



Fish and Seafood Procurement Policy

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1. Introduction

Fisheries and aquaculture play a significant role in feeding our planet. Never before has responsible and sustainable fishing been so important for ensuring the well-being of people and the environment. Increasing demand for protein is putting pressure on fish stocks, while aquaculture, if poorly managed, can have a negative impact on the environment.

In accordance with our ["Approach for sourcing of agricultural raw materials"](#), METRO is providing its customers with products, that comply with the highest quality and safety standards and which have been produced by socially and environmentally means.

This document updates and replaces the "Metro Cash & Carry Fish Procurement Policy" signed in 2016 as well as the "METRO procurement policy for sustainable fish purchasing" signed in 2012 and is being issued as a result of new developments. The major changes concern the scope, targets, and endangered species.

This updated policy will also provide a newly established **METRO Fish and Seafood Action Plan** for initiatives on sustainable fish and seafood. The Action Plan puts the policy into implementation with actions. The action plan consists of three pillars:

1. Certifications
2. Partnerships
3. Projects

This **METRO Fish and Seafood Procurement Policy** is related to METRO's overall ["Policy for Sustainable Sourcing"](#) and [METRO's "Approach for sourcing of agricultural raw materials"](#), both can be found on our website¹.

METRO supports the United Nations' Sustainable Development Goals (SDGs) and, with a commitment to a more sustainable fish and seafood assortment, pays attention to achieving the global agenda. In regards of this policy, METRO particularly works towards the goals:

- SDG 6 (clean water and sanitation)
- SDG 8 (decent work and economic growth)
- SDG 12 (responsible consumption and production)
- SDG 14 (life below water)
- SDG 15 (life on land)
- SDG 17 (partnership for the goals)

¹ <https://www.metroag.de/en/company/responsibility/procurement>



2. Objective

As fish and seafood is a very important element of the company's business, METRO takes responsibility at various stages of the value chain. METRO develops measures to promote responsible fishing and aquaculture in accordance with the needs of our customers, nature and with the people working in the seafood industry.

With this policy METRO seeks to expand the sustainability of its assortment of wild caught and aquaculture fish & seafood by requiring certification of products and establishing strong partnerships. METRO wants to contribute to further improving the conditions within its fish & seafood value chain and aims to provide more transparency within the own fish & seafood supply chain.

3. Scope

The METRO Fish and Seafood Procurement Policy applies to the following scopes.

Operational Scope:

All METRO operations in all countries, including International Trading Offices and all Food Service Distribution (FSD) companies (for these operations and certain country operations, alternative timelines may apply).

Brand Scope:

Focus is on Own Brand (Private Label) and no-name brand fish and seafood products purchased and sold by METRO.

In addition, we will also work with producer brands, industry partners and other stakeholders on systematic changes towards sustainable fish and seafood.

Definition

- Own Brand: An article/product that carries a registered METRO brand.
- No-name brand: Products not bearing a METRO brand but with METRO address. This also includes all in-house produced products and all products sold via counter and labelled with METRO address.
- Producer brand: Any product labelled with a supplier brand.

Product Scope:

All fresh, frozen, processed and canned fish and seafood products which can be either

- Pure fish/seafood products,



- Products in which fish or seafood is the main ingredient²

4. Target

METRO aims to improve its fish and seafood assortment by continuously optimising the environmental and social aspects of fishing and aquaculture.

4.1 Environmental

METRO has identified its twelve major fish and seafood species. Within our Own Brand (Private Label) and no-name brand supply chain 90% of these twelve species will by end of FY 2025 either:

(1) Be certified according to one of the following certification standards

- ASC (Aquaculture Stewardship Council)
- BAP (Best Aquaculture Practices Certified)
- European Organic Certification
- FOS (Friend of the Sea)
- GLOBALG.A.P.
- MSC (Marine Stewardship Council)

In addition, METRO accepts any other certification standard that has been recognised by the GSSI ([Global Sustainable Seafood Initiative](#)).

Or

(2) Be engaged in a credible active comprehensive Fishery Improvement Project (FIP) that is registered on <https://fisheryprogress.org/> or in an Aquaculture Improvement Project (AIP) that is in progress towards certification and with the clear target to achieve certification within a reasonable timeframe.

Or

(3) Be engaged with a third-party audit or a local certification scheme with reliable criteria; we expect the development towards certifications mentioned under 4.1 and 7.1. A global reference framework for sustainability initiatives (Seafood MAP), including third-party audits and local certification schemes, is under development by

² Main ingredient: Ingredient accounting for the largest portion of the product by weight (liquid medium should be excluded); this is usually the first ingredient listed



[GSSI](#) and will be used in future to assess the acceptability of local certification methods and improvement pathways.

