M&S AQUACULTURE AND WILD CAUGHT DECAPOD CRUSTACEAN WELFARE POLICY

SEPTEMBER 2025

M&S

EST. 1884

INTRODUCTION

We recognise the integral role of animal health and welfare in sustainable food production, and we are committed to continue progressing towards delivering the highest welfare standards possible within our supply chains. Our continued commitment to animal welfare has been recognised by leading animal welfare groups and benchmarks including Crustacean Compassion, BBFAW and RSPCA.

Our goal is to ensure that all wild caught and farmed seafood, as well as aquafeed, come from the most responsibly managed fisheries and farms.

Our top 4 priorities as part of our Forever Fish Sourcing Strategy in 2025/2026 are to:

1. Improve the lives of all the seafood we source, wild or farmed, fish, shellfish/decapod crustacean or mollusc through working with industry, scientists, and innovation companies to address the current challenges/gaps preventing the optimal handling and management of these species and improving animal welfare.
2. Support small scale fisheries to demonstrate healthy stocks, fill data gaps and support small scale communities through the adoption of the Community Catch Initiative in all our small-scale fisheries.
3. Lead/support our wild capture fisheries to adopt innovations such as underwater cameras, lights, selective gear and environmental monitoring tools to improve precision fishing and reduce bycatch and environmental impact.
4. Improve the lives of all fishermen/women and aquaculture employees through the adoption of best practice and an increased engagement in worker voice initiatives.

Data included in this report relates to April 2024 – March 2025 unless otherwise specified.

OUR APPROACH

Our requirements for the welfare of all farmed and wild caught seafood (including decapod crustaceans) are covered by our Farm Animal Welfare policy, Select Farm Sourcing Standards and Forever Fish Sourcing policy.

Our Forever Fish Sourcing policy has recently been updated to align with our seascape approach and it references all wild and farmed species we source globally, including decapods: *Cancer pagurus* (Brown crab), *Homarus americanus* (Canadian lobster), *Panulirus cygnus* (Australian rock lobster), *Procambarus clarkii* (Crayfish), *Nephrops norvegicus* (Langoustine), *Pandalus borealis* (Cold-water prawn), *Pleoticus muelleri* (Argentinian red shrimp), *Penaeus monodon* (Black tiger shrimp), and *Penaeus vannamei* (White leg shrimp).

Day-to-day management of our welfare and sourcing policies and their implementation is the responsibility of our team of agriculture, aquaculture and wild fisheries specialists. Our CEO is ultimately accountable for the whole sustainability programme (covering livestock and all farmed and wild caught seafood, including decapod crustaceans) and oversight is provided by the Board and our ESG committee.

All our agriculture, aquaculture and wild fisheries managers undergo animal welfare training. Our aquaculture team has worked with industry experts, PHARMAQ Analytiq (previously Fish Vet Group), to develop and launch a comprehensive training course on fish and shrimp welfare, which is followed by all our aquaculture partners.

Adherence to our welfare policies forms part of the terms of trade with all our suppliers and is reviewed as part of our M&S Select Farm Assurance programme, Welfare Audit programme and annual supplier assessment based on data collected via our Fish Tracker survey.

We continue to partner with industry and invest in research projects focussing specifically on welfare.

OUR COMMITMENTS TO DECAPOD CRUSTACEAN WELFARE

M&S commits to the following:

1. To never sell any live, wild or farmed, crustaceans. This is prohibited within our Farm Animal Welfare and Forever Fish Sourcing policies.
2. To never sell any warm-water prawns from supply chains which permit eyestalk ablation of their broodstock.
3. To ensure that all decapod crustaceans within our supply chains are humanely stunned and slaughtered. Where this is not already the case, clear action plans will be in place to improve the stun and slaughter methods in as short a time scale as possible.
4. To reduce the negative effects of capture methods on decapod crustacean welfare through adapting equipment, fishing and handling practices.
5. To reduce bycatch associated with decapod crustacean sourcing through adapting equipment, fishing and handling practices.
6. To use our voice for good globally to lead and collaborate with industry, scientists and technology companies to drive change and develop solutions and improvements in all seafood welfare matters especially those relevant to decapod crustaceans.
7. To invest in scientific trials in our supply chains to improve welfare.
8. To continue to fully engage and participate as part of the working groups with the SAGB to develop industry best practice and push for compulsory adoption and robust stretching codes of best practice for the UK decapod crustacean industry.

