

# CONSCIOUS AVOIDANCE

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



PHOTO: SeaChoice



**SeaChoice.org**

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. This report represents the seventh edition of our Seafood Progress assessments of major Canadian retailers' seafood policies and practices.

## CONTRIBUTIONS

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SeaChoice would like to thank FishWise and BLOOM for guidance, advice and valuable support extended during the process of this assessment. SeaChoice drew inspiration from Bloom's "Willful Ignorance" report and Greenpeace's 2024 Tuna Scorecard.<sup>1,2</sup>

## RETAILER ACKNOWLEDGEMENT

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SeaChoice commends the consistent engagement from Canadian retailers on their Seafood Progress profiles from 2018 through to this 2025 report. We view this continued involvement as an indication of their good intentions. In particular, we'd like to acknowledge METRO for demonstrating the most consistent engagement, comprehensive responses and highest overall scores across all retailers since the release of our first Seafood Progress report in 2018. We also acknowledge retailers for following some of our recommendations in critical areas over the years. For example, all retailers developed sustainable seafood policies by 2018 and have since reported annually against them, Sobeys obtained full-chain traceability of all its seafood products in 2023, Buy-Low Foods (owned by Pattison Food Group) stopped selling farmed salmon altogether nearly a decade ago and several retailers have developed human rights policies and supplier codes of conduct.

We urge retailers to examine this year's results and embark upon a true due diligence approach to sourcing seafood, as relayed in the "Recommendations" section of this report.



**DAVID SUZUKI  
FOUNDATION**



**Ecology  
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# TABLE OF CONTENTS

Scores.....	<b>4</b>
Introduction .....	<b>5</b>
New methodology .....	<b>6</b>
Key findings.....	<b>7</b>
Results .....	<b>9</b>
Recommendations.....	<b>14</b>
Retailer profiles.....	<b>17</b>
METRO .....	<b>18</b>
Loblaw.....	<b>22</b>
Sobeys.....	<b>26</b>
Costco .....	<b>30</b>
Walmart Canada .....	<b>34</b>
Pattison Food Group.....	<b>38</b>
Scoring methodology .....	<b>42</b>
References.....	<b>49</b>



PHOTO: Freepik

# SCORES

A

90-100%

B

80-89%

C

70-79%

D

50-69%


F

below 50%

#1

**metro**

OVERALL SCORE  70% **C**

 ENVIRONMENTAL  HUMAN RIGHTS

 82% **B**  58% **D**

#2

**Loblaw Companies Limited**

OVERALL SCORE  46% **F**

 ENVIRONMENTAL  HUMAN RIGHTS

 61% **D**  32% **F**

#3

**Sobeys Inc.**

OVERALL SCORE  41% **F**

 ENVIRONMENTAL  HUMAN RIGHTS

 53% **D**  30% **F**

#4

**COSTCO WHOLESALE**

OVERALL SCORE  37% **F**

 ENVIRONMENTAL  HUMAN RIGHTS

 47% **F**  27% **F**

#5

**Walmart Canada**

OVERALL SCORE  22% **F**

 ENVIRONMENTAL  HUMAN RIGHTS

 17% **F**  27% **F**

#6

**Pattison Food Group**

OVERALL SCORE  14% **F**

 ENVIRONMENTAL  HUMAN RIGHTS

 23% **F**  5% **F**

# INTRODUCTION

Research shows that consumers, investors and employees expect companies to be increasingly transparent about their environmental and social impacts.<sup>3</sup> However, when it comes to the global seafood industry, opaque supply chains continue to hide numerous problems, including human rights abuses, illegal, unregulated and unreported fishing (IUU) and environmental degradation. Acting like a spotlight within the opaque supply chains, transparency is a prerequisite to accountability. In turn, accountability at the retail level pressures buyers, processors and producers to meet their demands, including improved data capture and sharing, monitoring worker wellbeing and promoting and enabling workers' efforts to organize.<sup>4</sup>

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 SeafoodProgress.org.

Though Seafood Progress has demonstrated that retailers have made progress over the years, mounting investigations suggest slave labor and environmental abuses remain prevalent in seafood supply chains. A contributing factor to this issue is an overreliance on voluntary initiatives, including certifications and social audits, on the part of retailers in lieu of due diligence processes and mandatory requirements. Without taking full responsibility for the seafood they sell, retailers are not driving enough change through their supply chains.

As such, Seafood Progress aims to accelerate corporate due diligence in Canada and abroad. Our 2025 Spotlight is an in-depth analysis of the scope of retailers' environmental and human rights policies, how these policies are actually being applied in practice and what – if any – plans retailers have to take true responsibility for the seafood they sell by adopting a due diligence approach to sourcing.

The following six retailers each hold five per cent or higher market share in Canada and are therefore profiled in this report: Costco, Loblaw, METRO, Pattison Food Group, Sobeys and Walmart Canada. Save-On-Foods and Buy-Low Foods were profiled separately in 2023 but have since merged under the Pattison Food Group corporate umbrella.<sup>5</sup> It is worth noting that, though our analysis is focused on major Canadian retailers, Costco and Walmart are major players globally, and Loblaw now has a North American presence with the expansion of its T&T Supermarket chain into the U.S.<sup>6</sup>

# NEW SCORING METHODOLOGY

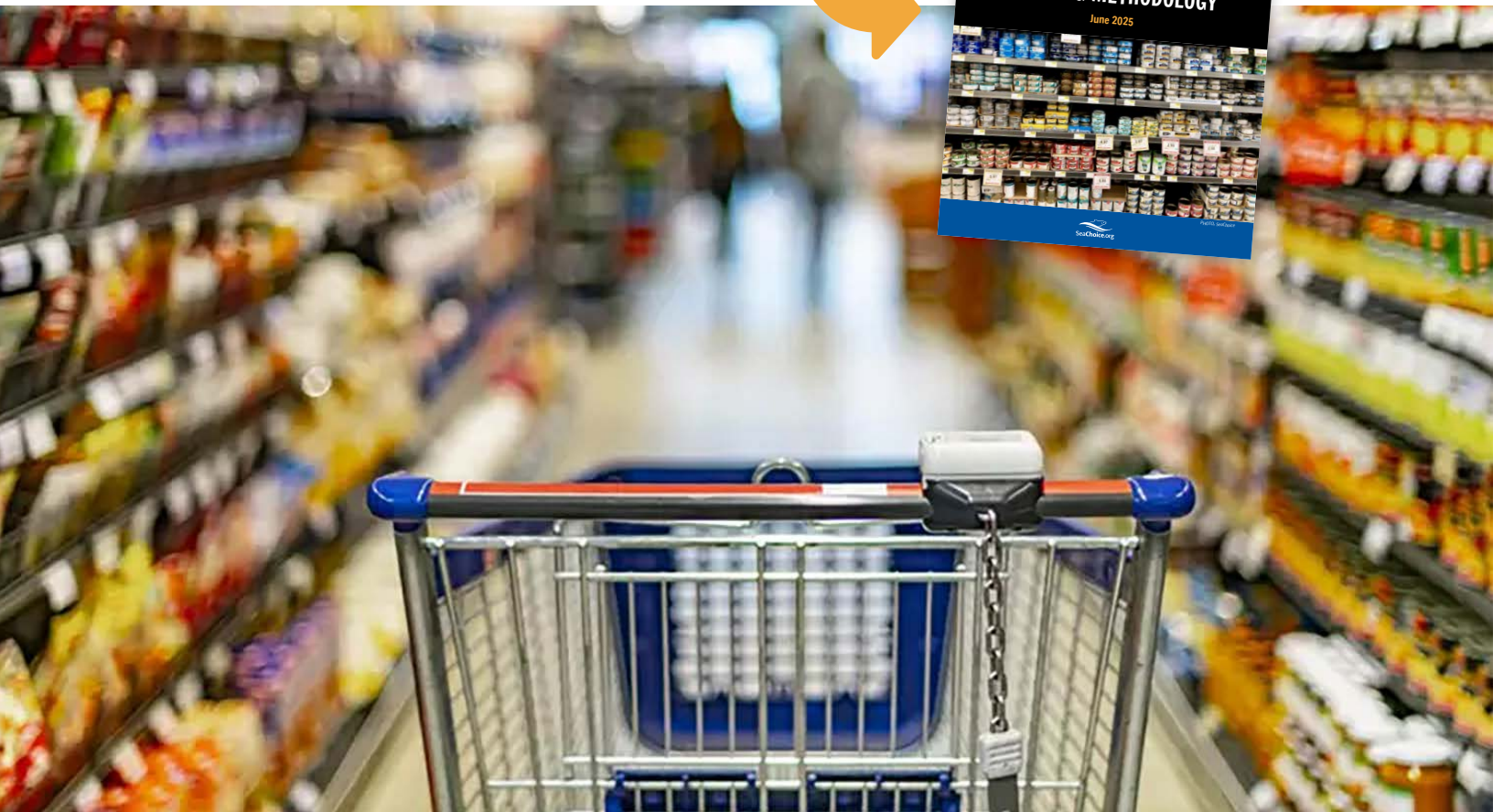
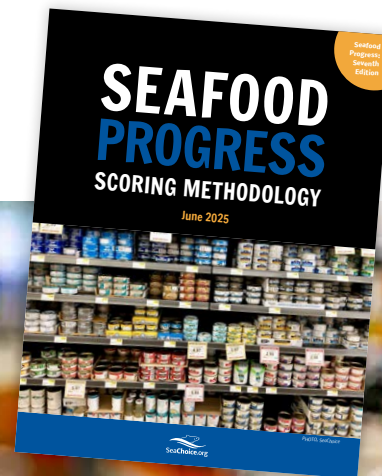
Prior to this report, the scoring methodology for SeaChoice's annual Seafood Progress reports was based on the six steps of the Conservation Alliance for Seafood Solutions Guidance for Companies and consisted of 23 key performance indicators (KPIs).<sup>7</sup>

To accelerate due diligence across Canadian retailers, SeaChoice introduced a new spotlight scoring methodology anchored in the OECD Due Diligence Guidance for Responsible Business Conduct.<sup>8</sup> Our methodology takes an in-depth look at the scope, application and strategy behind retailers' sustainable seafood and human rights policies. Retailers were also assessed for the first time on the extent to which they engaged with SeaChoice to inform their profiles.

The methodology consists of nine KPIs and is divided into two parts: "Environmental" and "Human Rights." Retailers were awarded a percentage for each KPI, and each section was weighted equally to determine their average overall scores.


**The key findings and full results are outlined below, and the full methodology can be found here.**

PHOTO: iStock



# KEY FINDINGS

## SCORES ACROSS ALL SIX RETAILERS

OVERALL SCORE  38% F

 ENVIRONMENTAL

 HUMAN RIGHTS


 47% F

 30% F

## ✓ 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  70% C

ENVIRONMENTAL #1

HUMAN RIGHTS #1

 82% B

 58% 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.

PHOTO: SeaChoice

## ✗ THE BAD

- 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 other 12 store chains that it owns.

[READ MORE](#)

### Loblaw Companies Limited

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.

[READ MORE](#)

## ...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.



## SEAFOOD INVESTIGATIONS

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.

[READ MORE](#)

# RESULTS

## ENVIRONMENTAL INDICATORS

The first part of the analysis focuses on retailers' sustainable seafood policies and practices and consists of five KPIs.

### KPI 1.1 ENGAGE

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

AVERAGE SCORE  47%

BOTTOM SCORE  Walmart at 0%

TOP SCORE  METRO at 80%

For the first time in Seafood Progress history, retailers were awarded a score for their level of engagement with SeaChoice (regardless of performance) on our questions related to their sustainable seafood policies and practices.

### KEY FINDINGS

- All retailers met with SeaChoice.
- Walmart did not respond to any survey questions.
- METRO achieved the highest score for its timely and comprehensive communications, and is the only retailer to provide some level of sales data.
- PFG and Sobey's overall scores were low, but their engagement was adequate.

### KPI 1.2 SCOPE

**How much of the retailer's seafood products are covered by its sustainable seafood policy?**

AVERAGE SCORE  51%

BOTTOM SCORE  Sobey's at 17%

TOP SCORE  Costco at 74%

This year we conducted a far more comprehensive analysis of the scope of retailers' sustainable seafood policies to determine which direct products are covered (shelf stable, frozen and fresh seafood, including prepared meals, sushi, snacks, etc.), and for the first time, [which indirect products are covered](#) (health, beauty, pet food and garden products where seafood is an ingredient).