4.2 Social

METRO is committed to protect and address human and labor rights in the fish and seafood supply chain. Therefore, METRO aims to eliminate any form of slavery and requires from its suppliers at least meet minimum social standards in management practices as recommended in the [Universal Declaration of Human Rights](#) and the International Labour Organization's Conventions and Recommendations as

- [International Labour Organization \(ILO\) Declaration on Fundamental Principles and Rights at Work](#)
- [C188 - Work in Fishing Convention, 2007 \(No. 188\)](#)

By end of FY 2025 METRO aims within our Own Brand (Private Label) and no-name brand supply chain for 100 % of species:

All land-based processing factories as well as land-based and at sea aquaculture have to be audited or certified against one of the [accepted social audits/certification](#) following the requirements of the [METRO Policy for Social Compliance](#).

Regarding at-sea operations METRO will accept any certification standard that has been recognised by [a seafood-specific social benchmark tool](#), which will be developed by GSSI and the Sustainable Supply Chain Initiative (SSCI).

4.3 Traceability

By end of FY 2030 all Own Brand (Private Label) and no-name brand fish and seafood products have to be digitally traceable (see Annex 1) and have to meet key data elements of the [Global Dialogue on Seafood Traceability](#) (GDST) standard.

Additionally, the scientific and common names (commercial designation) of species as well as the FAO catching area (wild catch) or name of the body of water (inland fishing) or the country of aquaculture have to be visible on all fish and seafood products.

By end of FY 2030 we strive for all of our A-Brand as well as supplier brand fish & seafood products for digital traceability (see Annex 1) and to meet key data elements of the [Global Dialogue on Seafood Traceability](#) (GDST) standard.

4.4 Tuna

In case of Tuna, METRO specific targets and requirements apply (see Annex 2).

5. Reporting

METRO will make this policy publicly available.

The progress against the target will be measured based on the following key performance indicators (KPI):

- Share of turnover of certified Own Brand (Private Label) and no-name brand products³ in accordance with one of the standards mentioned under 7.1 or another certification standard that has been recognised by GSSI
- Share of turnover of Own Brand (Private Label) and no-name brand products engaged in a Fishery Improvement Project (FIP) or Aquaculture Improvement Project (AIP)
- Share of turnover of Own Brand (Private Label) and no-name brand products assessed by a third-party audit or local certification scheme
- Share of turnover of Own Brand (Private Label) and no-name brand products meeting key data elements of the GDST and/or are digitally traceable
- Share of turnover of Own Brand (Private Label) and no-name brand products audited/certified in accordance with one of the accepted social auditing/certification standards
- Share of turnover of Own Brand (Private Label) and no-name brand tuna products certified in accordance with one of the standards mentioned under 7.1 or another certification standard that has been recognised by GSSI
- Share of turnover of Own Brand (Private Label) and no-name brand tuna products audited/certified in accordance with one of the accepted social auditing/certification standards

This will be reported in the METRO Corporate Responsibility Report.

³ In some cases, products will count as „certified “, while there is no label on the product but when the product can be identified as certified on the purchase records (i.e. invoice and delivery note). This will be valid for all products with a chain of custody certification until the point of sale incl. Tier 1 suppliers.

6. Policy framework

METRO is committed to the environmentally, socially and economically sustainable use of fish and seafood resources. METRO follows the national and international individual fishing quotas set by the EU and national governments worldwide. Additional to national and international legislation the policy covers the following core elements:

6.1 Endangered fish species

Overfishing, illegal fishing/trading, water pollution and climate change are key factors that are endangering fish species, even threatening some with extinction. METRO is striving to increase the sustainability of its fish assortment while taking the following into account:

- Recommendations from the United Nations Food and Agriculture Organization (FAO) (<http://www.fao.org/fisheries/en/>)
- IUCN Red List (International Union for Conservation of Nature) (<https://www.iucnredlist.org/>)
- Evaluations of the International Council for the Exploration of the Sea (ICES) (<https://www.ices.dk/Pages/default.aspx>)
- Agreements of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) (<https://www.cites.org/eng>)

And other country specific websites (e.g. for Germany)

- Thünen Institute (<https://www.fischbestaende-online.de/>)

METRO will gradually increase the amount of sustainable fish and seafood assortment sold and continue to avoid selling endangered species as well as encouraging its suppliers not to catch these species.