Our recent progress against these commitments, where not already fully achieved, is detailed in the relevant sections below and we will continue to update annually.

CERTIFICATION, AUDITING AND DATA COLLECTION

Farmed

Whilst we recognise third-party certification provides some safeguards around the welfare of farmed animals, our Forever Fish policy and Select Farm Standards go beyond certification and all the farms we source decapod crustaceans from are also subject to regular, comprehensive M&S Select Farm assessments. These are bespoke to M&S and include key welfare, as well as environmental and social and ethical requirements. Where used, hatcheries, nurseries and feed mills must also be assessed at specified frequencies, against our M&S Select Farm Standards.

Our direct suppliers are responsible for undertaking M&S Select Farm assessments. The supplier must sign off all audit actions within agreed timescales to remain part of the M&S supply base. Further information on our auditing process and the actions undertaken in the event of non-compliance are detailed in our welfare and sourcing policies. How each non-compliance is dealt with will vary based on severity and could involve one or more of the following:

- Remedial action agreed with supplier
- Deadlines set for compliance
- Training and knowledge transfer
- Increase in auditing or visits by M&S team
- Suspension/removal from supply base where improvements are not made, or the breach is unacceptable

In addition to our M&S Select Farm Standards, we recognise the following third-party certification schemes as our base standards (all are GSSI benchmarked): Aquaculture Stewardship Council (ASC) certified, Marine Stewardship Council (MSC) certified (relevant to certain farmed species such as rope grown mussels), Global GAP Aquaculture Standard assured, Best Aquaculture Practices (BAP) certified, or RSPCA Assured.

Wild

We also take a beyond certification approach to the sourcing of our wild caught decapod crustaceans. To enable us to responsibly source all our seafood we have been in partnership with WWF since 2004. This partnership allows us to risk assess each supply chain and demonstrate that they meet our Forever Fish responsible sourcing criteria.

In addition to our supply chain risk assessments in partnership with WWF, we also recognise these third-party certification schemes: Marine Stewardship Council (MSC) certified, Community Catch certified and Certified Seafood International (CSI) certified.

We also recognise fisheries which are part of a Fishery Improvement Project (FIP), aligned to either MSC, Community Catch or CSI.

Data

We collect detailed information on welfare, catch, environmental and human rights issues from our entire fish and seafood supply chains on an annual basis via our 'Fish Tracker'. All data collected is reviewed and progress is tracked. We regularly meet with all our suppliers and agree action plans which, where relevant include welfare improvements for decapod crustaceans. We also collect monthly or quarterly outcome measure data from some of our key aquaculture species and aim to roll this out to other species as they are developed. Some data is included in our published annual welfare performance summaries.

SUPPLY CHAIN EDUCATION AND SUPPORT ON SEAFOOD WELFARE

We have continued to dedicate focus and resource into improving all aspects of decapod welfare which have included multiple supplier visits to understand current practices, implementation of electrical stunning equipment, participation at industry events, contribution to Shellfish Association of Great Britain (SAGB) codes of good practice, and support and investment in research projects focusing specifically on welfare.

Our journey started in 2023 when we hosted a 'Welfare week' in Norway in partnership with Optimar. We took all our direct seafood suppliers to meet with scientists, industry experts, vessel owners and fish farmers to understand the issues and witness how technology can help address these challenges. In 2023, we also became members of the Catch Welfare Platform and have since, regularly presented at their events and contributed to their working groups.

Since 2023, we have been founding partners of a Fisheries Innovation & Sustainability (FIS) led project which developed and proved concept of electrical stunning and mechanical tail removal for Nephrops onboard vessel.

Since 2024, we have been founding project partners with Stirling University on work to determine best practice on electrical stunning methods in warm-water prawns and have collaborated with the Shrimp Welfare Project (SWP), which has resulted in the installation of electrical stunning machines at two additional M&S Select Farm shrimp sites.

We are committed to being science lead and proactively identifying the most humane method of slaughter in all different production systems.

