

M&S  
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SOURCING STANDARDS  
Seafood Sourcing Standard



# Seafood Sourcing Standard

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## 1.0 OVERVIEW

### Background

Marks & Spencer seafood products are sourced from around the world and may be from either wild stocks or aquaculture operations. Regardless of the source, every seafood product must be obtained from reputable fisheries and farms, known by Marks & Spencer. Since Marks & Spencer sell almost 100% own brand seafood, our seafood sourcing requirements apply to all product types that contain seafood, whether in a salad, ready meal, a can, or a sandwich etc. This policy document summarises our *'work with the best, avoid the worst and invest in the rest'* approach to seafood sourcing. This approach is reflected in the following sourcing principles which cover specific issues that matter to us.

In January 2010, Marks & Spencer became the first UK company to sign up to the [WWF Seafood Charter](#). Together, this commits WWF and Marks & Spencer to work as partners to drive Marks & Spencer's supply chains towards responsible sourcing of sustainable seafood and to take a leadership role in bringing widespread improvement to fisheries and fish farming globally.

Our *'work with the best, avoid the worst and invest in the rest'* approach to seafood sourcing is evident by our significant investment in fishery improvement projects (FIPs) around the world. We regard FIPs as an important tool for driving improvement towards reputable third party standards for sustainable fisheries.

Marks & Spencer is a member of the Global Sustainable Seafood Initiative (GSSI), whose mission is to ensure confidence in the supply and promotion of certified seafood, as well as to promote improvement in seafood certification schemes. Any third party certification scheme that has been formally recognised by the GSSI is acceptable to Marks & Spencer. We encourage all our suppliers of seafood to join the GSSI.

Marks & Spencer is also a member of the Sustainable Seafood Coalition (SSC), a cross-industry group in the UK tackling seafood sustainability using our influence as businesses involved in seafood to drive change. We are united in a vision for sustainable seafood and

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have pledged to work together to achieve this. As a member of the SSC, Marks & Spencer has committed to implement the SSC's voluntary Codes of Conduct for Seafood Sourcing and Environmental Claims. Once again, we encourage all our suppliers of seafood to join the SSC and implement the sourcing and labelling codes. Please refer to the SSC website for further detail and to review the codes themselves.

This Standard outlines the Outcomes and Requirements necessary to ensure that all Marks & Spencer finished products containing fish or shellfish, whether wild-caught or farmed, have been produced using seafood raw materials and ingredients sourced from fisheries and farms that protect the integrity of our products

Outcome: What you demonstrate to show you are in control of fish and shellfish sourcing

Requirement: What you **must** do to deliver the outcomes

Guidance: **How** you could achieve the requirements and outcomes

We will ask for specific outcomes, define what the mandatory requirements are to achieve those outcomes but enable suppliers to show how they meet them through their own risk assessments, mitigations and controls. To support suppliers, we will provide appropriate guidance documents and materials. If a supplier chooses to control a process by delivering an alternative approach but it does not meet, or exceed, the requirements, we may choose to make the guidance mandatory.

The evaluation of outcomes and the establishment of clear performance indicators will be important in assessing compliance with this Standard. We will conduct an Independent Integrity Audit to assess the effectiveness of the supplier's delivery of the outcomes and requirements.

**In Scope:**

All fish and shellfish raw materials and ingredients that are intended for use within the Marks & Spencer supply base and finished products, and which will ultimately be sold in our main chain stores, franchise, international and hospitality outlets.

**Out of Scope:**

Fish and shellfish raw materials used in stocks, and any seafood which is used as a flavour enhancer, such as anchovy essence and oyster extract or for use in Marks & Spencer pet food products.

We have prioritised our sourcing expertise on fish and shellfish used as raw material and ingredients, but not where seafood is used as a flavour enhancer. We are currently mapping supply chains for seafood used as a flavour enhancer and are introducing realistic requirements where possible, to bring these products in line with our sustainable seafood sourcing policy.

