

**Lidl Ireland
& Northern Ireland**



**Position Paper
on the Sustainable Sourcing
of Fish and Seafood**



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1. Our Position

1.1 The Purpose of this Policy

Lidl Ireland and Northern Ireland is committed to being a responsible retailer and upholding economic, social and environmental responsibilities in all of our daily activities. Through this policy, we want to support the principles of sustainable fisheries and aquaculture practices and recognise our role in protecting and preserving the world's marine ecosystems and safeguarding fish stocks for the future.

We are committed to the principles of responsible and sustainable fishing and farming by guaranteeing responsible product sourcing management and a traceable and transparent supply chain.

1.2 Acknowledging the Social & Environmental Impacts of the Fish and Seafood Industry

According to the United Nations Food and Agriculture Organisations (FAO) SOFIA Report¹ 33.1% of global fisheries have been fished beyond sustainable limits due to overfishing and illegal fishing. Fishing rates have been too high for species to replace themselves and marine populations have declined by 49% between 1970 and 2012².

This problem does not just have an impact on the ecosystems, it also impacts on communities where fishing is their main source of food and employment. According to the United Nations FAO¹ approximately 120 million people are directly employed in the fish and seafood industries. In Ireland, more than 14,500 people are employed in the seafood sector³.

While the world's population continues to grow, it is expected that the demand for seafood will continue to put pressure on global fish stocks. Consumers are increasingly aware of environmental and social issues in food supply chains and adjusting their shopping habits to be more responsible with their purchases.

At Lidl Ireland and Northern Ireland we want to encourage customers to buy responsibly sourced fish and seafood. To this end, we support sustainability organisations such as the Marine Stewardship Council (MSC), the Aquaculture Stewardship Council (ASC) and GLOBAL G.A.P. (Good Agricultural Practices) Aquaculture and advocate for the sourcing of fish and seafood that have been responsibly fished and farmed.

¹ [2018 State of World Fisheries and Aquaculture \(SOFIA\) report](#)

² [WWF's Living Blue Planet Report 2015](#)

³ [BIM's The Business of Seafood Report 2017](#)

1.3 Our Approach

Environmental Responsibility

We support the sale of fish and seafood that are caught with responsible fishing methods, reduce bycatch, restrict the catch of juveniles to a minimum and are environmentally friendly. We do not sell fish caught in areas for which there is no protection or management regulations by regional fisheries management organisations. Also, our wild fish and seafood is sourced from suppliers who avoid sensitive deep-water habitats such as coral reefs, seamounts and canyons when fishing.

Our product range has been designed to discourage the sourcing of seafood which is vulnerable, endangered or critically endangered in any way. For this reason we do not source any endangered or threatened fish species. In order to determine what we mean by 'threatened', we refer to the International Union for Conservation of Nature (IUCN) [Red List of Threatened Species](#).

We dissociate ourselves from Illegal, Unreported or Unregulated (IUU) fishing and illegal fishing methods. We do not source from any organisation on the [IUU vessel list](#) and require our suppliers to exclude the use of raw materials sourced from IUU fishing. Transshipment is where fish is transferred from one vessel to another, and whilst not illegal, when carried out at sea can allow IUU fish to go undetected. We do not sell any fish or seafood that is transhipped from catch vessels without a controlled procedure where traceability is being guaranteed.

Lidl has also recently joined the Global Ghost Gear Initiative (GGGI), a global cross-sectoral alliance committed to driving solutions to the problem of lost, abandoned and otherwise discarded fishing gear (also known as "ghost gear"), which account for about 10% of plastic pollution in the sea. The aim of GGGI is to improve health and productivity of marine ecosystems, protect marine animals from harm by extracting and dispose of marine litter, while providing tools for effective action against IUU fishing. Additional information can be found at <https://www.ghostgear.org/>.

Social Responsibility

In the seafood industry, supply chains are often complex, with multiple layers of activity. The vulnerability of both land and sea-based workers to exploitative labour practices highlights the need for transparency, and action by all parts of the supply chain.

Lidl Ireland and Northern Ireland takes a human rights due diligence approach to protecting workers within its supply chains. Lidl is a member of the European Union (EU) Business Social Compliance Initiative (BSCI) within the framework of the European Foreign Trade Association. In order to ensure appropriate and universally recognised social standards in our production sites, Lidl has developed a Code of Conduct which is based on the Ethical Trade Initiative Base Code and the International Labour Organisation (ILO) standards. It defines the social expectations of all global direct and indirect suppliers and forms an integral part of our commercial contracts. The Code specifically prohibits human rights violations in the form of both child labour and forced labour and further addresses issues including working conditions, discrimination and workplace health and safety. It is available [online](#) to ensure our expectations are clear to all of our stakeholders.

We require our suppliers to comply with our Supplier Code of Conduct which is part of our contracts, to ensure that the core ethical standards are met and improved throughout our supply chain (i.e. fishing, farming, processing, packing and delivery).

