



Fish and Seafood Procurement Policy

Contents

1. INTRODUCTION	2
2. OBJECTIVE	3
3. SCOPE	3
4. TARGETS	4
4.1 ENVIRONMENTAL	4
4.2 SOCIAL STANDARDS	5
4.3 TRACEABILITY	5
4.4 TUNA	6
5. REPORTING	6
6. POLICY FRAMEWORK	6
6.1 ENDANGERED FISH SPECIES	7
6.2 ILLEGAL, UNREPORTED AND UNREGULATED FISHING (IUU)	7
6.3 FISHING GEAR	8
6.4 AQUACULTURE	8
6.5 ANIMAL WELFARE	9
6.6 CONSCIOUS PROTEINS	9
6.7 BIODIVERSITY	10
6.8 QUALITY AND FOOD SAFETY REQUIREMENTS	10
6.9 ENVIRONMENTAL/SCIENCE-BASED TARGETS	10
6.10 PACKAGING	10
6.11 HUMAN RIGHTS POLICY AND CODE OF CONDUCT	10
7. ACTION PLAN	11
7.1 CERTIFICATION	11
7.2 PARTNERSHIPS	11
7.3 PROJECTS	12
ANNEX 1: TRACEABILITY	14
ANNEX 2: TUNA	15



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 provides its customers with products that comply with the highest quality and safety standards and that have been produced by socially and environmentally responsible 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 implements the policy with actions. The action plan consists of 3 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 of which can be found on our website¹.

METRO supports the United Nations Sustainable Development Goals (SDGs) and, with our commitment to sustainability, we strive to achieve the global agenda of the SDGs. For this policy, the following goals are particularly relevant:

- 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 (Partnerships for the goals)

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



2. Objective

As fish and seafood are 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 the people working in the seafood industry.

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

3. Scope

The METRO Fish and Seafood Procurement Policy applies within the following scopes:

Operational scope

All METRO operations in all countries, including International Trading Offices, Rungis Express, Classic Fine Foods and Pro à Pro (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.

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

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.



4. Targets

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

4.1 Environmental

METRO has identified its 12 major fish and seafood species. Within our own-brand (private-label) supply chain, 90% of these 12 species will, by 2025:

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

- ASC (Aquaculture Stewardship Council)
- BAP (Best Aquaculture Practices)
- EU organic label
- 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 a credible, comprehensive Fishery Improvement Project (FIP) that is registered on <https://fisheryprogress.org/> or an Aquaculture Improvement Project (AIP) that is pursuing certification with the clear target of achieving certification within a reasonable time frame.

Or

(3) Be part of a third-party audit or a local certification scheme with reliable criteria; we expect steps to be taken towards the 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 the [GSSI](#) and will be used in future to assess the acceptability of local certification methods and improvement paths.

4.2 Social standards

METRO is committed to protecting and addressing human and labour rights in the fish and seafood supply chain. Therefore, METRO aims to eliminate any form of slavery and requires that 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. These are outlined in:

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

Within its own-brand (private-label) supply chain, METRO has set the following goal for 100% of fish and seafood products by the year 2025:

All land-based processing factories as well as land-based and at-sea aquaculture must be audited or certified in accordance with one of the [accepted social audits/certifications](#) 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 [the seafood-specific social benchmark tool](#) which is being developed by GSSI and the Sustainable Supply Chain Initiative (SSCI).

4.3 Traceability

By 2030, all own-brand (private-label) fish and seafood products must be digitally traceable (see Annex 1) and 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), the name of the body of water (inland fishing) or the country of aquaculture must be visible on all fish and seafood products.

By 2030, we are striving for all of our A-brand as well as supplier-brand fish and seafood products to be digitally traceable (see Annex 1) and to meet key data elements of the [Global Dialogue on Seafood Traceability](#) (GDST) standard.



4.4 Tuna

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

5. Reporting

METRO will make this policy publicly available.