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**Responsibilities:**

**Marks & Spencer Fisheries & Aquaculture Manager and Aquaculture Specialist will:-**

- Approve (or not approve) fisheries based on the outcome of the risk assessment and advice from WWF, notifying the direct supplier and the relevant category team.
- Approve (or not approve) aquaculture operations based on a gap analysis against the most relevant Select Farm standard (conducted by the direct supplier) and our own risk assessment, notifying the direct supplier and the relevant category team.
- Work with fisheries, primary processors and aquaculture operations within the Marks & Spencer supply base to drive continuous improvement.

**Marks & Spencer Technologists will:-**

- Ensure all suppliers handling seafood have read and understood this policy document.
- Have visibility of their suppliers' seafood sourcing strategy and raise any issues or concerns with the appropriate specialist.

**Direct Suppliers will:-**

- Manage the relationship with their fish and shellfish supply base in accordance with the below outcomes and requirements and escalate issues to their lead technologist and Fisheries & Aquaculture manager where appropriate

**2.0 OUTCOMES & REQUIREMENTS**

**Fishery and Aquaculture Risk Assessment**

**Outcomes:**

Every fishery or farming operation will be risk assessed by Marks & Spencer, to ensure our policy requirements and farming standards are met in full, prior to any new product development containing seafood.

All sources of seafood, whether or wild or farmed, will undergo an annual sustainability assessment using the data captured within the Species Tracker. This data will be reported publicly each year in our Plan A report.

All seafood supplied to Marks & Spencer meets the criteria for a 'Responsibly Sourced' claim in line with Sustainable Seafood Coalition definition for responsibly sourced seafood.

**Requirements:**

- Complete the Species Tracker and receive approval to proceed from the Fisheries & Aquaculture Manager or Aquaculture Specialist for any proposed new seafood species, fishery or farm in advance of any product development engagement with Marks & Spencer.
- The Marks & Spencer Species Tracker will be completed in full for all seafood species used by the direct supplier, on an annual basis, and submitted to WWF and Marks & Spencer Fisheries & Aquaculture Manager, on or before the 1 February each year.
- Ensure that the completed Species Tracker covers 100% of seafood supplied to Marks & Spencer within the period covered by the tracker (1<sup>st</sup> April to 31<sup>st</sup> March the following year).

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- Participate with Marks & Spencer in an annual sustainability risk review for each species and source, based on species and source assessment results.
- Work with Marks & Spencer and other relevant stakeholders to develop appropriate improvement work for a seafood species or source if a need is identified in the risk review.
- Provide detailed information on and help to assess the sourcing of any marine and other key ingredients used in aquafeed.

### **Social and Ethical Standards at Sea**

#### **Outcome:**

All Marks & Spencer at sea supply chains are free from any form of human rights abuse, and operate to leading standards for crew health, safety and welfare.

#### **Requirements:**

- Marks & Spencer Ethical Risk Assessment will be completed in full, for all new seafood species, and sent to the Marks & Spencer Fisheries Manager or Aquaculture Specialist for approval (or not), prior to new product development.
- All seafood sold by Marks and Spencer must be purchased from companies who comply with the Marks & Spencer Human Rights Policy and Code of Ethics and Behaviours, which can be found on Connect.
- All seafood sold by Marks & Spencer must be sourced from vessels which are either:
  - Certified to the Responsible Fishing Scheme;
  - Actively engaged in a timebound plan to achieve Responsible Fishing Scheme certification (or an equivalent credible third party standard);
  - Where Responsible Fishing Scheme certification is not yet achievable (such as international fleets), a minimum of one supply vessel from each fleet must have completed the Vessel Questionnaire (available on Connect).
- Direct suppliers must actively facilitate the roll out of Responsible Fishing Scheme certification across fishing fleets within their supply base.
- Direct suppliers must hold a complete vessel list, to include all vessels within their supply chains.
- Direct suppliers must report the proportion of certified vessels within their supply chains on an annual basis, during sustainability review.