In addition, Lidl Ireland and Northern Ireland outlines the following responsibilities to its seafood supply base through our 'Ethical Sourcing Programme':

- All Ireland's negotiated suppliers must be linked to Lidl Ireland and Northern Ireland on the Supplier Ethical Data Exchange (Sedex) platform and have completed the Self-Assessment Questionnaire (SAQ), which needs to be updated every 6 months. All Ireland's negotiated suppliers must also ensure that:
 - All final seafood packing sites and seafood processing sites supplying into final seafood packing sites are linked to Lidl Ireland and Northern Ireland on Sedex and completed Self-Assessment Questionnaire (SAQ).
- All Ireland's negotiated suppliers/sites assessed as high risk on the Sedex risk assessment tool will be asked to complete Sedex Members Ethical Trade Audit (SMETA) ethical audit or share the results of a SMETA ethical audit from within the past 12 months with Lidl Ireland and Northern Ireland via the Sedex platform. Non-compliances must be addressed in line with the agreed corrective action plans. Suppliers will be alerted by Lidl Ireland and Northern Ireland if they fall into this category and will be provided with further information.

Lidl Ireland and Northern Ireland welcomes the opportunity to work closely with our suppliers to address salient human right issues within their supply chains. Any suppliers wishing to discuss these opportunities further should contact CSR.Purchasing@lidl.ie.

1.4 Guaranteeing the Best Practices

Origin, Transparency and Traceability

It is our goal to offer our customers full transparency regarding the traceability and origin of our products. To ensure there are no gaps in the traceability of our fish and seafood products we require our suppliers to have a fully traceable supply chain, from the fishing vessel or aquaculture farm, to the production plant, up until the packing plant. We provide clear, legible and understandable information on the packaging of our own-brand products. All fish and seafood packaging must clearly display the following information in accordance with European and National Regulations:

Fish and aquaculture consumer labels must include:

- Commercial and Scientific name
- Production Method (i.e. caught, farmed, etc.)
- Catch area / country and body of water / country of production:
 - For fish caught at sea: the catch area is the [FAO area](#)
 - For fish caught in freshwater: the body of water (river, lake, etc.) and the country of production
 - For farmed fish (aquaculture): the country of production
- Fishing gear (i.e. seines, trawls, surrounding nets and lift nets, hooks and lines, etc.)
- Whether the product has been defrosted

Where possible, we expect the certification scheme to be labelled on the front of our packaging.

Fish Farming and Feeding

We only work with suppliers who are committed to sustainable fishing and aquaculture production methods. We require that our suppliers do not have a negative impact on flora and fauna in the area, as well as large-scale changes in land (e.g. deforestation) or on the seabed.

For fish and seafood from aquaculture, the welfare of the animals is a priority. Our suppliers need to guarantee that the species-specific stocking density for the breeding pools is respected to prevent the farmed fish behaving in an aggressive manner. The breeding of genetically modified animals must be excluded. Suppliers must have taken precautions to avoid escapes from farm holdings and have an action plan in place to reduce outbreaks. The overall objective is to integrate environmentally sustainable aquaculture in the local ecosystems.

Fishmeal, i.e. fish used as forage in aquaculture, is increasingly seen as a driver of unsustainable practices.

We require that our suppliers preferably employ plant-based feeds and fisheries by-products as feed, and to reduce the share of the fishmeal and fish oil used in feed to a minimum. We also encourage our suppliers to source their fish based feed from sustainable fisheries and we do not tolerate hormone-treated feed. We expect our suppliers to have measures in place to demonstrate the described practices in aquaculture feeding.

Medication Use and its Impacts on the Environment and Animals

We expect our suppliers to have a responsible approach to the use of drugs and the application of treatment methods in accordance with EU legislations. They should ensure that diseases or parasitic infestations are avoided in their aquaculture or in wild species in the vicinity thereof.

Our suppliers must only use legally permissible chemicals and must prevent the release of chemicals that are toxic and difficult to break down or can accumulate in the food chain. These include substances in the EU Registration, Evaluation, Authorisation and Restriction of Chemicals ([REACH](#)) Regulation.

A functioning sewage, waste and wastewater management system should be present at all levels within the supply chain.

2. Our Scope

This transparent, publicly accessible position paper on the sustainable sourcing of fish and seafood applies to the entire permanently listed own-brand range of Lidl's fish and seafood which includes chilled, frozen, convenience and canned products sold in Lidl Ireland and Northern Ireland.

3. Actions

3.1 Responsible Sourcing Goals

For our permanently listed own-brand range of frozen, chilled, canned and convenience fish and seafood products we are committed to sourcing:

- 100% of our wild caught fish (with the exception of tuna, see below) from MSC Certified fisheries or from Irish Fishery Improvement Projects (FIP)* from 31st December 2019.
- 100% of our farmed fish from an ASC or GLOBAL G.A.P. Aquaculture certified farm from 31st December 2019.

