

3rd EDITION

The High Cost of Cheap Tuna

US Supermarkets,
Sustainability, and
Human Rights at Sea



Greenpeace is an independent campaigning organization that uses peaceful protest and creative communication to expose global environmental problems and to promote solutions that are essential to a green and peaceful future.

Published August 2024 by
Greenpeace USA
1300 I (Eye) Street NW
Suite 1100 East
Washington, DC 20005
Tel: (202) 462-1177

Authors: Charli Fritzner - *US Project Lead, Global Fisheries* and Nick Ritchie - *Research Contractor*

Editors: Charli Fritzner - *US Project Lead, Global Fisheries*; Steph Taylor - *Senior Oceans Campaigner* and Tanya Brooks, *Senior Strategic Communications Specialist*

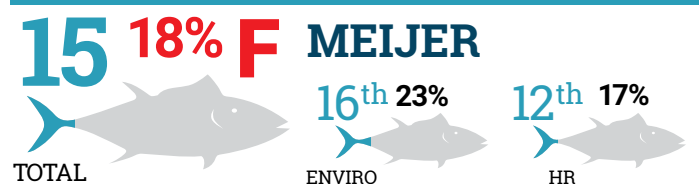
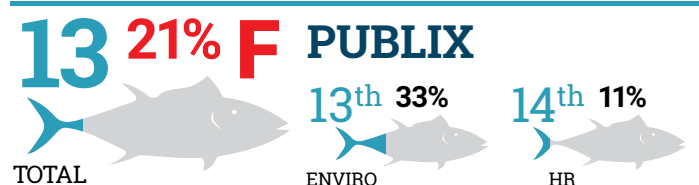
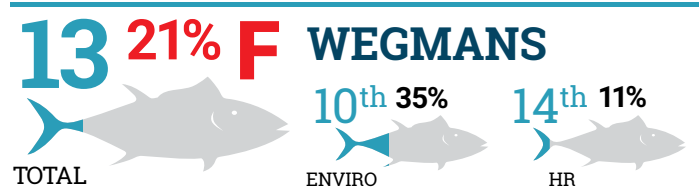
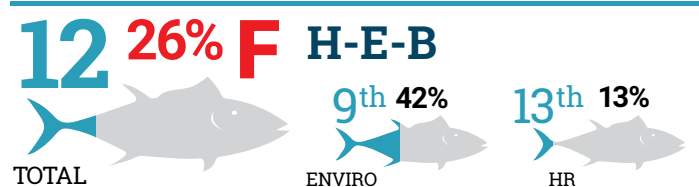
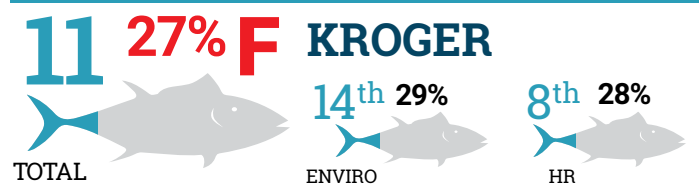
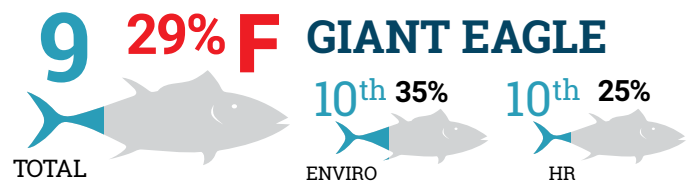
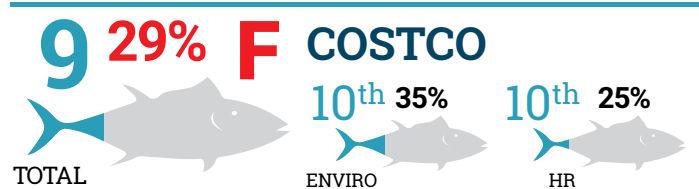
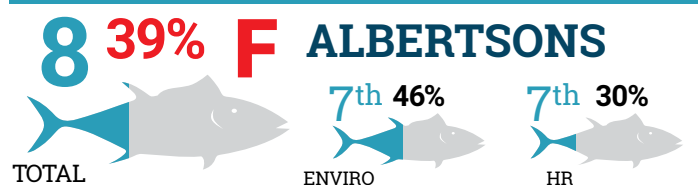
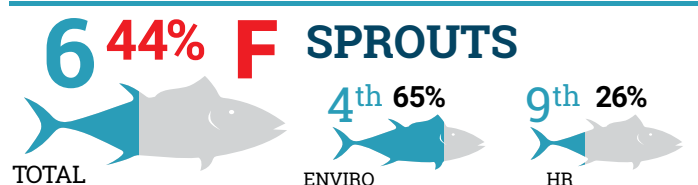
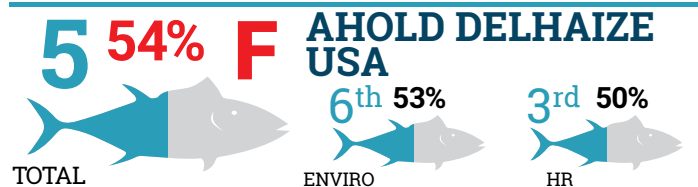
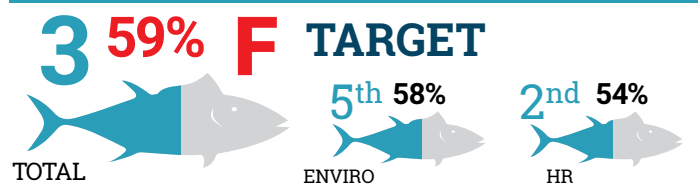
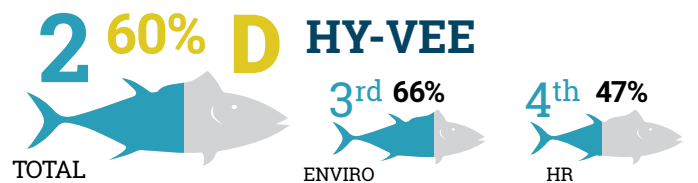
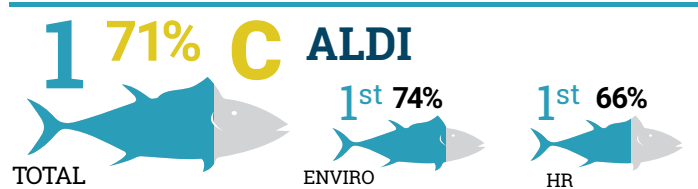
Design by: Kyle Mckibbin

Cover © Ronny Sen / Greenpeace

greenpeace.org

* Greenpeace Inc. is a registered Internal Revenue Service 501(c)(4) nonprofit entity that operates in the United States of America.

2024 Tuna Retailer Scorecard



NOTE: Percentage is rounded off to the nearest whole number.
ENVIRO: Total score for all questions in the survey related to environmental issues.
HR: Total score for all questions in the survey related to human rights & labor issues.

Introduction

In Greenpeace USA's third scorecard measuring the human rights and sustainability practices of 16 major US supermarkets' tuna supply chains, only two retailers achieved a passing score.

Since the last report, there are signs of progress and improvements for some retailers, though there is still a significant and concerning gap between where these retailers' human rights and sustainability practices and policies are and where they need to be to effectively address these critical issues.

The United States is one of the world's largest consumer tuna markets.¹ Accounting for a significant portion of the \$40 billion USD global industry,^{2,3} US retailers have the economic power to shape and shift the global tuna industry through business practice, sourcing, and global advocacy efforts. They play a key role in determining the human rights outcomes of tens of thousands of workers across the global tuna supply chain.

In the period since the publication of the second edition of the *High Cost of Cheap Tuna* in 2023, there have been numerous investigations and reports that revealed the ongoing issues in the supply chain of seafood that ends up on US shelves and plates. There are approximately 128,000 fishers ensnared in forced labor⁴, fishers who may be stranded at sea for months or even over a year at a time. They are isolated from their families, with no way to alert anyone to their situation while at sea, and largely hidden from sight. There is often an overlap between labor rights abuses and illegal, unregulated and unreported (IUU) fishing activities. Together, these linked issues serve to perpetuate the depletion of tuna stocks, bycatch of marine life caught on tuna lines, and suffering of fishers subject to labor abuses on board.

This year's scorecard shows year-on-year growth, with now two major retailers, Aldi and Hy-Vee, achieving a passing grade and several others following closely behind. These developments show that retailers are increasingly taking responsibility for their entire tuna supply chain, from fishing to the products they offer to consumers.

Nonetheless, much remains to be done. As well as recognizing progress where made, this report lays out the worst performing retailers. Retailers must adopt policies that reflect what science and justice demand, or bear the consequences as consumers make more informed choices to spend their money elsewhere.

Methodology

Since 2008, Greenpeace USA has periodically invited retailers to complete a survey on their policies regarding the sourcing and marketing of tuna and tuna products sold in their stores; we have then graded those responses and compiled them in a report. Prior to 2021, the survey's questions focused exclusively on retailers' environmental and sustainability policies; last year, the questionnaire expanded to incorporate policies on human rights and labor protections. For 2024, the survey adds two non-point questions to provide more context.

This year's survey contains 39 questions with points across six categories addressing the following issues:

1. Tuna Procurement Policy (20%)



Do retailers have official policies governing the procurement of their tuna that cover environmental and human rights issues? For example, do they only buy tuna from suppliers that recruit workers through formal channels that do not charge them recruiting fees? Are those workers guaranteed a local living wage? What policies do they have in place to ensure the safety and well-being of workers on their suppliers' tuna vessels? What is their policy on procuring tuna from vessels that engage in transshipment at sea? Do they buy any tuna from "red" or "yellow"-listed fisheries? Is all their tuna Marine Stewardship Council certified or from a Fishery Improvement Program? This section does not address the practical steps being made to enforce these policies, merely whether such policies in fact exist.

2. Traceability (20%)



Can retailers trace all their tuna back to the individual vessel that caught it? Will they commit to making lists of those vessels public? How can retailers guarantee that their suppliers are providing the tuna they say they are and that that tuna is caught in the manner and under the conditions their suppliers claim? If so, how?

3. Advocacy and Initiatives (10%)



Do retailers publicly advocate for fisheries reform, improved management, and stronger guarantees of workers' human and labor rights? If so, how? Do they add their name to group letters sent to fisheries organizations or do they involve themselves in discussions with individual governments or relevant United Nations agencies? Do they source their tuna from vessels with democratic and independent trade unions?

4. Human Rights and Labor Protections (25%)



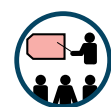
What due diligence do retailers pursue to ensure that suppliers are meeting their commitments to human rights and labor protections? Do they have senior staff assigned to follow these issues? Do they have systems in place to regularly identify human rights risks and impacts? What kind of grievance and remediation mechanisms are available to workers? How do they deal with suppliers when and if abuses are discovered?

5. Current Sourcing (20%)



Do retailers stock any tuna of threatened species, from problematic fisheries, or from brands that have a history of using either of the above? What is the percentage of their tuna that is caught by various sustainable and less sustainable methods? To what extent do they consider how their purchasing practices might affect the human and labor rights of workers in the supply chain?

6. Customer Education and Labeling (5%)



What information do they provide to enable consumers to make informed choices?

Each question was assigned a maximum point value, and responses were scored accordingly. The score totals were aggregated, and each section was weighted to provide a final percentage score.

In addition, every question (across all categories) was also classified as pertaining either to environmental issues, human rights issues, or both. For instance, some questions in the tuna procurement policy category related to environmental sustainability policies, others to human rights policies, and some, such as those pertaining to companies' stands on transshipment, were classified as pertaining to both. As a result, in addition

to the final percentage score, each retailer received an overall environmental score (marked as “ENVIRO” in the scorecard), and an overall human rights score (marked as “HR” in the scorecard). The full survey that was sent to retailers can be found in the Appendix.

We recognize that human and labor rights and environmental policy are complex and evolving fields that encompass a broad range of issues — including domestic and global politics, socioeconomics, migration, climate change, and resource management — and impact a wide spectrum of actors, from small business owners and corporations to migrant fishers, seafood processors and western consumers. We recognize also that there is always subjectivity involved in policy decisions and the assessment of those decisions. With this in mind, we have striven to be fair and, where appropriate, to give companies the benefit of the doubt, particularly where clear effort and engagement has been made and signs of progress are evident. To this end, Greenpeace USA’s goal is not to expose and shame; rather, it remains, as it has been since Day One, to highlight, for both retailers and customers, the problems with existing supply chain policies, as well as the solutions to correct them.

When it comes to the responsiveness of companies, this year 9 of 16 companies responded to our questions — Ahold Delhaize USA, Albertsons, Aldi, Giant Eagle, Hy-Vee, The Kroger Company, Sprouts Farmers Market, Target, and Whole Foods — provided detailed responses to our questionnaire. We have taken the answers of these responsive companies in good faith and not sought to rigorously verify statements or claims made in response. Policies and their contents were verified — but verifying detailed, supply chain information is beyond the scope of this report. The “non-responsive companies” — Costco, HEB, Publix, Walmart, Trader Joe’s, Meijer, and Wegmans — elected not to complete a survey. We therefore scored them on publicly available policies and statements, online inventory searches, working group membership, and other factors. The accuracy and detail of those assessments can best be refined in future versions of this report through greater cooperation and responsiveness on the part of those retailers.

Scoring

90-100% = **A**

80-89% = **B**

70-79% = **C**

60-69% = **D**

≤59% = **F**

Results & Findings

SCORES OVERVIEW

Results At A Glance

TOTAL SCORES:

- Two retailers — Aldi and Hy-Vee — received passing scores.
- Aldi topped the rankings with an overall score of 71% or a C when converted to a letter grade.
- Trader Joe's was last with 12%, closely followed by Meijer (17%), Wegmans (18%), and Publix (18%).

ENVIRONMENT SCORES:

- Five retailers — Aldi (70%), Ahold Delhaize USA (51%), Hy Vee (63%), Sprouts (63%) & Whole Foods (67%) — received passing Environmental scores.

HUMAN RIGHTS SCORES:

- All but one retailer — Aldi (64%) — received failing Human Rights scores.
- All retailers scored worse on Human Rights than Environment.

Two retailers received passing scores

This year, Aldi retained its top rank with a score of 71%, earning a C grade – an improvement of 9% from its D rating in 2023. With improvements over the past year in both its Human Rights and Environmental scores, this progress is certainly welcome, but there remains considerable room for further improvement.

Hy-Vee, which ranked fourth in last year's scorecard with a mark of 50%, showed improvement across the board to earn a score of 60%, joining Aldi as one of only two retailers to receive a passing grade. This progress is largely due to Hy-Vee's increased emphasis on supply chain traceability and product chain of custody.

Among the middle-performing cohort (35%-59%), there is a general improvement in scores, which is encouraging. Target, Whole Foods, Sprouts, and Albertsons all substantially increased their scores or made minor but still notable changes in their policies. Target demonstrated considerable improvement between successive scorecards, showing a willingness to adapt and modernize its approaches to tuna supply chains in the areas of worker rights and sustainability. Whole Foods was also a top performer in this category of retailers, increasing its score by 8 percentage points, leaving it just short of joining Aldi and Hy-Vee in the passing group.

Changes since the last scorecard

Although the overall range of scores may not seem promising at first glance, a comparison with past scorecards reveals a consistent trend of improvement for the majority of retailers. Notable progress has been made by Aldi, Target, Hy-Vee, and Whole Foods, while others showed more modest gains. This upward trend indicates a shift towards responsible, ethical, and sustainable business practices, and a greater focus on preserving ocean health.

Since Greenpeace USA began surveying companies on their sustainable sourcing policies over a decade ago, there has been wider adoption-or at least acknowledgement-of key policies such as phasing out transshipment at sea, Fisheries Improvement Projects (FIPs), and fishing methods that reduce bycatch. Recently, the importance of providing free, accessible, and private Wi-Fi on board has gained mainstream recognition. This connectivity is crucial for fishers to communicate not only with their families and friends but also with unions and authorities while at sea for extended periods.