Additionally, METRO identified species which are forbidden to sell, which are whales, dolphins and sawfish as well as wild caught turtles.

6.2 Illegal, unreported, unregulated fishing (IUU)

Illegal, unreported and unregulated fishing (IUU) is a significant cause of overfishing, destroys marine habitats and disadvantages honest fishers and frustrates fair competition, especially in developing countries.



METRO disavows illegal fishing practices and actively works to increase the transparency of fisheries. Moreover, METRO requires that its suppliers do not source from vessels that have been identified as IUU vessels by Regional Fisheries Management Organizations (RFMOs). The blacklists are publicly available and issued regularly.

6.3 Fishing gear

Some fishing techniques may cause significant damage to the ecosystem, increase bycatch rates or contribute to unhealthy stocks due to overfishing or catching fish smaller than the minimum size limit.

METRO explicitly forbids its suppliers to use dynamite or poison.

In addition, METRO supports the use of responsible fishing gear in accordance with the species and area being fished, as well as the improvement of existing fishing gear (e.g. larger mesh sizes, exit windows for non-target species, non-entangling or biodegradable fish aggregation devices).

METRO requires the mitigation of bycatch.

6.4 Aquaculture

Aquaculture is playing an increasingly important role in fish sourcing. METRO prefers responsible and controlled aquaculture farms with regards to:

Farm management

- Have an appropriate stocking density
- Use cages appropriate to each species
- Reduce negative effects on flora and fauna
- Minimise escapes of animals into the ocean
- Use a functioning water and waste management system

Feed

- Prohibit the use of hormones that stimulate growth
- Avoid the preventive use of antibiotics
- Comply with the requirements related to animal feed (including fish) of the ["Soy Procurement Policy"](#).
- Provide information about the usage of genetically modified organisms. More details can be found in our policy on [Genetically Modified Organisms \(GMO\)](#).



METRO's ambition is to increase the use of alternative feed for aquaculture fish feeding in order to reduce the soy use, thus engaging against deforestation and to reduce the overall environmental impact. METRO constantly searches for alternative proteins as feed, including insects, plant-based feed and cell grown alternatives.

6.5 Animal Welfare

METRO acknowledges the importance of Animal Health and Welfare; therefore, we have published the METRO Animal Health & Welfare Position on our website.

6.5.1 Aquaculture

Animal Welfare is especially important in Aquaculture. Therefore, METRO prefers farms which:

- Humanely stunned prior to slaughtering
- Have no routine mutilation like fin trimming

Genetically modified and cloned fish must not be used.

6.5.2 Crustaceans

Lobster or other crustaceans are important products in the international and professional cuisine. In order to respond to this demand of high-quality gastronomy METRO offers lobster from the live pool in selected countries.

Live lobster is a very sensitive animal. To ensure treatment in accordance to highest animal health and welfare possible throughout the entire supply chain there is the METRO "[Live Lobster- Quality Control- Technical Manual](#)", in place in order to keep live lobster quality and protect them from any harm and unnecessary stress. This manual cover transportation, platform and store operations and describes

- The conditions of transportation and how to keep live lobsters in stores
- The methods of inspection on the platforms
- In-store water tank control parameters and control frequency

6.6 Conscious Proteins

For METRO, conscious protein means providing customers with a diverse source of protein, for instance conventional proteins obtained from animals raised to e.g. more sustainable feed or with reduced environmental impact as well as alternative proteins including insects, plant based, and cell grown.

In 2020, METRO introduced its [position on conscious proteins](#). Animal and plant proteins are a crucial offer in METRO with which we can support our customers. We



will partner with relevant stakeholders and use the latest scientific knowledge to understand what a diverse balance of proteins looks like from production through to the plate, and we will support our suppliers (including our fish and seafood suppliers) by encouraging them to operate more sustainably.

In doing this we will have a positive effect on the overall food system.

6.7 Biodiversity

METRO supports the goals of the [International Convention on Biological Diversity](#) and contributes to the protection of biodiversity. Therefore, METRO has formulated the [Position on Biodiversity](#) and asks all suppliers to adhere to the principles mentioned in the document.

6.8 Quality and food safety requirements

METRO requests factories to have a valid [Global Food Safety Initiative](#) (GFSI) recognised certification and audit report to ensure quality standards and maintain food safety.