*We only accept FIP's recognised by Bord Iascaigh Mhara's (BIM), Ireland's Seafood Development Agency, and the Sustainable Fisheries Partnership (SFP) which provides a publicly available [online resource](#) about the status of fisheries, fish stocks, and aquaculture.

A FIP provides a platform for fishermen, seafood buyers and suppliers to develop a strategy to improve the management of the fishery and increase the sustainability through the MSC pre-assessment methodology and to progress to MSC certification where it is possible to do so.

For our permanently listed own-brand tuna and tuna used as an ingredient in our own-brand products (e.g. sandwich fillers, wraps, sandwiches), we are committed to:

- 100% of our canned tuna to be sourced responsibly from 1st January 2019, using either:
 - the 'pole and line' fishing method
 - the 'purse-seine' fishing method without using Fish Aggregating Devices (FAD) (i.e. FAD-free)
 - or/and to be MSC certified

A Fish Aggregating Device (FAD) is a man-made object, often buoys tied to the ocean floor, used to attract fish. These fish magnets are detrimental to the environment because they increase bycatch, or unintentional catch, and are often lost at sea creating harmful conditions for marine animals and coral reefs.

All canned Lidl own-brand tuna comes from companies complying with the conservation and management measures of the International Seafood Sustainability Foundation (ISSF). Furthermore, the tuna vessels must be on the Proactive Vessel Register (PVR) of the ISSF.

3.2 Measurement & Evaluation of our Goals

Lidl Ireland and Northern Ireland is committed to assessing the status of its fisheries and aquaculture sources on an annual basis. This will be conducted alongside a review of the seafood policy and through the assessment of compliance to the commitments of this policy. Lidl Ireland and Northern Ireland reserves the right to request information at any point, to audit compliance throughout the supply chain and take action on areas of non-compliance.

Also, independent verifications of the MSC, ASC, GLOBAL G.A.P. labels and certificates will be conducted on an annual basis with the relevant organisations. Lidl Ireland and Northern Ireland will also follow up annually on the status of the Irish Fisheries Improvement Projects (FIP's) with suppliers and BIM.

Supplier Responsibility

Lidl Ireland and Northern Ireland expects all Ireland's negotiated suppliers of own label listed fish and seafood to dedicate resources within their business operations to ensure compliance with this purchasing policy and the following internal policies, which are annexed to the suppliers contracts as part of our trading relationship:

- our 'Code of Conduct',
- the 'Catalogue of fish and shellfish requirements for suppliers' and
- the 'Ethical Sourcing Programme'.

Also, Ireland's negotiated suppliers will be asked to complete a 'Lidl IE/NI Fish and Seafood Questionnaire' once a year and to renew the Self-Assessment Questionnaire (SAQ) in the Sedex platform every 6 months.

3.3 Grievance Mechanism

Any queries on this policy should be directed to CSR.Purchasing@lidl.ie. Lidl Ireland and Northern Ireland welcomes feedback on the positions and commitments outlined and would like to acknowledge all stakeholders who supported the development of this policy.

3.4 Reporting our Progress

Lidl Ireland and Northern Ireland commits to reporting the progress on our goals and on this policy by publishing the results in our annual Sustainability Report and on our [‘A Better Tomorrow’](#) website. Also, to demonstrate our commitment to traceability and transparency we will become a participant of the ‘Ocean Disclosure Project’ and publish the sources of our wild caught seafood species before the end of 2019. The Ocean Disclosure Project is a platform for the voluntary disclosure of seafood sourcing. Read more about it here: <https://oceandisclosureproject.org/>.

We will continually engage in dialogue with Bord Iascaigh Mhara (BIM), Ireland’s Seafood Development Agency, and other non-governmental organisations with the aim of further developing our sustainability initiatives and finding ways to increase the transparency and the traceability of our products.

4. More Information

4.1 The MSC Label



The [Marine Stewardship Council](#) (MSC) Fisheries Standard is a science-based set of requirements for sustainable fishing. Each MSC certified fishery has been independently assessed on its specific impacts to wild fish populations and the ecosystems they are part of, focusing on ‘sustainable fish stocks’, ‘minimising environmental impact’ and ‘effective fisheries management’.

4.2 The ASC Label



The [Aquaculture Stewardship Council](#) (ASC) certification programme and label recognises and rewards responsible aquaculture. The ASC is a global organisation working internationally with aquaculture producers, seafood processors, retail and foodservice companies, scientists, conservation groups, social NGOs and the public to promote the best environmental and social choice practices in aquaculture.

4.3 The GLOBAL G.A.P. Aquaculture Standard



The [GLOBAL G.A.P. Aquaculture Standard](#) sets strict criteria for legal compliance, food safety, workers’ occupational health, safety and welfare, animal welfare and environmental and ecological care across the entire aquaculture production chain from broodstock, seedlings and feed suppliers to farming, harvesting and processing.