In 2025, we have been founding partners with SeaFish, SAGB and Clawbinder Pro on a new project to prove concept of effective claw banding on brown crab to eliminate the practice of claw nicking onboard vessel.

Earlier this year, we hosted our first M&S 'Welfare webinar' bringing together all our suppliers to share their best practices and facilitate cross species learnings.

In recent years, we have also spoken at the Blue Foods Summit and the annual SAGB conference on our work on decapod welfare and humane slaughter.

These events have led to many follow up conversations and we now have five live projects with various supply chains to improve handling, storage, transportation, or stun/kill practices. We will continue to use industry publications to talk about our focus in this area and communicate to customers.

For the past three years we have been recognised as the leading company by Crustacean Compassion in their Snapshot Benchmark for our work on decapod crustacean welfare. In 2024 we also received a Special Recognition Award (Innovation category) from Compassion in World Farming (CIWF) for eliminating eyestalk ablation and developing a comprehensive protocol to monitor health and welfare in our shrimp supply chains.

CAPTURE/HARVEST METHOD AND BYCATCH

All seafood sold by M&S is sourced from fisheries that use gear types designed to have a lower impact on marine habitats and are more selective in targeting specific species.

We actively encourage and support innovations that reduce unwanted bycatch and minimise impacts on seabed habitats throughout our supply base. By implementing targeted mitigation methods aligned with the WWF What's In the Net report - such as sinking lines, pingers, circle hooks, sea lion excluder devices, bird scarers, and best-practice handling and release protocols - we are achieving improvements in catch selectivity and ecosystem protection.

Fishing gear must allow for the escape of animals if lost or abandoned, for example escape hatches are required in all lobster and crab pots. All wild crab and lobster must be returned to the ocean should they carry berries or are undersize.

Capture/Harvest Method

- 100% of our wild caught crab and lobster (Canadian and Australian rock lobster) are caught by pot/creel.
- 100% of our wild caught crayfish are caught using fyke nets.
- 100% of our wild caught langoustine, cold water prawns and Argentinian red shrimp are caught by bottom otter trawl.
- 82.23% of our farmed warm-water prawns (white leg and black tiger) are harvested by drainage of ponds and 17.77% are harvested using seine nets.

ROUTINE MUTILATIONS AND SEX REVERSAL

Sex reversal in any species is not permitted.

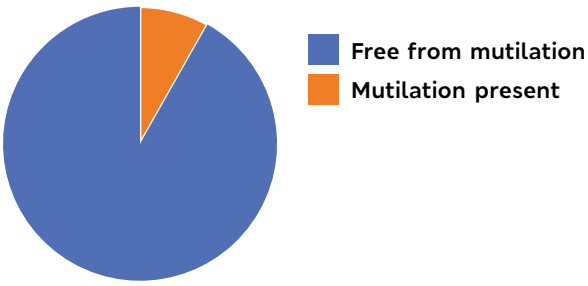
Non-therapeutic mutilations are not permitted within our seafood supply chains (including decapod crustaceans) unless veterinary advice deems it strictly necessary to protect the animals from subsequent loss of welfare due to injury. Data is collected every year from all suppliers on whether any mutilation procedures are undertaken, and in 2024/25, 91.80% of all our decapod crustacean supply were free from mutilations.

We can confirm 100% of our warm-water prawns are eyestalk ablation free. Since 2019 we have not approved/sourced any new warm-water prawns (*Penaeus vannamei* or *Penaeus monodon*) supply chains which allow eyestalk ablation of their broodstock.

No de-clawing occurs within our supply chains but some crab claw nicking is still present (51.51% of crabs in 2024/25). The practice of crab claw nicking is specific to the crab we purchase from vivier boats and is currently used to prevent the live crab from injuring each other whilst stored in seawater during transportation.

We now have a live project with Seafish, SAGB and Clawbinder Pro, to trial automated machines on board vessels which applies a sleeve to the claw, to prevent the need for claw nicking.