### KEY FINDINGS

- Retailers cover far more direct (63% average) than indirect (15% average) products.
- None of the retailers cover all direct products across all stores.
- The only retailers to cover any indirect products are Costco and Loblaw.
- Loblaw achieved second place at 70%, and is the only retailer to cover all private label and third-party health, beauty and pet food products containing seafood; however, their policy still excludes T&T.

KPI 1.3  
VERIFICATION

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

AVERAGE SCORE  33%

BOTTOM SCORE  Costco, PFG and Walmart at 0%

TOP SCORE  METRO at 100%

This indicator considers how the retailer verifies compliance against its sustainable seafood policy, and which seafood suppliers are being verified (private label only, or third-party brands as well).

### KEY FINDINGS

- PFG is the only retailer to not have a full chain traceability policy (despite reporting to SeaChoice since 2018 that it's "in the works").
- METRO is the only retailer to score 100% for having a full chain traceability policy that applies to all seafood (including third-party), and all suppliers of high-risk products complete self-evaluations that are verified by a third-party and are required to undergo regular traceability spot checks.
- Costco's traceability policy applies to its Kirkland Signature products only, and no plans to extend to third-party brands.
- Sobeys' traceability policy applies to all seafood products despite the fact that its sustainable seafood policy only applies to private label seafood.

KPI 1.4  
STRATEGY

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

AVERAGE SCORE  27%

BOTTOM SCORE  PFG and Walmart at 0%

TOP SCORE  Loblaw and METRO at 60%

While KPI 1.3 examines the measures retailers are currently taking to verify supplier compliance against their sustainable seafood policies, KPI 1.4 considers if retailers have plans to improve on their verification practices and adopt a true due diligence approach to sourcing.

### KEY FINDINGS

- Second lowest average score across all KPIs.
- None of the retailers have a timebound commitment to include the products and/or stores that are currently out of scope of their seafood policies.
- PFG is the clear laggard on this indicator due to its decentralized operations and policies and no timelines for improvement.
- Costco and Sobeys prioritize private label seafood, while METRO and Loblaw verify private label and third-party seafood suppliers equally, following a risk-based approach.
- Walmart scored 'o' as the fulfillment of its Seafood Policy is subject to significant conditions (e.g., price, customer demand, and availability). SeaChoice asked Walmart for examples of these conditions in practice in 2023 and again in 2025 but did not receive a response.

KPI 1.5  
GOVERNANCE

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

AVERAGE SCORE  78%

BOTTOM SCORE  PFG and Walmart at 33%

TOP SCORE  Costco, Loblaw, METRO & Sobeys at 100%

This indicator aims to identify how well embedded retailers' sustainable seafood policies are into their organizational culture and procurement practices.

### KEY FINDINGS

- Highest average score across all indicators.
- Loblaw, METRO and Sobeys all scored 100% on this KPI as they clearly hold at least two people or departments responsible and accountable and have a discrete budget and resources dedicated to their sustainable seafood policy work.
- PFG received the lowest score for reporting that responsibility and accountability vary by banner based on the level of integration within the PFG umbrella, and for neglecting to indicate if a budget is dedicated to its sustainable seafood policy work.



## HUMAN RIGHTS INDICATORS

The second part of the analysis focuses on retailers' human rights policies and practices pertaining to seafood and consists of four KPIs.

### SCOPE

While the scope of retailers' sustainable seafood policies is clear, their human rights policies appear to apply to everything they sell – including third-party brands – but in reality they don't actually investigate these supply chains for human rights abuses. As such, SeaChoice did not score retailers directly on the scope of their human rights policies to avoid potential fair-washing. However, under KPIs 2.3 and 2.4, retailers were scored on how their human rights policies are being applied to suppliers in practice and if and how they plan to improve on this approach given the prevalence of abuse in seafood supply chains.

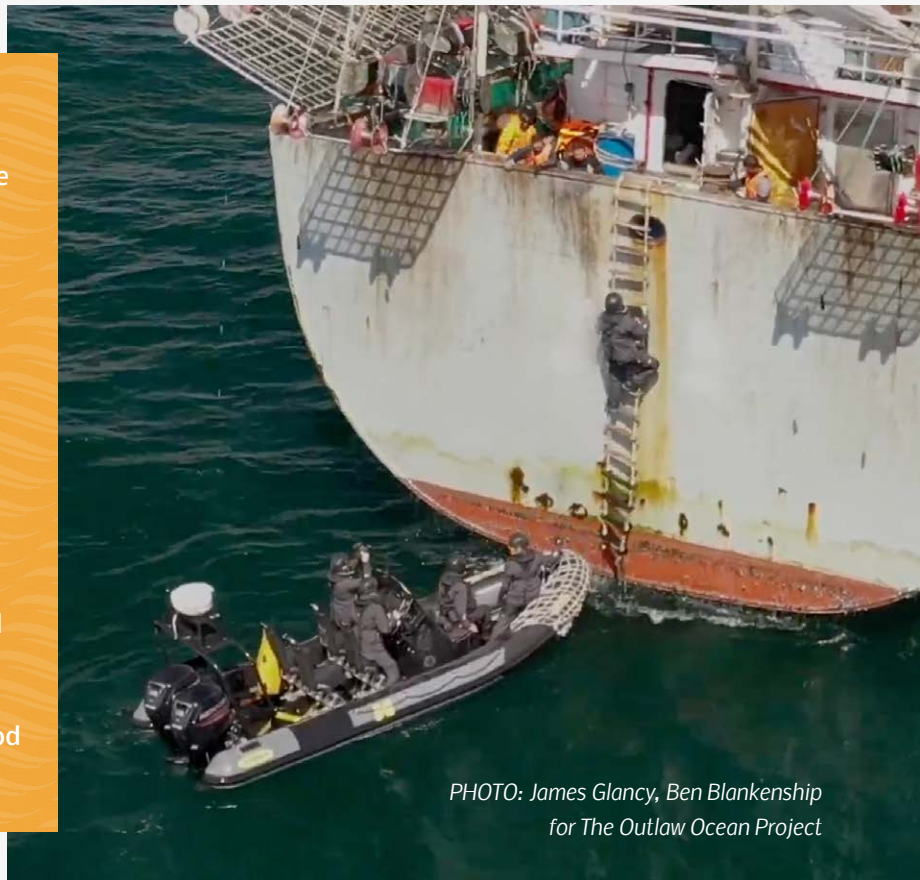


PHOTO: James Glancy, Ben Blankenship for The Outlaw Ocean Project

**KPI 2.1  
ENGAGE**

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



For the first time in Seafood Progress history, retailers were awarded a score for their level of engagement with SeaChoice (regardless of performance) on our questions related to their human rights policies and practices pertaining to seafood.

**KEY FINDINGS**

- All retailers met with SeaChoice.
- Walmart did not respond to any survey questions.
- Costco engaged on the environmental questions but did not respond to any human rights questions.
- METRO is the only retailer to provide comprehensive responses to most environmental and human rights questions, and remains the most engaged retailer since the first Seafood Progress report in 2018.
- METRO is the only retailer to provide SeaChoice with any comment on the Outlaw Ocean Project and Corporate Accountability Lab’s investigations where North American retailers were implicated for selling seafood tainted by human rights and environmental crimes.<sup>9</sup>

**KPI 2.2  
VERIFICATION**

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



This indicator considers how the retailer verifies compliance against its human rights policy, and which seafood suppliers are verified (private label only, or all). To achieve a perfect score, retailers must conduct (instead of or in addition to risk-based social audits) enhanced investigations of high-risk products across all suppliers (including third-party brands) in consultation with local stakeholders (e.g., engaging with unions or worker representative organizations to understand worker perspectives).

**KEY FINDINGS**

- None of the retailers require third-party brands to undergo risk-based audits, but all expect them to abide by their supplier codes of conduct.
- None of the retailers conduct investigations of high-risk products in consultation with local stakeholders or audit to the vessel or farm level.
- PFG is the only retailer to not have a human rights policy, and to not publish its supplier code of conduct.
- PFG and Sobeys both expect suppliers to abide by their supplier code of conduct but do not verify compliance of any suppliers.

KPI 2.3  
STRATEGY

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

AVERAGE SCORE  17%

BOTTOM SCORE  PFG and Sobeys at 0%

TOP SCORE  Costco, Loblaw and Walmart at 25%

This indicator aims to determine if retailers intend to improve on their current approach verifying that seafood suppliers are abiding by their human rights policies, given the evidence of abuse that is becoming more and more prevalent in global seafood supply chains.

#### KEY FINDINGS

- Lowest average score across all indicators.
- Lowest engagement across all human rights indicators.
- None of the retailers reported (and no public info to indicate) that they are looking beyond flawed certification and audit schemes and actively exploring due diligence approaches to verifying seafood supplier compliance against their human rights policies.
- None of the retailers reported plans to take true responsibility for and investigate the supply chains of their third-party brand seafood suppliers.
- PFG reported that it is currently evaluating the most feasible and effective means to verify working conditions related to seafood.

KPI 2.4  
GOVERNANCE

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

AVERAGE SCORE  50%

BOTTOM SCORE  PFG at 0%

TOP SCORE  METRO at 100%

This indicator aims to identify how well embedded retailers' human rights policies are into their organizational culture and seafood procurement practices.

#### KEY FINDINGS

- Costco and Walmart did not respond to this question.
- METRO and Sobeys were the only retailers to report that there are resources and a discrete budget in place for their human rights policy work in relation to seafood.
- PFG scored 0 as it is unclear who is deemed responsible and accountable, or if there is a discrete budget set aside for its human rights policy work in relation to seafood.

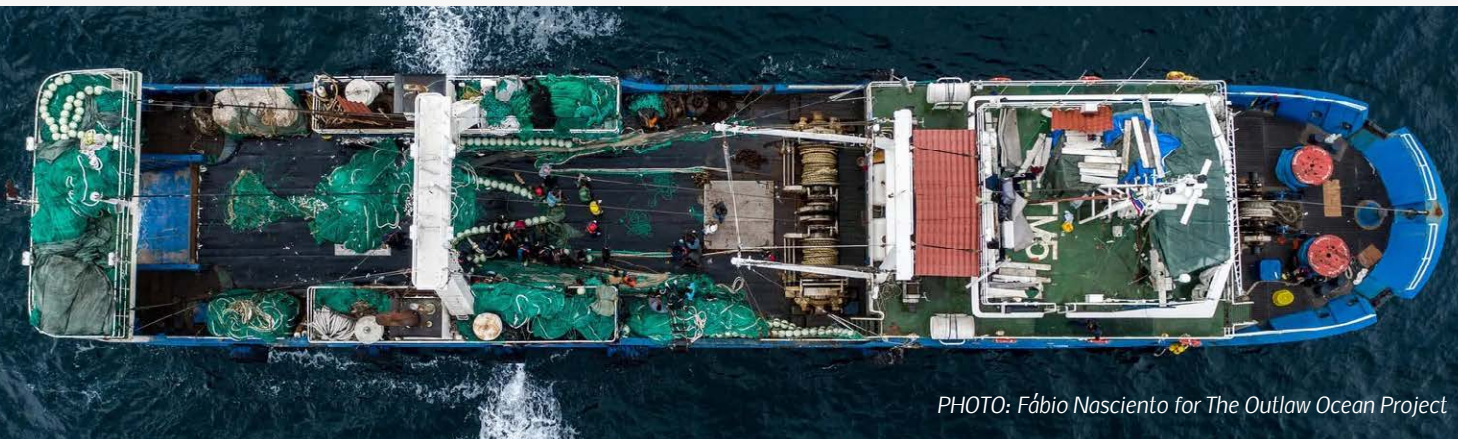
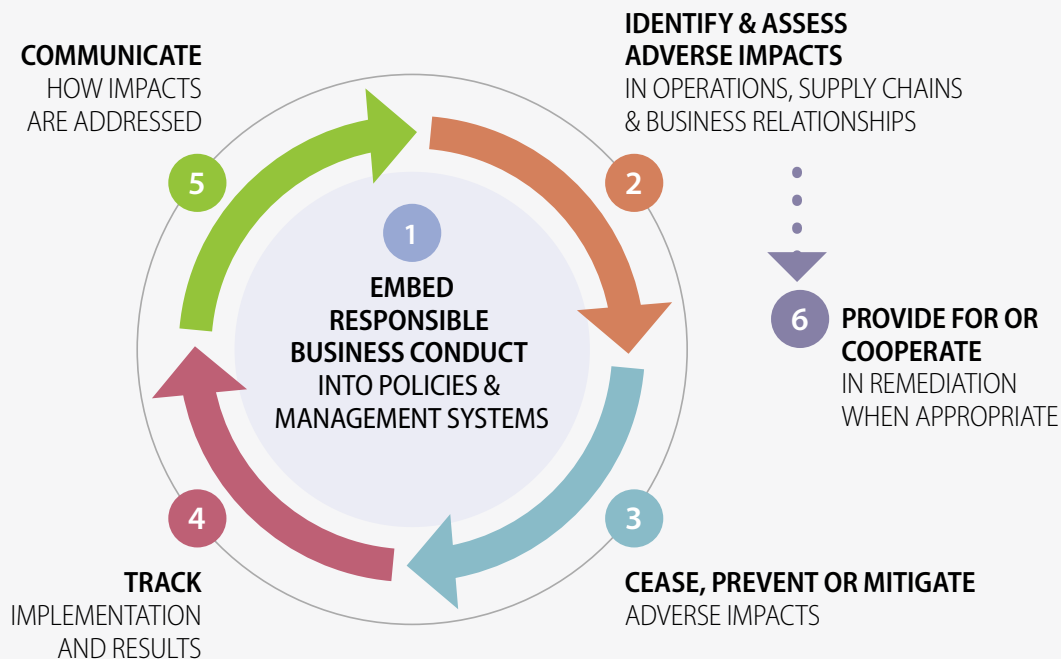


