### **Seafood Progress**

Brands' Commitment to Sustainable and Socially Responsible Seafood





Sustainable Seafood Policy Seafood Sourcing Statement



Headquarters Nova Scotia, Canada

### **OVERVIEW**

### **Commitment to Sustainable Seafood**

67% of products sold in 2022 met commitment.

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Sustainability Commitment. Clearwater informed SeaChoice that, for its private label products, it is committed to, where available, preferentially selecting MSC-certified supply when making procurement decisions, pursuing MSC certification for the fisheries in which it participates when market demand exists for eco-labeled product, and continuing to lead, in partnership with other stakeholders to advance fisheries towards certification. Clearwater has not specified a quantitative goal or timeline for meeting this commitment, but the company's vertically integrated operations support full chain traceability of all its private label products. Clearwater informed SeaChoice that 67% of its seafood sold in the past year was in line with its commitment (in other words, MSC certified). Clearwater has not set a commitment for the third party brand products that it sells through its brick and mortar locations and online store, which amounted to less than 1% of its sales by volume in 2019.

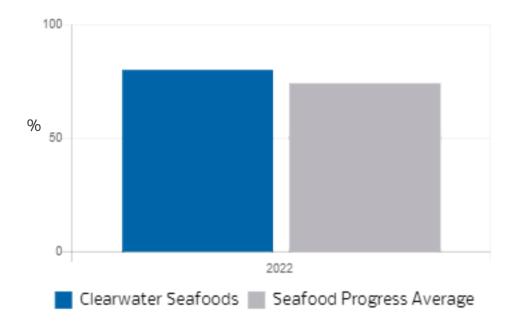
Clear Objectives Supplier Expectations Traceability Policy Reporting on Activities **Social Responsibility Commitment.** Clearwater's website includes a general commitment to social responsibility that does not reference credible standards or indicate if it has a traceability policy in place to support its commitment. However, through direct communication SeaChoice discovered that all of Clearwater's employees that work on its fishing vessels are members of The United Food and Commercial Workers Union (UFCW) which entitles them to salaried pay, health benefits and a process for filing grievances in relation to human rights abuses. Furthermore, the company has an external mechanism in place for employees to report human rights abuses and unethical behaviour, and it conducts remediation activities to support its

social responsibility commitment but does not make these results public.

### **STEP 1: COMMITMENT**



# 1.1 The brand has a publicly available commitment regarding environmentally sustainable seafood.



For its private label products, Clearwater Seafoods is committed to, where available, preferentially selecting MSC-certified supply when making procurement decisions, pursuing MSC certification for the fisheries in which it participates when market demand exists for eco-labeled product, and continuing to lead, in partnership with other stakeholders to advance fisheries towards certification (personal communication, C. Boyd, 21/03/2022). Clearwater has not specified a quantitative goal or timeline for meeting this commitment. Finally, the company's vertically integrated operations support full chain traceability of all its private label products (personal communication, C. Penney, 10/02/2022). Clearwater has not set a commitment for the third party brand products that it sells through its brick and mortar locations and online store, which amounted to less than 1% of its sales by volume in 2019 (personal communication, C. Boyd, 24/03/2022).

#### Scoring

100% Commitment to environmental sustainability includes clear objectives that are supported by references to credible standards, a full chain traceability policy and a timeline for meeting the commitment (unless the commitment has already been met).

80% Commitment to environmental sustainability that includes clear objectives that are supported by references to credible standards and a full chain traceability policy that traces at least the product scientific name, geographic origin, farmed/wild and gear type or farming method.

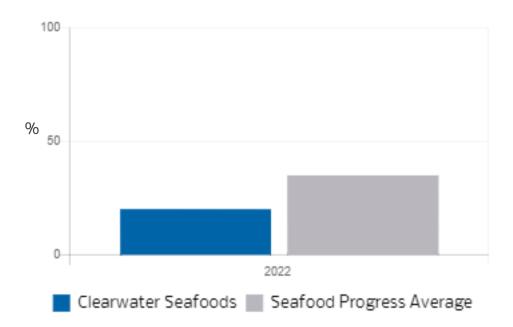
60% Commitment to environmental sustainability that includes clear objectives that are supported by references to credible standards (such as Seafood Watch or Ocean Wise ratings, eco-certifications, etc.).