Figure 1. Percentage of decapods free from mutilation 2024/25



TRANSPORT TIMES AND SPECIES-SPECIFIC HOLDING CONDITIONS

Our Animal Welfare policy states that live animal transportation (road and/or sea) should be kept to a minimum and must not exceed 8 hours. The only exceptions to this within our seafood supply are the transportation of farmed Atlantic salmon, oysters and mussels, which are covered within species-specific Select Farm Sourcing standards, and the transportation of wild caught crab, lobster and crayfish.

Our suppliers hold agreements with fishermen on the appropriate storage methods of live shellfish (including decapod crustaceans) during storage and transportation to their factories for processing in line with industry codes of good practice.

Data is collected annually from all suppliers on methods of live handling, storage, and transportation. Detail for each of our decapod crustacean species are summarised below.

Catch landed and transported live

Canadian lobsters have their claws banded and are stored and transported on boats, immersed in a holding tank for the length of the fishing trip, or held on deck for 8-12 hours inside plastic crates which are covered with damp cloths to protect them from direct sun.

Once unloaded from the boats, lobsters are transported on refrigerated trucks at 4°C with ice. Transport times via road depend on the port of landing and can vary between <1 hour - 25 hours. On arrival at the processing facility, lobsters are stored live in purpose-built seawater holding tanks for up to 48 hours prior to stun and kill.

Australian rock lobsters are stored on board in tanks, no claw banding is required as they do not have claws. Rock lobsters are then transported in temperature-controlled trucks with circulated seawater to holding tanks at the processing facility. Maximum transport time is 5 days.

Brown crabs are transported (sea and land) for a maximum of 24 hours prior to processing. Brown crabs can be stored on board vessels in two ways: in water tanks (vivier) or in plastic tubs. Brown crab stored in water tanks are kept alive and able to move around. However, to prevent them damaging each other with their claws, they have their claws clipped which disables them from gaining purchase on each other, thus reducing damage to each other during live storage. Crabs are also stored on board in plastic tubs which are watered constantly or covered with damp cloths to keep them out of direct sun. Transport times by lorry can vary depending on the port of landing and range from 5 minutes to 14 hours. For road transport, crabs are held in plastic tubs and covered in damp cloths to keep them moist and cool.

Crayfish are transported on boats in sacks or crates (with ventilation holes and covered with damp cloths to keep them out of direct sun) and then transferred to crates at the factory where they are stored in chillers. Maximum storage time on boat is 8 hours, followed by a maximum transport time of 2 hours via road in refrigerated vehicles.

Species	Max transport time (hours)	Proportion (%)
Crab	12	17.79
	24	82.21
Canadian Lobster	36	100
Australian Rock Lobster	120	100
Crayfish	24	100

Catch landed dead or killed pond side

All (100%) of our warm-water prawns are stunned and killed pond side so are not transported or held live.

Most cold-water prawns and Argentinian red prawns are currently landed dead as well as a significant quantity of Nephrops. However, where some cold-water prawns, Argentinian red prawns and Nephrops are alive when landed on the vessel these are currently stored on ice for the duration of the trip.

We are actively working on a project led by FIS to improve the handling of live Nephrops on board vessels to introduce an effective stun process prior to Nephrops being processed as tails.