PHOTO: Fábio Nascimento for The Outlaw Ocean Project

# RECOMMENDATIONS

Retailers' responsible sourcing efforts are spread across a wide variety of commodities. When it comes to seafood products, navigating and tracing what is known to be one of the most complex supply chains across all commodities is no easy feat. In an effort to avoid sourcing unethical seafood, retailers have built policies around and relied heavily on third-party eco-certifications and social audits to investigate their supply chains. Unfortunately, it has become clear that these mechanisms are not a one-stop solution to ensuring seafood is sourced responsibly. Mounting evidence reveals environmental and human rights abuses remain prevalent in seafood supply chains. Such abuses pose significant risks to retailers, including legal action, reputational damage, supply chain interferences and loss of product options if habitats and species are overharvested. With regulatory enforcement gaining traction globally, it is clear that retailers need to take proactive measures and implement a due diligence approach to sourcing seafood where risks are assessed regularly, findings are acted upon, progress is tracked and results are shared transparently.<sup>10</sup>

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.<sup>8</sup>*

## 1. EMBED RESPONSIBLE BUSINESS CONDUCT

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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. Company staff and culture must be aligned to the company's commitment to human rights and the HRDD process. Sufficient staff time and resources must be allocated to execute this work, and procurement practices need to reinforce these efforts across supply chains."<sup>10</sup>

## 2. IDENTIFY AND ASSESS ADVERSE IMPACTS

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This report demonstrates that Canadian retailers are covering even fewer seafood products under their policies than we previously thought. In particular, third-party brands are often excluded, following a global theme of retailers not taking responsibility for these products.<sup>1</sup> To identify and assess adverse impacts, retailers need to first 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, retailers could follow a risk-based approach to assessing all seafood suppliers where high-risk species, geographies and production/harvest methods are prioritized.

Furthermore, 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. Retailers must demonstrate traceability in their own operations as well as demand the same from their suppliers to enable full chain traceability so that they are in a position to identify risks and investigate issues. The Global Dialogue on Seafood Traceability is one standard that retailers can reference.<sup>11</sup>

Finally, it is worth noting that Canadian retailers have long sold far more imported than domestically produced seafood

products as they tend to be more competitive in terms of price and availability. Imported seafood often comes with long and complex supply chains where traceability and verification efforts are challenging. However, the tides are shifting as recent tariffs placed on imported products could have the effect of increasing demand for domestic seafood. This presents an opportunity for retailers to focus their sourcing efforts on domestically produced seafood where traceability and verification are more easily achieved.

## 3. CEASE, PREVENT OR MITIGATE

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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.<sup>1,2</sup> FishWise identifies keeping workers at the centre of HRDD and conducting enhanced investigations of high-risk products in consultation with local stakeholders as two fundamental elements of HRDD that companies often miss.<sup>10</sup>

Furthermore, a critical action outlined in the OECD guidance is to cease sourcing products with severe and irremediable adverse impacts where change is not possible. As a result of the Outlaw Ocean China series findings, High Liner announced they had cut ties with a Chinese company implicated in that investigation.<sup>12</sup>

Companies also need to take a far more active role in addressing systemic human rights issues and mitigating risks across the sector. Regulations in North America remain largely inadequate to address the issues of illegal product and forced labour. For years, SeaChoice has advocated for the Canadian government to bring its seafood traceability standards into the 21st century. Major retailers 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. FishWise's Traceability Principles provide guidance for government and companies to adopt stronger traceability policies and programs.<sup>13</sup>

## 4. TRACK

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Retailers must embed their policies into their operations, identify risks following a holistic approach and cease, prevent or mitigate adverse impacts before they are ready to effectively track the implementation and effectiveness of their due diligence activities. The OECD identifies tracking as a means to provide the enterprise with an understanding of whether the systems it has put into place are effectively enabling the enterprise 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

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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. None of the retailers responded meaningfully to the findings of various seafood investigations where seafood tied to labour abuses

were connected back to their store shelves. Incredibly, some retailers are far behind the times in that they haven't even published their policies. For example, Pattison Food Group doesn't appear to have a public human rights policy and its supplier code of conduct is not published, and Loblaw's Master Sourcing Guide for Seafood remains private.

Acting like a spotlight within our opaque seafood supply chains, transparency is a prerequisite for accountability. Step 5 in the OECD's due diligence cycle is important in that it involves communicating how impacts are actually being addressed.

## 6. PROVIDE REMEDIATION

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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. The type of remedy will depend on the nature of the impact, but examples include restitution or rehabilitation, financial or non-financial compensation, punitive sanctions and taking measures to prevent future adverse impacts.



PHOTO: Ed Ou for The Outlaw Ocean Project

# RETAILER PROFILES

# 2025 SEAFOOD PROGRESS PROFILE: METRO



<b>Private label brands</b>	Irrésistible, Selection, Personelle
<b>Key documents</b>	<ul style="list-style-type: none"> <li>• <a href="#">Forced Labour Report 2023</a></li> <li>• <a href="#">Supplier Code of Conduct - June 2022</a></li> <li>• <a href="#">Sustainable Fisheries &amp; Aquaculture Policy - June 2022</a></li> </ul>
<b>Parent company</b>	N/A
<b>NGO partner</b>	N/A
<b>Stores covered by seafood policy</b>	Brunet, Food Basics, Jean Coutu, Les 5 Saisons, Marché Adonis, Marché AMI, Marché Extra, Marché Richelieu, Metro Pharmacy, METRO Plus, Metro Plus, Première Moisson, Super C
<b>Stores NOT covered by seafood policy</b>	N/A

## ✓ THE GOOD

- 1st place overall across all retailers at 70%.
- By far the most engaged retailer this year and on all annual Seafood Progress surveys since 2018.
- Highest engagement on human rights questions by a landslide at 80% (average score = 23%).
- The only retailer to report seafood sales data to SeaChoice.
- Covers the most direct products (fresh, frozen and shelf stable seafood) across all stores under its Fisheries & Aquaculture Policy at 92%.
- One of two retailers to achieve a perfect score for demonstrating that its Human Rights Policy pertaining to seafood is well embedded into its operations.

## ✗ THE BAD

- No tangible plans to incorporate worker perspectives into its human rights due diligence process.
- No plans to cover remaining shelf stable or indirect products (pet food, health, beauty or garden products containing seafood ingredients) under its Fisheries & Aquaculture Policy.

## 🔍 SEAFOOD INVESTIGATIONS

In relation to recent seafood investigations, METRO was implicated in [the Outlaw Ocean Project's China series](#) (correspondence [here](#)) and India report (correspondence [here](#)) where egregious human rights and environmental abuses were connected back to seafood products sold by North American retailers. Additionally, a supplier of METRO'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 METRO (e.g., [Aqua Star](#), [High Liner](#) and [Toppits](#)). Beyond the correspondence published, METRO has not reported further on its remediation efforts specific to the China investigation. In relation to the India shrimp investigation, METRO shared the following in a panel in February 2025, and reiterated it to SeaChoice: "In the specific case of farmed shrimp, METRO monitors its suppliers closely. The company continues to require certification for this type of product and accepts recognized third-party sustainable seafood certifications benchmarked by the Global Sustainable Seafood Initiative (GSSI), in particular BAP 2\* min and ASC. Furthermore, in response to the situation in India, METRO has raised the bar for the compliance threshold for the modules dealing with working conditions in its self-assessment questionnaire. As a result, any supplier of farmed shrimp from India must complete the questionnaire and meet a very high compliance threshold" (personal communication, METRO, 06/03/2025).

# ENVIRONMENTAL

## KPI 1.1 ENGAGE

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

METRO received the highest score on this indicator across all retailers, having provided comprehensive and timely responses to most questions. Though METRO did not share revenue or volume data by product category, it was the only retailer to share percentages of its seafood sales. METRO has been the most engaged retailer since the first Seafood Progress report was released in 2018.



## KPI 1.2 SCOPE

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

METRO informed SeaChoice that its [Fisheries and Aquaculture Policy](#) covers all fresh, frozen and canned products (including third-party brands) across all store banners. However, the policy does not cover METRO's other shelf stable products and does not cover any of its [indirect products](#) (health, beauty, pet food and garden products containing seafood as an ingredient). SeaChoice commends METRO for being the only retailer to share percentages of total purchases by product category in 2024, as follows: canned fish & seafood (0.4%), frozen fish & seafood (1%), fresh fish & seafood (1.2%), health - krill & fish oil only (0.03%), all pet food (0.4%), all soil & fertilizer (0.01%) (personal communication, METRO, 19/03/2025).



#### 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](#)).



#### SHELF STABLE



#### FROZEN



#### FRESH



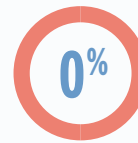
#### HEALTH e.g. fish oil



#### BEAUTY e.g. collagen



#### PET FOOD e.g. cat food



#### GARDEN e.g. fertilizer



- **PRIVATE LABEL BRANDS**  
Products that retailers sell and own.
- **THIRD-PARTY BRANDS**  
Products that retailers sell but do not own.
- **UNBRANDED PRODUCTS**  
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.

**KPI 1.3  
VERIFICATION**

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

METRO was the only retailer to achieve 100% on this indicator for having a full chain traceability policy in place that applies to all seafood (including third-party brands), and requiring all suppliers of high-risk products to: 1) complete self evaluations that are verified by a third-party, and 2) undergo traceability spot checks on at least an annual basis. METRO informed SeaChoice that it has a full chain traceability system in place that applies to all seafood products and that involves tracing the scientific name, geographic origin, farmed or wild and gear type or farming method from the source fishery or farm. Suppliers are asked to fill out an excel spreadsheet called a traceability form for all products they sell METRO. This form includes all the traceability and certification information for a said product and allows METRO to proceed with a sustainability assessment. All new products are subject to this assessment prior to their listing. Then, traceability information is updated yearly, a new assessment is triggered if the traceability information changes, and products can be delisted if the new traceability information is found to be non-compliant. Additionally, METRO conducts random DNA testing, frequent product traceability tests and random checks on suppliers' chain of custody records, meaning that METRO randomly checks suppliers' ability to document their full supply chain, i.e. each step taken by the product from the boat/farm to METRO's distribution centre (personal communication, METRO, 27/02/2025).



**KPI 1.4  
STRATEGY**

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

METRO 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 all shelf stable and indirect products under the scope of its Policy. METRO shared with SeaChoice that, when it comes to its Fisheries & Aquaculture Policy, it does not prioritize any one supplier or species over another; all control and national brand suppliers are covered. METRO's continuous improvement programs focus on high-risk commodities including farmed salmon, farmed tropical fish like tilapia and pangasius, apex predators like tuna and swordfish and farmed shrimp. METRO also has a list of withdrawn species that is reviewed annually, and species are added and removed occasionally. In 2010, METRO's Fisheries and Aquaculture Policy was inclusive of third-party and private brand products, but did exclude some products (e.g. sushi) that were more challenging to assess. Since then, METRO has expanded its Policy to include unbranded seafood products and sushi. METRO's goal is to include all seafood products under its Fisheries and Aquaculture Policy; however, indirect products are currently excluded as the sustainability assessment of ultra processed products is very tough from an operational standpoint. These products come with complex supply chains, and multiple suppliers and origins. In terms of policy scope, METRO's strategy involves directing its available resources where they are most needed. That said, METRO may consider broadening its Fisheries and Aquaculture Policy to include indirect products in future (personal communication, METRO, 14/01/2025).



