmed warm water prawn broodstock reproduction used in product supplied to Waitrose is removed by end of December 2023 at the latest; this is written into our seafood sourcing policy for our suppliers which they must adhere to as written into their contract.

We measure progress against this requirement for those with derogations on at least a quarterly basis with our farmed prawn suppliers as a formal KPI with them directly and also in our fish forum meetings where it is formally recorded in the minutes; currently 85% of our warm water prawn supply is ablation free.

## Education, training and sharing best practice

Some staff e.g. Senior Aquaculture & Fisheries Manager have had welfare training delivered by the Fish Vet group covering finfish and decapod crustaceans.

We continue to educate and work with not just our supply chains but the wider industry on the practice of eye ablation of female broodstock in shrimp hatcheries. For example we advocate for the prohibition of this practice during industry, government, and NGO discussions and with certification standard holders. Our suppliers have also worked very closely with the prawn supply chains and wider stakeholders to help them understand Waitrose's non ablation commitment.

As members of the Sustainable Seafood Coalition (SSC), we follow the voluntary SSC codes of conduct, including on responsible sourcing (which covers decapod crustaceans and is global in supply scope), and we'll work only with fisheries and aquaculture farms that share our commitment to responsible sourcing and animal welfare. We are part of an industry working group developing welfare Codes of Practice for the handling of decapod crustacea across the shellfish supply chain facilitated by the Seafish Industry Authority, and includes participation from Ministerial department Defra (Department for Environment, Food & Rural Affairs). The purpose of these Codes of Practice is to help businesses minimise unnecessary stress to crustacea during catching, processing, transportation, sale and final despatch.

All British fishing vessels supplying Waitrose fish and shellfish have been asked to adopt the Responsible Fishing Vessel Standard (RFVS) scheme. RFVS is a voluntary vessel based certification standard which enables commercial fishing operations to provide assurance of decent working conditions and operational best practice through independent, third-party auditing.

## Capture Methods

We are committed to reducing abandoned, lost, discarded fishing gear, and other plastics that can harm sea species. Abandoned, lost or otherwise discarded fishing gear and ghost fishing gear (ALDFG) has numerous negative environmental impacts. The ability of ALDFG to continue fishing, often referred to as 'ghost fishing', has detrimental effects on fish stocks, seabirds, marine mammals and the wider marine environment.

Additionally, the loss of fishing gear contributes to marine plastic pollution through the introduction of synthetic materials into the marine food chain. Modern plastics used in the production of fishing gear can remain in the environment indefinitely and will eventually break down into toxic microscopic plastic and fibres that can poison marine mammals and fish.

Our commitment is implemented through our fish sourcing policy which requires suppliers' compliance with [Global Ghost Gear Initiative \(GGGI\) best practice framework and risk assessment](#). Supply chains should take a risk based approach to fishing gear loss, incorporating investment in the marking of fishing gear to aid identification of fishing vessels, adopt best practice principles when setting gear, and a responsible approach to fishing and the wider marine environment. The capture methods for our wild and farmed caught decapod crustaceans are as follows:

- Brown Crab: Wild caught, pots and traps: creels.
- Warm Water Prawns: Pond system, intensive farming.
- Cold Water Prawns: Wild caught, trawls: bottom otter trawling.

- Lobster: pots and traps.
- Norway lobster (nephrops) trawls: bottom otter trawling.

We do not allow for the wild capture of warm water prawns. We publicly specify how all our seafood is caught in our [Ocean Disclosure Project](#) with details on the species, and farming and fishing region.

## **Harvest and slaughter**

### Wild

Harvesting methods for farmed and wild caught fish and seafood are continually evolving. We are committed to reducing the negative effects of the capture method on decapod crustacean welfare. We are working directly with our supply chains and through our Fish Forum Wild Welfare Working Group to understand best current practices and to implement fishing trip, gear adaptations, and handling practices during and immediately following capture in a continuous improvement model.

The Waitrose & Partnership policy on bycatch and discards applies to all wild caught species. We are committed to minimising bycatch and discards, and avoiding capture of non-target species including immature and undersized specimens (this includes decapod crustaceans). Waitrose suppliers must ensure that fish are caught using methods that minimise by-catch of vulnerable fish and non-targeted fish species, ensuring minimal impact on habitats and non-targeted species such as coral, seabirds and marine mammals. We actively support fishing practices that minimise discards and avoid the capture of immature and undersize fish, through preferential purchasing (i.e. choosing supply chains with lower impacts where there is otherwise equivalence) and supporting Fisheries Improvement Projects which address these issues. We recently had an independent audit of our bycatch conducts for all our wild caught supply chains, and are assessing the results and discussing mitigating actions we can implement with the auditors.

Below are current slaughter methods for each species we currently sell under our own label:

- Crab: brown crab is sourced from one site in Orkney. It is in a Fisheries Improvement Project, and electrically stunned to kill. This is the only crab we use for our own label products.
- Lobster: all lobster is electrically stunned to kill.
- Cold water prawns: wild caught using demersal trawls, which are slaughtered via thermal shock (iced) then frozen or processed onboard.
- Nephrops: All our nephrops are put on ice after capture, which is currently standard practice in the global fishing industry.

### Farmed

We ask our supply chain for farmed seafood to be pre-stunned before slaughter to reduce any pain or distress. Our warm water prawn supply chain is working to achieve this goal. Below are current slaughter methods for each farmed crustacean species we currently sell under our own label.

- Warm Water Prawns: currently harvested and killed using thermal shock with strict requirements for time out of the water, ice slurry temperature and composition, and time in the water.

We recognise that electrical stunning is the best practice for all decapod crustaceans. We are working with experts and our supply chains to review our harvest methods and explore a move to electrical stunning instead. This includes developing projects within our Fish Forum Working Group and with the Shrimp Welfare Project to further progress this agenda, as well as participating in the Code of Practice Industry Working Group for decapod crustaceans .

### **Transportation and live sales**

Waitrose & Partners recognise that transportation is a significant element of decapod welfare and that the requirements are species specific. These topics will be discussed during our Fish Forum Welfare Working Group. However, we expect and require all transportation conditions are followed to ensure the best welfare practices are kept for each species, such as light, temperature, water quality, salinity and overcrowding, to prevent drying out, gill and body damage and low oxygen levels at all times.

Any live transportation of decapod crustaceans within our supply chain must be as short as possible. We are aiming for less than 24 hours journey time from landing to processing. The duration from landing to processing for our brown crab is less than an hour and the crabs are transported in appropriate environment conditions to ensure best welfare practice.

We do not permit the live sale of decapod crustaceans to the public in our stores.