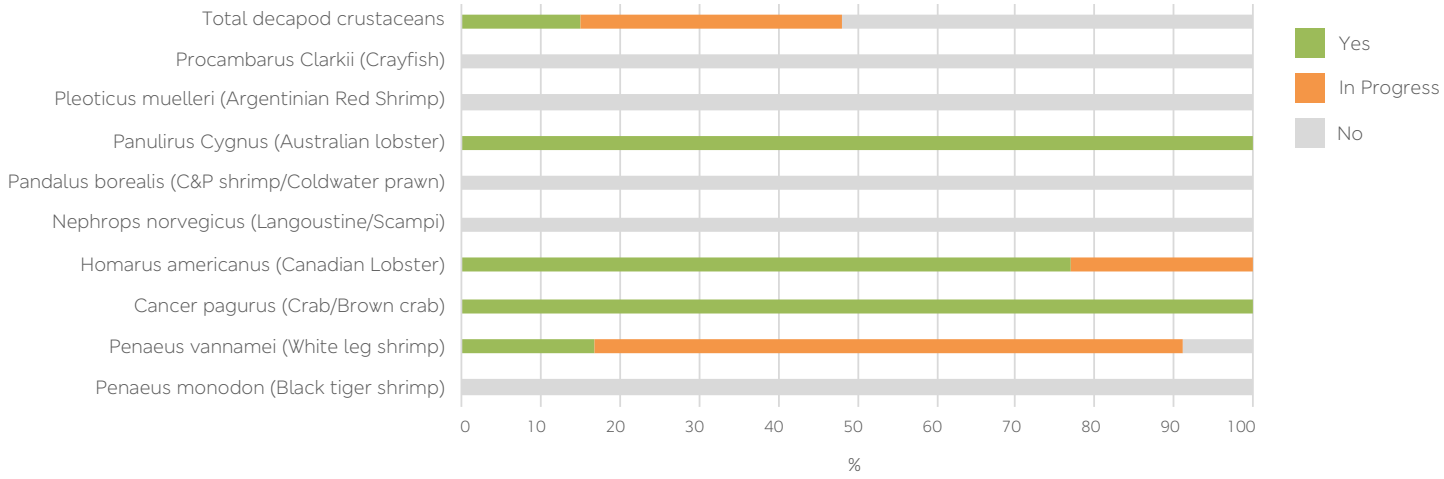
STUNNING AND SLAUGHTER

Techniques for the harvesting, stun and slaughter of farmed and wild caught fish and shellfish/decapod crustaceans are evolving quickly. Methods used tend to be species-specific and often depend on the size of the animals being harvested. We are committed to the adoption of best practice and to driving positive change in all our supply chains, with a focus on good animal welfare and minimising stress. In 2024/25, 15.19% of our total decapod crustacean supply was slaughtered using electrical stun prior to kill (all crab, 77% of lobster and some warm-water prawns).

The stun and slaughter methods for each decapod crustacean species in our supply chains are summarised below:

- 100% of our brown crab are electrically stunned prior to cook (kill).
- 100% of our Canadian lobsters are now electrically stunned prior to cook/kill (in 24/25 23% were killed using high pressure processing (HPP)).
- 100% of our Australian rock lobsters are electrically stunned to kill.
- 85.65% of our warm-water prawns were stunned and killed via thermal shock in ice slurry. 14.35% were electrically stunned, followed by thermal shock in ice slurry. There are now electrical stunners in place at M&S *Penaeus vannamei* farms in Honduras, Vietnam and Thailand with trials ongoing. M&S are partners in the ongoing Stirling University project to optimise electrical stunning from a welfare perspective and are also involved in research to validate the effectiveness of super chill ice slurry stun as a high welfare alternative to electrical stun.
- 100% of our crayfish are kept chilled prior to cook (kill).
- 100% of our cold-water prawns and Argentinian red shrimp are landed dead and frozen or processed on board.
- Langoustine which are sold as tails for scampi have their tails removed on vessel. Percentages may vary depending on vessel, trawl time and handling but there may be some occasions when the langoustine is alive when its tail is removed. We regard this as an unacceptable practice and are currently working closely with vessels to trial on board electrical stunning for langoustine tail production, or to keep the langoustine whole on board. We are founding partners of a FIS led project to develop and prove concept of electrical stunning and mechanical tail removal on board vessel and the first sea trials were completed in March 2025 and further sea trials are planned for February 2026.