40% Commitment to environmental sustainability that includes clear objectives for sustainable procurement.

20% General commitment to environmentally sustainable seafood.

o% No publicly available environmental sustainability commitment.

### 1.2 The brand has a publicly available commitment regarding socially responsible seafood.



Clearwater's website includes a general commitment to social responsibility that does not reference credible standards or indicate if it has a traceability policy in place to support its commitment. However, through direct communication SeaChoice discovered that all of Clearwater's employees that work on its fishing vessels are members of The United Food and Commercial Workers Union (UFCW) which entitles them to salaried pay, health benefits and a process for filing grievances in relation to human rights abuses. Furthermore, the company has an external mechanism in place for employees to report human rights abuses and unethical behaviour, and it conducts remediation activities to support its social responsibility commitment but does not make these results public (personal communication, C. Penney, 10/02/2022).

#### Scoring

100% Commitment to social responsibility includes clear objectives, actions or expectations for seafood suppliers, a clear and effective traceability policy, and the grocer reports publicly on activities to support social responsibility.

80% Commitment to social responsibility includes clear objectives, actions or expectations for seafood suppliers, and a clear and effective traceability policy.

60% Commitment to social responsibility includes clear objectives and actions or expectations for seafood suppliers.

40% Commitment to social responsibility includes clear objectives for socially responsible procurement (for example by referring to credible international standards such as ILO, UN Declaration, etc.).

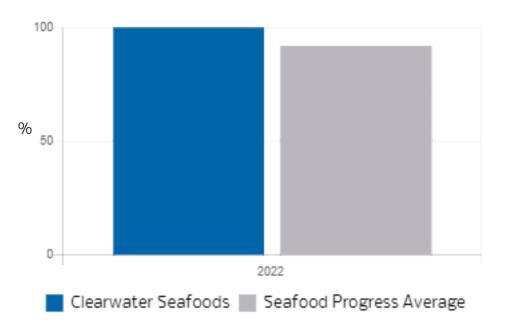
20% General commitment to socially responsible seafood.

o% No publicly available social responsibility commitment.

### **STEP 2: COLLECTING DATA**



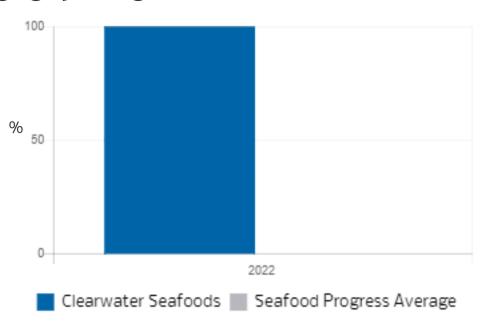
### 2.1 The brand collects data on species scientific name.



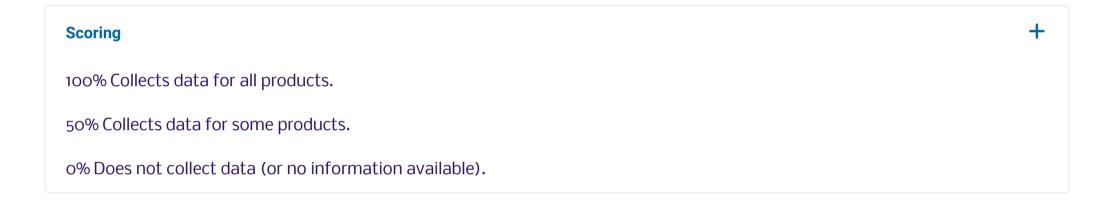
Clearwater collects data on species' scientific name for all private label products (personal communication, C. Penney, 10/02/2022).



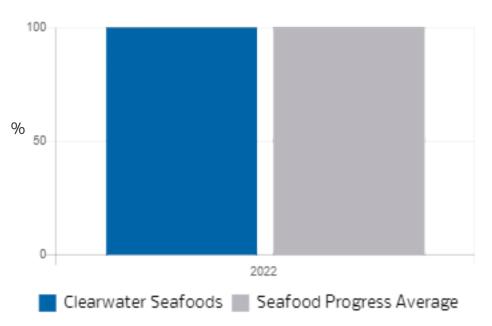
### 2.2 The brand collects data on geographic origin.