6.9 Environmental / Science Based Targets

[METRO is committed to reducing absolute Scope-3-CO2 emissions \(supply chain\) by 15% by 2030 compared to FY 2018.](#) Scope-3 emissions account for more than 90% of our total carbon footprint. In its own global business operations METRO has committed to climate neutrality by 2040.

6.10 Packaging

METRO works on the improvement of the packaging of products. Therefore, METRO expects from its suppliers to comply with the principles described in [METRO Own Brand Packaging Policy](#).

6.11 Human Rights Principles and Code of Conduct

To enhance our business impact and to benefit our customers, society and environment, METRO stated its respect for Human rights as of fundamental value in its [Human Rights Principles](#) and formulated the "[METRO Code of Conduct for business partners](#)", which we expect all our suppliers to adhere to.



7. Action Plan

The METRO Fish and Seafood Procurement Policy will be supported by the METRO Fish and Seafood Action Plan. In this plan METRO will outline timings and actions to come to our target. The plan will be defined for 18-24 months and then reviewed and updated accordingly. The action plan consists of three pillars (certifications, partnerships and projects) to ensure relevant actions with the right partners.

7.1 Certification

To achieve the objective and targets of this policy, METRO refers to various certification schemes. The list of accepted standards and certifications is a living document and will be updated according to new insights and benchmarks (e.g. GSSI benchmark). See 4.1 for the list of accepted certification schemes.

We actively work together with certification schemes to improve the fish and seafood industry towards a more sustainable and future oriented industry.

7.2 Partnerships

METRO is working actively on the implementation of its Fish and Seafood Procurement Policy together with different stakeholders within the value chain. METRO also encourages its METRO subsidiaries to partner up with nationally relevant stakeholders.

Global Sustainable Seafood Initiative (GSSI):

The [Global Sustainable Seafood Initiative](#) is a global platform and partnership of the private sector from across the seafood value chain, NGOs, experts, governments and international organisations, including the FAO, to tackle the complex, global sustainability challenges facing the seafood industry.

METRO is an active GSSI partner from the beginning and is committed to the Global Benchmark Tool based on the United Nations Food and Agriculture Organization's (FAO) Code of Conduct for Responsible Fisheries (CCRF) as well as to the development of further initiatives, driving forward to more sustainable seafood.

World Economic Forum / Tuna Declaration

In June 2017, METRO Wholesale has entered into a voluntary commitment regarding tuna traceability. [The Tuna 2020 Traceability Declaration](#), a public-private coalition convened by the World Economic Forum, was launched as part of the UN Ocean Conference in New York. It is a shared commitment among industry leaders across four areas to ensure full traceability of tuna supply chains, from vessel to point of



sale. The four areas include commitments regarding traceability, social and environmental sustainability as well as government partnerships. The declaration aims to create a process to accelerate and scale existing, successful partnerships between the public, private and civil society sectors and also to spur new collaboration, harnessing the latest technologies to help end IUU fishing of tuna.

Global Tuna Alliance (GTA)

METRO is one of the founders of the [Global Tuna Alliance](#) and active partner from the beginning. GTA is an independent group of retailers and supply-chain companies, working to ensure that tuna ultimately meets the highest standards of environmental performance and social responsibility. GTA promotes and actively supports the implementation of the Tuna 2020 Traceability Declaration across sectors.

Global Dialogue on Seafood Traceability (GDST)

The [Global Dialogue on Seafood Traceability](#) was launched as a seafood industry forum dedicated to drafting the [first global standard](#) for seafood traceability, which was launched in March 2020. METRO is one of the initiators and supported the community approach for seafood traceability from the beginning on. The GDST includes the active participation of different seafood industry stakeholders along the entire supply chain.

The GDST has grown into one of the largest and most diverse business-to-business forums in the seafood sector.

Consumer Goods Forum (CGF)

The [Consumer Goods Forum](#) is a global industry network that brings together the CEOs and senior management of retailers, manufacturers, service providers and other stakeholders across 70 countries. The CGF is driven by its members to encourage the global adoption of practices and standards that serves the consumer goods industry worldwide. METRO is active in leading coalitions and participating in projects.

7.3 Projects

METRO does not only strive for certification but also recognizes the positive impact small scale fisheries and aquaculture as well as singular projects can have for the sustainable development of an area or local community.

Touba Peche

As a fisherman in Senegal, Mouhamed "Momo" Mbaye saw little perspective: Overfishing of the oceans and unequal competition with international fishing fleets put local fisheries under severe pressure. Momo immigrated to Europe – and founded a fish import company in Berlin. With sustainably caught fish from his native country,



“Touba Peche” today improves local livelihoods – and contributes to METRO’s range for conscious fish purchasing.