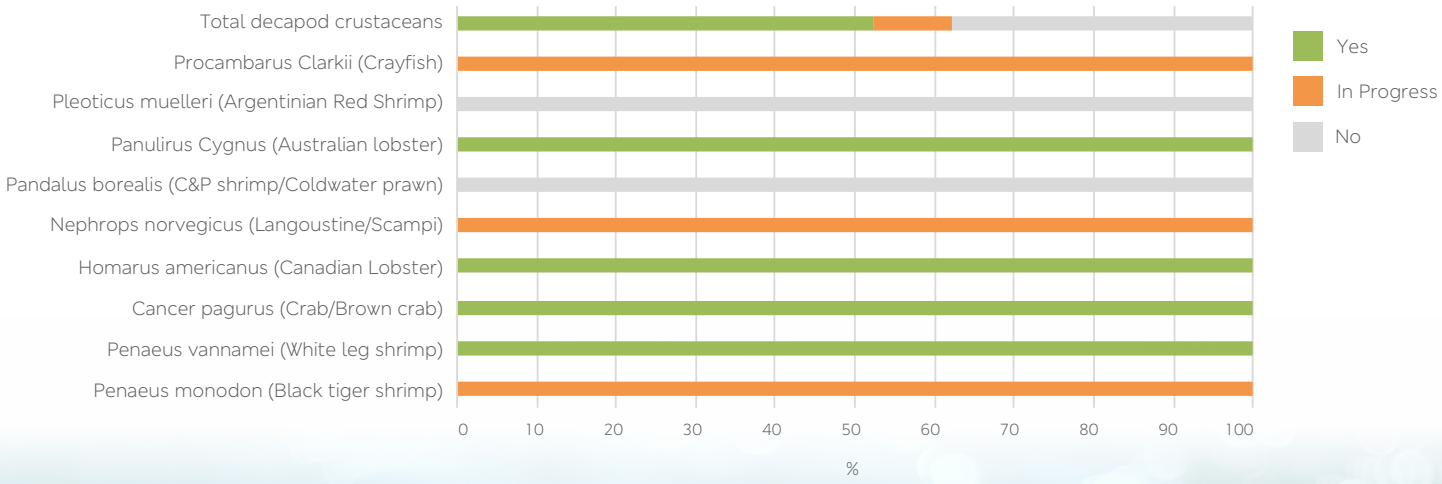
Figure 2. Electrical stun implementation, progress as of April 2024 - March 2025 by species



We are committed to ensuring that all decapod crustaceans within our supply chains are humanely stunned and slaughtered. Going forward, to ensure we are meeting this commitment we will:

- Continue to not approve/source any new species of decapod crustacean which are not electrically stunned prior to kill.
- Continue to fully support the FIS led project to develop and trial electrical stunning and mechanical de tailing of Nephrops norvegicus on board vessels. We will roll out improved handling and welfare practice on board vessels for Nephrops tail removal.
- Continue to work in close partnership with The Shrimp Welfare Project to sponsor the installation of new electrical stunning machines in our warm-water prawn supply chains.
- Continue to regularly visit our aquaculture and wild supply chains to understand the current practices and instigate a move towards improved welfare.
- Require by December 2026 that 100% of our crayfish are electrically stunned.
- By December 2026 to have completed trials on all our black tiger shrimp supply chains and have a committed plan to stop thermal shock ice slurry stun and move to electrical stunning prior to kill (assuming this is Stirling University's research trial recommendations).
- By December 2025 we will have completed trials on all our white leg shrimp supply chains to assess the most humane stun and slaughter method and finalise implementation dates for all supply chains. We are committed to being science lead in our actions.
- By the end of 2026 we will have further engaged with our cold-water prawn and Argentinian red shrimp supply chains to understand the current practices and instigate a move towards more humane stun and slaughter.

Figure 3. Electrical stun implementation, projected progress for 2025/26 based on 2024/25 volumes by species



OVERVIEW OF HUMANE STUN IMPLEMENTATION WITHIN OUR DECAPOD CRUSTACEAN SUPPLY CHAINS:

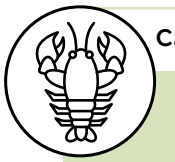
Completed

Brown Crab

- 100% electrically stunned

Australian Rock Lobster

- 100% electrically stunned



Canadian Lobster

- 100% electrically stunned

In Progress

Crayfish

- 100% will be electrically stunned by end of 2026

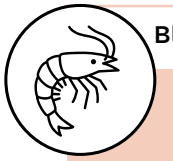
White Leg Shrimp

- 100% will be electrically stunned or rapid chilled (method will be dependent on results from current scientific studies) by end of 2026

Nephrops

- Electrical stunning trials at sea being completed in 2026

Being Scoped



Black Tiger Shrimp

- Trials to investigate a move to a more humane stun and slaughter method by end of 2026

Argentinian Red Shrimp

- Will engage with suppliers to instigate a move to more humane stun & slaughter by end of 2026

Cold Water Prawn

- Will engage with suppliers to instigate a move to more humane stun & slaughter by end of 2026