Clearwater collects data on geographic origin for all private products (personal communication, C. Penney, 10/02/2022).



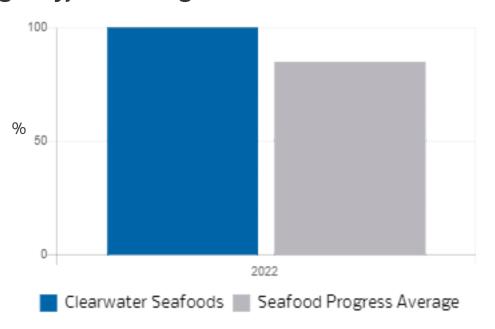
### 2.3 The brand collects data on whether wild or farmed.



Clearwater only sells wild caught seafood private products.

# Scoring100% Collects data for all products.50% Collects data for some products.0% Does not collect data (or no information available).

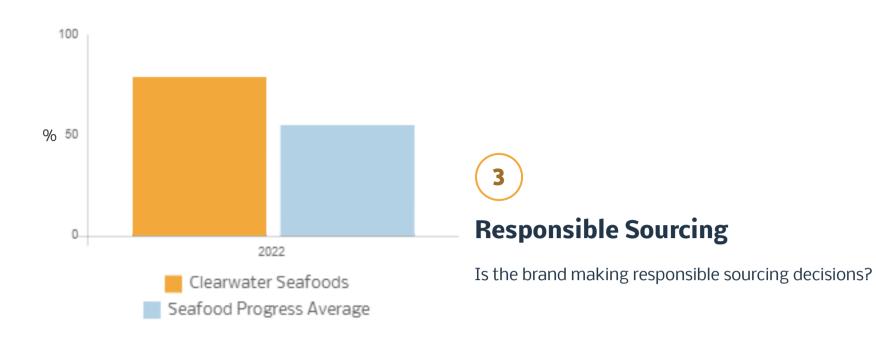
### 2.4 The brand collects data on gear type or farming methods.



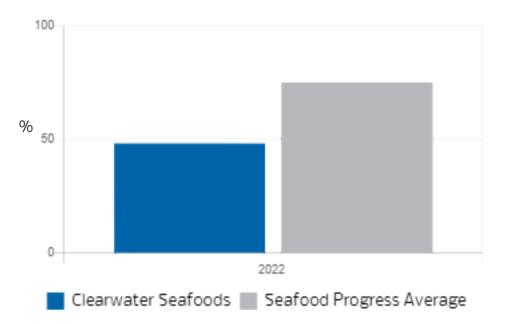
Clearwater collects data on gear type or farming methods for all private products (personal communication, C. Penney, 10/02/2022).



### **STEP 3: SOURCING**



### 3.1 Company publishes a clear hierarchy demonstrating its sourcing priorities.



Clearwater has stated that, where available, MSC is the standard that it uses to inform its purchasing decisions for its private label products (personal communication, C. Boyd, 21/03/2022). However, it does not specify the standard(s) it uses where MSC is not available.

#### Scoring

100% Publishes a clear hierarchy of sustainability standards demonstrating its sourcing priorities for all commodities it sells.

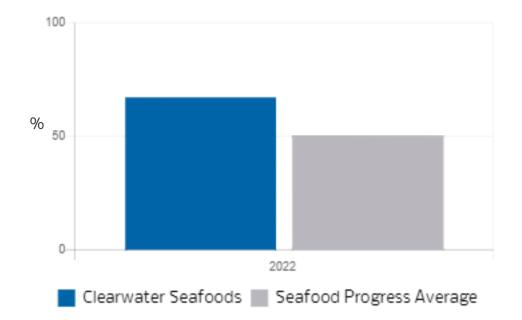
75% Publishes a clear hierarchy of sustainability standards used for sourcing some commodities, and identifies a general list of sustainability standards that it uses to inform its purchasing decisions for other commodities.

50% Publishes a clear hierarchy of sustainability standards used for sourcing some commodities, but doesn't identify the standards it uses to inform its purchasing decisions for other commodities.

25% Publishes a general list of sustainability standards that it uses to inform its purchasing decisions.

o% Does not publish the sustainability standards that it uses to inform its purchasing decisions.

