2025 SEAFOOD PROGRESS PROFILE: LOBLAW

Private label brands	Joe Fresh, Life brand, No Name, Presidents Choice, Quo, Seaquest, T&T
Key documents	 Forced Labour Report - 2024 Master Seafood Sourcing Guide - not public Position on Human Rights - Nov 2020 Supplier Code of Conduct - no date
Parent company	George Weston Ltd.
NGO partner	World Wildlife Fund (WWF)
Stores covered by seafood policy	Atlantic Superstore, Dominion Stores, Extra Foods, Fortinos, Freshmart, Loblaw Great Food, Loblaws CityMarket, Loblaws, Maxi & Cie, No Frills (included except for third-party operated fresh seafood counters), Provigo, Provigo Le Marché, Real Canadian Superstore, Real Canadian Wholesale Club, SaveEasy, Shoppers Drug Mart, Valu-mart, Your Independent Grocer, Zehrs, Zehrs Great Food
Stores NOT covered by seafood policy	<u>T&T Supermarket</u> (major seafood seller)







✓ THE GOOD

- 2nd place overall across all retailers at 46%.
- The only retailer to cover all indirect products under its Master Sourcing Guide for Seafood.
- Master Sourcing Guide for Seafood appears to be well embedded into its operations.

X THE BAD

- Master Sourcing Guide for Seafood does not apply to major seafood seller T&T Supermarket, and Loblaw has no plans to include it.
- Only retailer not to publish its Master Sourcing Guide for Seafood.
- Overall low engagement, particularly on human rights questions.
- Does not investigate the supply chains of third-party seafood brands for human rights abuses.
- No tangible plans to incorporate worker perspectives into its verification practices.

SEAFOOD INVESTIGATIONS

Loblaw did not respond to SeaChoice's inquiry about whether the company plans to strengthen its efforts to ensure that its seafood suppliers comply with its Human Rights Policy, amid growing evidence of abuse in global seafood supply chains. Loblaw was directly implicated in the Outlaw Ocean Project's China series where egregious human rights and environmental abuses were connected back to seafood products sold by North American retailers. Beyond the company's correspondence with Outlaw Ocean (published here), Loblaw has not reported publicly on its efforts to remediate based on the findings of that investigation. Additionally, a supplier of Loblaw's private label seafood, Premier Marine Canada, was implicated in the China series (correspondence here), as were various third-party seafood brands that are commonly sold by Loblaw (e.g., Aqua Star, High Liner and Toppits).





For the first time, SeaChoice is scoring retailers on <u>indirect products</u> containing seafood—such as pet food and fish oil—and taking a deeper look at how human rights policies are being put into practice. Check out our NEW scoring methodology!



ENVIRONMENTAL

KPI 1.1 NGAGE

Did the retailer engage with SeaChoice and respond to questions related to its sustainable seafood policy and practices?

Loblaw scored below average on this indicator as it provided adequate but not timely responses to most questions related to its Master Sourcing Guide for Seafood (not public) and practices.



(PI 1.2 SCOPE

Which seafood products are covered by the retailer's sustainable seafood policy?

Based on what Loblaw shared with SeaChoice, it is the only retailer to cover all private label and third-party brand direct and indirect products (except garden products) under the Loblaw Master Sourcing Guide for Seafood (not public). In fact, Loblaw received the highest score across all retailers on this indicator. However, its policy excludes T&T Supermarkets which is the largest Asian supermarket chain in Canada that sells significant amounts of seafood products (personal communication, Loblaw, 06/02/2025). Additionally, Loblaw declined to share revenue and sales data around its seafood products with SeaChoice. Finally, Loblaw is the only retailer to not publish its Master Sourcing Guide for Seafood (which acts as its sustainable seafood policy).

OVERALL SCORE* 70%



DIRECT PRODUCTS

Third-party, private label and unbranded shelf stable, frozen and fresh seafood products.





INDIRECT PRODUCTS

Third-party and private label health, beauty, pet food and garden products that contain seafood ingredients (examples HERE).

BEAUTY



GARDEN

SHELF STABLE

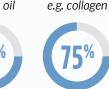
FROZEN



FRESH



HEALTH e.g. fish oil



PET FOOD



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PRIVATE LABEL BRANDS

Products that retailers sell and own.

THIRD-PARTY BRANDS

Products that retailers sell but do not own.

UNBRANDED PRODUCTS

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Products that retailers typically own but that do not have a brand on pack (e.g. fillets sold through deli counters). *Note: In calculating the overall score for this indicator, the decision was made to weight direct products at 75% and indirect products at 25% following the assumption that the former amounts to significantly higher volumes of seafood than the latter.

How does the retailer verify supplier compliance against its sustainable seafood policy?

