



AQUACULTURE AND WILD CAUGHT  
DECAPOD WELFARE

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JULY 2024

M&S

EST. 1884



## INTRODUCTION

M&S prides itself on its leading position in promoting the best animal welfare practices in our supply chains. We are already the retailer who sells more RSPCA assured products than any other.

Our requirements for the welfare of all farmed and wild caught seafood (including decapod crustaceans) are covered both by our Farm Animal Welfare policy and our Forever Fish Sourcing policy. This document outlines our overall approach to our sourcing as well as specific commitments and implementation of our welfare and responsible sourcing policies.

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 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 2024/2025 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.

## OUR APPROACH

Our farm animal welfare policy covers all aquaculture production, and we publish our Select Farm Sourcing Standards for all Aquaculture species. Our Forever Fish seafood sourcing policy has recently been updated to align with our seascape approach and it references all wild and farmed species we source, 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 policy and its implementation is the responsibility of our team of agriculture and 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, Fish Vet Group, to develop and launch a comprehensive training course on fish and shrimp welfare, which is followed by all our aquaculture partners.

We also continue to partner with the Shellfish Association of Great Britain (SAGB) to further develop codes of best practice and work alongside industry experts in humane stun and slaughter equipment design and support and invest in research projects focusing specifically on welfare.

We have recently partnered with the Shrimp Welfare Project (SWP) to support the implementation of electrical stunning machines in two locations at M&S Select Farm shrimp sites.

Adherence to the welfare policy requirements forms part of our terms of trade with our suppliers, (which includes both wild and farmed decapod crustaceans) and is reviewed as part of our Marks & Spencer Select Farm Assurance programme, Welfare Audit programme and annual Supplier Scorecard assessment.



## CERTIFICATION, AUDITING AND DATA COLLECTION

Our direct suppliers are responsible for undertaking Select Farm Sourcing Standard audits. The supplier must sign off all audit actions within agreed timescales to remain part of the Marks & Spencer 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

As a minimum all our farms must meet at least one of the following standards: 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. We've adopted these as our base standards in recognition of the fact that we source in different locations and markets around the world.

Most of our wild caught seafood is either MSC Certified or FIP Engaged (94%), and other supply chains are risk assessed by WWF to ensure they meet our Forever Fish responsible sourcing criteria. Our Canadian lobster, Australian rock lobster, cold-water prawns and some crab are MSC certified, langoustine, crayfish and Argentinian red shrimp are FIP engaged, and other crab is categorised as having 'Sustainable practices' or 'Few Issues' by WWF.

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'. We also collect quarterly outcome measure data from some of our key aquaculture species and aim to roll this out to other species as they are developed. Data is included in our published annual welfare reports.

## CAPTURE METHOD AND BYCATCH

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 seabed and habitats are encouraged and supported throughout our supply base.

Our primary processors have specific agreements in place with each fishery which details catch method, fishing areas and best practice adopted for storage and handling. These are reviewed and agreed before any new source is approved. We collect information on all catch methods and bycatch mitigation practices in place for all our species sourced.

We ensure that all our suppliers adhere to measures which reduce the negative effects of the capture method on decapod crustacean welfare and reduce bycatch. This requirement covers 100% of our decapod crustacean supply.

Fishing gear must allow for escape of animals if lost or abandoned, for example escape hatches in all lobster and crab pots. Data is also collected on catches of species other than the target (non-target/bycatch inc. endangered, threatened and protected species (ETP)).

From our annual Fish Trackers, we can confirm there are no ETP catches in our wild decapod crustacean fisheries and suppliers are expected to work on an improvement plan if bycatch is a significant proportion of catch.

M&S have committed never to sell any live wild or farmed crustaceans. This is prohibited within our animal welfare and Forever Fish sourcing policy.

We can also confirm all wild crab and lobster are returned to the ocean should they carry berries or are undersize.



## ROUTINE MUTILATIONS AND SEX REVERSAL

Sex reversal in any species is not permitted.

The routine behavioural mutilation of farmed seafood (including decapod crustaceans) is not permitted (this includes eye stalk ablation) 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 we can confirm 100% of our warm-water prawns are eyestalk ablation free.