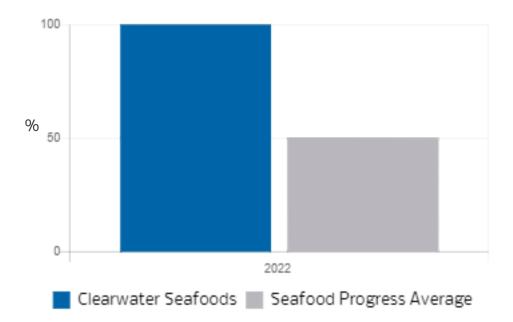
# 3.2 The brand has reported on the percentage of seafood sold in the past year that meets its sustainability commitment by volume or value.



Through its Seafood Progress profile, Clearwater reported that 67% of its products by volume that were sold in the Canadian marketplace in 2021 were MSC certified (personal communication, C. Boyd, 30/03/2022).

Scoring	+
100% Grocery store has reported that 100% of its seafood sold meets its sustainability commitment.	
75% Grocery store has reported that 75% or more of its seafood sold meets its sustainability commitment.	
50% Grocery store has reported that 50% or more of its seafood sold meets its sustainability commitment.	
25% Grocery store has reported that 25% or more of its seafood sold meets its sustainability commitment.	
o% Grocery store has not reported on the percentage of its seafood sold that meets its sustainability commitment (or no information available).	

# 3.3 Suppliers are required to sign a code of conduct to uphold the brand's environmental sustainability commitment.



As a vertically integrated company, all of Clearwater's employees that deal with its MSC certified and non-MSC certified commodities (including vessel operators) are required to uphold MSC chain of custody standards on a daily basis. Clearwater verifies that this standard is being met in its facilities and on vessels through internal and MSC audits (personal communication, C. Penney, 10/02/2022).

#### Scoring

100% All suppliers are required to sign a code of conduct that covers all of the retailer's environmental sustainability commitment and the retailer actively verifies that this commitment is being upheld on at least an annual basis.

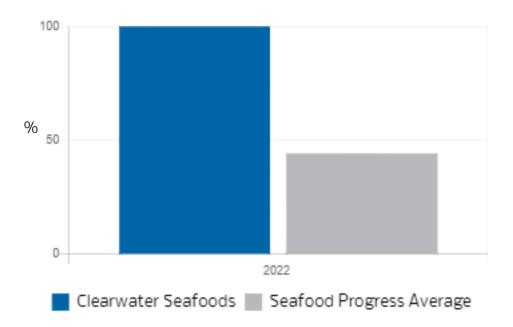
75% Rubric for retailers Feb 17 2022 Rubric for retailers Feb 17 2022 .XLSX 100% 10 B84 All suppliers are required to sign a code of conduct that covers all of the retailer's environmental sustainability commitment. Screen reader support enabled. All suppliers are required to sign a code of conduct that covers all of the retailer's environmental sustainability commitmental sustainability commitment. Turn on screen reader support

50% Rubric for retailers Feb 17 2022 Rubric for retailers Feb 17 2022 .XLSX 100% 10 B83 All suppliers are required to sign a code of conduct that covers some of the retailer's environmental sustainability commitment. Screen reader support enabled. All suppliers are required to sign a code of conduct that covers some of the retailer's environmental sustainability commitment. Turn on screen reader support

25% Some suppliers are required to sign a code of conduct that covers some of the retailer's environmental sustainability commitment.

o% Suppliers are required to sign a code of conduct to uphold the grocery store's environmental sustainability commitment.

# 3.4 Suppliers are required to sign a code of conduct to uphold the brand's social responsibility commitment.



As a vertically integrated company, Clearwater does not deal with third party suppliers and directly manages its supply chain from harvest to sale. All of its employees are required to sign its **Business Code of Conduct**, which covers all of its social responsibility commitment, on an annual basis (personal communication, C. Penney, 10/02/2022).

#### Scoring

100% All suppliers are required to sign a code of conduct that covers all of the retailer's social responsibility commitment and the retailer actively verifies that this commitment is being upheld on at least an annual basis.