### **Illegal, Unregulated and Unreported (IUU) seafood**

#### **Outcome:**

All seafood sold by Marks & Spencer is sourced from fisheries compliant with all international, national and local laws and regulations.

#### **Requirements:**

- Ensure that all seafood supplied to Marks & Spencer is fished or farmed in accordance with national and international laws.

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- Identify all vessels or groups of vessels that supply seafood to Marks & Spencer and check those vessels against published National / Regional (as appropriate) lists of vessels and IUU lists.
- Communicate concerns over IUU fishing to Marks & Spencer and relevant primary processors and obtain confirmation that vessel skippers and owners actively oppose these practices. This may form part of a broader vessel approval scheme such as Responsible Fishing Scheme.
- Promote the use of tracking and monitoring systems on board fishing vessels to prove fishing activity has been conducted within legal requirements.
- Ensure systems exist to trace all finished product back to individual fishing vessels or groups of fishing vessels as appropriate.
- Ensure that all seafood complies with the EU IUU Regulation including the EU Catch Certification Scheme.
- Continue to monitor the European Commission Decisions on Non-Cooperating Countries on IUU.

**Fishing gear impacts, waste and discards**

**Outcomes:**

All seafood sold by Marks & Spencer is sourced from fisheries using gear types that have a lower impact on the marine habitat and those which are more selective towards the target species.

Innovations such as gear modifications and new designs that help to avoid unwanted catches and minimise the impacts on the sea bed and habitats are encouraged and supported throughout our supply base.

**Requirements:**

- For gear types which inherently have higher negative impacts on the seabed, Marks & Spencer will only accept seafood from these fisheries if they are MSC certified or can demonstrate that they are operating to best practices that minimise or improve the impacts to an acceptable level.
- Specific, demonstrable requirements must be met for any fisheries using beam trawl catch methods, and this must be pre-agreed with Marks & Spencer before commencing supply.
- All tuna destined for Marks & Spencer product, regardless of species, must be caught using line-capture methods.
- All skipjack tuna destined for Marks & Spencer product must be caught by pole and line.
- Marks & Spencer will only accept fish that are larger than the mandatory minimum landing size (MLS) or minimum marketing size. When a MLS is not specified, we expect our suppliers to develop a MLS or minimum weight equivalent, based on size at maturity data, to ensure that no juvenile fish enter our supply chain.

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## Endangered, Threatened and Protected Species

### Outcome:

Marks and Spencer does not sell any species listed as 'Endangered' or 'Critically Endangered' on the International Union for Conservation of Nature (IUCN) List of Threatened Species and those listed on the Appendices of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

### Requirements:

- The IUCN List of Threatened Species and the CITES Appendices must be reviewed to ensure that no species listed as 'endangered'/Critically Endangered' are supplied to Marks & Spencer.
- N.B. Where a species is listed as 'endangered' or 'critically endangered' and the assessment appears to be superseded by recent credible data (e.g. stock assessments) that demonstrates the situation has changed, suppliers should provide these details when seeking approval / submitting the tracker.
- Ensure and demonstrate that accidental capture of non-target species is minimised through the use of best practice.
- If any species supplied to Marks & Spencer is listed as 'Avoid' by credible seafood guides, suppliers are required to understand why and to work with the supply chain to improve the sustainability performance of that fishery/farm.
- Ensure that no member of the supply chain is actively engaged in the deliberate capture and/or slaughter of non-seafood species such as marine mammals or sea turtles or in shark finning.

## Sensitive Marine Habitats

### Outcome:

Marks and Spencer does not sell any species from fisheries of farms that are involved in irreversible damage to the marine environment.