**KPI 1.5  
GOVERNANCE**

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

METRO informed SeaChoice that its Responsible Procurement Team, which consists of four employees, is responsible for tracking progress against METRO's Sustainable Fisheries and Aquaculture Policy, among other commodity programs. METRO's Senior Vice President of National Procurement is accountable for the implementation of METRO's Sustainable Fisheries and Aquaculture Policy (personal communication, METRO, 14/01/2025). Furthermore, there are resources and a discrete budget dedicated in part to our Responsible Procurement Team to work on METRO's Sustainable Fisheries and Aquaculture Policy, as well as our policies for other commodities (personal communication, METRO, 19/03/2025).





# HUMAN RIGHTS

## KPI 2.1 ENGAGE

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

METRO received the highest score by far across all retailers for providing comprehensive and timely responses to most questions related to its Human Rights Policy and practices.

SCORE  
80% **B**

## KPI 2.2 VERIFICATION

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

METRO scored below average on this question as it does not conduct risk-based social audits, and more importantly, it does not conduct investigations of high-risk seafood products in consultation with local stakeholders. METRO informed SeaChoice that its [Supplier Code of Conduct](#) is integral to its business agreement with suppliers. This means that by signing their business agreement with any METRO entity, suppliers and related parties accept the provisions of the Supplier Code of Conduct and undertake to comply with its requirements. When it comes to human rights and working conditions, METRO does prioritize certain categories. Those include meat and poultry, fish and seafood, and fruits and vegetables as well as private label products. In 2023, METRO issued supplier assessments based on its Supplier Code of Conduct to all private brand, unbranded and national brand seafood suppliers, as well as private label, unbranded and national brand suppliers of other high-risk commodities that are of high volume. The assessments were issued again in 2024, with new suppliers and suppliers who didn't respond being invited to participate again. A third-party company, Sphera, verifies the documents suppliers submit to ensure their validity and relevance. To date, the questionnaires have been issued to Tier 1 suppliers only. Where non-conformities have been uncovered by assessments, METRO strives to work with suppliers to help them improve, rather than cutting ties and having them continue their operations and move their business to another customer. To date, METRO has not solicited a third-party to conduct social audits on any suppliers, but its Supplier Code of Conduct states that it reserves the right to do so (personal communication, METRO, 06/03/2025).

SCORE  
25% **F**

## KPI 2.3 STRATEGY

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

METRO scored low on this indicator as it did not report plans to incorporate worker perspectives into its human rights due diligence process in relation to seafood. METRO reported to SeaChoice that it plans to continue with its supplier self assessments but does recognize the limitations of such surveys. Although some suppliers may not meet the compliance threshold set by METRO, this does not necessarily mean that they do not have good business practices, or that they use forced or child labour. As this is a self-assessment questionnaire, the non-compliances obtained may in some cases constitute a risk indicator (personal communication, METRO, 14/01/2025).

SCORE  
25% **F**

## KPI 2.4 GOVERNANCE

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

METRO is one of two retailers to score 100% on this indicator for clearly holding at least two parties responsible and accountable for its Human Rights Policy in relation to seafood, and having a discrete budget dedicated to this work. METRO shared with SeaChoice that, as part of its commercial agreements, the responsibility for the application of its Supplier Code of Conduct falls on METRO's Responsible Procurement Team. METRO's Vice President of Public Affairs and Communications, as well as its Executive Committee, are held accountable for the implementation of its Supplier Code of Conduct (personal communication, METRO, 14/01/2025). Additionally, there are resources and a discrete budget dedicated to our Responsible Procurement Team to work in part on the human rights components of METRO's Sustainable Fisheries and Aquaculture Policy (personal communication, METRO, 19/03/2025).

SCORE  
100% **A**

# 2025 SEAFOOD PROGRESS PROFILE: LOBLAW

<b>Private label brands</b>	Joe Fresh, Life brand, No Name, Presidents Choice, Quo, Seaquest, T&T
<b>Key documents</b>	<ul style="list-style-type: none"> <li>• <a href="#">Forced Labour Report - 2024</a></li> <li>• Master Seafood Sourcing Guide - not public</li> <li>• <a href="#">Position on Human Rights - Nov 2020</a></li> <li>• <a href="#">Supplier Code of Conduct - no date</a></li> </ul>
<b>Parent company</b>	George Weston Ltd.
<b>NGO partner</b>	World Wildlife Fund (WWF)
<b>Stores covered by seafood policy</b>	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
<b>Stores NOT covered by seafood policy</b>	<a href="#">T&amp;T Supermarket</a> (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.

## ✗ 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](#)).

# ENVIRONMENTAL

KPI 1.1  
ENGAGE

## 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.



KPI 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).



### 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](#)).



SHELF STABLE



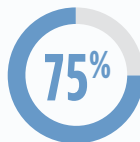
FROZEN



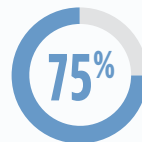
FRESH



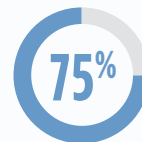
HEALTH  
e.g. fish oil



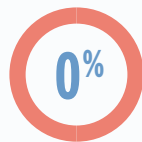
BEAUTY  
e.g. collagen



PET FOOD  
e.g. cat food



GARDEN  
e.g. fertilizer



- **PRIVATE LABEL BRANDS**  
Products that retailers sell and own.
- **THIRD-PARTY BRANDS**  
Products that retailers sell but do not own.
- **UNBRANDED PRODUCTS**  
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.

**KPI 1.3  
VERIFICATION**

**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).



**KPI 1.4  
STRATEGY**

**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).



**KPI 1.5  
GOVERNANCE**

**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**

**KPI 2.1  
ENGAGE**

**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.



**KPI 2.2  
VERIFICATION**

**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, 06/02/2025). 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 [Supplier Code of Conduct](#), 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, 06/02/2025).

SCORE  
50% **D**

**KPI 2.3  
STRATEGY**

**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.

SCORE  
25% **F**

**KPI 2.4  
GOVERNANCE**

**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.

SCORE  
33% **F**

# 2025 SEAFOOD PROGRESS PROFILE: SOBEYS

<b>Private label brands</b>	Best Buy, C'est Pret, Compliments, Eight Treasures, Panache, Ready for you, Ricardo, Sensations, Thrifty Kitchens Food
<b>Key documents</b>	<ul style="list-style-type: none"> <li>• <a href="#">Ethical &amp; Sustainable Sourcing Governance Model</a></li> <li>• <a href="#">Ethical &amp; Sustainable Sourcing Policy - July 2024</a></li> <li>• <a href="#">Fish &amp; Seafood Sourcing Guidelines &amp; Commitments - July 2020</a></li> <li>• <a href="#">Forced Labour Report - 2024</a></li> <li>• <a href="#">Sustainable Business Report - 2024</a></li> </ul>
<b>Parent company</b>	Empire Company Ltd.
<b>NGO partner</b>	Ocean Wise
<b>Stores covered by seafood policy</b>	Foodland, FreshCo., IGA, Safeway, Sobeys, Sobeys Wholesale, Thrifty Foods, Voila (e-commerce)
<b>Stores NOT covered by seafood policy</b>	Bonichoix, Boni-Soir, Chalo Freshco, Farm Boy, Kim Phat, Lawtons Drugs, Les Marchés Tradition, Longos, Needs, Rachelle Béry, Voisins



## ✓ THE GOOD

- Adequate and timely engagement with SeaChoice on environmental questions.
- Has full chain traceability on all private label and third-party direct products (fresh, frozen and shelf stable seafood).
- Policies appear to be well embedded into its operations.

## ✗ THE BAD

- 11 of its 19 store chains are NOT covered by Sobeys' Sustainable Seafood Guidelines.
- Lowest coverage of seafood products under its Sustainable Seafood Guidelines and across all retailers at 17%, and no timeline to include third-party seafood.
- Very low engagement with SeaChoice on human rights questions.
- Does not verify supplier compliance against its Sustainable Seafood Guidelines or Supplier Code of Conduct.
- No tangible plans to adopt a human rights due diligence process that incorporates worker perspectives.

## 🔍 SEAFOOD INVESTIGATIONS

Sobeys 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 Ethical and Sustainable Sourcing Policy amid growing evidence of abuse in global seafood supply chains. In relation to recent seafood investigations, Sobeys was implicated in [the Outlaw Ocean Project's China series](#) where human rights and environmental abuses were connected back to seafood products sold by North American retailers. Beyond the company's initial response to Outlaw Ocean (published [here](#)), Sobeys has not reported publicly on its efforts to remediate based on the findings of that investigation. Additionally, a supplier of Sobeys' private label seafood, [Premier Marine Canada](#), was implicated (correspondence [here](#)), as were various third-party seafood brands that are commonly sold by Sobeys (e.g., [Aqua Star](#), [High Liner](#) and [Toppits](#)).

# ENVIRONMENTAL

KPI 1.1  
ENGAGE

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

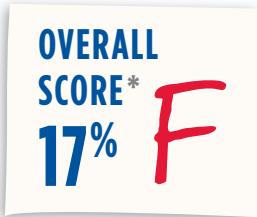
Sobeys provided adequate and timely responses to most questions related to its [Seafood Sourcing Guidelines](#) and practices.



KPI 1.2  
SCOPE

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

Sobeys received the lowest score on this indicator at 10%. Sobeys informed SeaChoice that its [Fish and Seafood Sourcing Guidelines and Commitments](#) cover all private label fresh and frozen and some shelf stable products, but does not cover any third-party fresh, frozen or shelf stable products. Furthermore, it does not cover any health, beauty, pet food or garden products (personal communication, Sobeys, 13/02/2025). Finally, Sobeys declined to share revenue and sales data around its seafood products with SeaChoice.



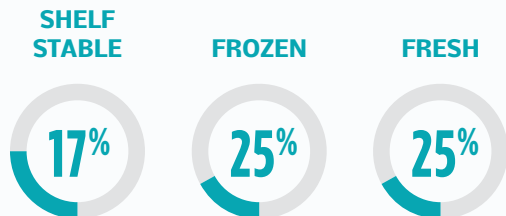
### DIRECT PRODUCTS

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](#)).



- PRIVATE LABEL BRANDS**  
 Products that retailers sell and own.
- THIRD-PARTY BRANDS**  
 Products that retailers sell but do not own.
- UNBRANDED PRODUCTS**  
 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.*

KPI 1.3  
VERIFICATION

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

Sobeys achieved the second highest score on this indicator at 66% as it has a full chain traceability policy in place that applies to all seafood (including third-party brands), and the information collected from suppliers is verified by the Sustainable Fisheries Partnership (SFP). Sobeys informed SeaChoice that, through the SFP's Seafood Metrics platform, Sobeys achieved full chain traceability of all the direct seafood it sells (private label, third-party and unbranded) in 2023, and continues to collect information from suppliers on a quarterly basis. Sobeys works closely with the SFP to address gaps in its reporting and to ensure seafood data is accurate (personal communication, Sobeys, 31/01/2025).

SCORE  
66% D

KPI 1.4  
STRATEGY

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

Sobeys scored below average on this indicator as some of its private label direct seafood products are in scope and the retailer's approach to verification is clear, but there's no timebound commitment to include third-party direct products or indirect products. Sobeys informed SeaChoice that its initial focus is on its Own Brand seafood as it has the most control over these products. Sobeys uses its Seafood Metrics initiative, delivered by the Sustainable Fisheries Partnership (SFP), to provide national brand supplier partners a comprehensive understanding of the sustainability risks and opportunities associated with their source fisheries, including both wild-caught and farmed seafood. Businesses can evaluate the sustainability impacts of fish and seafood products, understand the effectiveness of existing improvement efforts, and prioritize future opportunities. Seafood Metrics also supports traceability within supply chains by enabling suppliers to report place of origin. This empowers suppliers and Sobeys' procurement teams to make informed decisions about the seafood they source and promote more sustainable practices in the industry. Using the data obtained through Seafood Metrics, Sobeys has begun to update its seafood guidelines to be more reflective of the current environmental and social imperatives to ensure our oceans are being fished responsibly (personal communication, Sobeys, 31/01/2025).