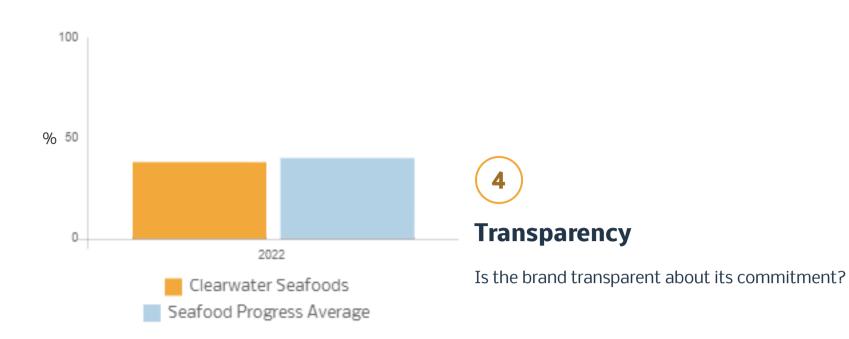
75% Rubric for retailers Feb 17 2022 Rubric for retailers Feb 17 2022 .XLSX 100% 10 B92 All suppliers are required to sign a code of conduct that covers all of the retailer's social responsibility commitment. Screen reader support enabled. All suppliers are required to sign a code of conduct that covers all of the retailer's social responsibility commitment. Turn on screen reader support support

50% All suppliers are required to sign a code of conduct that covers some of the grocery store's social responsibility commitment.

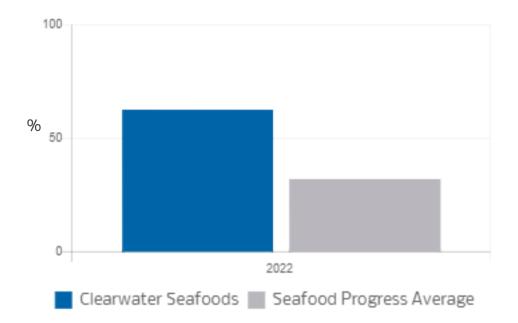
25% Some suppliers are required to sign a code of conduct that covers some of the grocery store's social responsibility commitment.

o% Suppliers are not required to sign a code of conduct (or no information).

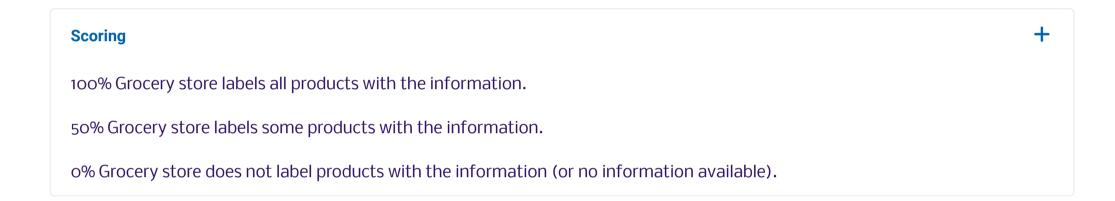
### **STEP 4: TRANSPARENCY**



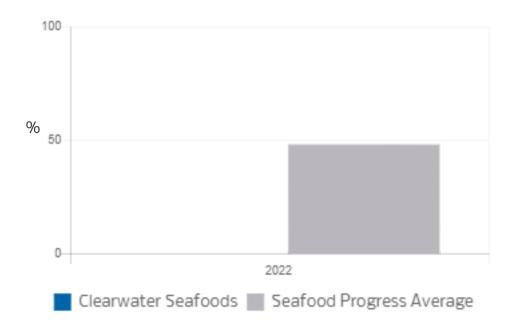
# 4.1 The brand labels products with the information that allows consumers to make informed decisions.



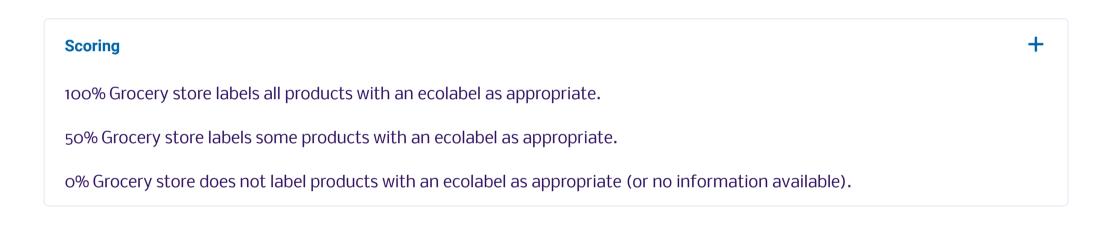
Clearwater labels all branded products with scientific name and as wild and some with geographic origin. It does not label any of its products with gear type (personal communication, C. Penney, 10/02/2022).