In 2023/2024, 93.60% of all our decapod supply were free from mutilations. Some crab claw nicking is still present within our supply chain (67.14% of crabs do have their claws clipped), but we continue to work closely with our suppliers and SAGB to develop best practice where required and where improvement is needed.

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. We believe an alternative solution can be found to crab claw nicking as an industry and we will push to progress this solution.

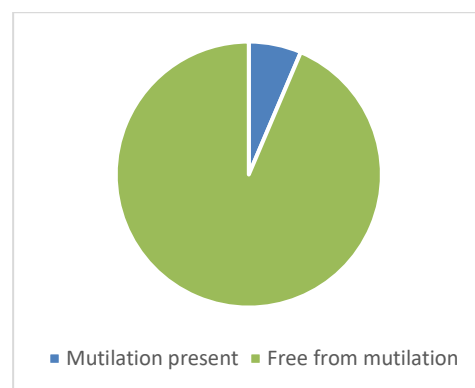


Figure 1. Percentage of decapods free from mutilation 2023/2024

## TRANSPORT TIMES AND SPECIES-SPECIFIC HOLDING CONDITIONS

Our animal welfare policy states live animal transportation must not exceed 8 hours and suppliers should target a time less than 4 hours (inclusive of loading/unloading). The only exceptions to this within our seafood supply are the transportation of farmed Atlantic salmon, farmed scallops and mussels, which are covered within species-specific Select Farm Codes of Practice, 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. The only decapod crustaceans transported live for processing at factory sites are lobsters, crabs, and crayfish.

### Catch Landed and Held Live On Board - For Onshore Processing or Live Export (Not For Live Sale By M&S)

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 which can be up to 2 days, 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 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 tank, no claw banding is required as they do not have claws. Lobsters are then transported to holding tanks on land for a maximum of 48 hours prior to stun and kill.

Brown crabs can be stored on board vivier boats for a maximum of 48 hours prior to landing. Day boat crab can be held on board boats for a maximum of 12 hours prior to landing. Crabs are stored on board in tubs which are 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 7 hours. For road transport, crabs are held in plastic tubs and covered in damp cloths to keep them moist and cool or in vivier tanks.

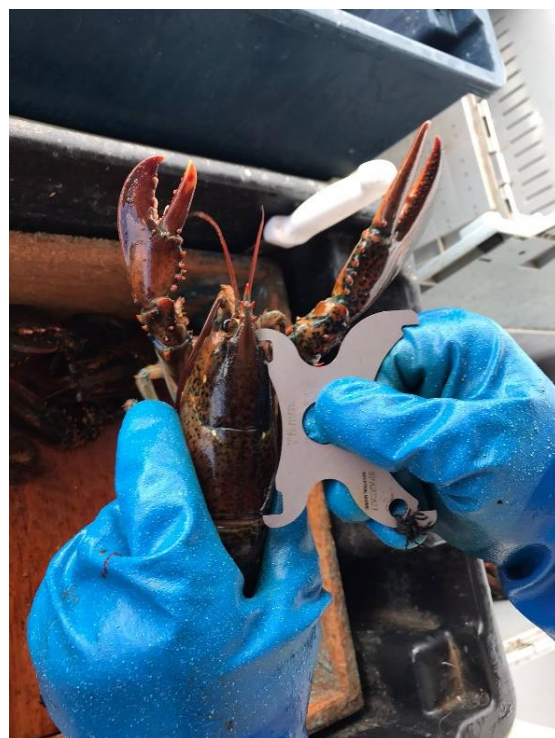
Crayfish are transported on boats in sacks or crates (with ventilation holes and covered with damp cloths to keep them out of direct sun) and then transferred to crates at the factory where they are stored in chillers. Maximum storage time on boat is 8 hours, followed by a maximum transport time of 2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

### Catch Landed Dead and Held On Board

All other decapod crustaceans are stunned and killed pond side or landed dead. 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.

Data is collected annually from all suppliers on existing methods of live handling, storage, and transportation.



## CAPTURE, STUNNING AND SLAUGHTER

We annually risk assess and review the handling and humane stunning and slaughter of all seafood species we source, including all crustaceans, through our Fish Tracker. Techniques for the harvesting and slaughter of farmed 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 and slaughtered.