Overall, there is some movement towards integrating human and labor rights into retailer supplier policies. This shift is essential to address the realities and challenges along the tuna supply chain, from the recruitment of fishers and conditions on board ships to processing plants across the globe. As retailers profit from goods like tuna, they also bear responsibility for what takes place along the entire supply chain before these products reach their shelves or seafood sections. This growing awareness and accountability are promising for both the environment and workers. However, these efforts must continue and accelerate to address these pressing issues effectively.

The Worst Performers

This year, half of all retailers scored 35% or lower. Among them are Trader Joe's (12%), Meijer (18%), Publix (21%), Wegmans (21%), HEB (26%), Kroger (27%), and Costco (29%) and Giant (29%). As with last year, every retailer scored worse on human rights than on environmental and sustainability policies.

While these retailers have policies that mention human rights and sustainability, they lack measurable time-bound plans for improvement or for alignment with internationally recognized frameworks such as the United Nations Guiding Principles on Business and Human Rights. Additionally, most rely heavily on third-party or supplier-led initiatives for social, product, and transparency audits. This approach is not an effective substitute for direct engagement with workers across their supply chains and does not adequately address the implementation and monitoring of grievance and remediation mechanisms for affected workers.

Despite years of guidance from international bodies, academic and NGO research, shocking media exposés, and increasing consumer awareness, many businesses are still failing to act on their responsibilities. Others have made promises or set goals without attaching timelines or implementing tangible practices for their realization.

FINDINGS

The good

Almost Every Retailer Has Some Kind of Policy in Place

For sustainable seafood or tuna policies, a number of retailers explicitly feature not sourcing from “red” fisheries according to the Monterey Bay Aquarium or from any company that engages in shark finning. It is worth noting that trade in shark fins is illegal in the USA,⁵ but not in all countries. As such, it is important that companies do take the measures to not source from companies that engage in shark finning to limit this destructive practice. Though only three (Hy-Vee, Giant Eagle, and Sprouts) included language in support of marine reserves and marine protected areas.

In terms of human rights, all retailers surveyed apart from Trader Joe’s have a standalone human rights/labor policy that covers all of their tuna procurement. Having a policy is a key first step, but it is a first step.

Our Asks: We ask that supermarkets have a sustainable/responsible seafood sourcing policy and a standalone human rights/labor policy that covers 100% of tuna procured across all categories (fresh, frozen and shelf-stable) and sold in all stores. For more information, see [Q1-6](#) in the Appendix.

Many Retailers Are Able to Trace Tuna

Aldi, Giant Eagle, HEB, Publix, Sprouts, Wegmans and Target state in their response or on their publicly accessible information that they are able to trace every shop keeping unit (SKU) of tuna on their shelves. While encouraging to see Target increase its coverage of tuna that they can trace, it was disappointing to see Ahold Delhaize USA and Giant Eagle go from 100% of their SKU tuna being traceable in the last scorecard to between 90% and 99%. Whole Foods now also sits in this bracket, with canned tuna being fully traceable but this not extending to other types.

For full traceability, Hy-Vee remains the only retailer to commit to publishing and then to actually publish its full vessel list. This is a commendable measure that goes beyond simple promises of transparency for consumers and does more to deliver it. That Hy-Vee continues to publish its list shows once again that it is possible for retailers to take this step if they decide to.

Our Asks: We ask that supermarkets are able to trace 100% of tuna (fresh, frozen and shelf-stable) down to the individual vessel that caught the fish and that they commit to publicly publish a list of those vessels. For more information, see [Q15-16](#) in the Appendix.

The bad

Little Human Rights Due Diligence to Ensure Policies Are Adhered To

There remains a significant lack of progress in the area of human rights due diligence, with a continued overreliance on third-parties or social audits. On human rights due diligence processes, there was a clear group of the retailers who have such a process, which is aligned with the UN Guiding Principles on Business and Human Rights (UNGPs), like Ahold Delhaize USA, Aldi, Hy-Vee, Kroger, Target, and Whole Food; even Albertsons which implements a due diligence framework to complement social audits for over 75% of its tuna suppliers. And the rest had nothing in the way of a UNGP-aligned human rights due diligence process.

Our Asks: We ask that retailers move beyond third party audits and instead institute comprehensive human rights due diligence processes that cover 100% of their supply chain and that align with the UN Guiding Principles on Business and Human Rights to identify, prevent, mitigate and account for how they address their negative impacts on human or labor rights. These processes must involve meaningful engagement with workers in their design, implementation, and governance. *For more information, see [Q22-33](#) of the Appendix.*

International Standards Not Being Upheld

For workers' contracts, none of the retailers were able to provide in their response or publish on their own sites examples of contracts that comply with ILO core labor standards and ILO Convention No. 188 across all of their tuna suppliers. Though Aldi and Sprouts do apply this for some of their suppliers. Others assert that contracts are written in a language that the worker understands, a reasonable expectation for any contract.

Only Aldi and Hy-Vee make explicit commitments to the International Bill of Human Rights, the ILO Core Conventions, and the C188 - Work in Fishing Convention. While Aldi also includes a commitment to uphold the UNGPs. That more progress has not been made to ensure that supplier practices and tuna sourcing catch up to these international standards is disappointing.

Our Asks: Retailers must preferentially source tuna from vessels that use Port States that have ratified and implemented the ILO Work in Fishing Convention and that effectively conduct labor inspections under the provisions of the convention; and/or from companies with independent, democratic trade unions and that respect their workers' rights to collectively bargain and engage in union activities. *For more information, see [Q7](#) of the Appendix.*

Lack of Workers' Voice and Grievance Mechanisms

Only one retailer, Ahold Delhaize USA, currently has a policy to offer a safe and anonymous mechanism through which workers can raise complaints or concerns regarding human rights issues, ensuring that all of their tuna suppliers publicly disclose online and in all of their labor contracts the procedures for their employees to file grievances that are secure, anonymous, and confidential, free from threat of retaliation. Plus ensuring that there is a protected avenue for workers to take their complaint to the level of the retailer themselves if the issue is not adequately dealt with by the supplier itself.

Additionally, no retailers were able to show that they source any real percentage of tuna from vessels with democratic and independent trade unions.

Our Asks: We ask that retailers ensure that workers have access to secure, anonymous, confidential, and independent complaints mechanisms with strong protections against retaliation. While an effective grievance mechanism must be in place at the level of the supplier, a means must also exist by which workers or their representatives can take a complaint up to the level of the buyer, if not resolved by the supplier. *For more information, see [Q28-29](#) in the Appendix.*

Few Limits on Transshipment at Sea

Transshipment at sea — in which fish or marine wildlife is transferred from one vessel to another, enabling the fishing vessel to stay out at sea longer — is a major issue in global commercial fisheries. This is a practice that allows fishing vessels to remain at sea for months or even years, and which is linked to both forced labor risk and Illegal, Unreported and Unregulated (IUU) fishing.

Ahold Delhaize USA, Aldi, Albertsons, Giant Eagle, Hy-Vee, Sprouts and Target claim to allow transshipment at sea only when there is 100 percent observer coverage. What we see in reality is that observer coverage remains extremely low. While there are nascent endeavors to enhance this with electronic monitoring in the form of video surveillance such as that seen in the Tuna Transparency Pledge, more needs to be tested and the issue of human and labor rights abuses remains largely unaddressed. This policy, at the very least, is to some extent better than having no policy on transshipment at all, which is the case for virtually every other retailer.

Our Asks: We ask that retailers commit to completely phasing out buying fish from companies that allow transshipment. *For more information, see [Q8](#) of the Appendix.*

Conclusion

The road to actual accountability and real sustainability is often paved with good intentions and promises to do better. For the retailers in this survey, sustainability and human rights policies are often based on notions that in 3 or 5 years, their business practices will align with industry best-practices. However, with the depletion of ocean life and the suffering of workers happening now, these extended timelines are simply not addressing the issues with the urgency that science and justice demand. Retailers must not only strive to emulate current best-practices promptly but also proactively engage with domestic and international governments and bodies to advocate for stronger labor protections and sustainability in the global tuna sector.

The scorecard results reveal many signs of improvement in the retailer tuna supply chain. Comparing the current scores of 14 retailers to their previous years shows a discernible trend of improvement, with only two retailers' scores declining. Among the top performing retailers, the trend of improvement is even more pronounced. With Aldi, Target, Hy-Vee, and Whole Foods making significant scoring gains this year, there are now two retailers that have passed Greenpeace USA's rigorous tuna scorecard and two others that are close.

It is encouraging to note that most retailers have made some efforts to improve their tuna supply chains by creating policies that consider human rights and environmental concerns to a greater or and lesser extent in their tuna procurement policies. However, for many retailers, their dedication to addressing these issues does not extend beyond publishing such policies. Many fail to communicate if or how they have made measurable time-bound progress towards developing and implementing due diligence frameworks that align-even in part-with the United Nations Guiding Principles on Business and Human Rights.

Moreover, regarding social, product, and transparency audits, many retailers remain entirely reliant on the outcomes of third-party or supplier-led initiatives. This suboptimal approach allows some suppliers to act with impunity and at their own discretion while pacifying retailers by appearing to take remedial action. Additionally, this complete lack of direct engagement with workers throughout supply chains leaves many of the retailers included in this report powerless to implement or monitor grievance and remediation mechanisms that ensure safety and anonymity for workers. The continued lack of policy clarity, and strategic opacity that is apparent across many of the retailer's human rights policies only serves to placate impressionable consumers while imperiling the broader fishers labor rights movement.

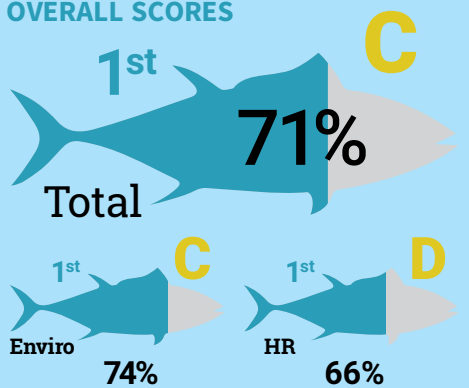
Retailers can and should take steps such as increasing advocacy efforts at domestic and international policy level, advocating for the UN Oceans Treaty, working with suppliers and local government agencies to ensure better protections for source-country workers, and adding better in-store customer education materials and package labeling to help consumers make informed purchases.

Smaller retailers have often spearheaded crucial initiatives left unaddressed by larger corporate conglomerates. However, larger retailers like Costco, Walmart, Albertsons, and Kroger, with their significant market power, have a considerable opportunity to drive substantial progress and position themselves as leaders in the sustainability and labor rights movement. Greenpeace USA urges these larger retailers to move beyond making promises and take more concrete steps to influence broad change in the industry.

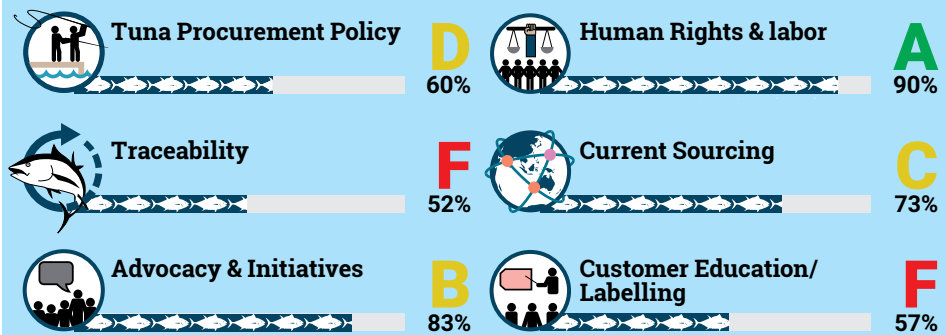
Retailer Profiles

ALDI

OVERALL SCORES



SECTION SCORES



For the third year running, Aldi placed first overall amongst all other retailers. In this edition, Aldi saw an impressive increase in year on year scoring (9%). This increase can be attributed to Aldi's increased performance across the **Traceability**, **Human Rights and Labor Protections**, and **Current Sourcing** categories. On **Traceability**, Aldi's practice of conducting product traceability exercises at production facilities, random product checks, as well as supplementing third-party traceability audits in order to address and combat fish fraud was notable.

Not only is Aldi able to score points in most categories due to the substance of its policies, but for a large part, Aldi continues to be successful each year due to the public communication of the work it does, and the frameworks it adheres to. In its policy Aldi mentioned that it preferential sources from tuna suppliers that source from Fish Aggregating Devices-free (FAD-free) purse seine vessels, and longline fishing vessels that utilize best practices to mitigate bycatch.⁶ Bycatch minimization strategies like this are enforced by Aldi as it works towards having bycatch-free supply chains by 2030.⁷

On **Human Rights and Labor Protections**, Aldi's improved score is reflected by its efforts to further maintain its due diligence program alongside its Corporate Responsibility Supplier Evaluation (CRSE) program.⁸ Aldi's commitment to upholding various internationally-recognized human rights instruments, as well as fundamental rights at work across all activities in its supply chain, including the UNGPs, is noteworthy.⁹

PROS: Aldi should also be commended for being the only retailer on this scorecard to actively advocate for a living wage for the workers in its supply chains and, for including explicit mention of the need for documentation of worker payments from its suppliers.¹⁰ Additionally on worker rights, Aldi's Business Partner Sustainability Standards outline that its business partners must respect workers rights to freedom of association, collective bargaining, and their right to elect representatives to form or join trade unions.¹¹

With respect to worker recruitment across supply chains, in its International Policy on Forced Labor, Aldi maintains that the terms of all worker contracts must be clear, transparent, and set forth in a language that the worker fully understands. Moreover, in an effort to reduce modern slavery and indentured labor, Aldi abides by an 'Employer Pays Principle', which stipulates that only legally licensed recruitment agencies may be used to recruit workers, and that any costs borne from recruitment must be shouldered by the employer, and not by a prospective employee.¹²

In the **Tuna Procurement Policy** section, Aldi scored well for having comprehensive, publicly available seafood and human rights policies. Additionally, Aldi picked up points for those policies making specific reference to various internationally-recognized human rights instruments,¹³ and for providing considerate detail regarding the various sustainability pledges, initiatives, and organizations that Aldi is a party to in respect to its tuna sourcing.¹⁴

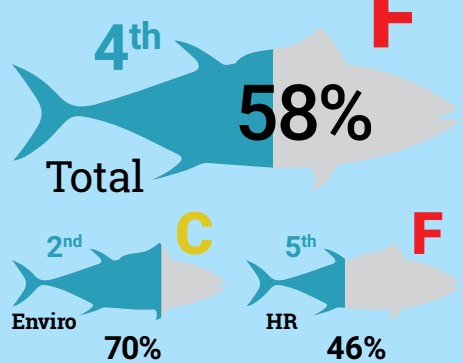
Moreover, among the numerous positive standouts across Aldi's swath of policies applicable to its scoring in this report, Aldi's alignment with and commitment to the aforementioned internationally recognized instruments set them apart from the vast majority of other retailers. For example, Aldi's International Forced Labor Policy, which explicitly covers all stages of its supply chain, is guided by a number of international standards including the UN Guiding Principles on Business and Human Rights, and numerous International Labor Organization conventions too.^{15,16} In this sense, Aldi truly sets a best-practice standard in this domain; a standard that many other retailers could adopt.

Additionally, it is commendable that Aldi has implemented an annual Corporate Responsibility Supplier Evaluation (CSRE) program, that it conducts in a positive manner with its suppliers in order to support long-term relationships with them. For those who demonstrate a strong commitment to continuous improvement Aldi prioritizes allocating a majority of its supply-side business to these suppliers.¹⁷

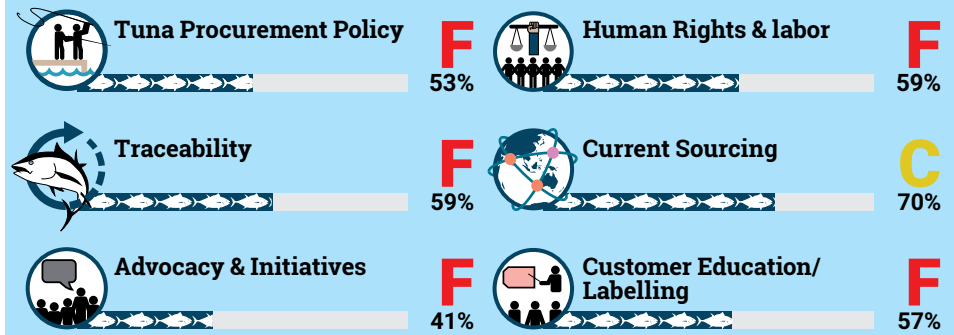
CONS: While Aldi's recognition of grievance mechanisms is present, it does rely heavily on third party organizations. These third party organizations cannot be substituted for a robust internally-developed framework.