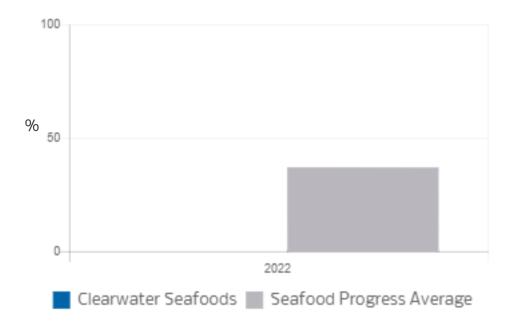
# 4.2 The brand follows best practice guidelines for making environmental claims on its products.



Clearwater uses its "Responsibly fishing since 1976" self claim on product labels which does not adhere to ISO14021 Type II guidance due to use of vague language and claims of sustainability. Furthermore, it does not make sufficient evidence to back up this claim publicly available. Clearwater also labels some products with the MSC certification claim which includes a unique chain of custody number that serves as evidence to back up its claim.



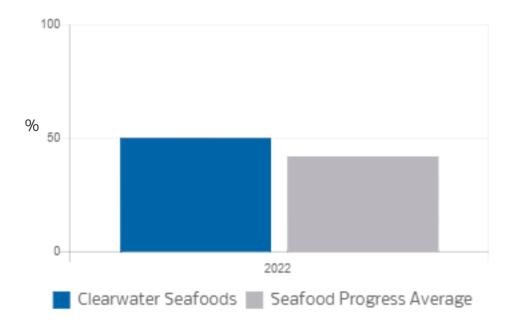
# 4.3 Scientific name, geographic origin and harvest method of the brand's products is publicly available.



Clearwater publishes information on geographic origin and harvest method, but not scientific name, for all its species on <u>its website</u> (personal communication, C. Penney, 10/02/2022).

Scoring	+
100% All seafood products with region and gear type has been made available.	
50% Some seafood products with region and gear type has been made available.	
o% No list of products procured with region and gear type has been made available.	

# 4.4 The brand publicly reports how much of its seafood meets its sustainability criteria by volume or value of sales.



Through its Seafood Progress profile, Clearwater reported for the first time on the percentage of seafood sold by volume in Canada in 2021 that met its sustainability commitment (personal communication, C. Boyd, 30/03/2022).

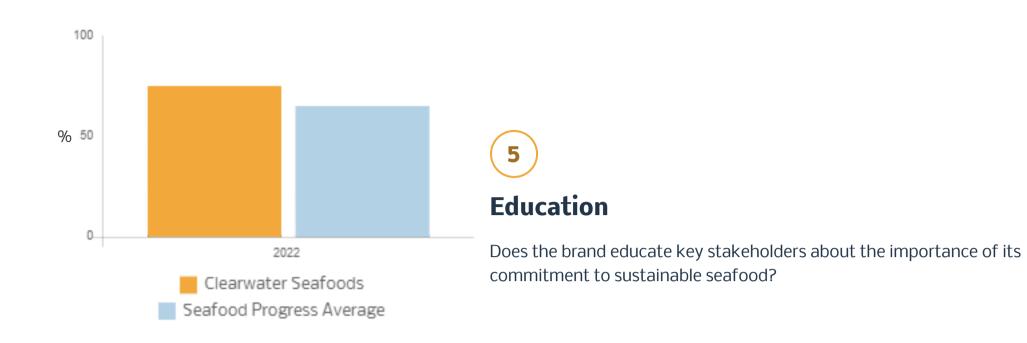
#### Scoring

100% Retailer regularly reports publicly how much of its seafood sold meets its commitment by volume or value of sales every year.

