CONSCIOUS AVOIDANCE

How Canadian retailers steer clear of due diligence on seafood amid growing evidence of abuse

SUMMARY REPORT



PHOTO: SeaChoice





Introduced by SeaChoice in 2018, Seafood Progress is a unique initiative aimed at driving transparency and accountability throughout seafood supply chains. Major retailers are scored annually on their actions and progress in relation to their commitments to sourcing sustainable and socially responsible seafood. These results are made public on <u>SeafoodProgress.org</u>.

Though Seafood Progress has demonstrated that retailers have made progress on their sustainability commitments over the years, mounting investigations suggest slave labor and environmental abuses remain prevalent in seafood supply chains. The persistent reliance on voluntary mechanisms, including certifications and social audits, rather than comprehensive due diligence and mandatory requirements, likely contributes to insufficient accountability and limits the effectiveness of efforts to drive change within their supply chains.

To accelerate adoption of due diligence approaches and enhance transparency across Canadian retailers and their global supply chains, the **Seventh Edition of Seafood Progress** takes an in-depth look at the strategy and scope of application of retailer sustainability and human rights policies—examining whether these policies are applied consistently across all products, suppliers, and stores. For the first time, the scoring also specifically analyses how these policies are applied to indirect products containing seafood—such as pet food, fish oil, and prepared meals.

The report finds that even the most robust policies are narrowly applied—often covering only about half of the seafood products on store shelves. In some cases, policies are not even extended across all retail stores operated by the same parent company. These shortcomings are especially pronounced with human rights policies, which are often not embedded into operational practices. Notably, no retailer was found to verify whether third-party brands actually adhere to the retailers' stated policies.

This year's Seafood Progress report reveals a troubling trend: retailers appear to be consciously avoiding responsible sourcing for significant portions of the seafood they sell. This problem is not confined to Canada, initial reviews of retailer policy application elsewhere show similar shortcomings. Moreover, ongoing investigations linking seafood products to human rights abuses demonstrate that these products continue to reach shelves worldwide. It is clear there is an urgent need to assess policy application, identify areas for improvement, and accelerate adoption of due diligence frameworks.



SCORES



#1



#2



#3



#4



#5



#6



KEY FINDINGS



✓ THE GOOD

- All six retailers met with SeaChoice, and five responded to survey questions to varying degrees.
- Sustainable seafood policies appear to be well embedded in retailers' operations (average score = 78%).
- Kudos to Loblaw for covering the most indirect products under its Master Sourcing Guide for Seafood.

metro

OVERALL #1



ENVIRONMENTAL #1

HUMAN RIGHTS #1



■ 82⁸ B **■ 58**⁸ D



METRO achieved first place overall across all retailers at 70 per cent and has held the position of first place since the first Seafood Progress report in 2018. This year and on all previous Seafood Progress reports, METRO was by far the most engaged retailer and placed first. METRO's Fisheries and Aquaculture Policy covers the most direct products across all retailers, and it was also the only retailer to report on seafood sales data. Finally, METRO was one of two retailers to achieve a perfect score for demonstrating that the human rights components of its Fisheries and Aquaculture Policy is well embedded into its operations.



- All retailers are lagging on human rights with an average score of 30%, and engaged far less on these questions (23%) than our environmental questions (47%).
- Half the retailers have not embedded their human rights policies into their operations.
- Walmart came in second to last place overall at 22% as its profile is based solely on public information (Walmart met with SeaChoice but didn't respond to any survey questions).
- Apart from Loblaw and Costco, retailers don't cover health, beauty, pet food or garden products containing seafood under their sustainable seafood policies.

Pattison Food Group

OVERALL #6

ENVIRONMENTAL #6

HUMAN RIGHTS #6







Though Pattison Food Group (PFG) engaged with SeaChoice, it received the lowest overall scores largely due to its decentralized operations, narrow seafood sourcing policy scope and lack of a traceability policy or any measures to verify supplier compliance against its policies. PFG is also the only retailer to not have a public human rights policy and to not publish its Supplier Code of Conduct. Additionally, PFG's sustainable seafood policy appears to only apply to Save-On-Foods and excludes the

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Loblaw Companies

other 12 store chains that it owns.

Despite being urged by SeaChoice annually since 2018 to include T&T Supermarket, Loblaw still has no plans to include this store banner under its Master Sourcing Guide for Seafood. T&T is the largest Asian supermarket chain in Canada (with recent expansion into the U.S.) and is known for being a major seafood seller.

