

OUR SEAFOOD SOURCING APPROACH:



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INTRO

The World Wise Foods Group is committed to supplying our customers with 100% responsibly sourced¹ seafood. We are passionate about fishing methods that preserve ocean biodiversity and provide secure livelihoods for fishing communities. We are proud to be a leading global supplier of one-by-one² caught tuna that is certified as sustainably sourced.³

Our Seafood Sourcing policy (see Appendix 2) outlines the requirements each seafood product and the associated fishery must meet to be approved for supply. We work in collaboration with our supplier partners to ensure these requirements are adhered to. We also work closely with our customers to ensure we meet any of their requirements as well as delivering on price and quality.

This document outlines our approach to ensuring compliance with our policy as well as our broader approach to seafood sourcing.

RISK ASSESSMENT

We conduct a risk assessment for all fish species and fisheries prior to sourcing. This includes a gap analysis against our Seafood Sourcing policy and a review of applicable data from reputable external sources. Where it is used, the sustainability status of bait is also considered in these assessments or is verified via certification.

Changes to the status of fish species and fisheries are monitored on an on-going basis and sourcing decisions reviewed accordingly.

Where gaps are identified, we work with our suppliers and source fisheries to drive improvements, often through Fishery Improvement Projects (FIPs). A source will not be approved for supply until it complies with our policy. Existing sources will be suspended should non-compliance be identified.

We also conduct a Human Rights risk assessment for fisheries annually and processing sites bi-annually – see page 3 for further.

CERTIFICATION AND CLAIMS

We recognise the importance of independent third-party standards and support supplier partners to achieve these.

Our use of the terms “Responsibly Sourced” and “Sustainably Sourced” on any packaging or external communications are governed by the Sustainable Seafood Coalition (SSC) Codes of Conduct on Environmentally Responsible Fish and Seafood Sourcing and Environmental Claims – see Appendix 1 for further detail.

CATCH METHODS

We seek to use catch methods that are highly selective and with low environmental impact.

All of our tuna is caught using one-by-one methods with single hooks and lines catching tuna one at a time. We are passionate about these catch methods because of their environmental and social sustainability credentials:

- The low impact fishing gear used for one-by-one methods does not interact with marine habitats;
- One-by-one fishing gear is not typically abandoned, lost or discarded, thereby minimally contributing to marine pollution;
- One-by-one methods are highly selective – the bycatch of non-target species is minimal. For example, bycatch in the Maldives pole and line fishery is recorded as 0.65% with discards of 0.02%.⁴

Purse seine fishing can have a negative impact on the sustainability of tuna stocks and ocean biodiversity. This is intensified by the scale of its use – in 2022 over 468,000 tonnes of tuna were caught this way in the Indian Ocean, over three times the amount caught using pole and line methods.⁵

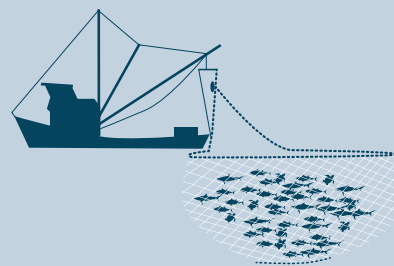
EXAMPLE CATCH METHODS

Pole & line

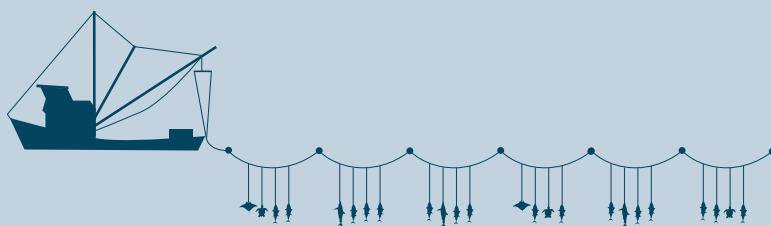
All World Wise Foods tuna is caught using this catch method



Purse seine



Longline



average US longline set length = 28miles

We do not source from fisheries that use Drifting Fish Aggregating Devices (dFADs). The presence of Anchored Fish Aggregating Devices (aFADs) in our supply chains are specific to individual fisheries. For example, in the American Albacore Fishing Association north Pacific one-by-one fishery FADs are not utilised. In other fisheries, such as the Maldives, where aFADs are present, they exist in small numbers and are maintained by the Ministry of Fisheries and Ocean Resources. aFADs continue to play a vital role in ensuring food security in developing countries⁶. All aFAD's present in our supply chain are also aligning to the Global Tuna Alliance (GTA) management best practices guidelines.