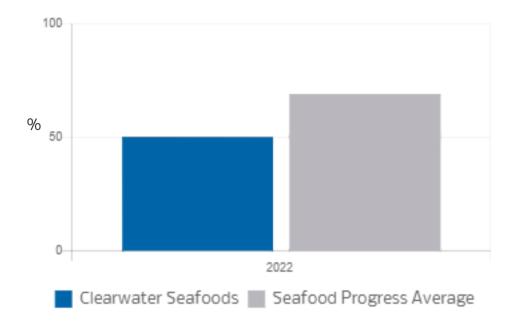
50% Rubric for retailers Feb 17 2022 Rubric for retailers Feb 17 2022 .XLSX 100% 10 B123 Retailer has at one point reported publicly how much of its seafood sold meets its commitment. Screen reader support enabled. Retailer has at one point reported publicly how much of its seafood sold meets its commitment. Turn on screen reader support

o% No public information on how the grocery store is doing to meet its commitment.

### **STEP 5: EDUCATION**



# 5.1 There is a description of the brand's commitments to sustainable and socially responsible seafood on its website.



**<u>Clearwater's website</u>** includes some description of its commitments to sustainability and social responsibility.

#### Scoring

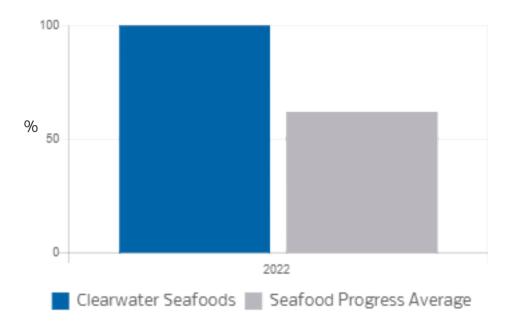
100% Training programs regularly conducted for all seafood staff.

75% Training programs conducted for all seafood staff, but only once.

50% Training programs sometimes conducted or for only some seafood staff.

o% Training programs not conducted for seafood staff (or no information available).

## 5.2 The brand has taken actions to ensure its suppliers are aware of its sustainable seafood commitment or policy.



As a vertically integrated company with MSC Chain of Custody, all of Clearwater's employees that deal with its MSC certified and non-MSC certified commodities (including vessel operators) are required to uphold MSC standards on a daily basis and are trained on receiving product that meet the MSC Standard. (personal communication, C. Penney, 10/02/2022).

#### Scoring

100% There is a comprehensive description of the grocery store's commitments to sustainable and socially responsible seafood in store.

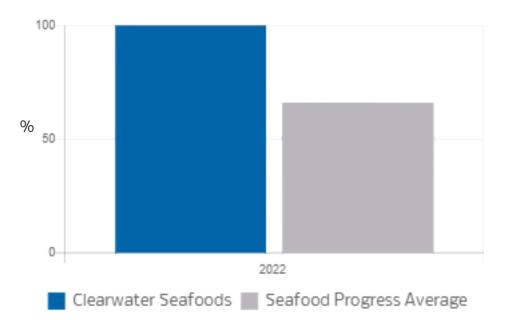
50% There is some description of the grocery store's commitment to sustainable seafood and/or socially responsible seafood in store.

o% There is no description of the grocery store's commitments to sustainable and socially responsible seafood in store.

### **STEP 6: TAKING INITIATIVE**



### 6.4 Other seafood products.



All of Clearwater's products that are sold in the Canadian marketplace are MSC certified (except for its offshore lobster). Clearwater takes various actions to support management improvements to the commodities it sells, including conducting outreach to DFO and the MSC, collaborating to drive improvements through industry associations, and working with suppliers such as the Canadian Association of Prawn Producers directly (personal communication, C. Penney, 10/02/2022).

- Only sells versions of this product that meet the highest bars for sustainability, i.e. are certified by MSC/ASC, Recommended by Ocean Wise and/or rated Best Choice by Seafood Watch (100 pts).
- Conducts outreach to policymakers and/or certifying bodies to advocate for harvest or farming method and management to be more environmentally sustainable (20 pts).
- Collaborates with other companies pre-competitively to improve fishing or aquaculture practices (20 pts).
- Works with suppliers or producers directly to improve fishing or farming practices (20 pts).
- Preferentially sources from more sustainable sources that are MSC/ASC certified, Recommended by Ocean Wise or Best Choice by Seafood Watch (20 pts).
- Prioritizes sourcing products with high levels of social responsibility and traceability (20 pts).



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