With respect to transshipment, despite Aldi mandating 100% observer coverage in all instances where this practice takes place, it is nonetheless discouraging that Aldi continues to allow it. Many difficult to mitigate human rights and environmental issues continue to be associated with the practice of transshipment; and, given the historical attention this issue has received from rights groups it is imperative that retailers like Aldi develop an explicit standalone transshipment policy or stance. That being said, Aldi does deserve recognition for its 'ALDI Sustainability Assessments (ASAs)', wherein the retailer conducts traceback exercises with the express purpose of linking Aldi products with their sources.

OVERALL SCORES



SECTION SCORES



In this edition of the scorecard, Whole Foods was able to add 8 percentage points to its overall score in comparison to last year's report.

In Whole Foods' update of their retailer's Supplier Code of Conduct (2023),¹⁸ it is encouraging to see explicit language used that requires worker's contracts to be provided in clear, understandable language, and delivered in a manner understood by the worker.¹⁹ Additionally, Whole Foods is among a handful of retailers to have implemented a sufficient human rights due diligence process that applies to all of the tuna suppliers in its supply chain and aligns with the UNGPs.²⁰

However, despite Whole Foods' Sustainability Report and Supplier Code of Conduct making reference to various International human rights instruments, such as the International Labor Organization's (ILO) Core Conventions, the UNGPs, and the International Bill of Human Rights, the retailer's two key documents omit any mention of the ILO's C188 Work in Fishing Convention, an essential commitment for any retailer dedicated to a thorough due diligence standard.

Consistent with previous years, Whole Foods has continued to score highly across most environmental categories. As such, this year, Whole Foods came second overall on this area, behind only Aldi. On its **Customer Labeling**, Whole Foods is more transparent with its customer base.

Whole Foods deserves commendation for its engagement and citation of relevant materials published through various not-for-profit channels. In its survey, Whole Foods cited one of Greenpeace Southeast Asia's reports, Forced Labor at Sea (2019 and 2021),²¹ as a key source for review in determining whether companies or vessels associated with labor risks were part of its tuna supply chains. In light of similar reports, and the pervasiveness of human rights risks across many tuna supply chains, Whole Foods has committed to conduct a saliency assessment this year to aid in identifying any key human rights risks connected to its business. It should be noted however, that no additional points were awarded to Whole Foods this year for providing this information.

PROS: This year, Whole Foods scored markedly better across the **Human Rights and Labor Protections** section of the survey. While nearly all retailers had some form of policy in place, few of those policies contained such a high level of detail or made robust reference to international instruments. Whole Foods also deserves commendation for including language in its policies that regard worker voice, engagement, and remediation mechanisms. Additionally, this year it appears as though Whole Foods has implemented more thorough assessments of the potential for human rights risks across its supply chains; and, as mentioned above, has even committed to conduct a saliency assessment to identify any unknown human rights risks connected to its business.

With respect to **Current Sourcing**, Whole Foods stipulates that all of its canned tuna must be sourced from pole and line, troll, and handline fisheries that use an industry-leading 'one-by-one' catch method.²² Additionally, the source fishery must either be MSC certified or be rated green or yellow by Monterey Bay Aquarium (MBA)'s Seafood Watch fisheries tracker.²³ On this note, although unrelated to any scoring rubric, Whole Foods is a signatory on the Bali Declaration in support of one-by-one fisheries in Indonesia.

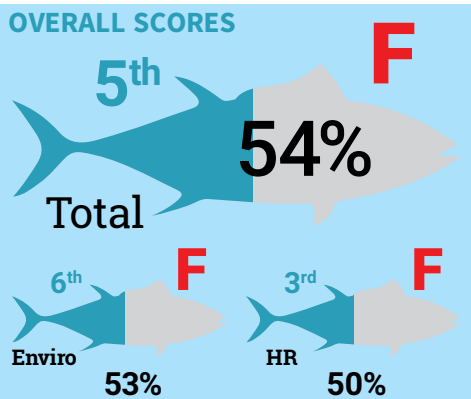
On **Traceability**, Whole Foods can boast an industry-leading approach that requires every tuna supplier to use electronic tracing software that tracks each catch of tuna at every point across the supply chain, from vessel to can.²⁴

CONS: The most significant shortfall across all of Whole Foods policies is the absence of a currently operable grievance mechanism. And, despite there being some processes in place for communicating how the retailer addresses human rights, these processes are not fully aligned with the UNGPs on Business and Human Rights. One core attribute of a safe, anonymous, and accessible due diligence mechanism is that those who access and use it must not be exposed to any consequent risks. And, although Whole Foods is confident in the safety of its current mechanism, these deliverables cannot be guaranteed.

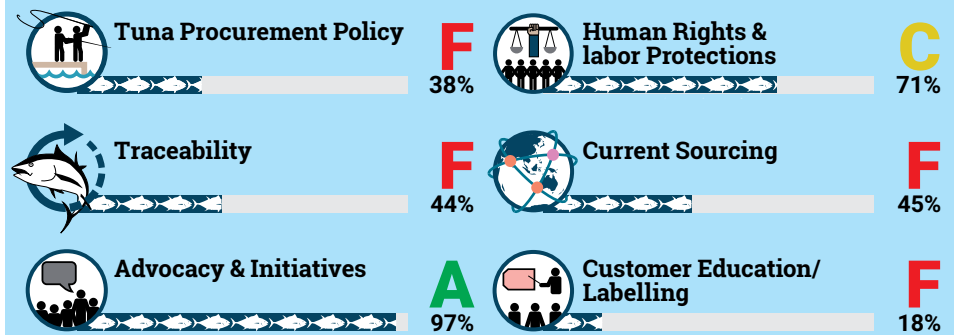
That being said, Whole Foods has advised that this year it is piloting a grievance mechanism project for seafood industry workers in Thailand in collaboration with the Issara Institute. Further, it commits that the insights and results of this trial will support the ongoing development of its human rights due diligence processes. Moreover, Whole Foods has committed to building the public reporting and communication capacity regarding potential human rights risks involved in its supply chains.

On **Current Sourcing**, this year Whole Foods scored less well reflecting the introduction of products utilizing less environmentally-friendly catch-methods. Last year the retailer only sourced tuna that had been caught via pole and line or troll and handline methods, the two most widely recognised sustainable methods. However, this year, it seems the retailer has begun stocking tuna products caught via longlines and longlines with bycatch mitigation devices.

OVERALL SCORES



SECTION SCORES



This year, Ahold Delhaize USA dropped a percentage point due to a slight decrease in traceability. This was due to the retailer no longer being able to trace every SKU of tuna down to the vessel level; something that they claim to have been able to do in previous years.

In other areas related to traceability, however, Ahold was able to score rather well. Additionally, to combat IUU, Ahold mandates that tuna suppliers must be able to provide evidence that they are purchasing from legal fishing vessels. On this front, Ahold deserves commendation for its continued monitoring and identification of environmental and human rights risks across its supply chains.

In the previous edition of this report, Greenpeace USA recognized the strength, depth, and transparency of Ahold's 2022 Human Rights Report;²⁵ primarily because Ahold is among only a handful of retailers to make reference to international human rights instruments, and express concern for migrant workers in its supply chains.²⁶

Ahold does well in **Advocacy and Initiatives**, sending more letters to key policy makers in support of labor reform in the tuna and fisheries sectors than any other retailer has.

As part of Ahold's Code of Ethics, it has implemented an access to remedy process that plays both an integral and effective part in its human rights due diligence framework. A key part of this framework is the company's "Speak Up Line", a free and accessible local ethics helpline that is accessible 24/7 in the local languages of all countries in which Ahold operates.²⁷

Ahold also deserves recognition for its work to incorporate the UNGPs on Business and Human Rights across all of the brands and stores associated with the Ahold Delhaize family.²⁸ However, with reference to tuna supply chains, more work could be done to implement the International Labor Organisation's Work in Fishing Convention (C188), of which there is no mention within Ahold's policies.

PROS: As mentioned in previous years, Ahold's 2021 Human Rights Report proved to be a positive step in the right direction; and the follow up to this report, released in 2022, further built upon Ahold's commitment towards improving its approach to human rights across its supply chain.²⁹ In line with this, Ahold formally communicates its human rights due diligence process via this report as well as through standalone policies; and, this process aligns with the UNGPs.

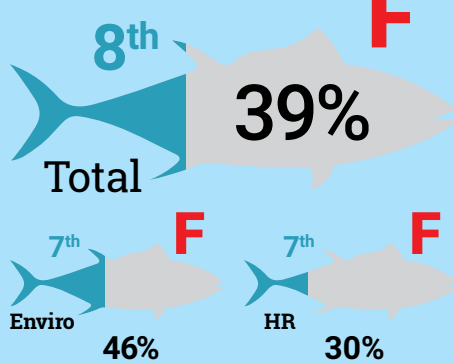
In the **Tuna Procurement Policy** section, Ahold remains one of the only companies to express an explicit commitment to collective bargaining rights and a freedom of association for workers across its supply chains.³⁰ This issue has come to the forefront across various seafood industries in recent years, as many workers seek to unionize. In the **Human Rights and Labor Protections** section, Ahold's human rights due diligence process remains considerably more modern and detailed than many other retailers, a few of which have no related standalone policies at all.

CONS: Overwhelmingly Ahold's scores related to catch methods in the **Current Sourcing** section leave much to be desired. In comparison to previous years, the share of tuna sourced from pole and line, troll, and handline has decreased substantially while sourcing from purse seine (with the use of FADs) and longlines without bycatch mitigation measures has gone up dramatically. These more destructive and less targeted methods of fishing remain a persistent threat to wild marine life.

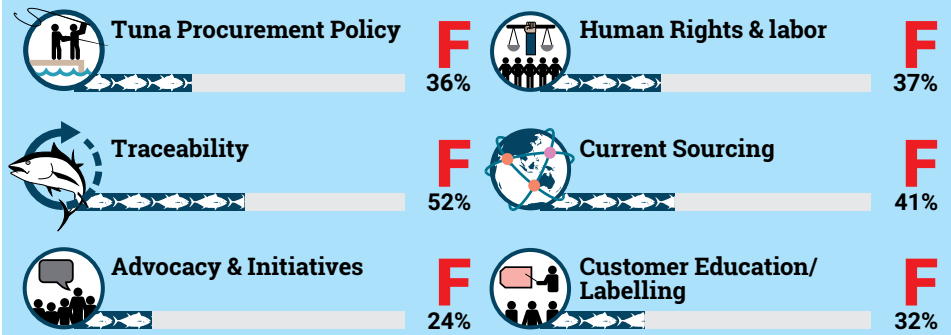
Ahold has made considerable strides in recent years to add thorough and considered policies that function to protect workers along its supply chain, and an implementation of either or both of these suggestions would further strengthen the company's already strong human rights policies.

Albertsons

OVERALL SCORES



SECTION SCORES



This year, Albertsons was only able to add an additional 3 percentage points to its previous score. Largely these extra points were awarded due to the retailer building on its previous efforts to ensure the well-being and safety of at-sea tuna vessel workers.

Albertsons began to consult and engage with workers along its supply chains during impact risk assessments, improving its scoring in the **Human Rights and Labor Protections** section for beginning. Although this is a welcome step in the right direction, Greenpeace USA encourages Albertsons to develop this process further and not rely on third party audits.

Greenpeace USA also recognizes that over successive years, Albertsons has made improvements in data collection and is able to provide data on shelf-stable tuna in addition to fresh and frozen. As such, on traceability the retailer scored quite well for conducting its own audits and for having implemented a traceability and verification system that is able to trace tuna to the vessel level - thus bolstering efforts to combat fish fraud.

Additionally of note, in April of this year Albertsons signed on to The Nature Conservancy's Tuna Transparency Pledge, which aims to advance on-the-water monitoring to 100% of all industrial tuna fishing vessels within each signatory's supply chain by 2027. The pledge aims to drastically curb IUU, and reduce bycatch and the killing of endangered, threatened and protected species.³¹ It should be noted however, that the signing of this pledge has not meant the allocation of any additional points to Albertsons this year as none of the goals or initiatives are yet realized.

PROS: It is commendable that Albertsons has a transshipment policy that makes reference to various international human rights instruments related to vessel and crew safety and worker protections, such as the Cape Town Agreement and the ILO's Work in Fishing Convention (C188).³² Due to an increase in communication of these policies and how they protect at-sea workers, Albertsons was able to pick up points this year in the **Tuna Procurement Policy** section of the survey. Unfortunately, Albertsons' policy on transshipment does not include any explicit language that signals the phasing out of this controversial practice; and, instead opts for guardrails and regulations for its suppliers that continue to engage in transshipment.

As the largest US-based retailer to partner with Trace Register, Albertsons has made improvements in data collection and is able to provide data on seafood suppliers down to a specific vessel level. During 2023, Albertsons and its seafood suppliers undertook a major transition in an effort to collect data via newer Trace Register software. On this front, Albertsons continues to make progress on its traceability commitments through the implementation of its Due Diligence Plan for traceability; and, in support of its efforts to combat IUU.³³ As such, on traceability the retailer scored quite well for conducting its own audits and for having implemented a verification system that is able to trace tuna to the vessel level - thus bolstering efforts to combat fish fraud.³⁴

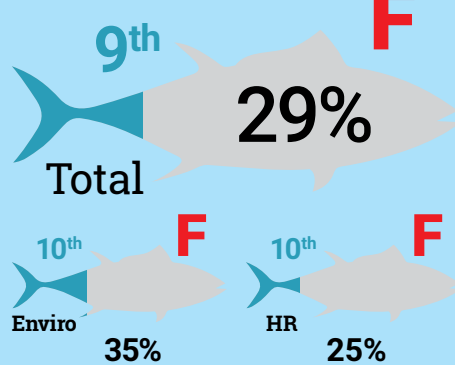
CONS: Similar to other middle-ranking retailers, Albertsons scored well for having some version of a tuna procurement policy in place, but missed out on many points for not making specific reference to various human rights instruments, such as the UN Guiding Principles on Business and Human Rights (UNGP) and ILO Core Conventions. Moreover, despite mentioning the International Bill of Human Rights, and the ILO's C188 in different policies, there is little further mention of how closely Albertsons' own policies align with these instruments, and if they have been fully implemented, or only partially adhered to.

Like other middle-scoring retailers, Albertsons scored rather poorly in the **Current Sourcing** section of the survey too. Despite requiring that its private-brand tuna products are sourced from suppliers that are either Certified by the Marine Stewardship Council or are from fisheries rated Green or Yellow by the Monterey Bay Aquarium's Seafood Watch program, Albertsons continues to stock other brands that are consistently associated with environmental and human rights abuses, thus putting its own internal efforts towards sustainability and adequate human rights protections at risk.

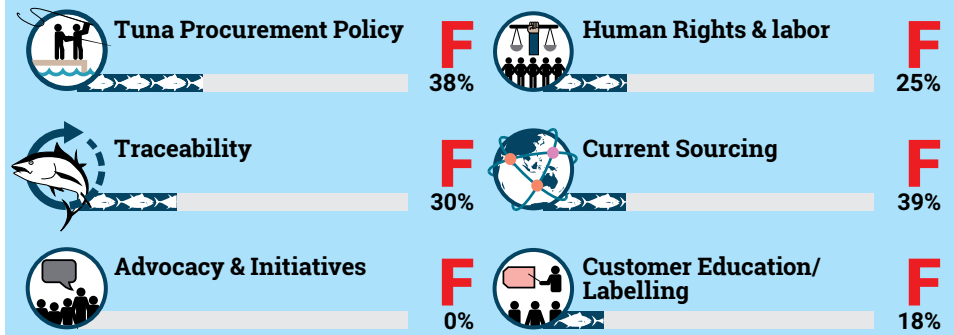
Additionally, Albertsons lost points for continuing to allow most of its private-label tuna to be sourced from suppliers with more indiscriminate catch-methods, such as purse-seine and longlines without by-catch mitigation. Shifting towards FAD-free purse-seine methods, utilizing by-catch mitigation, and preferencing tuna sourced from pole and line or handline caught suppliers would greatly increase Albertsons scoring in this section.