Loblaw scored low on this indicator as it has a full chain traceability policy in place that applies to all seafood (including third-party brands), but SeaChoice was unable to determine if the information collected in its supplier self assessments is verified by additional sources, or if Loblaw conducts traceability spot checks on suppliers of high-risk seafood products. Loblaw informed SeaChoice that it has a full chain traceability policy in place to support its Master Sourcing Guide for Seafood (not public). All of Loblaw's seafood suppliers are required to abide by detailed specification documents that are commodity specific and outline the expectations of its sustainability commitment. Loblaw



sends annual surveys to vendors to collect product level details (scientific name, location, etc.). Once received, these surveys are then assessed against the Master Sourcing Guide for Seafood (personal communication, Loblaw, 06/02/2025).

What is the retailer's strategy behind the scope of its sustainable seafood policy?

Loblaw received one of the top scores on this indicator, but was not able to surpass 60% as it does not have a timebound commitment to cover T&T Supermarket under its Master Sourcing Guide for Seafood (not public). Loblaw shared with SeaChoice that its sustainable seafood sourcing strategy focuses on taking a risk-based approach, by species and by region. This approach is informed by Loblaw's two sustainable seafood advisors, Dr. Jake Rice and Dr. Sherrylynn Rowe who conduct research on species of interest by Loblaw Procurement, and advise on the guidelines by which Loblaw should source. These guidelines are then provided in the Loblaw Master Sourcing Guide for



Seafood as an evergreen resource accessible to Loblaw procurement and sustainability teams (and all LCL employees) (personal communication, Loblaw, 06/02/2025).

Who is held responsible and accountable for ensuring the retailer's sustainable seafood policy is met?

Loblaw achieved a perfect score indicating that its Master Sourcing Guide for Seafood (not public) is well embedded into its operations. Loblaw informed SeaChoice that its Procurement, Category, Enterprise Sustainability & Social Impact, and Loblaw Brands are responsible for tracking progress against the Guide and that Loblaw Brands Sustainability is held accountable for ensuring the



objectives are met. Sustainable seafood is embedded into the operations of Loblaw's business. In order to scale a commitment of this magnitude, Loblaw can't rely on dedicated individuals but have implemented the process across the relevant stakeholders. An annual budget is dedicated to external Sustainable Seafood Advisors Dr. Jake Rice and Dr. Sherrylynn Rowe (personal communication, Loblaw, 06/02/2025).



HUMAN RIGHTS

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Did the retailer engage with SeaChoice and respond to questions related to its human rights policy and practices?

Loblaw scored below average on this indicator as it only provided partial responses to some questions related to its **Position on Human Rights** policy and practices.



How does the retailer verify supplier compliance against its human rights policy?

Loblaw was unable to score above 50% on this indicator as it does not investigate the supply chains of its third-party brand seafood suppliers for human rights abuses. Loblaw relayed to SeaChoice that it must audit factories, processing facilities, plants, farms, packing or other facilities outside of Canada and the U.S. that are going to produce, process, manufacture, grow, raise, package or pack (i) control brand products sourced by Loblaw, or (ii) products for which Loblaw is the Importer of Record (IOR). Loblaw continuously reviews the supplier monitoring program to determine if an expanded scope of the program is necessary and as it is made aware of new considerations as they relate to Loblaw's



supply chain (personal communication, Loblaw, o6/o2/2o25). SeaChoice was unable to determine if Loblaw facilitates and pays for these audits, or if suppliers do. When asked if and how Loblaw verifies the compliance of third-party seafood brands against its <u>Supplier Code of Conduct</u>, Loblaw informed SeaChoice that national brand (products that are not an own brand or where LCL is not the IOR), aka vendors who appear within Loblaw's stores under their own brand - are not covered by Loblaw's facilities upstream supply chain. Loblaw's Supplier Code of Conduct clearly outlines its expectations of the primary supplier as well as the expectation of those suppliers to manage their upstream supply chain in the same consistent manner (personal communication, Loblaw, o6/o2/2o25.

KPI 2.3

What is the retailer's strategy behind the scope of its human rights policy?

Loblaw scored low on this indicator as it did not report any plans to focus on human rights and responsible sourcing for seafood. Loblaw informed SeaChoice that it continuously reviews its supplier monitoring program to determine if an expanded scope of the program is necessary and as it is made aware of new considerations as they relate to Loblaw's supply chain (personal communication, Loblaw, 06/02/2025). Loblaw's 2024 Forced Labour Report states that, in 2024, Loblaw enlisted a



consulting firm to conduct a risk assessment on commodities used within its control brand portfolio. From this assessment, ten key commodities were identified as being particularly vulnerable within Loblaw's supply chain due to exceptionally high environmental and social risks. Seafood was not one of the commodities identified. Upon asking Loblaw if it plans to assess its seafood supply chains given the prevalence of environmental and social risks, SeaChoice did not receive a response.

KPI 2.4 VFRNANCE

Who is held responsible and accountable for ensuring the retailer's human rights policy is met?

Loblaw informed SeaChoice that it identifies 'Supply Chain' as responsible for tracking progress against its Position on Human Rights, and that it holds 'Compliance & Ethics' accountable for ensuring the objectives of its policy are met (personal communication, Loblaw, 06/02/2025). SeaChoice asked Loblaw if this information pertains to seafood and if resources or a discrete budget are allocated to its human rights work specific to seafood, but did not receive a response.



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