SCORE  
20% F

KPI 1.5  
GOVERNANCE

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

Sobeys achieved a perfect score on this indicator as it clearly holds at least two departments responsible and accountable, and a discrete budget is dedicated to the work on its [Seafood Guidelines](#). [Sobeys' Ethical and Sustainable Sourcing Governance Model](#) relays that its Corporate Governance and Social Responsibility Committee provides oversight over material ESG issues, including ethical and responsible sourcing, on a quarterly basis. Additionally, its Executive Leadership Team provides strategic input, oversight and approval on strategic decisions related to ethical and responsible sourcing, and are provided updates on progress against sourcing commitments as needed. The Model also states that its Sustainability Team provides direction and support to business categories on sustainable and ethical sourcing considerations and strategy, leads and supports on related policy development, implementation and governance, manages supply chain evaluation and due diligence for sustainable and ethical considerations, collaborates with internal teams on reporting against sourcing commitments, and engages with industry stakeholders and suppliers on related sourcing topics. Sobeys informed SeaChoice that its sustainable seafood sourcing work is supported by resources within its Corporate Sustainability and Merchandising teams. There are budgets allocated for various initiatives (personal communication, Sobeys, 31/01/2025).

SCORE  
100% A



# HUMAN RIGHTS

## KPI 2.1 ENGAGEMENT

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

Sobeys scored below average on this indicator as it only provided partial responses to some questions related to its [Ethical and Sustainable Sourcing Policy](#) and practices.

SCORE  
0% **F**

## KPI 2.2 VERIFICATION

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

Sobeys scored 'o' on this indicator as it expects suppliers to abide by its [Ethical and Sustainable Sourcing Policy](#) (acts as its Supplier Code of Conduct) but does not verify compliance. Sobeys' Policy states: "suppliers must ensure that their suppliers, contractors, sub-contractors, agents and subagents adopt and meet the requirements outlined in our Ethical and Sustainable Sourcing Policy. Suppliers are expected to complete their own risk assessments and due diligence for suppliers that they source from." Sobeys informed SeaChoice that at this time, it does not have the structure to audit suppliers against its Policy (Sobeys, personal communication, 31/01/2025).

SCORE  
0% **F**

## KPI 2.3 STRATEGY

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

Sobeys achieved a score of 'o' on this indicator as it does not verify supplier compliance against its [Ethical and Sustainable Sourcing Policy](#), and did not report plans to incorporate worker perspectives into its human rights due diligence process in relation to seafood. Empire's (parent company of Sobeys Inc) [2024 Forced Labour Report](#) states: "In fiscal 2025, we will engage in a more detailed supply chain risk-mapping analysis to better understand product categories, sourcing origins, and labour-violation risk areas that might require more investigation and action, with a particular focus on suppliers for Own Brands and goods for which we are the importer of record." [Sobeys' Human Rights page](#) states: "As we improve our due diligence approach, we will also continue to strengthen existing supplier and purchasing initiatives that support human rights, including our work on...sustainable seafood." SeaChoice asked Sobeys to elaborate on these plans in relation to seafood, but did not receive a response.

SCORE  
0% **F**

## KPI 2.4 GOVERNANCE

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

Sobeys achieved a perfect score on this indicator as it clearly holds at least two departments responsible and accountable, and a discrete budget is dedicated to the work on its [Ethical and Sustainable Sourcing Policy](#). Sobeys' Corporate Governance and Social Responsibility Committee provide oversight over material ESG issues, including ethical and responsible sourcing, on a quarterly basis. Sobeys' Executive Leadership Team provides strategic input, oversight and approval on strategic decisions related to ethical and responsible sourcing, and are provided updates on progress against sourcing commitments as needed. Sobeys' Sustainability Team leads and supports on related policy development, implementation and governance, and manages supply chain evaluation and due diligence for sustainable and ethical considerations. Finally, Sobeys' sustainable seafood sourcing work is supported by resources within its Corporate Sustainability and Merchandising Teams. There are budgets allocated for various initiatives (personal communication, Sobeys, 31/01/2025).

SCORE  
100% **A**

# 2025 SEAFOOD PROGRESS PROFILE: COSTCO CANADA

<b>Private label brands</b>	Kirkland Signature
<b>Key documents</b>	<ul style="list-style-type: none"> <li>• <a href="#">Forced Labor Report 2023</a></li> <li>• <a href="#">Human Rights Policy - Dec 2024</a></li> <li>• <a href="#">Seafood &amp; Aquaculture Policy - Dec 2024</a></li> <li>• <a href="#">Supplier Code of Conduct - Dec 2023</a></li> </ul>
<b>Parent company</b>	Costco Wholesale Corporation
<b>NGO partner</b>	World Wildlife Fund (WWF)
<b>Stores covered by seafood policy</b>	Costco
<b>Stores NOT covered by seafood policy</b>	N/A



## ✓ THE GOOD

- One of two retailers to cover some indirect seafood products under the scope of its Seafood & Aquaculture Policy.
- Has full chain traceability of its Kirkland Signature seafood and subjects these suppliers to risk-based social audits.
- Seafood & Aquaculture Policy is well embedded into its operations.

## ✗ THE BAD

- 4th place overall across all retailers at 37%.
- Did not respond to any human rights questions.
- Policies don't apply to third-party brand seafood products, and no plans to include.
- Does not appear to investigate the supply chains of third-party brands.
- No reported plans to investigate suppliers of high-risk seafood products in consultation with local stakeholders.

## 🔍 SEAFOOD INVESTIGATIONS

Costco 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. In 2023, Costco was implicated in [the Outlaw Ocean Project's China series](#) as well as the [The Corporate Accountability Lab's India shrimp report](#), where egregious human rights and environmental abuses were connected back to seafood products sold by North American retailers. Emails sent to Costco outlining Outlaw Ocean's findings can be found [here](#). Various third-party seafood brands that are commonly sold by Costco were also implicated (e.g., [Aqua Star](#), [High Liner](#) and [Toppits](#)). Costco has not responded publicly to either of these reports.

# ENVIRONMENTAL

KPI 1.1  
ENGAGE

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

Costco met with SeaChoice and provided adequate but not timely responses to most questions.



KPI 1.2  
SCOPE

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

Costco informed SeaChoice that its [Seafood and Aquaculture Policy](#) covers all its Kirkland Signature (KS) shelf stable, frozen, and fresh seafood products, as well as all KS pet food and health products that contain seafood as an ingredient (e.g. fish oil, shampoo, and skin products). In fact, Costco is one of two retailers to include any [indirect products](#) under its Policy. Beyond the endangered species listed in its Policy, Costco does not cover any third-party brand **direct products** (shelf stable, frozen, and fresh seafood) or **indirect products** (health, beauty, pet food, or garden products containing seafood as an ingredient) (personal communication, Costco, 13/01/2025). Finally, Costco declined to share revenue and sales data around its seafood products with SeaChoice.



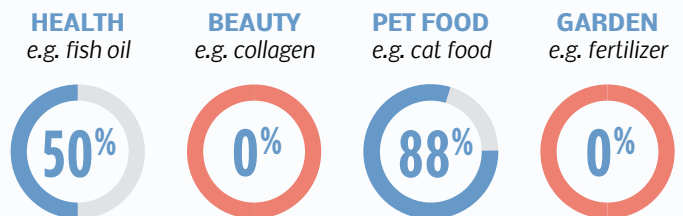
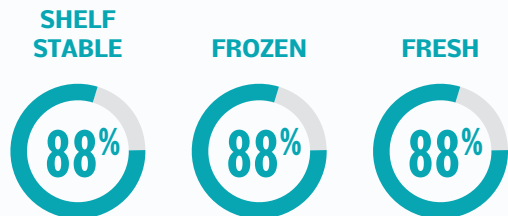
### DIRECT PRODUCTS

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](#)).



- **PRIVATE LABEL BRANDS**  
Products that retailers sell and own.
- **THIRD-PARTY BRANDS**  
Products that retailers sell but do not own.
- **UNBRANDED PRODUCTS**  
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.

**KPI 1.3  
VERIFICATION**

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

Costco was unable to score above 'o' on this question as its traceability policy does not apply to third-party brands. Costco informed SeaChoice that it has a full chain traceability policy in place that applies only to its private label Kirkland Signature seafood products. Costco issues an annual global seafood survey to all suppliers (including third-party brands) to collect key sourcing information, as well as its Seafood Policy which suppliers are required to sign and which reiterates Costco's seafood commitments. Furthermore, the survey requires suppliers to indicate if products are certified, and Costco's NGO partner, WWF, works with suppliers to verify this information (personal communication, Costco, 13/01/2025).



**KPI 1.4  
STRATEGY**

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

Costco's private label direct seafood products are in scope of its [Fisheries and Aquaculture Policy](#), and its approach to verification is somewhat clear, but there's no timebound commitment to include the large volume of third-party seafood or the remaining indirect products it sells that are currently out of scope. Costco informed SeaChoice that when it comes to its Seafood and Aquaculture Policy, private label (Kirkland Signature) seafood products are prioritized over third-party brand seafood products. Costco believes that prioritizing its efforts on private label seafood sends a strong message from senior leadership to third-party brands to get certified. Additionally, across private label and third-party brand products, Costco is focused on not selling the list of endangered species identified in its Policy. Furthermore, Costco prioritizes its efforts on higher volume and dollar items and works down from there (personal communication, Costco, 13/01/2025).



**KPI 1.5  
GOVERNANCE**

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

Costco informed SeaChoice that Tim Wahlquist, Aaron McNevin, and the Vice Presidents of Seafood Procurement—who together serve as an informal steering committee—are responsible for ensuring compliance with Costco's Seafood and Aquaculture Policy. Progress against the Policy is shared at Costco's budget meetings. Costco's Senior Merchant in each country that it operates provides updates and identifies actions to the retailer's internal buyers who are held accountable for ensuring Costco's Seafood and Aquaculture Policy is met (personal communication, Costco, 13/01/2025). Finally, Costco has dedicated people working on its Fisheries and Aquaculture Policy (personal communication, Costco, 21/03/2025).

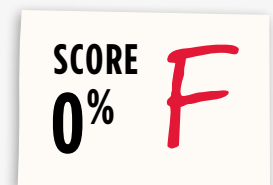


**HUMAN RIGHTS**

**KPI 2.1  
ENGAGE**

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

Costco neglected to respond to any questions related to its Human Rights Policy.



KPI 2.2  
VERIFICATION

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

Costco did not provide a response to this question. SeaChoice posed the following additional questions but did not receive a response from Costco: 1) Are third-party seafood suppliers also subject to Costco's risk based audits, or just Kirkland Signature seafood suppliers? 2) Does Costco facilitate and pay for audits of seafood suppliers via a third-party, or do these suppliers solicit audits from a third-party of their choosing and share the results back with Costco? and 3) Does Costco audit its Tier 1 suppliers only, or does it audit down to the vessel and farm level? Costco's [Supplier Code of Conduct](#) states that all suppliers are "responsible for ensuring compliance with the Code throughout the Merchandise supply chain." Costco's [2023 Forced Labour Report](#) states "Costco Canada facilitates the independent auditing of domestic agricultural suppliers of fresh meat and produce for labour and health & safety performance. For other suppliers, Costco Canada utilizes Costco's centralized compliance function for supplier audits as described below. Costco's ongoing risk assessment process informs our approach to targeting audits of supplier facilities against the Code standards. We prioritize suppliers of Kirkland Signature merchandise and suppliers whose product or country of origin poses an increased risk." Based on this information, SeaChoice made the assumption that Costco requires Tier 1 suppliers of private label seafood to undergo risk-based audits, but does not investigate the upstream supply chains of its third-party brand suppliers.

SCORE  
50% D

KPI 2.3  
STRATEGY

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

Costco did not provide a response to this question. [Costco's Supplier Code of Conduct](#) suggests the retailer relies on third-party social audits to verify private label seafood supplier compliance against its [Human Rights Policy](#). SeaChoice could not find evidence that Costco incorporates worker perspectives into its human rights due diligence process to mitigate risks and prevent human rights violations from occurring in its seafood supply chains. [Costco's 2023 Forced Labour Report](#) references plans to "periodically assess the effectiveness of our overall human rights due diligence approach, including mitigation of forced labour and modern slavery. In addition, we have a number of KPIs to measure our progress on assessing and addressing risks of forced labour and modern slavery as described above under Due Diligence and Remediation. We plan to track progress with these KPIs going forward, year over year."