FISHERY MANAGEMENT

We will only source from fisheries that can demonstrate they are sustainably managing stock levels and are taking proactive steps towards improvement. In the case of tuna, we are committed to exerting our influence to support initiatives to strengthen Regional Fishery

Management Organisations (RMFO) management, including both the critical areas of harvest strategy and allocation through advocacy to policy makers and exerting our supply chains influence to drive sustainable long-term resources.

The World Wise Foods Group will not purchase any seafood caught using Illegal, Unreported or Unregulated (IUU) fishing and will only purchase seafood from legally registered vessels. We only source from states that have either ratified or acceded the Port State Measures Agreement. These actions help to ensure that illegally caught seafood does not enter our supply chain.

We will not work with fisheries that trade in endangered species and we regard shark finning as an unacceptable practice. We are committed to only sourcing from vessels that adhere to a Fins Naturally Attached policy. The low impact fishing methods we use result in minimal bycatch of Endangered, Threatened or Protected species (ETPs) such as dolphins or turtles.



We will also not source seafood contrary to the conditions of internationally recognised marine protected areas. We support the principle of creating these reserves and recognise the contribution they make to restoring the health of marine ecosystems.

Ghost fishing gear is a major contributor to marine pollution, microplastic contamination and physical damage to delicate reef and coastal environments as well as ghost fishing. The pole and line catch method,

by its very nature, minimises the risk of lost fishing gear. We are supportive of the 2023 revisions to the MSC standard which now ensures that the impacts of ghost gear are explicitly considered during every fishery assessment.

HUMAN RIGHTS

We are committed to ensuring that all the jobs throughout our supply chain,

are decent, fair and safe and that human rights are always respected.

We conduct a bi-annual Supplier Partner Human Rights risk assessment which covers all seafood processors. We prioritise engaging supplier partners that rate as high risk in this assessment and develop a plan to address any issues identified.



CASE STUDY – PROMOTING HUMAN RIGHTS IN THE MALDIVES FISHERY

To better understand the gaps and opportunities in the Maldives tuna fishery, in 2022 we co-funded the International Pole and Line Foundation (IPNLF) to conduct a social assessment of the Maldives fishery. Through interviews with fishers, skippers and key informants, we have been able to gain greater insights into recruitment and employment practices. The fieldwork was concluded in April 2023. We are now supporting discussions on the findings and next steps with government and industry.

Our ultimate ambition is for effective vessel standards including third party grievance mechanisms to be in place across all tuna vessels in our supply chains. In line with this ambition and in partnership with the IPNLF and Sainsbury's, in 2022 we received funding from the SEA Alliance 'Change on the Water Fund'. We are now working alongside the relevant government departments and the International Organization of Migration (IOM) to support the development of a national grievance mechanism in the Maldives as well as developing additional resources to support migrant workers both prior to and during their time in the Maldives.

On an annual basis we also review all our fisheries using the SEA Alliance Fishery Risk Tool. The risk tool uses data from several indices and ratings systems to produce a high-level baseline assessment of human rights risks in selected fisheries. The focus of this assessment is human trafficking, forced labour, and child labour. The outputs of this assessment alongside our own understanding of risk, informs where we seek to implement enhanced due diligence.

Our supplier partners, including raw material suppliers, are expected to work towards achieving the expectations set out in our [Sustainable Sourcing Policy](#). This policy reflects the Ethical Trade Initiative (ETI) base code as well as customer requirements. Although the policy is written for processing sites, the principles of good employment practices can be applied to vessel level.

We encourage all countries we source from to ratify ILO C188 and to put in place systems that evidence compliance that is appropriate to vessel size and gear type.

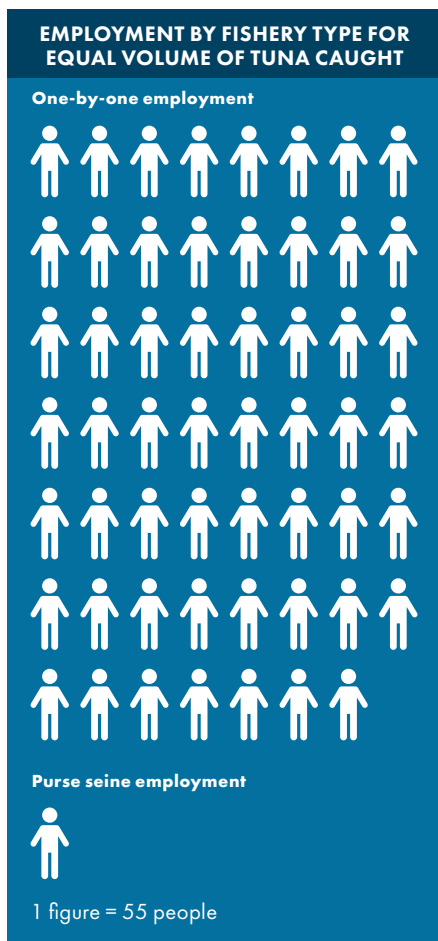
We are supportive of the principles of the Cape Town Agreement and work via relevant multi-stakeholder initiatives to advocate for ratification. We continue to support the improvement of safety standards on vessels.