We are committed to the adoption of best practice and to driving positive change in all our supply chains, with a common denominator being minimising stress and always with regard to good animal welfare. In summary for crustaceans:

### Capture/Harvest Method

- 100% of our crab, lobster (Canadian and Australian rock lobster) and crayfish are caught by pot/creel.
- 100% of our langoustine and Argentinian red shrimp are caught by bottom otter trawl.
- Our cold-water prawns are mainly caught using bottom otter trawl (98.42%), but bottom pair trawl (1.58%) also used.
- 85.97% of our warm-water prawns (white leg and black tiger) are harvested by drainage of ponds and 14.03% by seine nets.

### Stun/Kill Method and Progress on Implementation of Electrical Stunning, April 2023 – July 2024

- 10.97% of our total decapod supply was slaughtered using electrical stun prior to kill (all crab, 90% of lobster and some warm-water prawns).
- 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) or HPP killed. Plans are in place to validate the effectiveness of HPP in 2024 with a view to review for the 2025 season depending on outcome.
- 100% of our Australian rock lobsters are electrically stunned prior to cook (kill).
- 99.20% of our warm-water prawns are stunned via thermal shock ice slurry, with 0.80% electrically stunned. There are now electrical stunners in place at M&S *vannamei* farms in Honduras, Vietnam and Thailand with plans for implementation in 2024. The use of electrical stunners will remove the use of ice slurry for warm-water prawns in these locations. M&S are partners in the Stirling University project to validate electrical stunning in 2024 across multiple supply chains using various methods of stun.
- 100% of our crayfish are stunned using thermal shock ice slurry prior to cook (kill).
- All cold-water prawns and Argentinian red shrimp are landed dead.
- 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 may be 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 with sea trials planned in 2024.