SCORE  
25% F

KPI 2.4  
GOVERNANCE

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

Costco did not provide a response to this question. However, Costco's [2023 Forced Labour Report](#) states: "The Nominating and Governance Committee of our Board of Directors is responsible for sustainability oversight, including human rights. Regular reporting informs this Committee of progress, challenges and outcomes within our human rights activities." The report also includes a section on governance structure that relays who at Costco is tasked with strategic oversight, implementation, reporting and compliance. Costco did not reply when asked if there is a discrete budget set aside for this work.

SCORE  
33% F

# 2025 SEAFOOD PROGRESS PROFILE: WALMART CANADA



<b>Private label brands</b>	Equate, Great Value, Our Finest, Pure Balance, Special Kitty, Your Fresh Market
<b>Key documents</b>	<ul style="list-style-type: none"> <li>• <a href="#">Forced Labor Report 2024</a></li> <li>• <a href="#">Human Rights Statement - no date</a></li> <li>• <a href="#">Seafood Policy - June 2023</a></li> <li>• <a href="#">Standards for Suppliers - Feb 2024</a></li> </ul>
<b>Parent company</b>	The Walton Family
<b>NGO partner</b>	Sustainable Fisheries Partnership
<b>Stores covered by seafood policy</b>	Walmart
<b>Stores NOT covered by seafood policy</b>	N/A

## ✓ THE GOOD

- Scored above average on KPI 1.2 because its Seafood Policy covers some direct products (shelf stable, fresh and frozen seafood) across all stores.

## ✗ THE BAD

- The only retailer to not respond to any survey questions.
- 5th place overall at 22% largely due to not responding to any survey questions.
- The only retailer to stipulate conditions to the fulfillment of its Seafood Policy (including price, availability and consumer demand).
- Does not appear to investigate the supply chains of its third-party seafood suppliers for human rights abuses.
- No reported plans to adopt a human rights due diligence process that incorporates worker perspectives.

## 🔍 SEAFOOD INVESTIGATIONS

Walmart Canada 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 Standards for Suppliers, amid growing evidence of abuse in global seafood supply chains. In relation to recent seafood investigations, Walmart Canada was implicated in [the Outlaw Ocean Project’s China series](#), where human rights and environmental abuses were connected back to seafood products sold by North American retailers (correspondence with Walmart Canada can be found [here](#)). Additionally, a supplier of Walmart Canada’s private label seafood, [Premier Marine Canada](#), was implicated (correspondence [here](#)), as were various third-party seafood brands that are commonly sold by Walmart Canada (e.g., [Aqua Star](#), [High Liner](#) and [Toppits](#)). Walmart Canada was also implicated in The Corporate Accountability Lab’s [India shrimp report](#). To date, the retailer has not reported publicly on its efforts to remediate based on the findings of these investigations.

# ENVIRONMENTAL

## KPI 1.1 ENGAGE

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

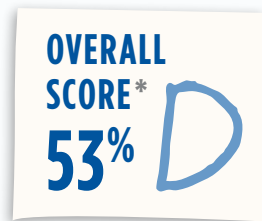
Walmart Canada met with SeaChoice but did not respond to any questions related to its [Seafood Policy](#) and practices.



## KPI 1.2 SCOPE

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

[Walmart's Seafood Policy](#) appears to cover some fresh, frozen and shelf stable products, and no health, beauty, pet food or garden products. Walmart Canada declined to share revenue and sales data around its seafood products with SeaChoice.



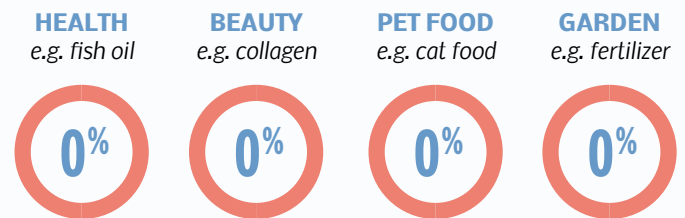
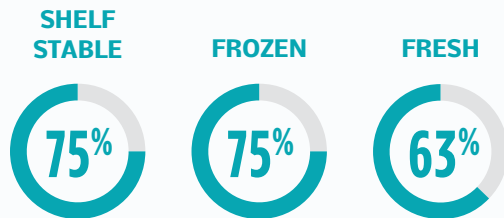
#### DIRECT PRODUCTS

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](#)).



- PRIVATE LABEL BRANDS**  
 Products that retailers sell and own.
- THIRD-PARTY BRANDS**  
 Products that retailers sell but do not own.
- UNBRANDED PRODUCTS**  
 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.*

**KPI 1.3  
VERIFICATION**

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

Walmart Canada did not provide a response to this question, and SeaChoice could not find information around how the retailer verifies supplier compliance against its [Seafood Policy](#). In 2023, WMC reported to SeaChoice that it supports its Seafood Policy with a full chain traceability policy (personal communication, Walmart Canada Manager, Sustainability, 08/02/2023). However, SeaChoice was unable to determine if Walmart Canada’s traceability policy applies to all seafood products (including third-party brands), or just private label.



**KPI 1.4  
STRATEGY**

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

Walmart Canada did not provide a response to this question. [Walmart’s Policy and Guidelines webpage](#) relays its commitments to fresh and frozen seafood, and fresh, frozen and canned tuna. SeaChoice was unable to obtain an update from Walmart on where it is at in achieving its commitments to fresh and frozen seafood, and canned tuna, set to be achieved in 2025. Walmart Canada is the only retailer to stipulate conditions to its seafood commitments, stated as follows in its [Seafood Policy](#): “based on price, availability, quality, customer demand, and unique regulatory environments across our global retail markets.” In 2023 and again in 2025, SeaChoice requested but did not receive examples from Walmart Canada of exceptions to its Seafood Policy based on these conditions. The Policy also states “when it comes to the issue of method of catch, Walmart will offer customer choice in select markets, based on local customer preference and market retail norms.” Distinct from its ongoing efforts to improve industry practices through its participation in The Seafood Task Force and grants awarded by The Walmart Foundation, SeaChoice could not find information specific to the strategy behind how Walmart Canada applies its Seafood Policy to the products it sources. For example, many retailers focus the application of their policies on their private label products first, while others follow a risk-based approach to sourcing across all seafood products sold by prioritizing efforts on high-risk species, specific countries of origin, suppliers, etc.



**KPI 1.5  
GOVERNANCE**

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

Walmart Canada did not provide a response to this question. [Walmart’s Corporate Governance webpage](#) outlines at a high level how the company manages and oversees ESG matters, and [Walmart’s Human Rights Statement](#) indicates: “The Nominating and Governance Committee of the Board is responsible for overseeing Walmart’s environmental, social, and governance agenda.” SeaChoice could not find public information around who, or which department at WMC, is held accountable for ensuring Walmart’s [Seafood Policy](#) is met, or if there is a discrete budget allocated to this work.





# HUMAN RIGHTS

## KPI 2.1 ENGAGE

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

Walmart Canada met with SeaChoice but did not respond to any questions related to its [Human Rights Policy](#) and practices.

SCORE  
0% **F**

## KPI 2.2 VERIFICATION

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

Walmart Canada did not provide a response to this question, but scored above average at 50% on this indicator as it appears to require Tier 1 suppliers of private label seafood products to undergo risk-based audits. However, it does not investigate the upstream supply chains of its third-party brand suppliers. [Walmart's 2024 Forced Labor Report](#) states that [Walmart's Standards for Suppliers](#) "apply to suppliers of Walmart Inc. and suppliers of Walmart controlled subsidiaries globally, including Walmart Canada...Suppliers are required to cascade these expectations throughout their supply chain-including to raw material, component, or ingredient suppliers." The report also indicates that "Walmart uses third-party social, safety and environmental compliance audits following a risk-based approach by focusing on areas that pose the greatest potential risk to worker dignity." SeaChoice was unable to determine if third-party brands are subjected to Walmart's risk-based audits, or if Walmart audits Tier 1 suppliers only or to the vessel and farm level.

SCORE  
50% **D**

## KPI 2.3 STRATEGY

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

Walmart Canada did not respond to this question and scored low as it appears to rely on social audits to verify private label suppliers, and no tangible plans to incorporate worker perspectives into its Human Rights Due Diligence process for seafood suppliers (including third-party brands). Walmart Canada's [2024 Forced Labor Report](#) states: "we strive to continually improve our risk-based audit program so we can better allocate our resources to higher-risk regions, product types and facilities and help increase overall program effectiveness."

SCORE  
25% **F**

## KPI 2.4 GOVERNANCE

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

Walmart Canada did not provide a response to this question. Walmart Canada's [Human Rights Statement](#) clearly identifies departments that are responsible and accountable for its ESG work, but it is unclear if this is specific to seafood or if there's a discrete budget dedicated to its human rights work in relation to seafood.

SCORE  
33% **F**

# 2025 SEAFOOD PROGRESS PROFILE: PATTISON FOOD GROUP

<b>Private label brands</b>	Only Goodness, Western Family
<b>Key documents</b>	<ul style="list-style-type: none"> <li>• <a href="#">Forced Labor Report 2023</a></li> <li>• <a href="#">Save-On-Foods' Sustainable Seafood Policy - approximately 2016</a></li> <li>• Supplier ESG Responsibility Standards and Procedures Document - acts as PFG's Supplier Code of Conduct, not public</li> <li>• No public human rights policy</li> </ul>
<b>Parent company</b>	The Jim Pattison Group
<b>NGO partner</b>	Ocean Wise
<b>Stores covered by seafood policy</b>	Save-On-Foods
<b>Stores <b>NOT</b> covered by seafood policy</b>	Associated Grocers, Bulkley Valley Wholesale, Buy-Low Foods, Choices Market, Meinhardt Fine Foods, Natures Fare Markets, Nesters Market, Pricemart Foods, Pure Integrative Pharmacy, Quality Foods, Urban Fare, Van-Whole Produce



Note: This is the first time that Seafood Progress has profiled Pattison Food Group. Save-On-Foods and Buy-Low Foods were profiled separately from 2018-2023, but are now both owned by [Pattison Food Group](#).

## ✗ THE BAD

- Very low engagement on human rights questions.
- Lowest scoring retailer overall at 14%, and by far the lowest scoring retailer on the human rights questions at 5%.
- Sustainable Seafood Policy is very outdated and not well embedded due to overall decentralized operations.
- Sustainable Seafood Policy does not cover any shelf stable, health, beauty, pet food or garden products and appears to only apply to Save-On-Foods (one of thirteen of its store chains).
- Does not have a full chain traceability policy in place to support its Sustainable Seafood Policy, despite reporting annually to SeaChoice since 2018 that it is in the works.
- The only retailer to not have a human rights policy, and to not publish its Supplier Code of Conduct.
- Does not verify supplier compliance against its Sustainable Seafood Policy or Supplier Code of Conduct.
- No tangible plans to adopt a human rights due diligence process that incorporates worker perspectives.

## ✓ THE GOOD

- Overall adequate and timely engagement with SeaChoice on its Sustainable Seafood Policy.

## 🔍 SEAFOOD INVESTIGATIONS

Pattison Food Group (PFG) 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 Supplier Code of Conduct, amid growing evidence of abuse in global seafood supply chains. While none of PFG's stores were 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, a supplier of Save-On-Foods' private label seafood – [Premier Marine Canada](#) – was. Correspondence between Outlaw Ocean and Premier Marine can be found [here](#). Various third-party seafood brands that are commonly sold in PFG's stores were also implicated (e.g., [Aqua Star](#), [High Liner](#) and [Toppits](#)).

# ENVIRONMENTAL

KPI 1.1  
ENGAGE

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

Pattison Food Group provided adequate and timely responses to most questions related to its [Sustainable Seafood Policy](#) and practices.

SCORE  
60% **D**

KPI 1.2  
SCOPE

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

Pattison Food Group (PFG) received the second lowest score on this indicator at 13%. PFG informed SeaChoice that, since amalgamating Buy-Low Foods and Save-On-Foods under PFG, the retailer has deferred to [Save-On-Foods' Sustainable Seafood Policy](#) (which is very outdated with goals stated to be achieved in 2016). The Policy covers some fresh and frozen products, but does not cover any shelf stable, health, beauty, pet food or garden products. The application of the Policy depends on how integrated the store banner is under the PFG umbrella, and reporting how much of its seafood meets its Policy is challenging given the decentralized buying structures across store banners (personal communication, PFG, 16/01/2025). Finally, PFG declined to share revenue and sales data around its seafood products with SeaChoice.