We recognise the importance of observer coverage on vessels and the need for enhanced observer safety where human observers are used. Through relevant industry groups, we advocate for all regulatory authorities and their respective observer programmes to work together to implement the Western and Central Pacific Fisheries Commission (WCPFC) mandatory observer safety reforms.

SMALL-SCALE FISHERIES

The World Wide Foods Group believes that traditional one-by-one fisheries offer the most environmentally sustainable and socially responsible way to catch tuna. Our commitment to source tuna responsibly from one-by-one fisheries contributes to United Nations Sustainable Development Goal 142 (SDG14) "Life below water"; this goal calls for sustainably managed small-scale fisheries⁷ to access the marine resources and profitable markets that are essential to their economic development.

Small-scale fisheries are very people-centric and are often intrinsically linked to the culture and traditions of the communities they are connected to, contributing to cultural identity. In many developing economies small-scale fisheries make a significant contribution through the generation of foreign exchange from international trade. These fisheries are key to local food security



and the creation of employment. For example, the Maldivian one-by-one tuna fishery employs 55 times more crew per tonne of harvest than an industrial purse seine fishery⁸. Using a fishing method that contributes to the sustainability of fish stocks helps to ensure fishing community's livelihoods are sustainable for the long term.

We seek to enable developing nation fishing communities to access profitable markets. We recognise the value of third-party certifications, and reflect this in our purchasing decisions, however formally attaining sustainability certifications can create a barrier to market entry for small scale developing nation fisheries. In this context, we are committed to sourcing from small-scale fisheries that can evidence they are sustainable and commit to any required improvement actions. This could be achieved through an independent assessment⁹, credible FIP, or a certification process.

14 LIFE BELOW WATER

- TARGET 14-1: REDUCE MARINE POLLUTION
- TARGET 14-2: PROTECT AND RESTORE ECOSYSTEMS
- TARGET 14-3: REDUCE OCEAN ACIDIFICATION
- TARGET 14-4: SUSTAINABLE FISHING
- TARGET 14-5: CONSERVE COASTAL AND MARINE AREAS
- TARGET 14-6: END SUBSIDIES CONTRIBUTING TO OVERFISHING
- TARGET 14-7: INCREASE THE ECONOMIC BENEFITS FROM SUSTAINABLE USE OF MARINE RESOURCES
- TARGET 14-A: INCREASE SCIENTIFIC KNOWLEDGE, RESEARCH AND TECHNOLOGY FOR OCEAN HEALTH
- TARGET 14-B: SUPPORT SMALL SCALE FISHERS
- TARGET 14-C: IMPLEMENT AND ENFORCE INTERNATIONAL SEA LAW

We will continue to invest in small-scale fisheries long term sustainability, and we support the GTA's call for Governments and the World Trade Organisation to urgently implement SDG14 Target 6 which prohibits the fishing subsidies that are negatively impacting small scale developing nation fisheries.

TRACEABILITY AND TRANSPARENCY

The World Wise Foods Group is committed to ensuring the traceability of our products. All our products can be sourced back to country of origin, the vessel or group of vessels which caught the seafood, FAO region, landing location and fishing method used.

We require all eligible vessels in our supply chain to be listed on the Authorised Vessel List of the RFMO where they fish. We require mandatory International Maritime Organisation (IMO) numbers for the eligible vessels

we purchase from. Under the MSC CoC standards, it is also a requirement that vessel license and authorisation lists are published by the flag and coastal States of the vessels we purchase from.

Where supplier partners process one-by-one caught tuna alongside other catch methods or species for other customers, traceability is ensured through chain of custody (CoC) documentation, independent audits and our own regular on-site and remote assessments of traceability systems.

While we do not use high-seas transshipment in our supply chains, we recognise the associated traceability, product integrity and human rights risks and support the GTA's call for tuna RFMOs to adopt amendments to existing transshipment regulations to bring them in line with best practice.

