

Responsible sourcing of Crustaceans: wild and farmed

I. Introduction

Waitrose & Partners is committed to the responsible sourcing of its 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). Animal welfare, including fish and shellfish and decapod crustaceans is [important to Waitrose](#) customers and suppliers. To promote fish and shellfish welfare, Waitrose:

- Shares best practice with all stakeholders globally, including for example our zero tolerance for prawn broodstock eyestalk ablation,
- Sets a better industry standard, including contributing to the development of a decapod crustacean specific industry code of practice,
- Continuously develops its own standards: Waitrose has formed a joint Waitrose-supplier working group on wild and farmed seafood welfare (Fish Forum).
- Pushes for continuous improvement in its 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).
- Requires supplier compliance with the GGGI best practice framework for ghost gear.
- Shows leadership by engaging with NGOs and experts in innovation projects that will improve welfare.
- Will advocate for the inclusion (and enforcement) of decapods in UK legislation relating to sentient animals – such as the Animal Welfare Act, The Welfare of Animals in Transport Order, the Animals at Time of Killing Regulation, and the Animals (Scientific Procedures) Act, as well as push for improvements in other countries via its supply chain and their influence.

All of the decapod crustaceans sourced for 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, Waitrose welcomed the UK [government passing legislation that recognises them as sentient beings](#), including them in the [Animal Welfare \(Sentience\) Act 2022](#). Waitrose welcomes the ‘Sea to Plate: The welfare journey of decapod crustaceans’ report from Crustacean Compassion highlights potential welfare issues at each stage of the

animal's journey from sea to plate and species-specific welfare recommendations. Waitrose is committed to ensuring all sourced shellfish and decapod crustaceans are responsibly sourced and that there is continuous improvement in animal welfare standards in its supply chains.

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

2. Scope of policy

This policy is an annex of the Responsible Sourcing of Fish and Shellfish Policy, which applies to Waitrose branded:

- Fish and shellfish sold as such
- Added value chilled, frozen and ambient (canned) fish products
- Branded fish or shellfish products sold within Waitrose and John Lewis 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 the policy is global and applies to all species sourced.

3. How our policies are implemented

Policies are subject to the 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 the Regulatory Steering Group. Policies are disseminated to 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 responsibility

of direct suppliers, the Senior Aquaculture and Fisheries manager and the Fish Technical Manager to implement the Responsible Sourcing of Fish and Shellfish Policy and the elements of the welfare policy that apply to Waitrose seafood. Technical Audits of suppliers are conducted by Waitrose Technical Team to verify compliance with Waitrose policies. Policies are reviewed annually.

Compliance with policies is a contractual obligation for suppliers. Waitrose has specific procedures for any non-compliance with policies and responds 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.

4. Certification

At the end of Waitrose's 2023/24 financial year, 93.6% Waitrose own brand fish and shellfish was independently certified to a recognised third-party standard.

100% of Waitrose farmed fish and shellfish is 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.

Wild caught fisheries must be independently certified to a recognised third party standard (Marine Stewardship Council (MSC) / Food and Agriculture Organization Responsible Fisheries Management (FAO RFM)) or in an approved Fishery Improvement Project. Fisheries in a credible Fishery Improvement Project (FIP) must be certified by 31st December 2025.

5. 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, Waitrose continues 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 the 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 crustaceans) welfare on [this webpage](#) and in our annual E&S report, for example on eyestalk ablation.

6. Waitrose bespoke prawn 'feet on the farm' assessment

Waitrose has 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 feedback is sought 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 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, who have been fully trained in welfare and other aspects of animal husbandry. These indicators include swimming behaviour, mortalities, feeding behaviour, and shrimp visual inspections.

7. 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 including MarinTrust.

8. Use of non-therapeutic mutilations

Non-therapeutic mutilations are procedures which involve interference with the sensitive tissues or bone structure of the animal, other than for the purpose of its medical treatment.

Waitrose has a strict policy prohibiting eyestalk ablation in shrimp (prawn) broodstock reproduction. Eyestalk ablation is removal of one or both eyestalks of (farmed) breeding female shrimps (prawns), often without anaesthetic, in order to increase egg production and reproductive success. This practice causes trauma, stress and pain and therefore is not good welfare.

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 Waitrose supplying hatcheries.