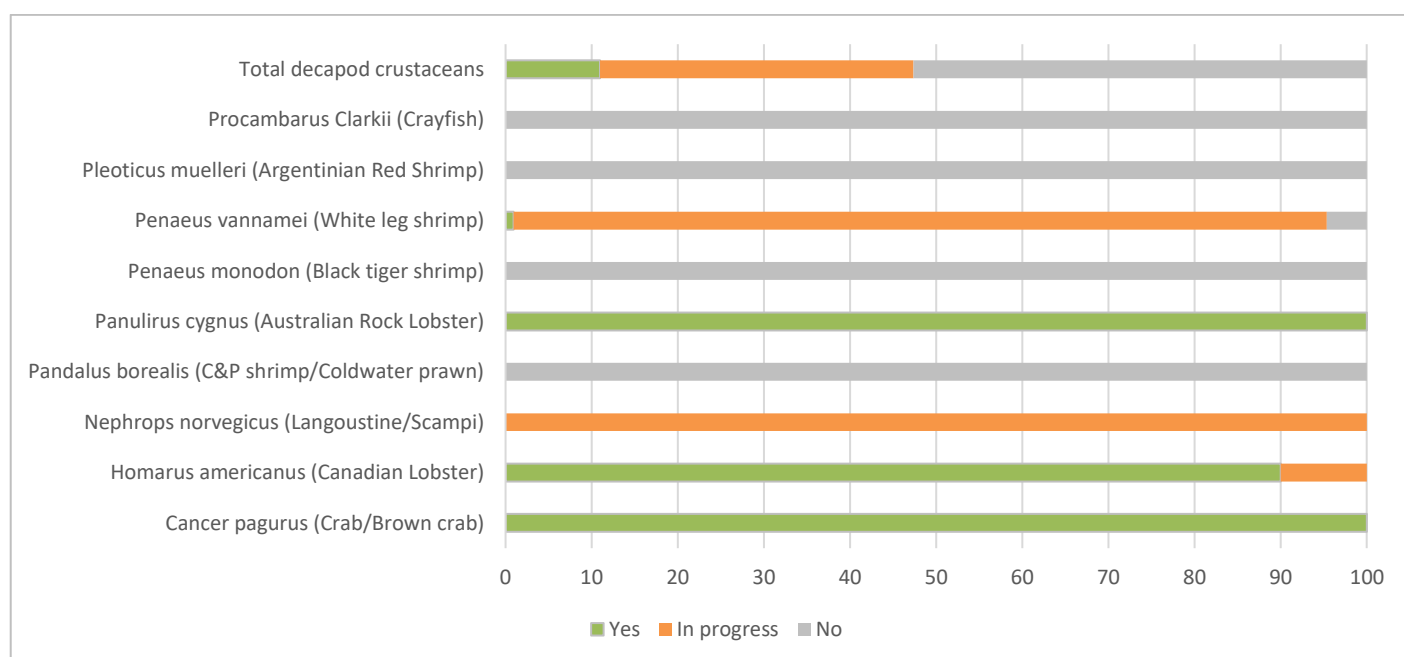


Figure 2. Electrical Stun, Progress to date April 2023 - July 2024



## SUPPLY CHAIN EDUCATION AND SUPPORT ON SEAFOOD WELFARE

All data collected via our annual Fish Tracker is reviewed and progress is tracked with improvements implemented but this is not publicly reported due to many of the innovative projects being confidential and protected by IP. Individual species action plans are agreed with all suppliers and include welfare improvements for decapod crustaceans. Welfare improvements we are making include moving to electrical stunning for lobster as well as projects trialling the use of electrical stunning in our warm-water prawns.

In 2023 we were recognised as the leading company by Crustacean Compassion for our work on decapod crustacean 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 catch welfare platform events, contribution to SAGB codes of good practice, collaboration and project partners with Stirling University on *Nephrops* and shrimps and collaboration with SWP on shrimp electrical stunning implementation.

We are founding partners of a FIS led project to develop and prove concept of electrical stunning and mechanical tail removal on *Nephrops* on board vessel. We are also project partners with Stirling University on work to determine best practice on electrical stunning methods in warm-water prawns.

In 2023, we hosted a 'Welfare week' in Norway in partnership with Optimar where 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.

We have also spoken at the Blue Foods Summit and the Annual Shellfish Association of Great Britain conference to communicate our requirements for humanely treated seafood and the introduction of electrical stunning across all aquaculture species followed by wild fisheries.

These events have led to many follow up conversations and we now have six live projects with various supply chains to improve handling, storage, transportation, or stun/kill practices within the supply chains.



We will continue to enhance our interactive map by including case studies showing our species and how they are caught or farmed, and we will use industry publications to talk about our focus in this area and communicate to customers.

We will continue this drive and below are our current commitments to seafood welfare.

## COMMITMENTS TO DECAPOD CRUSTACEAN WELFARE

M&S commits to the following:

1. To never sell any live decapod crustaceans in our business.
2. Reducing the negative effects of capture methods on decapod crustacean welfare through adapting equipment, fishing and handling practices.
3. Reducing bycatch associated with decapod welfare through adaption of fishing practices, equipment and handling practices.
4. We are committed to ensuring that all decapod crustaceans within our supply chains are humanely stunned and slaughtered and will achieve this by undertaking the following:

### Completed and In Progress

- a. Since January 2023 we have not approved/sourced any new species of decapod crustacean which are not electrically stunned prior to kill.
- b. We have changed all of our lobster suppliers' processes to stop seawater ice slurry stun and moved to electrical stunning prior to cooking or HPP.
- c. We are fully supporting/driving the FIS led project to develop and trial electrical stunning and mechanical de tailing of *Nephrops norvegicus* on board vessels. Once proven we will adopt this process and roll out onto our vessels. In the meantime, we will understand the exact process in place on our existing vessels and drive to improve current practice where possible.
- d. We will 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.
- e. We have joined Stirling University's project 'Optimisation of stunning practice from an animal welfare perspective in tropical prawns – *Penaeus vannamei*.'

### Future Commitments, July 2024 – December 2026

- f. By 2025/26 100% of all our Canadian lobsters will be electrically stunned prior to kill. We will remove HPP unless it is proven to meet effective stun requirements.
- g. We have visited our wild supply chains to understand the current practices and instigate a move towards improved welfare throughout the supply chain. We will move this supply chain to electrical stunning by December 2025, meaning 100% of our crayfish will be electrically stunned.
- h. By December 2024 we will have completed trials on all our white leg shrimp supply chains to stop thermal shock ice slurry stun and move to electrical stunning prior to kill. We will have implemented electrical stun into our supply chains and have a committed plan to move all white leg shrimp to electrical stunning as soon as possible.
- i. By December 2025 we will have completed trials on all our black tiger shrimp supply chains to stop thermal shock ice slurry stun and move to electrical stunning prior to kill and have a committed plan to change all our *Penaeus monodon* supply chains to stop seawater/freshwater ice slurry stun and move to electrical stunning prior to kill.
- j. By 2025/26 85% of our warm-water prawns will be electrically stunned (100% of white leg shrimp), meaning 49% of our total decapod crustacean supply (based on 23/24 volumes) will be electrically stunned.
- k. We will roll out improved handling and welfare practice on board vessels for *Nephrops* tail removal.
- l. 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.