We recognize the growing importance of transparency to consumers. All of our MSC certified tuna, is procured from

vessels registered under the MSC CoC protocol. This information is publicly available through the MSC. We also publish annually the detail of where we source our seafood from, the catch methods used and any standards in place – see further [here](#).

STRATEGIC PARTNERSHIPS AND INDUSTRY INITIATIVES

World Wise Foods recognises that there are systemic industry issues in the seafood sector that cannot be addressed alone. We are committed to supporting the long-term sustainability of ocean ecosystems by actively engaging in

strategic partnerships and industry wide initiatives. We also recognise the important role that collective advocacy can play in driving progress in seafood sustainability.

Examples of our partnership are detailed below.

International Pole and Line Foundation (IPNLF)	The IPNLF works to develop, support and promote one by-one tuna fisheries. Our shared focus over the past 12 months has been conducting the Maldives social assessment and supporting the development of a national grievance mechanism (see page 4 for further). We have also supported the IPNLF launch of the Sourcing Transparency Platform, and been active members of the Marketing Action Group.
Global Tuna Alliance (GTA)	The GTA is a sector-wide, multi-stakeholder initiative of partners seeking to build a shared, global, and non-competitive solution to sustainability issues in the global tuna supply chain. Our Chair of the Board is a member of the GTA Partners Advisory Group. The GTA continue to be active in its continued RFMO advocacy across all tuna fisheries in a range of diverse matters from HCR implementation, dFAD management, and national adoption of PSMA, to Electronic Monitoring implementation and improving labour standards on fishing vessels.
Sustainable Seafood Coalition (SSC)	Via our membership of the SSC we are able to guarantee that all claims of responsibly and sustainably sourced seafood on our product packaging complies with the Sustainable Seafood Coalition (SSC) Codes of Conduct. We are an active member of the SSC Codes working group which is currently reviewing the Codes of Conduct to ensure they remain fit for purpose.
Seafood Ethics Actions (SEA) Alliance	The SEA Alliance is a pre-competitive collaboration of retailers and seafood businesses aiming to strengthen human rights due diligence carried out in the global seafood supply chain and ensure respect for human rights. World Wise Foods is a member of the advocacy working group. We are also leading a study into the implementation of responsible recruitment practices and the Employer Pays Principle (EPP) in the global tuna processing sector.
Sustainable Fisheries and Communities Trust (SFACT)	<p>World Wise Foods’s Chair of the Board established SFACT in 2020. SFACT seeks to protect fishing livelihoods and communities in marginalised Coastal States by:</p> <ul style="list-style-type: none"> • Supporting Technical Capacity and Facilitation • Accelerating Coastal Conservation and Development • Advancing Education.
Global Sustainable Seafood Initiative (GSSI)	World Wise Foods is a funder of SFACT and continues to work closely with the organisation to promote the rights of small-scale fishers.
Global Sustainable Seafood Initiative (GSSI)	The GSSI is a global multi-stakeholder platform for collaboration and knowledge exchange. World Wise Foods became members of the GSSI in April 2024 and we look forward to working collaboratively with its members to address the various challenges facing the seafood sector going forwards.

APPENDIX 1

CLAIMS

We align with the following definitions as agreed by the Sustainable Seafood Coalition (SSC).

A) Sustainability

This relates to the current environmental and management status of the fish. Members will only make sustainability claims if they are satisfied the following minimum criteria are met:

- The source fishery is consistent with the principles of relevant key international standards and codes of conduct; and
- An independently audited chain of custody is in place to trace the seafood to its source.

Members will demonstrate that these criteria have been met by at least one of the following:

- Certification to a third party sustainability standard; or
- Independent third party audit.

B) Responsibility

Seafood sourced in alignment with the SSC Code of Conduct on Environmentally Responsible Seafood Sourcing may carry claims of responsibility.

APPENDIX 2

SEAFOOD SOURCING POLICY

OVERVIEW

The World Wise Foods Group sources seafood from around the world. Regardless of the source, we are committed to supplying our customers with 100% responsibly sourced¹⁰ seafood with every product obtained from fisheries that meet the requirements outlined in our Seafood Sourcing policy.

We recognise the importance of rewarding sustainable fishing practices through our purchasing decisions and advocating for industry-wide action. Detail on our broader approach to seafood sourcing can be found [here](#).

SCOPE

This policy covers the seafood products sourced by World Wise Foods and American Tuna, Inc.

Seafood components that account for less than 5% of the final product fall out of scope of this policy. This excludes tuna which, regardless of quantity, must be one-by-one caught.