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...AND THE UGLY

- All retailers (except METRO, which got a C) received an overall F, which means they scored below 50 per cent.
- All retailers expect third-party brands to abide by their human rights policies, but the fine print shows that none actually investigate the supply chains of these products. The prioritization of private label seafood products over third-party is clear when looking at the application of retailers' sustainable seafood policies, but veiled when looking at that of their human rights policies.
- None of the retailers reported plans to integrate worker perspectives into their verification practices, and two retailers (Pattison Food Group and Sobeys) don't verify supplier compliance against their human rights policies at all.



Despite being implicated, none of the retailers have spoken up or appear to have taken meaningful remedial actions in the wake of the 2023 major investigations that connected egregious human rights abuses back to the seafood they sell.

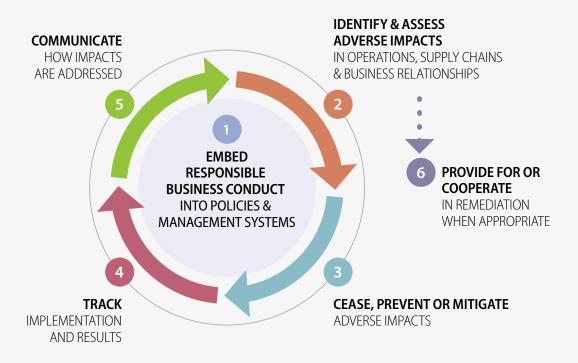
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RECOMMENDATIONS

SeaChoice commends the consistent engagement from Canadian retailers on their Seafood Progress profiles from 2018 through to this 2025 report. Their continued involvement and uptake of recommendations over the years is an indication of their good intentions. We urge retailers to reflect on this year's results, refer to the recommendations and embark upon a true due diligence approach to sourcing seafood.

SeaChoice has aligned our recommendations to retailers with the six steps of the OECD Due Diligence Guidance for Responsible Business, as follows:



OECD Due Diligence Guidance for Responsible Business Conduct, pg 21.

1. EMBED RESPONSIBLE BUSINESS CONDUCT

This report reveals that the majority of major Canadian retailers do not hold individuals and departments accountable and responsible for implementation of their seafood policies, nor do they have resources directly allocated to this work. FishWise's Human Rights Due Diligence (HRDD) Fundamentals report states that a company's "HRDD implementation must be seen, not as a side project, but as a core part of doing business."

2. IDENTIFY AND ASSESS ADVERSE IMPACTS

To identify and assess adverse impacts, retailers need to apply their human rights and sustainable seafood policies equally to all the seafood they sell, rather than focusing efforts solely on private label products that are of high volume and value. This report reveals that half the Canadian retailers profiled are not tracing critical information on all their seafood products back to the vessel or farm.



3. CEASE, PREVENT OR MITIGATE

This report and others reveal that retailers are not incorporating worker perspectives into their human rights due diligence process to mitigate risks and prevent human rights violations from occurring in their seafood supply chains. Retailers also need to use their influential positions to advocate for better data capture and traceability for seafood imported and sold in North America, as well as improve enforcement to deter illegal practices and trade.

4. TRACK

The OECD identifies tracking as a means to provide the company with an understanding of whether the systems it has put into place are effectively enabling it to avoid and address adverse impacts in its own activities and in its supply chain or whether systems could be modified to be made more effective.

5. COMMUNICATE

One of the stand-out findings of this report is that retailers are keeping quiet about their performance and plans in relation to their human rights policies in comparison to those of their sustainable seafood policies. Acting like a spotlight within our opaque seafood supply chains, transparency is a prerequisite for accountability.

6. PROVIDE REMEDIATION

Where retailers discover adverse impacts in their supply chain or are implicated in investigations (e.g. Outlaw Ocean), they have a responsibility to address such impacts by providing for or cooperating in their remediation (e.g., restitution, rehabilitation, and taking measures to prevent future adverse impacts).



SeaChoice is a collaboration of three internationally recognized organizations: The David Suzuki Foundation, Ecology Action Centre and Living Oceans Society. Since its inception in 2006, the program has influenced the actions of major grocers and seafood brands, international certification bodies and national policy-makers, leading to significant changes in the market and on the water.









Please contact SeaChoice for more information at info@seachoice.org