Giant Eagle

OVERALL SCORES



SECTION SCORES



Overall in this year's edition Giant Eagle scored slightly worse than last year, losing percentage points due to backsliding in both the **Traceability** section and the **Advocacy and Initiatives** section of the survey too. Giant Eagle joins Ahold Delhaize USA as the only two retailers on the scorecard to regress from their previous scoring.

Giant Eagle continues to perform poorly in the **Current Sourcing** section of the survey, opting to source from suppliers who utilize sub-optimal catch-methods. Even despite the retailer being a core member of the Sustainable Fisheries Partnership,³⁵ which aims to reduce by-catch and advocate for best-practice catch methods, Giant Eagle continues to source from suppliers utilizing FADs and longline methods without bycatch mitigation devices.

With respect to fish fraud, an issue that is rampant across most tuna supply chains, Giant Eagle declined to answer any related questions. As such, the retailer cannot guarantee that tuna canneries in its supply chain are able to ensure separation of brands, or that vessels in its supply chains are able to guarantee product separation down to the fishing method. Irrespective of pledges signed or partnerships entered into - if a company does not commit to traceability audits of its own tuna supply chains - they remain powerless to combat fish fraud.

Overall however, in the absence of more diligent policies, Giant Eagle's general performance in this survey remains average at best.

PROS: On a promising note, Giant Eagle is aware of the many issues present across tuna supply chains, and communicates its intentions to increasingly address these issues. For example, Giant Eagle is among a handful of retailers that has a standalone tuna policy,³⁶ and has a sufficient Supplier Code of Conduct.³⁷ It has also recently begun working with the World Wildlife Fund and Finance Earth in supporting an anchovy Fishery Improvement Project (FIP) in Chile.³⁸ Additionally, its work with the SFP deserves recognition, and its inclusion in the Ocean Disclosure Project is commendable also.³⁹

Despite unfortunately still allowing transshipment across its supply chains, Giant Eagle explicitly commits to only allowing transshipment-at-sea with 100 percent observer coverage.

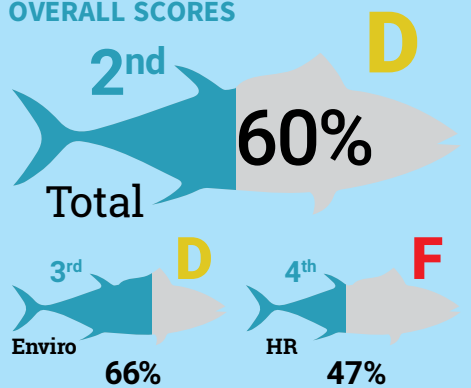
Giant Eagle also has explicit language in support of sourcing as much of its tuna as possible from suppliers with FIPs. Additionally, as previously mentioned the retailer is currently in the early stages of supporting the work of an anchovy FIP in Chile, and has committed to increasing its support of more FIPs in the future.

CONS: Giant Eagle continues to perform poorly in the **Current Sourcing** section of the survey, opting to source from suppliers who utilize sub-optimal catch-methods. Even despite the retailer being a core member of the Sustainable Fisheries Partnership,⁴⁰ which aims to reduce by-catch and advocate for best-practice catch methods, Giant Eagle continues to source from suppliers utilizing FADs and longline methods without bycatch mitigation devices. Additionally, Giant Eagle stocks a considerable number of products from problematic tuna brands that have been historically associated with poor human rights and sustainability practices. Stocking anything that doesn't meet acceptable standards in these domains only works to undermine a retailer's own sustainability efforts, and slows positive progress.

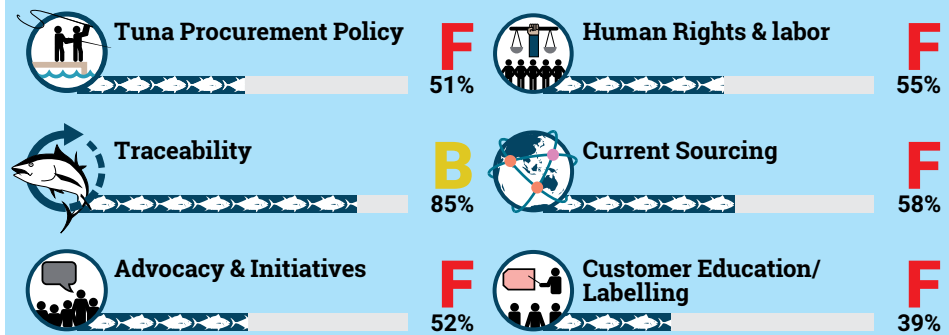
Despite having a standalone Human Rights Statement and a Supplier Code of Conduct, Giant Eagle fails to make explicit reference to internationally recognized instruments such as the UN Declaration of Human Rights, UNGPs, ILO Core Conventions, and the ILO's Work in Fisheries Convention, C188. In addition, in the Human Rights & Labor Protections section, while Giant Eagle cites its work with the Sustainable Fisheries Partnership's Human Rights Risk indicator for identifying human rights risks in their supply chain, this work is not supported by a comprehensive human rights due diligence process, worker engagement, or grievance mechanisms. This issue was perhaps one of the biggest standout failures among all of Giant Eagles' shortcomings as a retailer. The absence of a human rights due diligence framework, and as such the lack of an acceptable grievance mechanism reflects incredibly poorly on any company, especially those engaged directly with industries where human rights abuses are highly prevalent.

Hy-Vee

OVERALL SCORES



SECTION SCORES



Hy-Vee continues to go from strength to strength and continues to modernize and refine all of its existing policies regarding human rights, supply chains, and sustainability. In comparison to its score in 2023, Hy-Vee added 10 percentage points to its score this year, one of the largest overall scoring increases among all retailers.

Attributable in large part to an in-depth and thorough reassessment of many existing frameworks and policies, Hy-Vee was able to score much more highly this year in the **Human Rights and Labor Protections** and the **Advocacy and Initiatives** sections of the survey. Unlike most retailers in this report, Hy-Vee has not only updated its Seafood Procurement Policy within the last year, but it has also made explicit reference in this policy to how its human rights and supplier code of conduct policies interact and accompany one another.⁴¹

As part of the updates to its Seafood Procurement Policy, in 2023 Hy-Vee developed a new Seafood Supply Chain Due Diligence Framework and 3-Year Work Plan in collaboration with its partner FishWise. This framework is designed to align with the UNGPs by assessing potential human rights impacts within its seafood supply chains through verification exercises; and, further by sharing the results and recommendations with its seafood suppliers so that any additional steps are taken to mitigate potential human rights and instances of IUU-fishing.^{42,43}

In addition, Hy-Vee was the only retailer surveyed in this report to provide a full and comprehensive vessel list. This public-facing vessel transparency report, developed in collaboration with Fish Wise, was designed and completed in order to shed light on the complexity of Hy-Vee's tuna supply chains. In carrying-out and publishing this report, Hy-Vee exhibits a remarkable sense of awareness of its own impact in an industry where illegal fishing and human and labor rights abuses regularly occur. Greenpeace commends the retailer for proactively increasing the visibility into its own supply chain with the express purpose of further mitigating the risk of illegal fishing activities while protecting worker rights.⁴⁴ Additionally, Hy-Vee is in the process of completing an update to its vessel list, which will be based on 2023 sourcing data.

PROS: On traceability, Hy-Vee scored highest overall, and was able to add an additional few points this year as a result of its continued practice of internal traceability audits that allow it to trace all tuna back to a vessel level 100% of the time. Hy-Vee's traceability work is rooted in internationally recognized best-practice, and provides a publicly transparent overview that has enabled the retailer to make informed and considered improvements to its human rights policies over successive years.⁴⁵

Additionally, as mentioned previously, Hy-Vee was the only retailer surveyed in this report to provide a full and comprehensive vessel list. In carrying out and publishing this report, Hy-Vee exhibits a remarkable sense of awareness of its own impact in an industry where illegal fishing and human and labor rights abuses regularly occur.⁴⁶

Hy-Vee increasingly advocates for observer protections by encouraging regulatory authorities and their respective observer programs to work together and implement the International Observer Bill of Rights (IOBR) at the Regional Fisheries Management Organization (RFMO) level. RFMOs are multinational governing bodies that play a key role in managing conservation and sustainable management of high seas fisheries.

In the **Current Sourcing** section, Hy-Vee noted that it no longer stocks skipjack tuna from the Indian ocean, and has increased its use of pole and line and troll or handline catch-methods.

In the **Tuna Procurement Policy** section, Hy-Vee once again scored quite high, and stood out for making reference to international protection instruments such as the UNGPs, the International Bill of Human Rights, the ILO Core Conventions, and most importantly the C188 - Work in Fishing Convention. Additionally, Hy-Vee had strong, internationally recognized requirements for its suppliers, including mandated rest times, crew conditions, and health and safety requirements. As such, Hy-Vee scored highest out of all retailers on the steps taken by retailers to ensure the safety and well-being of the workers in the tuna vessels across their supply chains.⁴⁷

They were also one of two retailers to explicitly reference migrant worker rights in their supplier Code of Conduct, and to require that suppliers treat migrant workers the same as in-country nationals - an incredibly rare but vitally important provision.⁴⁸

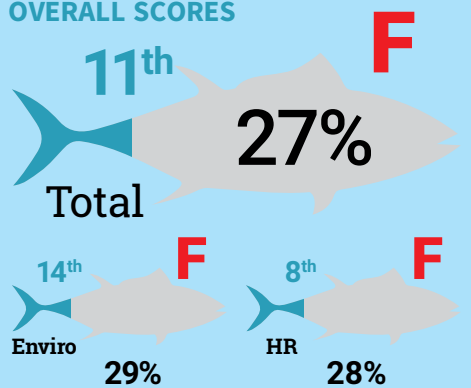
CONS: Although Hy-Vee saw an improvement in its Human Rights score, it scored poorly on questions related to the specific details of its human rights due diligence framework such as remediation, worker engagement, and worker voice. Although the retailer has signaled that its new draft Seafood Supply Chain policy includes a thorough Due Diligence Framework and 3-Year Work Plan that aligns with the UNGPs, there is yet no publicly available proof of this. Hy-Vee has, however, advised that a finalized version of this policy will be published this year.

Additionally, while Hy-Vee has made efforts to familiarize itself with its suppliers' grievance mechanisms, it has yet to establish its own grievance mechanism or mandate an alignment of its supplier's mechanisms with the UNGPs. An internally developed and implemented grievance mechanism would go a long way to better ensuring the safety and protection of workers along Hy-Vee's supply chain.

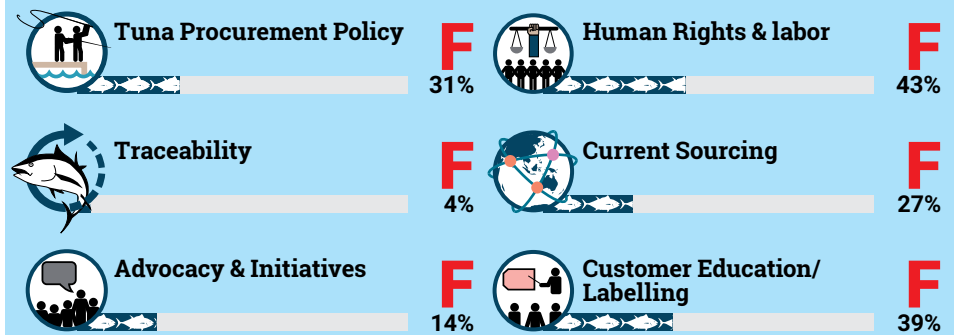
With respect to Hy-Vee's **Current Sourcing** policies, as reflected in its average score across this section of the survey, there is much to be desired regarding preferential catch-methods and bycatch reduction efforts. Unfortunately, Hy-Vee continues to source the majority of its tuna from damaging fishing methods, sourcing well over 90% from purse seine or longline. And, although there has been an encouraging increase in the amount of tuna the retailer sources from pole and line, handline or troll, and longlines with bycatch mitigation devices - there is still too high of a percentage to balance out the positive changes made regarding other catch-methods.

Kroger

OVERALL SCORES



SECTION SCORES



This year, Kroger's score remained exactly the same as last year. Although Kroger saw minor scoring increases in some sections, there were notable decreases in other sections that canceled these gains out.

Despite the addition of a few extra points in the **Tuna Procurement Policy** section, Kroger still continues to perform quite poorly across this entire section, opting to leave many questions blank and unanswered. Although it is commendable that in recent years Kroger has updated its human rights policy to include a commitment to upholding multiple international instruments such as the UNGPs, some Core ILO principles, and the International Bill of Human Rights - its policy simply does not go far enough in explaining how these apply to Kroger's tuna and seafood supply chains.⁴⁹

Another major change that was noticed in Kroger's policies this year is the unfortunate drop in points allocated towards sustainable catch-methods in the **Current Sourcing** section of the survey. According to Kroger's own data, the retailer has overseen a 20% decline in sourcing pole and line caught tuna in favor of an increased reliance on purse-seine catch-methods utilizing free-school and FAD-caught methods. Purse-seine nets, especially those utilizing FADs are associated with a much higher incidence of bycatch in comparison to pole and line methods.

Overall, it seems Kroger is primed to make positive progress on a number of fronts, but has yet to do so. With respect to its Seafood Sustainability Policy,⁵⁰ multiple goals within this policy expired at the end of 2023, and it will be interesting to see whether the retailer communicates how effective it has been in accomplishing these.

PROS: In regard to overall positives, it is encouraging that Kroger has developed and begun implementing its Human Rights Policy (2022), and that it commits to upholding the UNGPs, the International Bill of Human Rights, and the ILO Declaration on Fundamental Principles and Rights at Work.⁵¹ However, despite also mentioning the implementation of a due diligence framework, and a grievance and access to remedy mechanism - Kroger stops short of fully specifying how these key human rights protections have been fully incorporated into its operations and supply chains.

On workers freedom of association, it is encouraging that Kroger includes language in its Vendor Code of Conduct that affirms the retailer's commitment to supporting freedom of association and collective bargaining in its own facilities; but, it is disappointing that the Code of Conduct stops short of extending the same commitment to workers throughout Kroger supply chains.⁵²

Overall, there is a lot of improvement that needs to be made across all of Kroger's policies - however, a good start would be a publicly available update regarding how the retailer is tracking on its commitments for alignment with international human rights instruments, as specified in its 2022 Human Rights Policy.

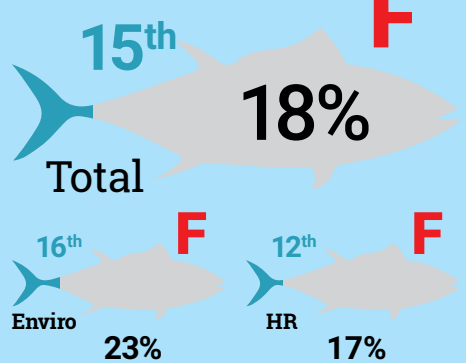
CONS: On **Traceability**, Kroger scored terribly and tied for the worst score among all retailers. Kroger's tracing program remains poorly developed and continues to rely heavily on the International Seafood Sustainability Foundation (ISSF), which does not function as a substitute for a tailored internal traceability policy.

With regard to transshipment, it is extremely disappointing for a company of Kroger's size and influence to leave this issue largely unaddressed.