OUR REQUIREMENTS

- A risk assessment must be completed and approved for all fish species and fisheries prior to sourcing. This includes a gap analysis against our Seafood Sourcing policy.
- All seafood must be sourced from fisheries that are certified to a Global Sustainable Seafood Initiative (GSSI) recognised standard or that are actively working to meet the expectations of these standards.¹¹
- All fisheries we source from must be able to evidence their sustainability status and any improvement actions; this could be through independent assessment¹², a credible Fishery Improvement Project (FIP)¹³ or a certification process.
- All seafood must be fished in accordance with national and international laws.
- No seafood should be caught by Illegal, Unreported or Unregulated (IUU) fishing
- No seafood should be sourced from companies involved in or associated with the trade of endangered or critically endangered species.
- No seafood should be caught contrary to any of the conditions of internationally recognised marine protected areas.
- All seafood should be sourced using gear types and fishing methods that have a minimal impact on the marine habitat and those which are more selective towards the target species.
- No seafood should be sourced using drifting fish aggregating devices (dFAD's).
- All tuna must be sourced from one-by-one¹⁴ fisheries.
- Employment provided in the fishery must be safe, legal and freely-chosen and human rights respected.
- All seafood must be traceable from a vessel or group of fishing vessels to the final customer.

In addition to the above World Wise Foods Group requirements, we also work closely with our customers to ensure we meet any of their additional requirements.

GOVERNANCE

This policy has been approved by the Board of Directors of World Wise Foods and American Tuna, Inc. and has the full support of senior management. Ensuring compliance is the responsibility of every member of staff.

Approvals of new fish species and fisheries are made by World Wise Foods Chief Executive. Existing sources will be suspended should non-compliance with this policy be identified.

Any derogations to this policy must be submitted to and approved by the board of Directors.

ENDNOTES

- 1 We align with the definition of responsible sourcing that has been agreed by the Sustainable Seafood Coalition (SSC) – see Appendix 1.
- 2 One-by-one methods include pole and line, handline and troll
- 3 We align with the definition of sustainable sourcing that has been agreed by the Sustainable Seafood Coalition (SSC) – see Appendix 1.
- 4 Miller, K., Nadheeh, Ibrahim., Jauharee, R., Anderson, C., Adam, M.S., 2019. Bycatch in the Maldivian pole-and-line tuna fishery. PLoS ONE 12(5): e0177391.
- 5 IOTC-2023-WPTT25AS-DATA03-RC_Rev4.zip - Retained Catches by Fleet, Year and Gear in the IOTC – accessed https://iotc.org/WPTT/25/Data/03-RC_Rev4
- 6 Detecting aFADs and estimating use patterns from vessel tracking data in small-scale fisheries. Widyatmoko, A.C, Hardesty. B.D, Wilcox, C (2021)
- 7 According to the FAO artisanal or small-scale fisheries refers to the relative level of technology used by the fishers. These fisheries can be subsistence or commercial fisheries, providing for local consumption or export. The small-scale fisheries sector tends to be firmly rooted in local communities, traditions, and values. Many small-scale fishers are self-employed and usually provide fish for direct consumption within their households or communities.
- 8 How much labor does one-by-one fishery employ? International Pole and Line Foundation, unpublished document (2022).
- 9 Any independent assessment of sustainability status will benchmark a fishery against the requirements of credible GSSI recognised standards. The assessment will determine if the fishery is certifiable, or actions that are required for them to qualify as certifiable. Any required actions must be agreed with the fishery before supply can commence. Any independent assessment will also include an assessment of human rights risks on vessels and meet the requirements of the SSC risk assessment process which requires all agreed actions to be actively monitored.
- 10 Defined by the Sustainable Seafood Coalition (SSC) as ‘Seafood sourced in alignment with the SSC Code of Conduct on Environmentally Responsible Seafood Sourcing.’
- 11 The appropriateness of sourcing from a fishery that has exited a certification scheme will be reviewed on a case-by-case basis.
- 12 Any independent assessment of sustainability status will determine that stocks are not overfished and sustainable (green on Kobe plot), the fishery is well managed and there have been no reports of IUU fishing. Any independent assessment will also include an assessment of human rights risks on vessels. To meet the requirements of the SSC risk assessment process, any agreed actions following the completion of the assessment will be actively monitored.
- 13 Where a fishery has completed a FIP, they will remain approved for 12 months after which a revaluation against our requirements needs to take place.
- 14 One-by-one methods include pole and line, handline and troll.
<https://www.fisheries.noaa.gov/national/bycatch/fishing-gear-pelagic-longlines#:~:text=The%20average%20U.S.%20longline%20set,large%2Dscale%20mechanized%20fishing%20fleets>



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