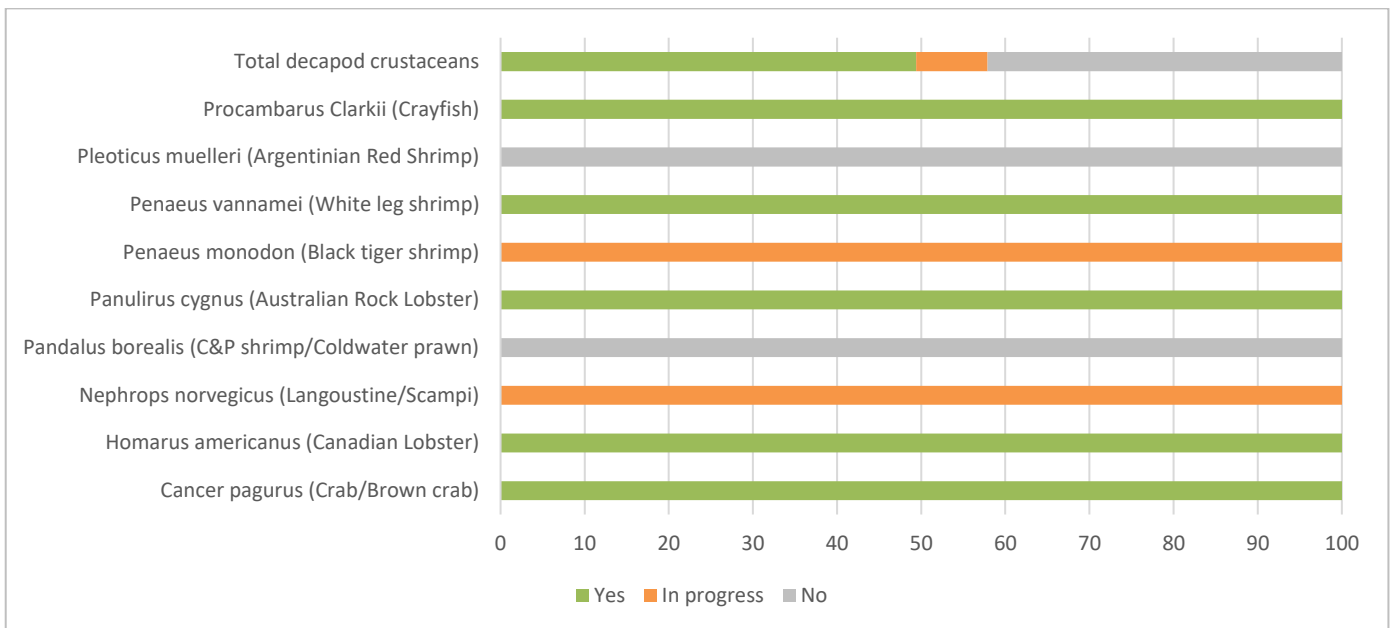


Figure 3. Electrical Stun, Projected Implementation by 2025/2026 (based on 2023/2024 volumes)

5. Avoiding non-therapeutic mutilations of decapod crustaceans and commit to:
  - a. Prohibiting eye stalk ablation within our supply chains. Since 2019 we have not approved/sourced any new warm-water shrimp (*Penaeus vannamei* or *Penaeus monodon*) supply chains which allowed eye stalk ablation
  - b. By December 2024 we will determine the exact boats supplying us who undertake crab claw nicking and work with them to understand the alternative available.
6. Since January 2023 we have not approved/sourced any new species of decapod crustacean which does not meet our welfare or Forever Fish sourcing policy
7. Lead the industry to find an alternative solution to claw nicking in Brown crab (*Cancer pagurus*) through engagement with scientists, SAGB and the fishing industry.
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.
9. To use our voice for good globally to lead and drive change and improvements in all seafood welfare matters especially decapod crustaceans.

We will publish our progress against these commitments annually.