The progress in achieving the targets will be measured based on the following key performance indicators (KPIs):

- Share of turnover accounted for by products certified³ in accordance with one of the standards mentioned under 7.1 or another certification standard that has been recognised by the GSSI
- Share of turnover accounted for by products which form part of a Fishery Improvement Project (FIP) or an Aquaculture Improvement Project (AIP)
- Share of turnover accounted for by products assessed by a third-party audit or local certification scheme
- Share of turnover accounted for by products meeting key data elements of the GDST and/or that are digitally traceable
- Share of turnover accounted for by products audited/certified in accordance with one of the accepted social auditing/certification standards
- Share of tuna turnover certified in accordance with one of the standards mentioned under 7.1 or another certification standard that has been recognised by the GSSI
- Share of tuna turnover audited/certified in accordance with one of the accepted social auditing/certification standards

This will be reported in the METRO Corporate Responsibility Report.

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. Beyond the applicable national and international legislation, the policy covers the following core elements:

³ In some cases, products will count as 'certified' even when there is no corresponding label on the product if the product can be identified as certified on the purchase records (i.e. invoice and delivery note). This will apply for all products with chain of custody certification up to the point of sale, including Tier 1 suppliers.

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 range 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 by 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 proportion of sustainable fish and seafood in its product range and continue to avoid selling endangered species as well as encouraging its suppliers not to catch these species.

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

6.2 Illegal, unreported and unregulated fishing (IUU)

Illegal, unreported and unregulated fishing (IUU) is a significant cause of overfishing. It destroys marine habitats, 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 organisations (RFMOs). The blacklists are publicly available and issued regularly.



6.3 Fishing gear

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

METRO explicitly forbids its suppliers from using 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 by-catch.

6.4 Aquaculture

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

Farm management

- Having an appropriate stock density
- Using cages appropriate to each species
- Reducing negative effects on flora and fauna
- Minimising escapes of animals into the ocean
- Using a functioning water and waste management system

Feed

- Prohibiting the use of hormones that stimulate growth
- Avoiding the preventive use of antibiotics
- Complying with the requirements related to animal feed (including fish) of the [Soy Procurement Policy](#)
- Providing information about the usage of genetically modified organisms. More details can be found in our [Policy on Genetically Modified Organisms \(GMOs\)](#).

METRO's ambition is to increase the use of alternative feed for aquaculture fish feeding in order to reduce the use of soy, thus engaging against deforestation and reducing 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

Animal welfare is important to METRO. Therefore, we have published the METRO Animal Health and Welfare Procurement Policy, which can be found on our website.

6.5.1 Aquaculture

Animal welfare is especially important in aquaculture. Therefore, METRO prefers farms that:

- Humanely stun animals prior to slaughtering
- Have no routine mutilation practices such as fin trimming

Genetically modified and cloned fish may not be used.

6.5.2 Crustaceans

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

Live lobsters are very sensitive. To ensure their treatment in accordance with the highest possible animal health and welfare standards throughout the entire supply chain, the METRO [Live Lobster Quality Control Technical Manual](#) is in place. This maintains the quality of live lobsters and protects them from any harm and unnecessary stress. This manual covers transportation, platforms 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 the frequency of checks

6.6 Conscious proteins

For METRO, offering conscious protein means providing customers with diverse sources of protein. These include conventional proteins obtained from animals raised on more sustainable feed or with reduced environmental impact as well as alternative proteins such as insects, plant-based proteins and cell-grown proteins.

In 2020, METRO introduced its position on conscious proteins. Animal and plant proteins are a crucial offering with which METRO can support its 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 [Convention on Biological Diversity](#) and contributes to the protection of biodiversity. Therefore, METRO has formulated its [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 that factories have a valid certification and audit report recognised by the [Global Food Safety Initiative](#) (GFSI) 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 2018.](#) Scope 3 emissions account for more than 90% of our total carbon footprint.

6.10 Packaging

METRO is working on improving its product packaging. Therefore, METRO expects its suppliers to comply with the principles described in the [METRO Packaging Policy](#) as well as in the [METRO Cash & Carry Own-Brand Packaging Policy](#).

6.11 Human Rights Policy and Code of Conduct

To enhance its business impact and to benefit its customers, society and the environment, METRO has stated its respect for human rights as a fundamental value in its [Human Rights Policy](#) and formulated the [METRO Code of Conduct for Business Partners](#), which it expects all its 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 timelines and actions for meeting its targets. The plan will be defined for 18 to 24 months, then reviewed and updated accordingly. The action plan consists of 3 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. the 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, helping it become more sustainable and future-oriented.

7.2 Partnerships

METRO is actively working 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 with relevant national stakeholders.