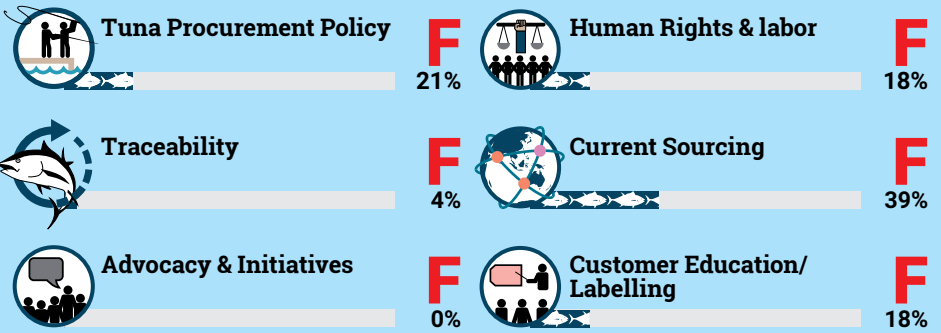
On **Advocacy and Initiatives**, Kroger scored quite poorly too and was among the lowest scoring retailers for this section. Given its size and industry influence It is disappointing that Kroger has made little effort to engage with federal or international bodies in support of greater advocacy and protection for biodiverse marine environments, sustainable fisheries, or greater observer protections. Greenpeace strongly encourages Kroger to make better use of its voice in the community and help drive important improvements across the greater seafood industry.

Meijer

OVERALL SCORES



SECTION SCORES



Overall, Meijer's failings are numerous, and the lack of any coherent standalone policies related to human rights or tuna supply chains is deeply problematic. Moreover, in Meijer's Supplier Code of Conduct,⁵³ which seemingly doubles as a human rights policy, there is no mention of any of the numerous international human rights instruments, such as the ILO Core Conventions, the UNGPs, The International Bill of Human Rights, or the ILO's C188 - Work in Fishing Convention. Additionally, the retailer relies too heavily on supplier audits, and supplier self-reporting of problems within its supply chain. When companies do not have robust internal audit systems in place, and instead rely on third party or supplier self-auditing processes, supply chain abuses become more common and overlooked.

One positive this year was the release of Meijer's updated Supplier Code of Conduct (2023)⁵⁴ and, with it, a mention of support for workers' rights for freedom of association and the implementation of a Grievance Mechanism. Despite there being little additional information surrounding these policies, such as explicit confirmation that these measures are accessible for workers across its supply chains, this is a step in the right direction for Meijer.

PROS: Aside from the development of its standalone 2023 Supplier Code of Conduct, which includes some mention of human rights, freedom of association, and reference to a grievance mechanism - there is little else to be positive about when examining Meijer's currently operable policies.

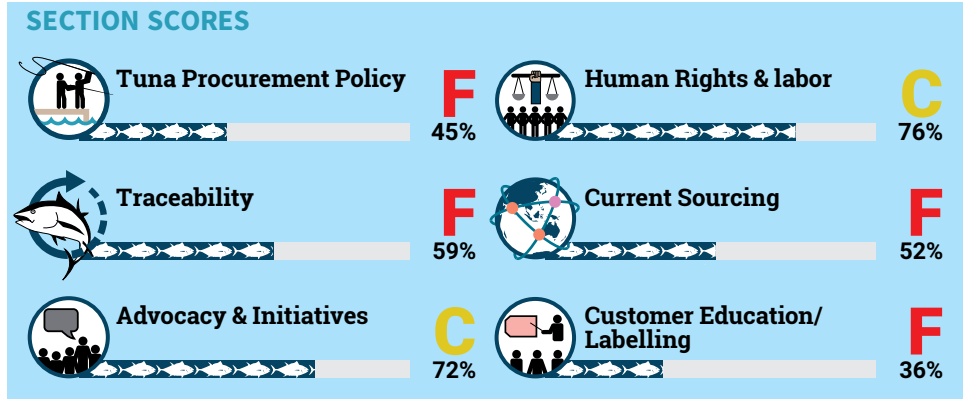
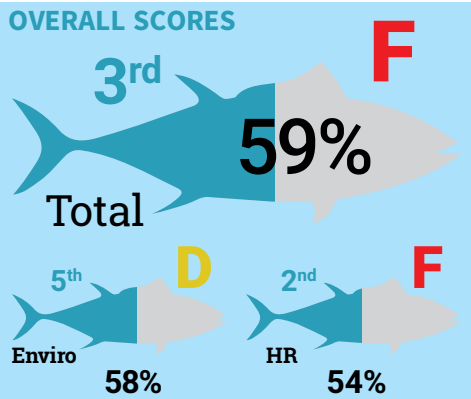
Although the retailer deserves some commendation for its work with the Global Seafood Alliance, and its participation in the Ocean Disclosure Project,⁵⁵ there is no mention of any progress related to these initiatives, or communication of how they have shaped Meijer's policies.

Overall, there is a lot of improvement that needs to be made across all of Meijer's policies, however a good start would be the development of a standalone human rights policy, and better communication of which species its Sustainable Seafood policy covers. In turn, perhaps next year Meijer could expect to see a more substantial increase in scoring.

CONS: Meijer's poor score was largely a result of a lack of information, and a lack of alignment with any internationally recognised frameworks or initiatives. The absence of a shelf-stable tuna policy, or any standalone tuna policy for that matter, greatly harmed Meijer's ability to score any points in the opening section of the survey.

One great failure was Meijer's inability to provide any detail regarding supplier requirements, or really any detail at all about its suppliers in general. There is seemingly no framework in place to trace its own tuna products from vessel to cannery to supplier, nor does the retailer have an internal traceability audit system in place to begin remedying this egregious shortcoming. In such circumstances, retailers remain unable to back up any public advocacy claims they may make in support of sustainability or human rights. Similarly, Meijer does not have a human rights due diligence framework in place, again relying on suppliers to provide information regarding their own practices.

Across the **Current Sourcing** and **Customer Education and Labeling** sections, Meijer performed disappointingly too. Across its entire survey there remains no mention of preferential sourcing for tuna from more sustainable fisheries, nor does Meijer even make reference to any sustainable sourcing certifications it has in place (internal or otherwise).



Easily one of the most notable overall standouts in this year's edition, Target added 11 percentage points to its score this year, achieving the largest single increase in scoring.

This increase was due to higher scores across Target's **Tuna Procurement Policy** and **Advocacy and Initiatives** sections. Attributable in large part to an in-depth and thorough reassessment of many existing frameworks and policies, both of Target's 2023 Sustainability and Governance Report, and Target's draft Commitment to Sustainable Seafood, communicate the retailer's current and future planned initiatives and policies in detail. Additionally, alongside the submitted survey, Target provided a substantial amount of supplementary information, references, and written justification for each of its answered responses.

Over the past year, Target has emphasized a renewed focus on social responsibility, product traceability, worker rights, and a push to counter illegal fishing. Utilizing an internally-facing "Seafood Supply Chain Due Diligence Framework" and a "3-Year Work Plan", this currently operationalized framework aligns with the UNGPs on Business and Human Rights, and applies to all tuna suppliers across Target's supply chain. Implemented from 2023, and ongoing through 2024, these renewed processes and initiatives are reflected in Target's draft "Commitment to Sustainable Seafood" which is expected to be fully implemented by 2025.⁵⁶

PROS: Among the many retailers scored, when assessing vendor supply chains and traceability, Target has made strides to become a leader in this space. One example of this is the implementation of an internally facing Vendor Expectations Letter (an accompanying product to their Seafood Sustainability Commitment), that all seafood vendors sign annually. This letter references both the ILO Core and C188 Work in Fishing conventions.⁵⁷ With further respect to vendors, Target's Commitment to Sustainable Seafood outlines that preferential sourcing is granted to vendors that are members of the International Pole & Line Foundation, are International Seafood Sustainability Foundation participating companies, or have published responsible purchasing policies, and actively work to implement environmental, social responsibility, and traceability initiatives.⁵⁸

Further, for shelf-stable tuna products, Target is committed to sourcing tuna from fisheries that are certified by the Marine Stewardship Council with supply chain traceability, are Green or Yellow rated according to the Monterey Bay Aquarium's Seafood Watch program, or are from fisheries that are engaged in improvement projects that mandate trackable time-bound progress that is reported to a credible public industry reporting platform such as Fishery Progress.⁵⁹

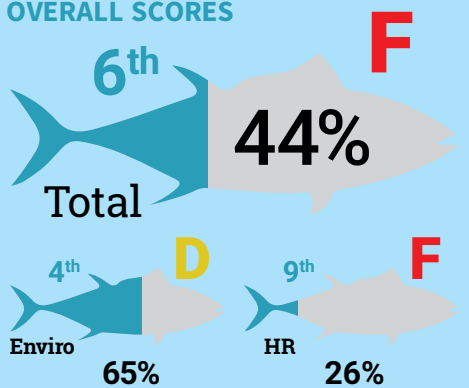
Annually, in collaboration with a sustainable seafood consultant, Target also audits its own tuna supply chain and reviews its tuna vendors traceability practices, assessing the implementation of vendors tuna policies and commitments, and works with vendors to strengthen areas of weakness or concern.

CONS: Overall one key downside of Target's tuna procurement and traceability policies is that it still allows transshipment. In some cases where tuna is transshipped, traceability and chain-of-custody can face disconnects and suffer as a result. However, efforts to combat this are outlined in Target's Detailed Guidance for At-Sea Transshipment, wherein Target specifies that in all instances where tuna is transshipped there is 100% observer coverage, and that observers have access to independent communication devices and personal life-saving beacons. Moreover, vessels that engage in transshipment within Target's supply chain are mandated to have an emergency action plan in the event that threats to observer safety occur.⁶⁰

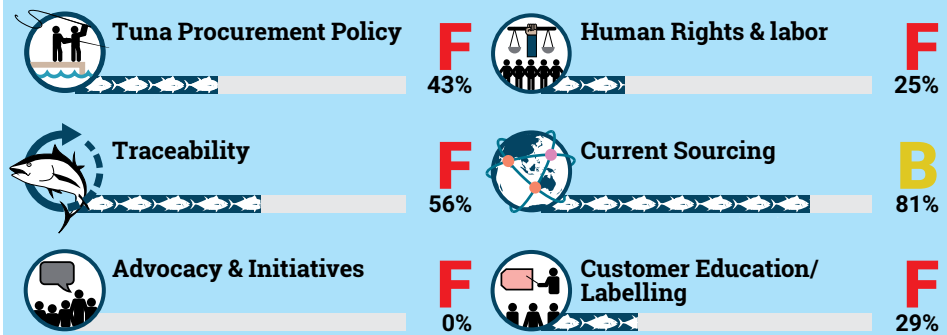
In regard to its renewed Commitment to Sustainable Seafood policy that allowed Target to score so highly in this year's scorecard - although Target expects to release the final version of this framework in Q3 2024, and have it fully implemented in 2025, it is not exactly clear which sections are still being worked on, or which policies and initiatives will come into effect next year. As such there is still some degree of opaqueness that exists around Target's key document.

Sprouts

OVERALL SCORES



SECTION SCORES



This year, Sprouts completed a survey and provided Greenpeace with additional supporting resources to aid in the completion and verification of its survey and profile. Alongside its Supplier Code of Conduct, its Responsible Seafood Sourcing Policy, and its Commitment to Human Rights, Greenpeace was also able to draw upon Sprouts' 2023 Impact Report to aid in the completion of its profile.^{61;62;63;64}

Sprouts' overall score increase this year was due to additional points picked up in the **Tuna Procurement Policy** section, and in the **Traceability** section also. On **Advocacy and Initiatives**, Sprouts disappointingly failed to record a single score throughout the entire section, and with respect to the **Human Rights and Labor Protections** section, consistent with previous years, Sprouts scored very poorly. It should be noted however, that in Sprouts's Commitment to Human Rights, the retailer acknowledges that there is substantial work yet to be done; and, that it is taking progressive steps to ensure alignment with the UNGPs and other unspecified human rights frameworks.⁶⁵

The 4% bump this year was due to an increase in scoring in the **Tuna Procurement Policy** and **Current Sourcing** sections. Sprouts now asserts that it can ensure that 40% of its tuna products come from suppliers that comply with ILO core labor standards, and the ILO's Work in Fishing Convention (C188).

Sprouts has enhanced its supply chain monitoring, and refined its human rights due diligence framework, though overall Sprouts is still lagging massively behind other high-performing retailers due to a complete absence of a grievance mechanism, and the absence of a commitment to uphold all four of the international instruments of human rights.

In **Current Sourcing**, Sprouts also saw a slight score increase due to the retailer no longer stocking yellowfin tuna sourced from Indian Ocean fisheries, or Albacore tuna caught using the controversial drifting longline method. In both of these cases, further commendation is due, as in each instance Sprouts has chosen to forgo profiting from unethical sourcing and catch-methods.

PROS: Sprouts achieved its highest scores and ranking for the **Current Sourcing** section. Sprouts sources 93% of its tuna from suppliers that exclusively utilize pole and line and troll or handline catch methods; two methods that are deemed the most sustainable and ethical. Sprouts got one of the highest scores for not stocking problematic species or brands, and for halting the procurement of tuna caught via unethical catch-methods..

On **Traceability**, Sprouts was also in the group of top performers, and although they did not top the cohort, it deserves praise for conducting ongoing internal traceability audits to ensure that all tuna can be traced back to the individual fishing vessel. Additionally, Sprouts requires that its vendors must provide chain of control documents, and evidence that products do not come from sources utilizing any illegal methods; including those violating human rights.⁶⁶

With respect to human rights, Sprouts insists that it can identify risks of forced or child labor through bi-annual supply chain mapping, and that it reviews the policies and practices associated with the suppliers sourcing from these countries. Subsequently, as of this year, Sprouts has found that roughly 45% of its tuna supply chain has completed a human rights impact assessment, and that 40% of its tuna products come from suppliers that comply with ILO core labor standards, and the ILO's Work in Fishing Convention (C188).

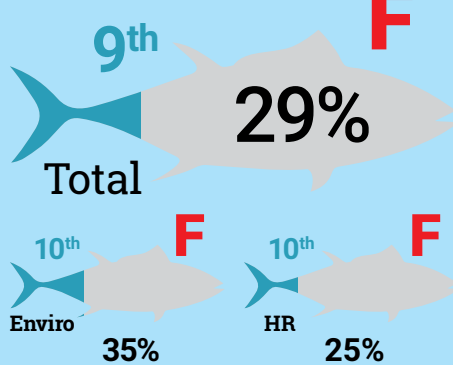
CONS: Despite an update to its Human Rights Policy over the past few years, Sprouts still lags massively behind other retailers with considered and developed standalone policies. Sprouts' commitment to human rights excludes an explicit alignment with various international instruments such as the UN Declaration on Human Rights, ILO guidelines, and the UNGPs. Although commendable improvement to its policy and its risk assessment protocols has been made, the retailers' Human Rights scores continue to be low - and Greenpeace urges Sprouts to push harder on an alignment to these frameworks, and to communicate its progress towards these goals in a more transparent manner.

Furthermore with respect to human rights, when it comes to several practical elements of a due diligence process including such areas as remediation, grievance mechanisms, and worker engagement, Sprouts barely has any current policies in place that frame its approach of implementation of these key mechanisms.

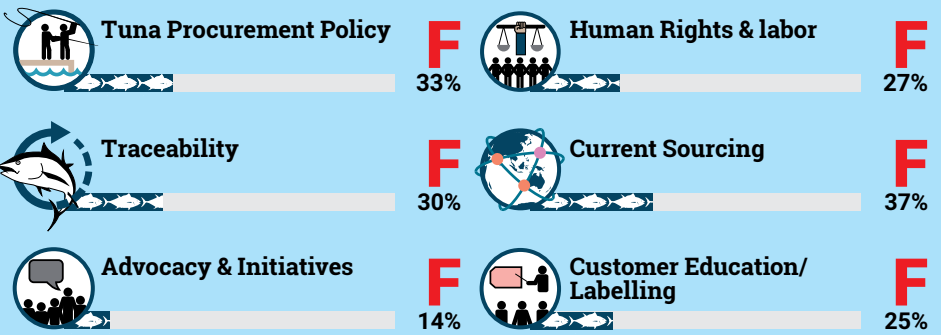
On **Advocacy and Initiatives**, Sprouts scored badly, as one of four retailers to nab no points at all across this entire section. For a retailer like Sprouts, that has built its image on responsible social and environmental practices, it is severely disappointing that it has made no effort to engage with federal or international bodies in support of greater advocacy and protection for biodiverse marine environments, sustainable fisheries, or greater observer protections. Greenpeace strongly encourages Sprouts to make better use of its voice in the community and help drive important improvements across the greater seafood industry.