Waitrose policy prohibiting eyestalk ablation in shrimp (prawn) broodstock reproduction is implemented through direct communication with suppliers, through the Senior Aquaculture and Fisheries Manager, Fish Technical Manager and the relevant Commercial Manager, as well as being highlighted via the Fish Forum. Supplier conditions of purchase which all suppliers must sign up to when they agree to conditions of purchase; this includes zero tolerance of eyestalk ablation in farmed warm water prawn broodstock reproduction. These conditions apply to all existing and any potential new suppliers.

Waitrose set a target to remove ablation for farmed warm water prawns used in products supplied to Waitrose by 31st December 2023. Waitrose measured progress against this requirement on at least a quarterly basis with its farmed prawn suppliers as a formal KPI with

them directly and in the Waitrose Fish Forum meetings where it was formally recorded in the minutes.

Achievement of target: As of 1st January 2024 100% of Waitrose's warm-water prawns were free from eyestalk ablation and continue to be.

Waitrose recognises that other non-therapeutic mutilations occur in some fisheries and farms (e.g. claw nicking and declawing) and is working to identify and implement a specific plan to eliminate these practices.

9. Education, training and sharing best practice

Certain partners including Waitrose Senior Aquaculture & Fisheries Manager have had welfare training delivered by the Fish Vet group covering finfish and decapod crustaceans.

Waitrose continues to educate and work with not just its supply chains but the wider industry on the practice of eye ablation of female broodstock in shrimp hatcheries, as well as further opportunities for improvements such as claw nicking/declawing. Waitrose advocates for the prohibition of this practice during industry, government, and NGO discussions and with certification standard holders. Waitrose 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), Waitrose follows the voluntary SSC Codes of Conduct, including on responsible sourcing (which covers decapod crustaceans and is global in supply scope), and Waitrose works only with fisheries and aquaculture farms that share its commitment to responsible sourcing and animal welfare.

During 2023-24 Waitrose has been a part of a working group which is revising the SSC Codes of Conduct, and Waitrose developed a proposed set of welfare commitments for all fish and seafood for inclusion in the Codes based on feedback from key stakeholders and SSC members. These will continue to be reviewed via a planned stakeholder consultation during 2024.

Waitrose is part of an industry working group developing the Seafish, UK Crab and Lobster Management Group and Shellfish Association of Great Britain commissioned Welfare Codes of Practice for the handling of decapod crustacea across the shellfish supply chain, which 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. These Codes are now finalised and [will be published by Seafish](#). Waitrose will be requiring all supplying vessels to adhere to these Welfare Codes of Practice as a minimum requirement, with measures that will monitor implementation and performance.

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.

10. Harvest and capture

Harvest and capture methods for farmed and wild caught fish and seafood are continually evolving. Waitrose is committed to reducing the negative effects of the capture method on decapod crustacean welfare including not only the target species, but also bycatch and other unintentionally affected species during the processes. Waitrose works directly with supply chains and through the 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 policy on bycatch and discards applies to all wild caught species. Waitrose is 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 fishing methods that minimise bycatch of vulnerable fish and non-targeted fish species, ensuring minimal impact on habitats and non-targeted species such as coral, seabirds and marine mammals. Waitrose actively supports 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.

Waitrose had an independent audit of its bycatch conducts for all Waitrose wild caught supply chains, and is assessing the results and discussing mitigating actions that can be implemented with the auditors.

Waitrose is 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. To combat this, fishing gear must have an escape mechanism so that if the gear is lost or abandoned animals can escape.

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.

Waitrose commitment is implemented through Responsible Sourcing of Fish and Shellfish Policy which requires suppliers' compliance with [Global Ghost Gear Initiative \(GGGI\) best practice framework and risk assessment](#). Suppliers must risk assess and record the likelihood of loss and impact of the fishery gear according to this framework. Suppliers must identify best practice mechanisms and develop a documented plan for implementation with the fishery. High risk and very high risk fisheries must be avoided. Suppliers should incorporate investment in the marking of fishing gear to aid identification of fishing vessels, and adopt best practice principles when setting gear and a responsible approach to fishing and the wider marine environment. Additionally, a number of supply chains (cold water prawns and lobster) are MSC certified which has requirements for ALDFG that fisheries must meet in order to achieve certification and an annual surveillance audit to ensure any conditions are on track to be closed out. The remainder of wild caught decapod crustaceans are FIP engaged.