### Requirements:

- Ensure that no Marks & Spencer wild caught seafood comes from fishing vessels that actively operate in legally recognised marine sensitive areas or no-take marine reserves.
- Ensure that no Marks & Spencer wild caught seafood comes from fishing vessels that knowingly cause irreversible damage to sensitive marine habitats.
- Evaluate, mitigate, minimise and where possible avoid the impacts of the production of seafood species if it occurs within or near the vicinity of marine protected areas.
- Ensure fishing or fish farming activities comply with recognised conservation objectives as well as with regulations if these activities are conducted within or close to sensitive marine habitats.

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## Responsible Farming Practices

### Outcome:

All farmed seafood supplied to Marks & Spencer is sourced from Marks & Spencer approved Select Farms.

### Requirements:

- All farmed seafood supplied to Marks & Spencer must be from farms operating in compliance with the relevant Select Farm Protein Standard.
- It is the responsibility of the direct supplier to ensure that this is the case before sourcing commences and whenever sourcing is active.
- Producers will be required to demonstrate compliance with this standard and it is the responsibility of our direct suppliers to regularly audit against it.
- All personnel responsible for carrying out Select Farm audits must have been properly trained to do so by the appointed Marks & Spencer audit partner.
- A sample of farm sites will be audited by our independent audit partner at an agreed frequency.
- Where a Marks & Spencer Select Farm standard does not yet exist, the following must be in place:
  - The grow out site must be certified to an internationally recognised aquaculture standard (for example ASC, Global Gap, GAA BAP or another standard that we deem credible).
  - As a minimum, the grow out site must have been visited by our direct supplier to review aquaculture management practices and conduct an initial gap analysis against the most relevant Select Farm standard. This must have been discussed with the Marks & Spencer Aquaculture Specialist.
  - The Marks & Spencer Aquaculture Specialist must be satisfied that the supply will meet an M&S Select Farm Assurance standard once developed.
  - The Marks & Spencer direct supplier and producers in the supply chain must be prepared to work with the Marks & Spencer Aquaculture Specialist to develop a Select Farm standard (where one does not already exist), once it has been determined that the product is successful and will remain on sale in the medium to long term.
  - The Marks & Spencer Species Tracker must be completed by the direct supplier and approved in writing by the Marks & Spencer Fisheries & Aquaculture Manager and/or Aquaculture Specialist, before any NPD work commences.

## Aquafeed

### Outcome:

All aquafeed used within the Marks & Spencer supply base is sourced from approved feed mills that meet the Controlled A list Raw Material Requirements & Guidance for Feedstuffs

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### Requirements:

- All aquafeed in our supply chains are sourced from approved aquafeed manufacturers whose production systems comply with the Marks & Spencer Code of Practice (Aquafeed Manufacture).
- Aquafeed manufacturers must be audited by our direct suppliers, having been properly trained to do so, at a frequency agreed by Marks & Spencer.
- A sample of aquafeed manufacturers will be audited by our independent audit partner at an agreed frequency.

### 3.0 GUIDANCE

The following list details all relevant policy and guideline documents which should be read and implemented in conjunction with this Seafood Sourcing Policy:

1. M&S Species Tracker
2. Aquaculture Governance Guide
3. Select Farm Standards – choose relevant species
4. Controlled A List Requirements & Guidance for Feedstuffs
5. Controlled A List Requirements and Guidance for Shellfish
6. Controlled A List Requirements and Guidance for Fish

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## **4.0 APPENDICES**

### **Appendix 1 - Glossary of Terms**

Chain of Custody	Detail of every link in supply chain back to farm, including specific pond or cage, and ocean, including specific vessel(s). Every time the raw material is moved, paid for, handled, stored or processed.
Direct Marks & Spencer Supplier	A site holding a 4 figure Marks & Spencer supplier code that supplies finished products intended to be sold in main chain stores, Franchise, International and Hospitality outlets.
Primary Processor	Any site handling/processing seafood destined for Marks & Spencer finished product, but who does not pack the finished product themselves.
Seafood	Throughout this policy document, the term 'seafood' refers to all species of fish and shellfish, whether wild-caught or farmed, marine or freshwater.

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