Costco

OVERALL SCORES



SECTION SCORES



Once again, Costco did not complete a survey or provide any supplementary materials to support Greenpeace USA in the scoring of its tuna supply chain. As such, only publicly available information was used to update last year's scores.

This year, Costco managed to increase its score slightly. With respect to traceability, through the use of internal and third party audits, like those offered by the International Seafood Sustainability Foundation (ISSF), Costco is able to trace to the vessel each catch of Albacore Tuna that is destined for its private-brand Kirkland canned tuna products.⁶⁷ As such, the communication of this audit framework earned Costco extra points in the **Traceability** section.

In line with the United Nations' Sustainable Development Goal number 8, Costco has committed to regular supply chain assessments and reviews.⁶⁸ Costco achieved a high score for its assurance that workers throughout its tuna supply chains receive contracts that are accessible, and are written with language the worker understands. This closely mirrors stipulations set forth in Convention 188 as developed by the International Labor Organisation.⁶⁹

Broadly, it is a positive sign that Costco's sustainability initiatives remain guided by seven of the United Nations Sustainable Development Goals (SDGs); with SDG 14, "Life Below Water" being a focal point for the retailer's seafood policy.⁷⁰ Committing to the bare minimum, Costco aims to not sell any seafood species that are on the International Union for Conservation of Nature (IUCN) endangered or critically endangered lists.⁷¹ Though its direct partnership with the World Wildlife Fund to support Fisheries Improvement Projects is notable.⁷²

Overwhelmingly, large parts of Costco's human rights and sustainability policies rely on its support for the work of third party organizations like The Seafood Task Force; that despite doing valuable work, cannot be substituted for coherent internal Costco policies.

PROS: Costco could claim some recognition for its role as a founding member of the Seafood Task Force, a coalition of organizations, retailers, and NGOs that work to improve sustainability in the Thai seafood supply chain through recruitment transparency, chain-of-custody oversight, and work rights more broadly.⁷³ However, although information about the task force is easily accessible via its website, it is difficult to ascertain if or how many of the protocols, policies, and parts of the task force's '10-point-plan' Costco actually adheres to.

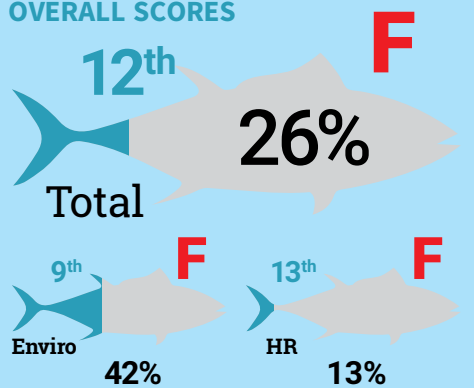
Costco's Supplier Code of Conduct (2018) does show that the company has a grievance mechanism, and also that it reserves the right to conduct audits of its vendors and suppliers at any time; in turn allowing it to work with third parties to analyze risk across its supply chain.⁷⁴ The mention of both of these mechanisms in Costco's policies is a great first step, however, yet again, a lack of further depth or specific reference to the United Nations Guiding Principles effectiveness criteria result in lower scores in the **Traceability** and **Human Rights and Labor Protections** sections respectively.

CONS: The same issues that dragged down Costco's scores in previous years largely remained consistent in this edition of the scorecard also. In the **Tuna Procurement Policy** section, its sourcing and seafood sustainability policies remain vague, as does its policy on human rights.⁷⁵ Costco's human rights policy could be improved greatly if it were to strictly adhere to standard international human rights principles, such as the UNGPs, ILO Core Conventions, and the ILO's Work in Fishing Convention (C188).

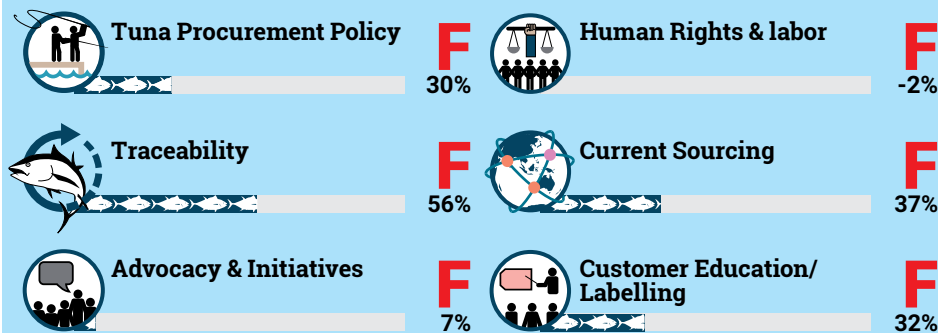
Additionally, like many other surveyed retailers, Costco does not have a standalone public transshipment policy, nor does it even make reference to the practice in any of its seafood policy briefing web pages or documents. This is especially disconcerting given Costco's market capture, buying power, and industry influence - all of which could easily be used to lead and drive action on transshipment.

H-E-B

OVERALL SCORES



SECTION SCORES



As has been the case in previous years, despite specifically mentioning on one of its Sustainable Seafood websites that, “H-E-B will gladly answer questions regarding our sustainable seafood practices,” once again H-E-B declined requests to complete a survey for this year’s tuna report card.⁷⁶ As such, similar to the other retailers who declined to return a completed survey, H-E-B’s publicly available policies were instead used to complete their scorecard. These included H-E-B’s Seafood Policy,⁷⁷ Supplier Code of Conduct,⁷⁸ and its Seafood Sustainability Table.⁷⁹

Despite having some language in its internal policies in support of ILO convention 138,⁸⁰ that specifies vendors must not employ underage workers in their respective regions, H-E-B fails to cite an adherence to other core ILO labor standards or the C188 Work in Fishing Convention.

Similar to most retailers, H-E-B scored points early on in the **Tuna Procurement Policy** section for having some sustainability and human rights policies in place, but was largely unable to record scores for many of the more specific questions. It also scored well in terms of Traceability, and for its efforts to source mostly sustainable fish from fisheries that are rated ‘Green’ or ‘Yellow’ on the Environmental Defense Fund’s (EDF) Seafood Selector.

Where H-E-B fell down, as with many other non-responsive retailers, is the lack of depth and specificity in most of its publicly available policies.

PROS: In the **Tuna Procurement Policy** and **Current Sourcing** sections, H-E-B scored well for having some policies in place and for illustrating its seafood sustainability specifics (showing how each species of tuna has been sustainably caught and how it is classified) in a product sourcing grid.⁸¹ Making this sustainability and sourcing information so easily accessible to the public in this format is a promising step, though more must be done.

Using this product sourcing grid, and H-E-B’s Seafood Policy webpage it is easy to see that this retailer preferentially sources from fisheries that are rated ‘Green’ or ‘Yellow’ according to the Environmental Defense Fund’s Seafood Selector, or are certified as sustainable by the Marine Stewardship Council (MSC).⁸² With further regard to sourcing, H-E-B mentions in its Seafood Policy that it only sources from suppliers involved in Fishery Improvement Projects (FIPs), that meet the Conservation Alliance for Seafood Solutions criteria; and track the time-bound progress of these FIPs towards their sustainability goals through the Fishery Progress website.⁸³

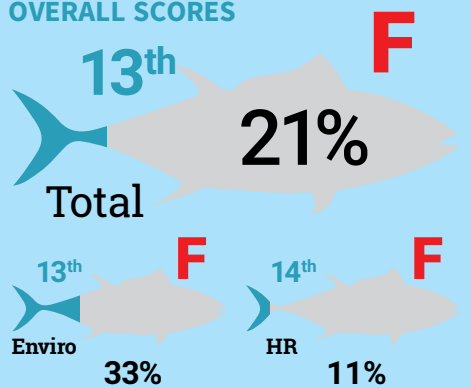
H-E-B also scored well for its efforts to improve **Traceability**, including its commitments to not selling IUU tuna, for utilizing Trace Register to provide third party verification of its inventory, and for undertaking independent audits to uncover non-compliant products and suppliers.⁸⁴

CONS: Like many retailers, despite an undoubted awareness of the pervasive human rights concerns ingrained in the global tuna industry, H-E-B’s scores in the human rights sections of the survey suffered due to a lack of policy depth and specificity. Regarding adherence to common conventions and due diligence frameworks, such as the UNGPs on Business and Human Rights or core ILO conventions, across all of its policies, H-E-B fails to mention any of these standard globally applicable policies, or at a minimum even how it enforces its own vague human rights policy.

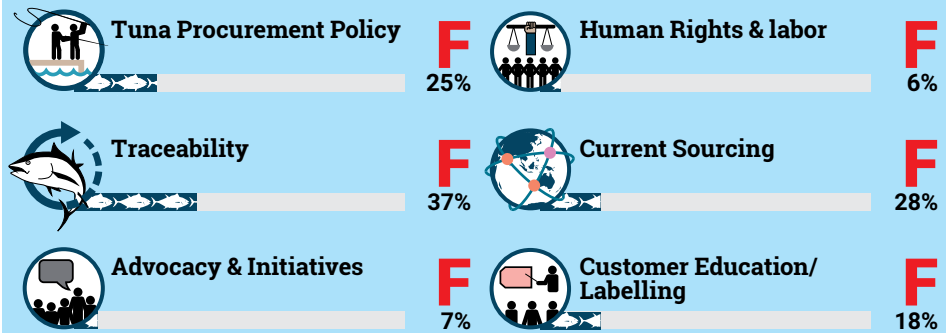
One instance of this is that despite having some language in its internal policies in support of the bare-minimum policies such as the ILO convention 138,⁸⁵ which specifies vendors must not employ underage workers in their respective regions, H-E-B fails to cite an adherence to other industry-specific conventions like the ILO’s C188 Work in Fishing Convention. With more than half of the survey questions concerning human and labor rights and protections, it is no surprise that HEB fared so poorly across many survey sections.

Publix

OVERALL SCORES



SECTION SCORES



As has been so in previous editions of this scorecard, Publix did not respond to requests from Greenpeace USA to complete the survey. As such, its positions, policies, and initiatives were drawn from publicly available information, such as tuna product pages on its website, news articles, and previously cited sources from past editions of this report. Due to no measurable changes year on year to Publix's policies, the retailer's score didn't change.

Like many other low-scoring retailers, Publix seemingly lacks coherent and structured frameworks and policies that are specific to their tuna products. Instead, Publix opts for generalized blog-style explainers like its "Seafood Sustainability" page. And, although this webpage mentions that some of their products are "responsibly sourced" or "sustainably sourced," there is little supporting information regarding what these labels actually mean in terms of traceability, sourcing, and at-sea worker rights.⁸⁶

Compiling qualitative and quantitative data across a range of sustainability, supply chain, and human rights domains would no doubt greatly aid Publix in creating the measurable time-bound policies it currently may not have. If Publix were to achieve some of these goals or share any of these practices that it is implementing, it is likely that it could score highly on future editions of this scorecard.

PROS: Publix acknowledges the importance of making commitments to sourcing sustainable seafood, and this is evidenced by its public collaboration with a number of important seafood-focused sustainability organizations and initiatives, such as the Sustainable Fisheries Partnership (SFP), the Global Sustainable Seafood Initiative (GSSI), and the Ocean Disclosure Project (ODP).⁸⁷

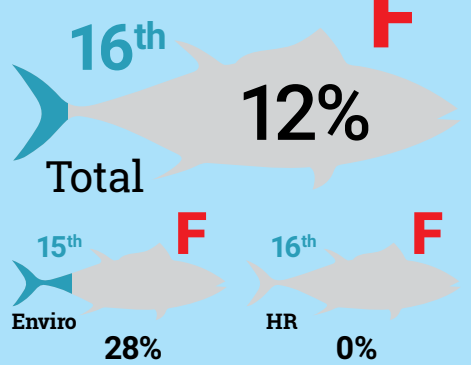
It should also be noted that Publix has previously participated in the SFP's bycatch audit program.⁸⁸ It is not clear, however, to what degree this has affected their sustainability practices related to Publix's yellowfin tuna products, and as a result this did not directly translate into any extra points awarded in the survey.

CONS: Despite having published sustainability reports over the past few years while committing to various initiatives and making donations to support fishery improvement projects, Publix still falls incredibly short of publicly communicating how or whether these statements translate directly into product specific policies or actions. Largely, there remains a lack of adequate information regarding seafood sourcing, traceability, product chain of custody, and consequently worker rights across Publix's supply chain. As a result, Greenpeace USA was unable to award scores for many questions across both the Environmental and Human Rights categories of the survey.

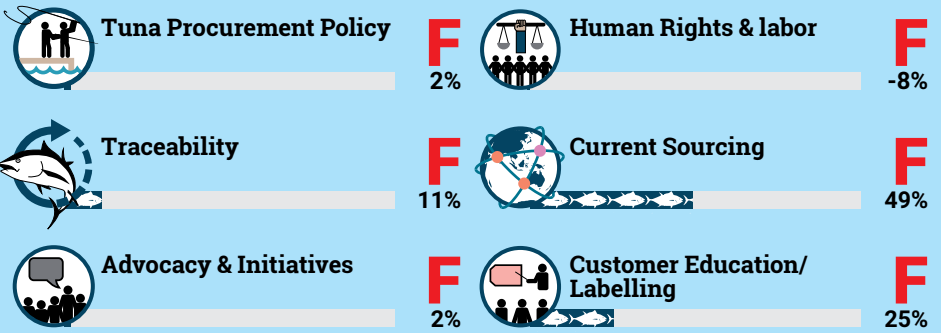
Trader Joes

TRADER JOE'S

OVERALL SCORES



SECTION SCORES



For the first time, Trader Joe's (TJ) was added to the list of retailers in Greenpeace USA's High Cost of Cheap Tuna report. Trader Joe's boasts a strong foothold in the US grocery landscape and a loyal and devoted consumer following that may be contingent on a public perception that the retailer is both environmentally sustainable and fair to its workforce.

Unfortunately for TJ customers, the validity of this perception is difficult to verify given the complete lack of any formal sustainability, supply chain, or worker rights policies available in the public domain. Moreover, as Trader Joe's did not respond or fill out a survey, there was little information available to score this retailer.

Perhaps one positive is that Trader Joe's does state that they use the Seafood Watch List to inform its product development and procurement policies. Additionally, Trader Joe's mentions that in 2013 it switched sourcing methods for several wild-caught seafood products in order to reduce the potential for bycatch.⁸⁹ However once again, these assurances are only published on the Product FAQs page of its website, with no sources listed or ability to verify these claims.

As a consequence of the lack of public information, Trader Joe's performed more poorly than any other retailer surveyed, and came in dead last in this year's edition of the tuna retailer scorecard. This ranking is incredibly disappointing given that the last time Trader Joe's was surveyed for its tuna sustainability in 2013, it topped Greenpeace USA's rankings.

Additionally, in light of a recent labor rights push by Trader Joe's employees, it was reported by Bloomberg, that in January of this year an attorney representing Trader Joe's at a National Labor Relations Board hearing argued that the US Labor Board is unconstitutional. This argument was made against the US Labor Board after it accused the retailer of illegally threatening and retaliating against workers who sought to formally organize.⁹⁰ US labor law protects employees by extending them the right to organize and communicate about working conditions even if they are not unionized.⁹¹

PROS: Trader Joe's utilizes the Seafood Watch List to inform its product development and procurement policies,⁹² and includes some mention of sustainable fishing methods for its privately labeled tuna products.

Trader Joe's states that it requires suppliers to follow US law and the laws of any other relevant nation or international governing body, but it doesn't go further or provide much detail on this beyond requesting that suppliers certify (whether that be self-reported or reviewed by third parties is unclear) that there was no use of forced labor, prison labor, or child labor. Although statements like this are encouraging and may offer some reassurance, they once again lack the requisite detail and policy-related specificity to be deemed a formal policy.