The capture methods for wild and farmed caught Waitrose own label decapod crustaceans are as follows:

- 100% of Waitrose Brown Crab: Wild caught, pots/creels.
- 100% of Waitrose Warm Water Prawns: Farmed, pond system.
- 100% of Waitrose Cold Water Prawns: Wild caught using bottom otter trawls.
- 100% of Waitrose Lobster: Wild caught using baited traps.
- 100% of Waitrose Langoustine (*Nephrops* sp.): Wild caught using bottom otter trawls.

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

11. Humane slaughter

Waitrose recognises that decapod crustaceans should only be stunned using methods that result in instantaneous insensibility to pain and distress or where insensibility is induced without causing pain and distress. This insensible state should be maintained until death occurs and slaughter should also occur instantaneously. Slaughter should be carried out by trained and competent practitioners.

Waitrose recognises that electrical stunning is best practice for all decapod crustaceans as the best option available for rendering decapods insensible. This must be done immediately with appropriate electrical species-specific parameters and approved, specialist equipment, before slaughter by a swift and effective humane killing method.

Waitrose recognises that electrical stunning for all decapod crustaceans followed by mechanical killing (splitting or spiking) by trained professionals is the most humane method of slaughter, but this is not standard practice across decapod crustacean species, countries and supply chains. Further research and trials are needed to ascertain how to do this at commercial scale. Waitrose is working with experts and supply chains to review harvest methods, stunning and slaughter and exploring a move to electrical stunning instead.

Waitrose is committed to ensuring own label decapod crustaceans are humanly stunned and slaughtered, in line with [Crustacean Compassion guidance](#), across all species and geographies. This has been achieved for most species, and Waitrose is working with the remainder of supply chains (warm and cold water prawns, langoustines) and the Fish Forum Welfare Working Group to collaboratively develop and implement an action plan to achieve this for 100% of supply chains. Some of these supply chains are already trialling electrical stunning. Waitrose is also working with the Shrimp Welfare Project to further progress this agenda, as well as participating in the Welfare Codes of Practice Industry Working Group for decapod crustaceans.

Permitted methods of stunning and slaughter:

- Electrical stunning immediately followed by mechanical killing (spiking or splitting).

Methods of stunning and slaughter that Waitrose are working with suppliers to phase out:

- Wet/ice chilling
- Dismemberment.

Prohibited methods of stunning and slaughter:

- Fresh water 'drowning'
- High salt solution
- CO₂ gassing
- Dry/air chilling
- Chemical anaesthetic.

Wild

Below are current slaughter methods for each species Waitrose currently sells as own label:

- Crab: 100% of Waitrose brown crab is sourced from the UK and is electrically stunned to kill. This is the only crab used for own label products.
- Lobster: 100% of Waitrose lobster is electrically stunned to kill.
- Cold water prawns: 100% of Waitrose cold water prawns wild caught using demersal trawls, which are slaughtered via thermal shock (iced) then frozen or processed onboard.

- Nephrops: 100% of Waitrose nephrops are put on ice after capture, which is currently standard practice in the global fishing industry.

Farmed

Waitrose requires its supply chain for farmed seafood to be pre-stunned before slaughter to reduce any pain or distress. The warm water prawn supply chain is working to achieve this goal. Below are current slaughter methods for each farmed crustacean species Waitrose currently sells.

- Warm water prawns: 100% of Waitrose 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.

12. Transportation and live sales

Waitrose & Partners recognise that transportation is a significant element of decapod welfare and that the requirements are species specific. Waitrose requires all transportation conditions 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 the supply chain must be as short as possible. Waitrose aims for less than 24 hours journey time from landing to processing. The duration from landing to processing for brown crab is less than an hour and the crabs are transported in appropriate environmental conditions to ensure best welfare practice.

Waitrose is developing transport requirements and reporting as part of the bespoke warm water farmed prawn aquaculture Responsible Efficient Production (REP) index and via the Fish Forum Welfare Working Group for other crustaceans. Waitrose will require all supplying vessels to adhere to the industry [Welfare Codes of Practice](#) as a minimum requirement, including regarding transport.

Waitrose does not permit the live sale of decapod crustaceans to the public in our stores.