Global Sustainable Seafood Initiative (GSSI)

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

METRO has been 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). The company is also dedicated to the development of further initiatives for the promotion of more sustainable seafood.

World Economic Forum/Tuna Declaration

In June 2017, METRO Wholesale 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 to ensure full traceability in tuna supply chains, from vessel to point of sale. The participants



committed to actions relating to 4 main areas: traceability, social sustainability, environmental sustainability and government partnerships. The declaration aims to create a process for accelerating and scaling up existing, successful partnerships between the public, private and civil-society sectors, and 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 has been an active partner from the beginning. The 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. The 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 was one of the initiators and has supported the community effort for seafood traceability from the start. The GDST includes the active participation of different seafood industry stakeholders throughout 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 serve the consumer goods industry worldwide. METRO is active in leading coalitions and participating in projects.

7.3 Projects

Not only does METRO strive for certification: it also recognises the positive impact small-scale fisheries and aquaculture as well as singular projects can have on the sustainable development of an area or local community.

Touba Peche

As a fisherman in Senegal, Mouhamed 'Momo' Mbaye had bleak prospects. Overfishing of the oceans and unequal competition with international fishing fleets put local fisheries under severe pressure. Momo emigrated to Europe – and founded



a fish import company in Berlin. With sustainably caught fish from Momo's 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. To fulfil the traceability requirements, METRO has set up the PROTRACE programme.

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

METRO's PROTRACE solution enables the digital, lot-based traceability of fish. PROTRACE covers attributes that are already legally prescribed and will gradually be enhanced to fulfil the 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 it also faces challenges, such as poor management and by-catch. 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. It was convened by the World Economic Forum (WEF). METRO is also a founding partner of the Global Tuna Alliance (GTA), working on the implementation of the Tuna 2020 Traceability Declaration. METRO strongly and actively supports the GTA's implementation plan. The Tuna 2020 Traceability Declaration consists of 4 main pillars: traceability, environmental responsibility, social responsibility and government partnerships.

As a partner of the GTA, METRO endorses the GTA's 5-year strategy.

Following the guidelines and targets defined in the Fish and Seafood Procurement Policy, METRO has set additional requirements for 100% of its own-brand (private-label) fresh, frozen, processed and canned tuna as of January 2021:

(1) Traceability

In addition to the traceability target in the policy, METRO ensures effective traceability (tracking tuna products from the 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 an effective traceability system for tuna products, using key data elements developed through the Global Dialogue on Seafood Traceability with the goal of enabling products to be traceable to a vessel or groups of vessels, trip dates, catch method and catch area, and being able to disclose these details to the final customer on request
- b. Ensuring that METRO's own traceability data is consistent and can be shared throughout 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 committing to take proportionate action to address identified risks

By 2030, we are striving for all of our A-brand tuna products to be digitally traceable (see Annex 1) and to meet key data elements of the [Global Dialogue on Seafood Traceability](#) (GDST) standard.



(2) Environmental responsibility

Within our own-brand (private-label) supply chain, 100% of tuna must meet one of the following criteria:

- a. It must 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-recognised standard, tuna must come from a credible, comprehensive Fishery Improvement Project that is registered on <https://fisheryprogress.org/>

Additionally, METRO aims to source tuna solely from companies participating in the [International Seafood Sustainability Foundation \(ISSF\)](#) which comply with ISSF Conservation Measures. These ensure sustainability concerning impacts on the environment, by-catch mitigation and support for RFMOs (regional fisheries management organisations).

Furthermore, METRO requests all vessels to register on the ISSF ProActive Vessel Register (PVR). METRO only accepts companies which comply (compliance category: 'Conformance' or 'Minor Non-Conformance') with the ISSF Conservation Measures and Commitments shown in the [annual compliance report](#). Companies in the category of 'Major Non-Conformance(s)' are not accepted as METRO suppliers.

(3) Social responsibility

METRO is committed to protecting and addressing human and labour rights in the fish and seafood supply chain. The detailed target is defined in section 4.2 of this Fish and Seafood Procurement Policy.

Additionally, METRO requests that its suppliers:

- Implement standards that are aligned with [ILO 188](#)
- Implement standards that are aligned with those of the [Cape Town Agreement](#)

(4) Government partnerships

METRO is committed 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 as part of the METRO operations in individual countries.