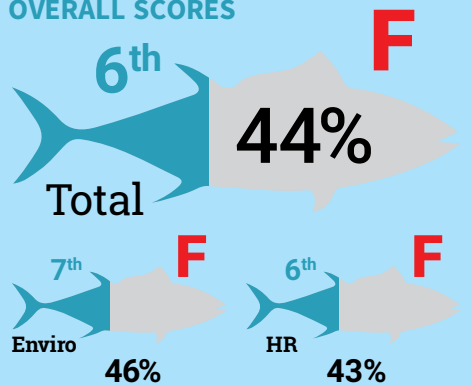
CONS: For Trader Joe's, more so than for any other retailer, the list of 'cons' or negatives associated with all surveyed categories is difficult to quantify, track, or list. This is due to the void of information publicly available to consumers, prospective partners, or organizations wishing to learn more about this retailer.

Trader Joe's sourcing and seafood sustainability policies remain vague and almost entirely non-existent, as does its policy on human rights. Trader Joe's could easily improve both of these policy areas if they were more clearly guided by specific international principles, such as the UNGPs, ILO Core Conventions and the ILO C188 Work in Fishing Convention. Trader Joe's also does not seem to have a public transshipment policy, which is disappointing.

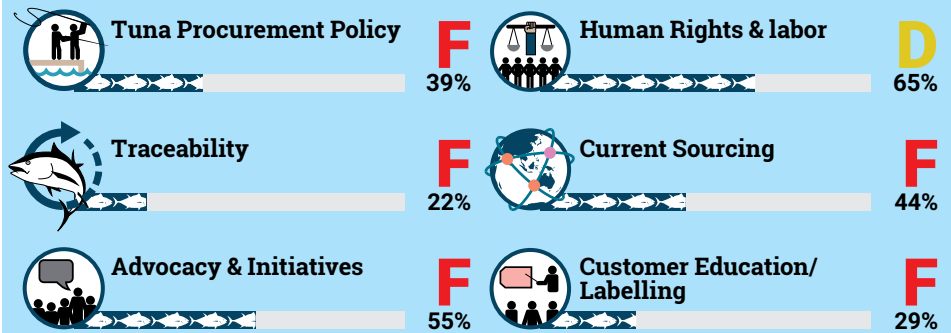
With respect to human rights across its supply chain, Trader Joe's does not publicly mention anywhere any kind of adherence to, or consideration of grievance mechanisms, due diligence frameworks, or engagement with vulnerable groups.

Walmart

OVERALL SCORES



SECTION SCORES



Once again, this year Walmart did not complete a survey; as such, publicly available information, including Walmart's Human Rights webpage,⁹³ its Human Rights Statement on its corporate policy page,⁹⁴ and its updated Seafood Policy⁹⁵ were used to score the survey. Additionally this year, with the use of Walmart's 2023 "Enhanced Seafood Policy",⁹⁶ more contextual information was able to be added to Walmart's retailer profile. However since most of the policies proposed in this future focused policy will not be fully commercialized until 2025 or 2027, Greenpeace USA was unable to award Walmart any extra points in this current survey.

Of note, in 2022 Walmart partnered with The Nature Conservancy (TNC) and the government of the Republic of the Marshall Islands to source tuna certified to Marine Stewardship Council (MSC) standards for its Great Value private-label brand.⁹⁷ This partnership resulted in the founding and launch of Pacific Island Tuna (PIT); a vertically integrated end-to-end tuna supply chain company with a core focus on sustainability. Walmart has stated that it plans to source all of its Great Value Brand private-label canned skipjack tuna from the Pacific Island Tuna company.⁹⁸ This is a promising move, especially as PIT claims that no transshipment happens across their supply chain.⁹⁹ However, the reliance on certifications like MSC and that this has not yet been implemented across Walmart's supply chains mean that the impact and reach is yet to be seen.

PROS: Walmart was one of the only retailers to have a reasonably thorough standalone policy section on human rights, that includes language in support of global forced labor prevention, responsible recruitment expectations, and supplier requirements for supply chain transparency. Further, it is commendable that this policy makes reference to international instruments, including the UN Universal Declaration of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, and the UN Guiding Principles on Business and Human Rights.¹⁰⁰

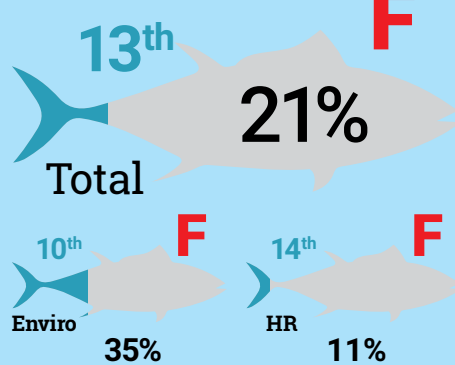
Largely, it appears that Walmart continues to prepare for large strides forward for its tuna procurement, sustainability, and supply chain transparency policies with the update and release of its 'Enhanced Seafood Policy' (2023).¹⁰¹ However, as most of Walmart's proposed keystone seafood policies are either in-progress or to be implemented from 2025 through 2027, it is difficult to accurately report on their current state of affairs in 2023 and 2024. That being said, there are some reasons to be both excited and cautiously hopeful for many of the future initiatives outlined.

For its Fresh and Frozen and Shelf Stable tuna, Walmart has stated that by 2027 it will only source from vessels that have 100% observer monitoring, whether electronic or human, and phasing out high seas transshipment unless there is 100% coverage of observer monitoring as well.

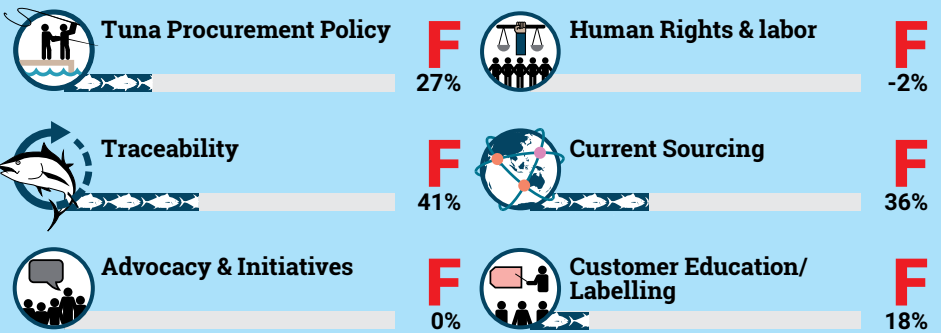
CONS: While Walmart's sustainability and human rights policies are more detailed and better developed than most, many of the commitments detailed in its Enhanced Seafood Policy are goals for 2025 and 2027, and at present it is unclear how much progress has been made towards them. Because this survey is interested in what policies are currently in place, Walmart's score in the Tuna Procurement Policy section suffered from a lack of information concerning its progress towards these goals.

Like other retailers, Walmart's policies omit a number of key details. With regard to human rights for example, while Walmart does mention the need to ensure migrant workers are recruited responsibly, the survey questions associated with this topic required written recognition of the increased risks faced by migrant workers - and Walmart's policies did not include this specifically-aligned language. Moreover, as Walmart continues to rely on third-party social audits when it comes to monitoring, it is difficult to ascertain from its own internal documents various key details about these audits. Additionally, although Walmart does have a due diligence framework, it does not include human rights nor apply to seafood supply chains.¹⁰² Similarly, Walmart mentions its use of a grievance mechanism, yet as currently implemented it does not meet the UN's guidelines.

OVERALL SCORES



SECTION SCORES



As in the past two editions of this scorecard, this year Wegmans did not submit a survey. As such, Wegmans scoring was calculated using publicly available information and information from previous scorecards. Primarily, Wegmans “Responsible Seafood Sourcing” website, and “Wegmans Seafood Sourcing Policy 3.8” (2024) were analyzed and used to score the survey.^{103, 104}

Since the last edition of this report, it appears as though Wegmans has made some effort to increase the public communication of its sustainable seafood policies with the 2024 publication of “Wegmans Seafood Sourcing Policy 3.8.” In this policy outline, Wegmans highlights changes in its approach to traceability, namely with its insistence that, by the end of 2024, all of its seafood suppliers must utilize a Global Dialogue on Seafood Traceability (GDST), which enforces an interoperable traceability system chosen by the supplier.¹⁰⁵ Moreover, with respect to seafood sourcing, this policy outline maintains that all seafood will be “sourced from fisheries or farms that are certified as benchmarked to the standards of the Global Sustainable Seafood Initiative (GSSI),” or that “seafood may be sourced from fisheries or farms that have utilized alternative documented processes to verify alignment with and support of responsible practices related to environmental impact.”¹⁰⁶

However, despite the release of its updated seafood sourcing policy for 2024, Wegmans fails to outline timelines for implementation, or specify key details about what percentage of which species caught are covered under these policies. As such, for the purpose of scoring Wegmans for this scorecard, very little usable and detailed information was able to be carried across from this key policy document to their finalized score. That being said, the release of “Wegmans Seafood Sourcing Policy 3.8” (2024), is an incredibly encouraging development, and Wegmans deserves commendation for this update to its policies.

PROS: The largest case for positivity with Wegmans lies in its updated Seafood Sourcing Policy, and dedicated webpage, “Responsible Seafood Sourcing.” This includes some solid moves in the right direction, such as the updated traceability and sourcing requirements, along with supply chain and supplier requirements regarding the ILO Declaration on Fundamental Principles and Rights at Work, UN Guiding Principles on Business & Human Rights (UNGP), and the ILO Core Conventions, among others.

Beyond this, Greenpeace commends Wegmans’ commitment to sourcing from fisheries that are certified sustainable or involved in a Fisheries Improvement Program (FIP). Additionally, it is promising to see Wegmans enforcing supplier commitments to a GDST standards system, a move that will hopefully empower it to maintain and report more accurately on its traceability standards. Although commitments such as these are a positive signal, this scorecard marks policies not promises.

CONS: Across the board, the lack of detail in most of Wegmans’ seafood policies undermines the company’s positive overtones of commitments to improved traceability, sourcing, and human rights across its supply chain. This lack of clarity, coupled with rough timelines for these major commitments makes it unclear how Wegmans will achieve both its promised objectives and those that it requires of its suppliers.

Additionally, based on available information, it appears as though Wegmans relies entirely on third-party social audits to ensure its sourcing policies and standards are achieved. While third-party audits may have value in specific instances, social audits have long been recognized by the human rights community as insufficient. To effectively address the problems and ensure that they are complying with international labor, health, safety, and environmental standards, companies must establish adequate levels of independent oversight and supply chain monitoring, and genuinely engage with workers employed in their supply chains.

Appendix

Greenpeace USA's Tuna Grocery Retailer Survey 2024

What follows is a copy of Greenpeace USA's Sustainable and Worker Friendly Tuna Grocery Retailer Survey distributed to 16 major US retailers in 2024. Retailer answers to this survey form the basis of this report.

TUNA PROCUREMENT POLICY (20%)

1. Do you have a sustainable/responsible seafood sourcing policy (or a standalone tuna policy) that covers tuna procurement in your fresh, frozen, and shelf-stable categories?

- a. ☐ Yes, all categories across all stores and products (5)
- b. ☐ Partially, fresh and frozen categories only across all stores and products (2)
- c. ☐ Partially, the shelf-stable category only across all stores and products (2)
- d. ☐ Only some categories across some banner stores or some products (please specify) (1)
- e. ☐ No (0)

2. Environmental Sustainability: What % of the overall tuna (fresh, frozen and shelf-stable) sold by your company is covered by your sustainable seafood/tuna procurement policy?

- a. ☐ Less than 50% (0)
- b. ☐ 51% to 89% (0)
- c. ☐ 90% to 99% (2)
- d. ☐ Applies to all (4)

3. Do you have a standalone human rights/labor policy that covers tuna procurement in your fresh, frozen, and shelf stable categories?

- a. ☐ Yes (5)
- b. ☐ No (0)

4. Human Rights: What % of the overall tuna (fresh, frozen and shelf-stable) sold by your company is covered by your human rights/labor policy?

- a. ☐ Less than 50% (0)
- b. ☐ 51% to 89% (0)
- c. ☐ 90% to 99% (2)
- d. ☐ Applies to all (4)

5. Does your sustainable seafood/tuna policy explicitly feature any of the following? (choose all that apply)

- a. ☐ prohibits sourcing tuna from “red” fisheries according to the Monterey Bay Aquarium Seafood Watch program (2)
- b. ☐ prohibits sourcing tuna from “yellow” fisheries according to the Monterey Bay Aquarium Seafood Watch program (2)
- c. ☐ requires at minimum that all tuna sourced is either MSC-certified or part of a FIP that is making progress according to FisheryProgress.org, and rated either “A” or “B” (1)
- d. ☐ requires that all shelf-stable tuna storewide be pole and line, troll, or handline caught (2)
- e. ☐ prohibits sourcing from any company that engages in shark finning (2)
- f. ☐ has language in support of marine reserves and marine protected areas (2)
- g. ☐ has other environmental sustainability requirements that our suppliers must follow (1) (please specify)

6. **Do you have a commitment to respect all internationally-recognized human rights AND fundamental rights at work across all activities in your supply chain embedded in your seafood/tuna procurement policy or standalone human rights policy? To receive full credit, the commitment must explicitly reference the following: (1) the International Bill of Human Rights** (which encompasses the Universal Declaration of Human Rights (UDHR),¹⁰⁷ the International Covenant on Civil and Political Rights (ICCPR),¹⁰⁸ and the International Covenant on Economic, Social, and Cultural Rights (ICESCR)¹⁰⁹), **(2) the International Labor Organization's Core Conventions,¹¹⁰ and (3) C188 - Work in Fishing Convention.¹¹¹ Furthermore, your company must adhere to the UN Guiding Principles on Business and Human Rights (UNGP).¹¹²**
- _____ Partially; our policy has some language in support of international human rights and/or labor rights in reference to our tuna supply chain. (1)
 - _____ Partially. It explicitly commits our company to uphold two of the sets of instruments referenced above. (2)
 - _____ Yes, our commitment explicitly includes all three sets of instruments: **the International Bill of Human Rights**, the **ILO Core Conventions**, and the **C188 - Work in Fishing Convention**. (4)
 - _____ Yes to all in (c), **and** it explicitly commits our company to uphold the **UN Guiding Principles on Business and Human Rights (UNGP)**. (5)
 - _____ No. (0)
7. **Our tuna procurement policy has the following commitments on preferential sourcing:** *(choose all that apply; 3pts each)*
- _____ a commitment to preferentially source from vessels that go to port States that have ratified and implemented the *ILO Work in Fishing Convention*, and effectively conduct labor inspections according to the *ILO Guidelines for port State inspections* under the Convention.
 - _____ a commitment to preferentially source from companies with independent, democratic trade unions and who respect their workers' rights to collectively bargain and engage in union activities.
8. **What is your company's public stance on sourcing from tuna vessels that engage in transshipment-at-sea?** *(Please select one. Note: to receive credit, this stance must be publicly visible, for example, in a tuna procurement policy.)*
- _____ We forbid sourcing from any tuna vessel that engages in transshipment-at-sea, and our traceability audits verify compliance with these policies. (7)
 - _____ We forbid sourcing from any tuna vessel that engages in transshipment-at-sea. (5)
 - _____ We allow it only in cases where there is 100% observer coverage, either via an onboard observer or a combination of onboard observers and onboard cameras. (3)
 - _____ We allow it, but only where the names of transshipping vessels and the time and location of every transshipment is recorded. (1)
 - _____ We do not have a stance on this issue. (0)

Worker Contracts and Recruitment

9. **As stated in our policy, our company only purchases tuna from suppliers that have worker contracts that comply with ILO core labor standards and ILO Convention No. 188, are signed by the vessel owner and worker, and are written¹¹³ in a language that the worker understands.** *(Please select one.)*
- _____ Yes, there are clearly written contracts, for which we have provided examples of in our survey response. We are unaware of whether these terms are also verbally communicated. (2)
 - _____ Yes, there are clearly written contracts, for which we have provided examples of in our survey response, **and** we have evidence that these terms are verbally communicated to workers as part of the onboarding process. (4)
 - _____ Partially, we have ensured everything in item (a) but only for _____% our suppliers (1)
 - _____ No (0)
10. **As stated in our policy, our company only purchases tuna from suppliers who are actively reducing recruitment-related risks for their workers by only recruiting via formalized avenues and agencies that are not on government or NGO red lists, and prohibiting recruitment fees, guarantee deposits, and wage deductions or withholdings.**
- _____ Yes, and we have provided examples of these contracts in our survey response. (5)
 - _____ No (0)

11. As stated in our policy, our company only purchases tuna from suppliers who provide their workers with a local¹¹⁴ living wage.¹¹⁵ (Please select one.)