OVERALL  
SCORE\*  
23% **F**



### DIRECT PRODUCTS

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

SCORE  
31% **F**



### INDIRECT PRODUCTS

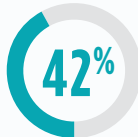
Third-party and private label health, beauty, pet food and garden products that contain seafood ingredients (examples [HERE](#)).

SCORE  
0% **F**

SHELF  
STABLE



FROZEN



FRESH



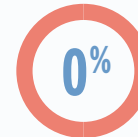
HEALTH  
e.g. fish oil



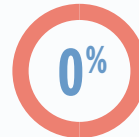
BEAUTY  
e.g. collagen



PET FOOD  
e.g. cat food



GARDEN  
e.g. fertilizer



- **PRIVATE LABEL BRANDS**  
Products that retailers sell and own.
- **THIRD-PARTY BRANDS**  
Products that retailers sell but do not own.
- **UNBRANDED PRODUCTS**  
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.

**KPI 1.3  
VERIFICATION**

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

Pattison Food Group (PFG) scored 'o' on this indicator as it does not have a full chain traceability policy in place to support its [Sustainable Seafood Policy](#). Prior to being amalgamated under PFG, Save-On-Foods (now PFG's largest store banner) has reported to SeaChoice on an annual basis from 2018-2023 that it is working on implementing a full chain traceability policy to support its Sustainable Seafood Policy. Pattison Food Group's [2023 Forced Labour Report](#) states: "In 2023, we continued the process of seeking out and evaluating options for systems and/or standardized processes that can provide visibility and traceability in our products' supply chains. Given that our companies procure but do not directly produce our goods for sale and considering the significant number of products in our stores (hundreds of thousands), this is a highly complex, challenging and thorough exercise."



**KPI 1.4  
STRATEGY**

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

Pattison Food Group (PFG) score 'o' on this indicator as only its fresh and frozen seafood products are in scope across some store banners, it does not verify supplier compliance against its [Sustainable Seafood Policy](#), and there is no timebound commitment to cover the remaining products and store banners under its Policy. PFG informed SeaChoice that it has worked with its NGO partner, Ocean Wise, for several years to evaluate all of its Save-On-Foods sourcing and make changes to more sustainable options over time. PFG prioritizes based on volume and work to avoid and eliminate any species of significant concern. PFG continues to evaluate sourcing based on fishery-specific information, including species, catch methods and season (personal communication, PFG, 18/02/2025). PFG considers itself in the beginning stages of integrating procurement policies (including its Sustainable Seafood Policy) across all store banners. This is a challenging process due to variances in current buying structures across banners (personal communication, PFG, 16/01/2025).



**KPI 1.5  
GOVERNANCE**

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

Pattison Food Group (PFG) received the lowest score across all retailers on this indicator at 33%. PFG informed SeaChoice that responsibility and accountability currently varies by banner, as some banners are fully integrated in the larger PFG supply chain, and others are not yet. In general, the responsibility to ensure policies are met rests with the procurement teams of the banner and category, and the ESG team has a role in reviewing progress against policies and any significant decisions that would impact the fulfillment of those policies. All policies have commitment from the highest levels of the organization (personal communication, PFG, 18/02/2025).



**HUMAN RIGHTS**

**KPI 2.1  
ENGAGE**

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

Pattison Food Group (PFG) scored below average on this indicator as it only provided partial responses to some questions related to its human rights policy and practices.



**KPI 2.2  
VERIFICATION**

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

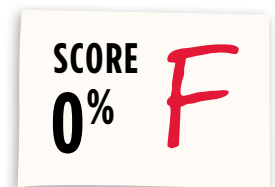
Pattison Food Group (PFG) scored 'o' on this indicator as it expects suppliers to abide by its Supplier ESG Responsibility Standards and Procedures Document (acts as its Supplier Code of Conduct) but does not verify compliance. PFG is the only retailer to not have a publicly available human rights policy and to not publish its Supplier Code of Conduct. PFG's [2023 Forced Labour Report](#) indicates that its Supplier Code of Conduct was very recently established in 2023. PFG informed SeaChoice that, over the past few years, it has been working to ensure suppliers sign on to policies, and understanding where they are in terms of their due diligence processes. The company does not currently audit suppliers, and does not have a timeline in mind for doing so (personal communication, PFG, 16/01/2025).



**KPI 2.3  
STRATEGY**

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

Pattison Food Group (PFG) achieved a score of 'o' on this indicator as it does not verify supplier compliance against its Supplier ESG Responsibility Standards and Procedures Document (not public), and did not report plans to incorporate worker perspectives into its human rights due diligence process in relation to seafood. PFG's [2023 Forced Labour Report](#) states: "We are at the relative beginning of creating formalized processes and policies to address forced labour and child labour in the supply chains of the products we procure." PFG informed SeaChoice that it has been looking into how to execute and integrate supply chain mapping and risk assessment for some time. The company claims it has been able to further resource this area over the past year to make gains in its capacity. The growing awareness of human rights issues in extended supply chains further emphasizes this need. PFG is currently evaluating the most feasible and effective means to verify working conditions related to seafood (personal communication, PFG, 20/02/2025).



**KPI 2.4  
GOVERNANCE**

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

Pattison Food Group (PFG) scored 'o' on this indicator as it does not verify supplier compliance and therefore is not in a position to deem anyone responsible for tracking progress against its Supplier ESG Document. Furthermore, PFG did not indicate who is held accountable for ensuring the objectives of the Document are met, or if there is a discrete budget in place for this work specific to seafood. PFG informed SeaChoice that its sourcing team is responsible to ensure its suppliers have acknowledged and accepted PFG's ESG Terms & Conditions. These were developed by the ESG and Legal team and has alignment with the highest levels of the organization (personal communication, PFG, 18/02/2025).



# SCORING METHODOLOGY



PHOTO: Freepik

This scoring methodology is comprised of nine key performance indicators (KPIs) and divided into two sections. The first section focuses on retailers’ sustainable seafood policies and practices and is comprised of five KPIs. The second focuses on retailers’ human rights policies in relation to seafood and is comprised of four KPIs. The scoring differs from past Seafood Progress methodologies in that it considers product categories previously out of the assessment scope (e.g. pet food, health and beauty products containing seafood ingredients), and explores the application of and strategy behind retailers’ human rights policies in relation to seafood. The methodology also reflects the extent to which retailers engaged with SeaChoice to inform their profiles.

## ENVIRONMENTAL INDICATORS

### KPI 1.1 ENGAGE

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

<b>0%</b>	The retailer did not respond to any communications or no survey responses were provided.
<b>20%</b>	The retailer responded to communications and provided partial responses to some questions.
<b>40%</b>	The retailer met with SeaChoice and provided adequate responses to most questions.
<b>60%</b>	The retailer met with SeaChoice and provided adequate and timely responses to most questions.
<b>80%</b>	The retailer met with SeaChoice and provided comprehensive and timely responses to most questions.
<b>100%</b>	The retailer met with SeaChoice and provided comprehensive and timely responses to all questions.

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

### DIRECT PRODUCTS

Fresh, frozen and shelf stable products where seafood is the primary component.

CATEGORY		RETAILER'S RESPONSE		
<b>SHELF STABLE</b>	<b>PRODUCTS</b>	<b>STORES</b>	<b>AVERAGE SCORE</b>	
Private label	All   Some   None   N/A	All   Some   None   N/A	(Product points + Store points) / 2 = %	
Third Party	All   Some   None   N/A	All   Some   None   N/A	(Product points + Store points) / 2 = %	
Unbranded	All   Some   None   N/A	All   Some   None   N/A	(Product points + Store points) / 2 = %	
<b>AVERAGE SCORES</b> (Shelf only)	Product points / total applicable categories = <b>Product %</b>	Store points / total applicable categories = <b>Store %</b>	(Product % + Store %) = <b>Average %</b>	
<b>FROZEN</b>	<b>PRODUCTS</b>	<b>STORES</b>	<b>AVERAGE SCORE</b>	
Private label	All   Some   None   N/A	All   Some   None   N/A	(Product points + Store points) / 2 = %	
Third Party	All   Some   None   N/A	All   Some   None   N/A	(Product points + Store points) / 2 = %	
Unbranded	All   Some   None   N/A	All   Some   None   N/A	(Product points + Store points) / 2 = %	
<b>AVERAGE SCORES</b> (Frozen only)	Product points / total applicable categories = <b>Product %</b>	Store points / total applicable categories = <b>Store %</b>	(Product % + Store %) = <b>Average %</b>	
<b>FRESH</b>	<b>PRODUCTS</b>	<b>STORES</b>	<b>AVERAGE SCORE</b>	
Private label	All   Some   None   N/A	All   Some   None   N/A	(Product points + Store points) / 2 = %	
Third Party	All   Some   None   N/A	All   Some   None   N/A	(Product points + Store points) / 2 = %	
Unbranded	All   Some   None   N/A	All   Some   None   N/A	(Product points + Store points) / 2 = %	
<b>AVERAGE SCORES</b> (Fresh only)	Product points / total applicable categories = <b>Product %</b>	Store points / total applicable categories = <b>Store %</b>	(Product % + Store %) = <b>Average %</b>	
<b>DIRECT PRODUCT SCORES</b> (All Direct)	<b>PRODUCTS</b>	<b>STORES</b>	<b>AVERAGE SCORE</b>	
	Average Product %	Average Store %	Combined Average %	

### SCORING RATIONALE

All - 1 point, Some - 0.5 point,  
None - 0 point, N/A - removed from scoring

**COMBINED SCORES BY CATEGORY:** (Total product points + Total store points) / 2 = Average %

**DIRECT PRODUCTS OVERALL SCORE:** (Combined scores shelf stable + frozen + fresh) / 3 = Average %

**INDIRECT PRODUCTS OVERALL SCORE:**  
(Combined scores health + beauty + pet food + garden) / 4 = Average %

**\*OVERALL SCORE:** Direct product overall score (weighted at 75%) + Indirect product overall score (weighted at 25%) = Average %

### DEFINITIONS

#### PRIVATE LABEL BRANDS

Products that retailers sell and own.

#### THIRD-PARTY BRANDS

Products that retailers sell but do not own.

#### UNBRANDED PRODUCTS

Products that retailers typically own but that do not have a brand on pack (e.g. fillets sold through deli counters).

*Notes: The none/some/all non-dichotomous approach to scoring is limited in that a response of 'some' does not consider variances in sales volumes by product category, brand type or store.*

*Direct products encompass some indirect products where seafood is not a major ingredient (e.g., prepared meals, chips, dressings, oils, etc).*

*The decision was made to not score retailers on reported sales volumes and revenues.*

*\*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.*

## INDIRECT PRODUCTS Health, beauty, pet food and garden products that contain seafood ingredients (examples [HERE](#)).

CATEGORY	RETAILER'S RESPONSE		
<b>HEALTH</b>	<b>PRODUCTS</b>	<b>STORES</b>	<b>AVERAGE SCORE</b>
Private label	All   Some   None   N/A	All   Some   None   N/A	(Product points + Store points) / 2 = %
Third Party	All   Some   None   N/A	All   Some   None   N/A	(Product points + Store points) / 2 = %
Unbranded	All   Some   None   N/A	All   Some   None   N/A	(Product points + Store points) / 2 = %
<b>AVERAGE SCORES</b> (Health only)	Product points / total applicable categories = <b>Product %</b>	Store points / total applicable categories = <b>Store %</b>	(Product % + Store %) = <b>Average %</b>
<b>BEAUTY</b>	<b>PRODUCTS</b>	<b>STORES</b>	<b>AVERAGE SCORE</b>
Private label	All   Some   None   N/A	All   Some   None   N/A	(Product points + Store points) / 2 = %
Third Party	All   Some   None   N/A	All   Some   None   N/A	(Product points + Store points) / 2 = %
Unbranded	All   Some   None   N/A	All   Some   None   N/A	(Product points + Store points) / 2 = %
<b>AVERAGE SCORES</b> (Beauty only)	Product points / total applicable categories = <b>Product %</b>	Store points / total applicable categories = <b>Store %</b>	(Product % + Store %) = <b>Average %</b>
<b>PET FOOD</b>	<b>PRODUCTS</b>	<b>STORES</b>	<b>AVERAGE SCORE</b>
Private label	All   Some   None   N/A	All   Some   None   N/A	(Product points + Store points) / 2 = %
Third Party	All   Some   None   N/A	All   Some   None   N/A	(Product points + Store points) / 2 = %
Unbranded	All   Some   None   N/A	All   Some   None   N/A	(Product points + Store points) / 2 = %
<b>AVERAGE SCORES</b> (Pet food only)	Product points / total applicable categories = <b>Product %</b>	Store points / total applicable categories = <b>Store %</b>	(Product % + Store %) = <b>Average %</b>
<b>GARDEN</b>	<b>PRODUCTS</b>	<b>STORES</b>	<b>AVERAGE SCORE</b>
Private label	All   Some   None   N/A	All   Some   None   N/A	(Product points + Store points) / 2 = %
Third Party	All   Some   None   N/A	All   Some   None   N/A	(Product points + Store points) / 2 = %
Unbranded	All   Some   None   N/A	All   Some   None   N/A	(Product points + Store points) / 2 = %
<b>AVERAGE SCORES</b> (Garden only)	Product points / total applicable categories = <b>Product %</b>	Store points / total applicable categories = <b>Store %</b>	(Product % + Store %) = <b>Average %</b>
	<b>PRODUCTS</b>	<b>STORES</b>	<b>AVERAGE SCORE</b>
<b>INDIRECT PRODUCT SCORES</b> (All Indirect)	<b>Average Product %</b>	<b>Average Store %</b>	<b>Combined Average %</b>