Annex 1: Traceability

METRO strives for full digital traceability back to the vessel or farm, in order to prevent risks and increase transparency for customers. In order to fulfil the traceability requirements METRO has set up the PROTRACE Program.

Using the PROTRACE app enables the customer to retrieve product information about origin, production and sustainability aspects. All production steps are displayed in the app, leading to full transparency about the product specifications.

METRO's PROTRACE solution enabling lot-based traceability for fish in a digital way. PROTRACE covers already legally mandatory attributes and will be step by step enhanced towards GDST standards. PROTRACE provides a digital solution for traceability with various data-upload features.



Annex 2: Tuna

Tuna is one of the most important species within our diet but also faces challenges, like poor management and bycatch. Therefore, METRO acknowledges its responsibility and is working to ensure that tuna ultimately meets the highest standards of environmental performance and social responsibility.

METRO is a signatory of the [Tuna 2020 Traceability Declaration](#), which is a dialogue among governments, companies and civil society and was convened by the World Economic Forum (WEF). METRO is also founding partner of the Global Tuna Alliance (GTA), working on the implementation of the 2020 Tuna Traceability Declaration. METRO strongly and actively supports the GTA implementation plan. The Tuna 2020 Traceability Declaration consists of four main pillars: Traceability, Environmental Responsibility, Social Responsibility and Government Partnership.

As a partner of the GTA, METRO endorses the five-year strategy of GTA.

Following the guidelines and targets defined in the Fish & Seafood Procurement Policy, METRO sets additional requirements for 100 % of its Own Brand (Private Label) and no-name brand fresh, frozen, processed and canned tuna as of January 2021:

(1) Traceability

Additionally, to the traceability target in the policy, METRO ensures effective traceability (tracking tuna products from vessel to the final buyer), which underpins sustainability efforts as it creates transparency and accountability within the supply chain (see Annex 1), by:

- a. Implementing effective traceability system for tuna products, using Key Data Elements developed through Global Dialogue on Seafood Traceability with the goal to enable products to be traceable to vessel or groups of vessels, trip dates, catch method, catch area and the ability to disclose to final customer on request.
- b. Ensuring that own traceability data is consistent and can be shared along the supply chain, and that data systems are interoperable.
- c. Undertaking due diligence to identify the risks of IUU fishing in the supply chain and commit to take proportionate action to address identified risks.

By end of FY 2030 we strive for all of our A-Brand tuna products for digital traceability (see Annex 1) and to meet key data elements of the [Global Dialogue on Seafood Traceability](#) (GDST) standard.



(2) Environment

Within our Own Brand (Private Label) and no-name brand supply chain 100% of tuna must either:

- a. be certified according to a third-party certification standard that has been recognised by the GSSI;
- b. where fisheries have not yet met a GSSI-recognized standard, tuna needs to come from a credible comprehensive Fishery Improvement Project that is registered on <https://fisheryprogress.org/>

Additionally, METRO aims to solely source tuna from [International Seafood Sustainability \(ISSF\)](#) Participating Companies which comply with ISSF Conservation Measures. These ensure sustainability of impacts on the environment, bycatch mitigation and support RFMOs (Regional Fisheries Management Organization).

Furthermore, METRO requests all vessels to register on the ProActive Vessel Register (PVR) by ISSF. METRO accepts only companies which comply (Compliance Category: "Conformance" or "Minor Non-Conformance") with the ISSF Conservation Measures and Commitments shown in the [annual compliance report](#). Companies with major Non-Conformance(s) are not accepted for METRO supplies.

(3) Social

METRO is committed to protect and address human and labor rights in the fish and seafood supply chain. The detailed target is set in 4.2 of this Fish and Seafood Procurement Policy.

Additionally, METRO requests from its suppliers to

- implement standards that align with [ILO 188](#)
- implement standards that align with the [Cape Town Agreement](#) standards.

(4) Government Partnership

METRO commits to

- a. Working with governments to ensure the implementation of effective harvest strategies to achieve sustainable tuna stocks under the jurisdiction of each tuna RFMO.



- b. Working with governments to establish systems to identify and restrict illegal seafood and build capacity to establish and manage information systems to account for domestic and international fishing fleets, landings, enforcement and trade of seafood products.

The achievement of this goal is mainly carried out on a global level by METRO's partnership in the Global Tuna Alliance and not part of the METRO operations in countries.