## OVERALL SCORES

	PRODUCTS	STORES	AVERAGE SCORE
<b>OVERALL SCORES</b> (Direct + Indirect, all categories)	<b>Average Product %</b> (Direct + Indirect, all categories)	<b>Average Store %</b> (Direct + Indirect, all categories)	<b>Combined Average %</b> (Direct + Indirect, all categories)

**KPI 1.3  
VERIFICATION**

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

<b>0%</b>	The retailer does not have a <sup>1</sup> full chain traceability policy in place (or policy applies to private label seafood only) and does not verify supplier compliance against its sustainable seafood policy.
<b>33%</b>	The retailer has a <sup>1</sup> full chain traceability policy in place that applies to all seafood (including third party brands), but does not verify supplier compliance against its sustainable seafood policy.
<b>66%</b>	The retailer has a <sup>1</sup> full chain traceability policy in place that applies to all seafood (including third party brands), and all suppliers of <sup>2</sup> high-risk products are issued self evaluations on at least an annual basis. The information collected in these surveys is verified through additional sources, which is part of a due diligence process.
<b>100%</b>	The retailer has a <sup>1</sup> full chain traceability policy in place that applies to all seafood (including third party brands), and all suppliers of <sup>2</sup> high-risk products are issued self evaluations and are required to undergo <sup>3</sup> traceability spot checks on at least an annual basis.

- 1 A full chain traceability policy to support a sustainable seafood policy should trace at least the scientific name, geographic origin, farmed or wild, and gear type or farming method.
- 2 Products associated with higher risk geographies, species, and production/harvest methods.
- 3 Random checks on high-risk products to determine a supplier’s ability to provide documentation of their full supply chain from the vessel or farm.

*Notes: The traceability spot check requirement could inadvertently reward retailers for relying on proof of certification documentation to verify compliance against sustainable seafood policies. As several reports have identified, certified products are being associated with environmental crimes as well as social crimes. Therefore, it is important to note that beyond conducting these spot checks, retailers need to follow a due diligence approach to sourcing.*

**KPI 1.4  
STRATEGY**

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

<b>0%</b>	Some or all of the retailer’s private label fresh and frozen seafood products are in scope across some or all store banners, the retailer’s approach to verification is absent or unclear and/or its sustainable seafood policy is subject to significant conditions, and there’s no timebound commitment to include remaining products and/or store banners.
<b>20%</b>	Some or all of the retailer’s private label direct seafood products are in scope across some or all store banners and the retailer’s approach to verification is clear, but there’s no timebound commitment to include remaining products and/or store banners.
<b>40%</b>	Some or all of the retailer’s private label direct seafood products are in scope across some or all store banners and the retailer follows a <sup>1</sup> risk-based approach to verification, but there’s no timebound commitment to include remaining products and/or store banners.
<b>60%</b>	Most or all of the retailer’s direct seafood products are in scope across most or all store banners and the retailer follows a <sup>1</sup> risk-based approach to verification, but there’s no timebound commitment to include remaining products and/or store banners.
<b>80%</b>	All of the retailer’s direct seafood products are in scope across all store banners, the retailer follows a <sup>1</sup> risk-based approach to verification, and there’s a timebound commitment to include indirect seafood products.
<b>100%</b>	All of the retailer’s direct and indirect seafood products are in scope across all store banners and the retailer follows a <sup>1</sup> risk-based approach to verification.

- 1 An approach to verification that focuses on products associated with higher risk geographies, species, and production/harvest methods.

**KPI 1.5  
GOVERNANCE**

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

<b>0%</b>	The retailer has not deemed any person or department responsible or accountable.
<b>33%</b>	The retailer clearly holds one person or department responsible and/or accountable.
<b>66%</b>	The retailer clearly holds at least two people or departments responsible and accountable.
<b>100%</b>	The retailer clearly holds at least two people or departments responsible and accountable, and a discrete budget is dedicated to the work.



**HUMAN RIGHTS INDICATORS**

**KPI 2.1  
ENGAGE**

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

<b>0%</b>	The retailer did not respond to any communications or no survey responses were provided.
<b>20%</b>	The retailer responded to communications and provided partial responses to some questions.
<b>40%</b>	The retailer met with SeaChoice and provided adequate responses to most questions.
<b>60%</b>	The retailer met with SeaChoice and provided adequate and timely responses to most questions.
<b>80%</b>	The retailer met with SeaChoice and provided comprehensive and timely responses to most questions.
<b>100%</b>	The retailer met with SeaChoice and provided comprehensive and timely responses to all questions.

**KPI 2.2  
VERIFICATION**

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

<b>0%</b>	The retailer expects suppliers to abide by its Supplier Code of Conduct but does not verify compliance.
<b>25%</b>	The retailer issues suppliers of <sup>1</sup> high-risk products a self assessment that reflects its Supplier Code of Conduct on at least an annual basis, and this information is verified through additional sources.
<b>50%</b>	The retailer requires Tier 1 suppliers of private label seafood to undergo risk-based audits, but does not investigate the upstream supply chains of its third-party brand suppliers.
<b>75%</b>	The retailer requires all suppliers (including third-party brands) to undergo vessel and farm level risk-based audits.
<b>100%</b>	In addition to or instead of risk-based audits, the retailer conducts an enhanced investigation of <sup>1</sup> high-risk products across all suppliers (including third-party brands) in consultation with local stakeholders (e.g., engaging with unions or worker representative organizations to understand worker perspectives).

<sup>1</sup> Products associated with higher risk geographies, species, and production/harvest methods.

*Notes: Though most retailers have some type of grievance mechanism in place, SeaChoice was unable to determine the effectiveness of these tools and who is able to access to them. Additionally, according to [FishWise](#), while grievance mechanisms are a standard practice in any comprehensive human rights due diligence (HRDD) implementation, they are only one part of a worker engagement strategy. This is because such tools identify issues after they have occurred, where comprehensive HRDD has a broader mandate which includes proactively mitigating risks and preventing issues from occurring.*

**KPI 2.3  
STRATEGY**

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

<b>0%</b>	The retailer did not provide a response, and no public information.
<b>25%</b>	The retailer relies on third-party certifications and/or social audits to verify private label seafood supplier compliance against its human rights policy.
<b>50%</b>	The retailer recognizes the limitations of certifications and audits as a means of verifying supplier compliance against its human rights policy and is actively exploring worker driven approaches to verification for private label suppliers only.
<b>75%</b>	The retailer recognizes the limitations of certifications and social audits as a means of verifying supplier compliance against its human rights policy and is actively exploring worker driven approaches to verification for all suppliers (including third-party brands).
<b>100%</b>	The retailer has made a clear commitment to incorporate worker perspectives into its human rights due diligence process for all seafood suppliers (including third-party brands) to mitigate risks and prevent human rights violations from occurring in its seafood supply chains.

**KPI 2.4  
GOVERNANCE**

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

<b>0%</b>	The retailer has not deemed any person or department responsible or accountable.
<b>33%</b>	The retailer clearly holds one person or department responsible and/or accountable.
<b>66%</b>	The retailer clearly holds at least two people or departments responsible and accountable.
<b>100%</b>	The retailer clearly holds at least two people or departments responsible and accountable, and a discrete budget is dedicated to the work.

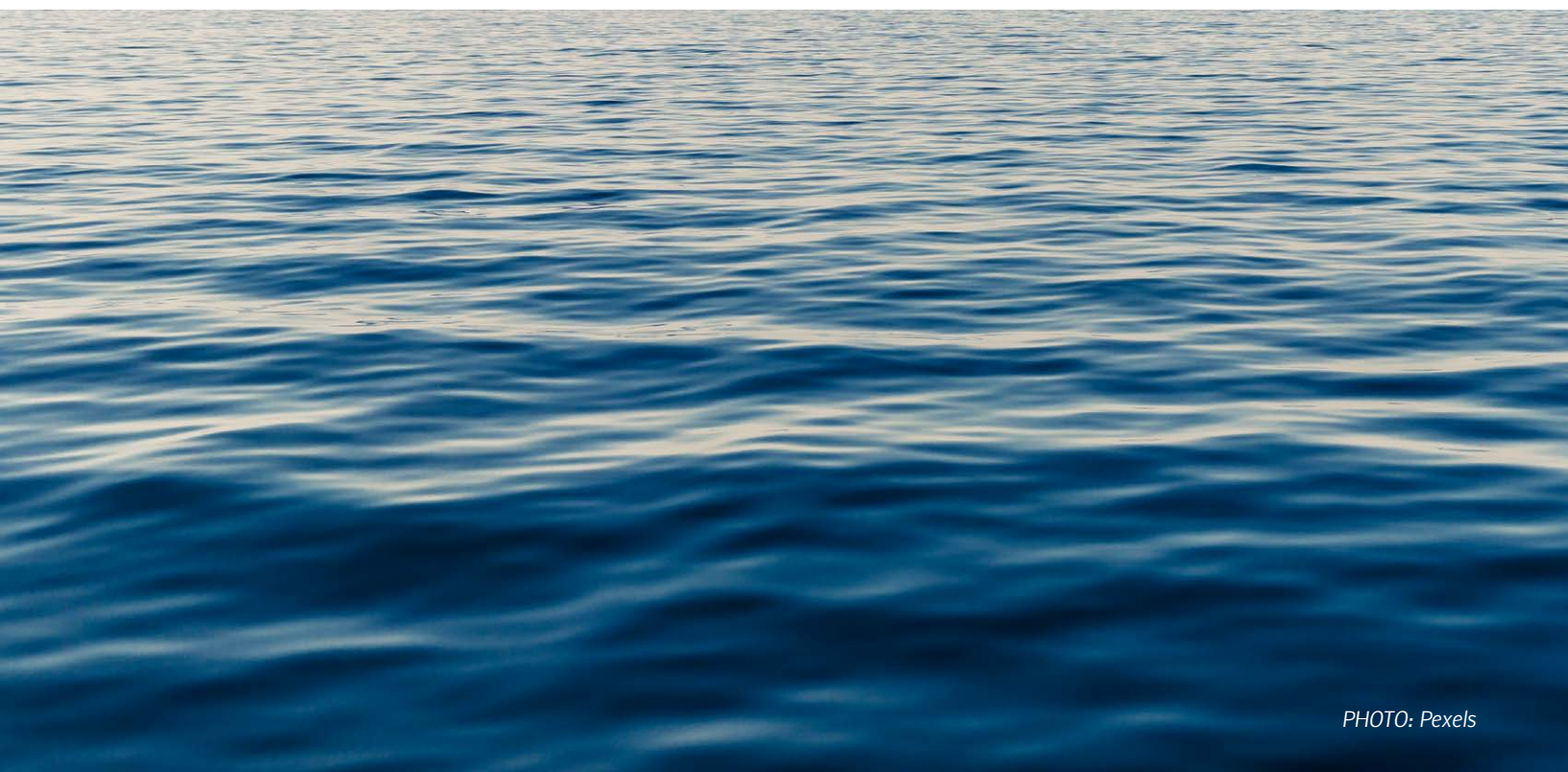


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# SeaChoice.org

Please contact SeaChoice  
for more information.

[seachoice.org](http://seachoice.org)  
[info@seachoice.org](mailto:info@seachoice.org)