- a. ☐ Yes. Furthermore, workers or their intended recipients (e.g. family of workers) are directly receiving the wages due to them at least once a month via direct deposit to their selected bank accounts. (2)
- b. ☐ Yes. All of (a) above, **and** the workers receive regular pay stubs that itemize and explain any deductions. (3)
- c. ☐ Partially, we have ensured everything in item (a) but only for _____% of our suppliers. (1)
- d. ☐ Not necessarily. Workers or their intended recipients are paid whatever is legally required under law, even if this results in pay discrimination on distant water tuna fishing fleets. (0)

Safety and Health at Sea

12. Our company does its part to ensure the safety and well-being of the workers in the tuna vessels that supply us by explicitly requiring the following in our policy: (Check all that apply.)

- a. ☐ Only purchase fish from vessels that strictly comply with the safety provisions and standards of the 2012 Cape Town Agreement on the Implementation of the Torremolinos Protocol for the Safety of Fishing Vessels. (1)
- b. ☐ Only purchase from vessels that guarantee that all fishers receive no less than 10 hours rest in any 24-hour period and 77 hours in any seven-day period. (5)
- c. ☐ Require supplying tuna vessels to demonstrate that their fishers receive, at no cost, food of sufficient nutritional value, quality, quantity, and variety, and potable water of sufficient quality and quantity, with due regard to the duration and nature of the voyage. (1)
- d. ☐ Only source from tuna vessels that spend a maximum of three months at sea before going to a port and allow crew unfettered access to port services for a minimum of 10 days. (5)

Worker Voice

13. Our company respects workers' freedom of association and collective bargaining by including the following in our policy: (check all that apply)

- a. ☐ affirming our company's commitment to supporting freedom of association and collective bargaining in its own facilities (2)
- b. ☐ affirming our company's commitment to supporting freedom of association and collective bargaining throughout our global tuna supply chains (2)
- c. ☐ ensuring that our suppliers respect union rights by investigating and fairly resolving all allegations of union busting or threats made against unionists (3)
- d. ☐ publishing our vessel supplier lists so that trade unions and worker rights organizations know which companies are in the end-buyer's supply chain (5) (Note: if your company's full vessel supplier list is already publicly disclosed and kept up to date, you will also receive credit here as well, regardless of your company's rationale for being transparent.)

14. Is it in your policy, and can your company verify, that all of its tuna suppliers treat migrant fishers equally as national fishers regardless of the applicable law in the flag State? (This means that migrant fishers are paid at least the national minimum wage through regular, full-time employment, and provided with equivalent social protection even if the government of the flag State does not require them to be treated the same way.)

- a. ☐ Yes (5)
- b. ☐ No (0)

TRACEABILITY (20%)

15. Are you able to trace every SKU of tuna (fresh, frozen, and shelf-stable) down to the individual vessel that caught the fish?

- a. _____ Yes, 100% (5)
- b. _____ Almost, between 90-99% of the time (3)
- c. _____ No, or less than 90% of the time (0)

16. Will you publicly commit to publishing a full list of your suppliers' fishing vessels from which your company sources tuna?

- a. _____ Yes, we already have this. (5) URL: _____
- b. _____ Yes, within 3 months (3)
- c. _____ No (0)

17. What are your seafood supplier requirements? Do you: *(choose each that applies; 2 points each, except item (f))*

- a. _____ have quarterly monitoring procedures in place to ensure that your suppliers conform to your environmental and social policy requirements, as tuna vessels should already be reporting to port every 3 months
- b. _____ conduct ongoing **internal traceability** audits to ensure that all tuna can be traced back to the individual fishing vessel (this is distinct from social audits)
- c. _____ utilize an **external** party to provide **traceability** audits to ensure that all tuna can be traced to the individual fishing vessel (this is distinct from social audits)
- d. _____ refuse to buy seafood from vessels and/or operators on the TMT Combined IUU Vessel List (<https://www.iuu-vessels.org>)
- e. _____ only source from suppliers that require a fishing crew manifest for each vessel that directly or indirectly supplies us with tuna
- f. _____ other, please describe: (1)

18. Fish fraud is a rampant problem in the seafood industry, and usually manifests itself in the substitution of a premium product for a cheaper product. How do you ensure that your suppliers are providing you with the actual product that meets your policy's specifications? *(Please choose all that apply and fill in the blank to receive credit; 2pts per question if answered satisfactorily)*

- a. We are aware that the tuna canneries in our supply chain source many different products. They are able to ensure separation of brands and products because:
- b. We know that the vessels that we source from are able to guarantee separation of product down to the level of fishing method (e.g., FAD-free skipjack kept apart from regular purse seine caught skipjack) because:
- c. We conduct our own traceability audits of our tuna supply chain, and the results of these audits provide us with confidence because:

ADVOCACY AND INITIATIVES (10%)

19. Do you advocate for fisheries and labor reform in the tuna sector by sending public letters to key policy-makers?

(Please share letters or URL to receive credit. For each answer option, please choose either the first option to indicate one letter (worth 2 points), or the second option to indicate 2 or more letters (worth 4 pts). This question is worth 10 points total, so there is an opportunity to secure “bonus” points for greater than five letters across all answer options.)

(Note: Please be aware that this question pertains to direct communications (that are available publicly) from your company to the relevant regulatory and/or legislative bodies involved. Examples must be within 3 years of the date of scoring. For purposes of the 2021 survey, a letter written in 2019 and a similar one in 2021 would receive credit for each instance.)

- a. Yes, we have sent one letter ____ or 2 or more letters ____ to the Taiwanese government demanding four key reforms in line with [NGO recommendations](#).
- b. Yes, we have sent one letter ____ or 2 or more letters ____ to a Regional Fishery Management Organization (RFMO) that manages an area where we source tuna, urging stronger environmental or social safeguards.
- c. Yes, we have sent one letter ____ or 2 or more letters ____ to the United Nations or its agencies advocating for greater human rights protection in the tuna sector.
- d. Yes, we have sent one letter ____ or 2 or more letters ____ to the United Nations or its agencies advocating for a robust UN Oceans Treaty.
- e. Yes, we have sent one letter ____ or 2 or more letters ____ to the U.S. Federal Government (e.g., U.S. Congress, an Executive branch agency such as NOAA, or a Regional Fishery Management Council (RFMC)), either supporting legislation or calling for policy reform to improve environmental sustainability and human rights protections in the tuna sector.

20. Our company advocates for observer protection by: (choose all that apply, except you may select either (b) or (c), but not both)

- a. ____ encouraging regulatory authorities and their respective observer programs to work together and implement the International Observer Bill of Rights (IOBR) at the RFMO level. (4)
- b. ____ ensuring that observers on supplying vessels are included alongside crew in our human rights due diligence processes (3)
- c. ____ ensuring that observers on supplying vessels are included alongside crew in our human rights due diligence processes **and** receive heightened protection as human rights defenders (4)
- d. ____ ensuring that observer programs, both regional and national, adopt measures that provide for the highest standards in investigations conducted following any observer death, in line with international standards such as the Minnesota Protocol on the Investigation of Potentially Unlawful Death.¹¹⁶ (4)

21. How much of your overall tuna (by volume) is sourced from vessels with democratic and independent trade unions?

- a. ____ None (0)
- b. ____ Less than 5% (0.5)
- c. ____ Between 5% - 9.9% (1)
- d. ____ Between 10% - 14.9% (please specify percentage) ____ (2)
- e. ____ Over 15% (4)

HUMAN RIGHTS AND LABOR PROTECTIONS (25%)

Human Rights Due Diligence¹¹⁷

22. To what extent does your company implement a robust human rights due diligence framework that seeks to go beyond an auditing based approach? (Please select one)

- a. _____ Our company does not have a due diligence framework. We rely on our suppliers providing documentation demonstrating its compliance with all applicable human rights laws for the region(s) in which it operates. (-1)
- b. _____ Our company does not have a due diligence framework, and instead relies on third-party audits and on our suppliers providing documentation demonstrating its compliance with all applicable human rights laws for the region(s) in which it operates. (0)
- c. _____ Our company recognizes the limitations of social audits in our tuna fishery supply chains and we have made a commitment to take action on implementing a due diligence framework within 180 days to move away from an exclusive reliance on social audits. (1)
- d. _____ Our company is already implementing our due diligence framework to complement social audits for over 75% of our tuna suppliers. (3)
- e. _____ Our company implements a human rights due diligence process that applies to ALL tuna suppliers in our supply chain, and this process is aligned with the UN Guiding Principles on Business and Human Rights. (5)

If you answered (d) or (e), please explain what your due diligence process looks like.

23. Does your company have senior level staff¹¹⁸ who are responsible for the day-to-day relevant human rights issues within the Company, including those arising from its suppliers? If so, please list the titles of the individuals tasked with this responsibility for all tuna sourced by your company. (Please select one.)

- a. _____ Yes, and here are the functions and titles: _____ (2)
- b. _____ Yes, here are the functions and titles, **and** we follow best practices to ensure that all relevant departments are integrally involved in harmonizing our human rights commitments with our procurement strategy (e.g., we have a human rights committee that meets regularly and ensure that at least one senior staff from each relevant department, including in-house human rights experts, sits on that committee): _____ (3)
- c. _____ Partially (in either scope of issue coverage or tuna category coverage), and here are some of the functions and titles: _____ (1)
- d. _____ No, we respond to human rights issues with available staff if they come up. (0)

Identifying, Assessing, Integrating and Acting on Human Rights Issues

24. Does your company have a system for regularly identifying human rights risks and impacts in its tuna supply chain, and do “key moments” trigger a review? Furthermore, have 75% or more of your suppliers completed human rights impact assessments on their vessels?

(Examples of a “key moment” would include a policy change by a relevant country, a high-profile report from civil society experts, entry into a new market, a new supplier, or a U.S. Federal Government action that indicates an increased risk of forced labor or trafficking in the fleets of certain flag states (e.g., the Department of Labor List of Goods Produced by Child Labor or Forced Labor, the State Department Trafficking in Persons report, and Customs and Border Protection withhold release orders).)

- a. _____ Yes, we have a global system in place to identify risks and impacts on a regular basis across our entire tuna supply chain, and can describe how and when new events trigger a fresh review **and** we know that 75% or more of our suppliers have done impact assessments on their vessels in the last year. (5)
- b. _____ Partially. We have a global system in place to identify risks and impacts on a regular basis across our entire tuna supply chain, and can describe how and when new events trigger a fresh review **and** we know that 50% or more of our suppliers have done impact assessments on their vessels in the last year. (3)
- c. _____ Partially. We have a global system in place to identify risks and impacts on a regular basis across our entire tuna supply chain, and can describe how and when new events trigger a fresh review **and** we know that 25% or more of our suppliers have done impact assessments on their vessels in the last year. (2)

- d. _____ Partially. We have a global system in place to identify risks and impacts on a regular basis across our entire tuna supply chain, and can describe how and when new events trigger a fresh review. We are unclear on what percentage of our suppliers have done impact assessments on their vessels in the past year. (1)
- e. _____ No (-1)

25. Does your company assess its human rights risks and impacts, prioritize action, *and* then take action to prevent, mitigate, or remediate the most salient human rights issues?

- a. _____ Yes, and we can describe this process and can **privately** share the results of our assessments. (1)
- b. _____ Yes, and we can describe this process and can **publicly** share the results of our assessments. (5)
- c. _____ No (0)

Tracking Effectiveness (M&E) and Communicating Results to the Public

26. Does your company track and evaluate the effectiveness of actions taken in response to its human rights risks and impacts, and use this information to improve processes moving forward? If so, how?

- a. _____ Yes: _____ (1)
- b. _____ No (0)

27. Does your company formally communicate how it addresses human rights impacts through its supply chain, in accordance with the guidance in UNGP Sec. 21 (i.e in a form that is accessible to your intended audiences, in a frequency that reflects your or your supply chain's human rights impacts, that provides sufficient information to evaluate the adequacy of your responses, and that does not pose any risks to affected stakeholders)?

- a. _____ Yes, and here is the URL: _____ (5)
- b. _____ Partially, we have some processes in place for communicating how we address our human rights impacts but they are not fully aligned with UNGP Sec. 21. Here is the URL: _____ and here is additional information/context about our process: _____ (3)
- c. _____ No (0)

Grievance mechanisms / Access to Remedy

28. Does your company have a safe and anonymous mechanism through which workers in its supply chain or external individuals can raise complaints or concerns regarding human rights issues, and is this mechanism accessible by itinerant fishers at sea?

- a. _____ We ensure that all of our tuna suppliers publicly disclose online and in all of their labor contracts the procedures for their employees to file grievances that are secure, anonymous, and confidential, free from threat of retaliation. **Furthermore**, there is a protected avenue for workers to take their complaint to the level of us, the buyer, if not resolved by the supplier. (5)
- b. _____ We ensure that all of our tuna suppliers publicly disclose online, in worker contracts, and via direct verbal communication to workers the procedures for their employees to file grievances that are secure, anonymous, and confidential, free from threat of retaliation. (3)
- c. _____ We have ensured everything in item (b), but only for 75% or more of our tuna suppliers. (2)
- d. _____ We are unfamiliar with the grievance mechanisms employed by our tuna suppliers, but we commit to asking all suppliers about them within 15 business days. (1)
- e. _____ We are unfamiliar with the grievance mechanisms employed by our tuna suppliers. (0)

29. Our company has a public-facing, non-judicial grievance mechanism (GM) that is deemed effective according to the UNGP Sec. 31, because it is: (Please choose all that apply *and briefly explain how your GM meets each of these criteria:*) (1 pt each)

- a. ☐ Legitimate: enabling trust from the stakeholder groups for whose use they are intended, and being accountable for the fair conduct of grievance processes;
- b. ☐ Accessible: being known to all stakeholder groups for whose use they are intended, and providing adequate assistance for those who may face particular barriers to access;
- c. ☐ Predictable: providing a clear and known procedure with an indicative time frame for each stage, and clarity on the types of process and outcome available and means of monitoring implementation;
- d. ☐ Equitable: seeking to ensure that aggrieved parties have reasonable access to sources of information, advice and expertise necessary to engage in a grievance process on fair, informed and respectful terms;
- e. ☐ Transparent: keeping parties to a grievance informed about its progress, and providing sufficient information about the mechanism's performance to build confidence in its effectiveness and meet any public interest at stake;
- f. ☐ Rights-compatible: ensuring that outcomes and remedies accord with internationally recognized human rights;
- g. ☐ A source of continuous learning: drawing on relevant measures to identify lessons for improving the mechanism and preventing future grievances and harms.

Please add your explanations on how your GM meets each of these criteria either below or immediately following each of the checked options above.

30. Does your company provide for or cooperate with other actors in remediation to victims where it has caused (or contributed to) adverse human rights impacts (e.g., excessive working hours or non-payment of wages), or cooperate in remediation to victims where adverse impacts are directly linked to the tuna you sell through your suppliers? If so, please provide an example.

- a. ☐ Yes. Here is an example of the approach we took when an adverse human rights impact occurred, and how we changed our policies or procedures to prevent similar adverse impacts in the future: _____ (5)
- b. ☐ We have not discovered any adverse human rights impacts in our supply chain, but here is our public policy and approach that our company would take to provide for or enable a timely remedy for victims: _____ (1)
- c. ☐ We do not cooperate with other actors in remediation to victims. (-1)

31. Does your company engage with workers, including migrant fishers, during its risk and impact assessments?

- a. ☐ Yes, and this is how we engage with them: (5)
- b. ☐ No (-1)

32. Does your company inform remediation of identified impacts through consultation with affected workers or their representatives and prioritization of their needs?

- a. ☐ Yes, and this is how we engage with them: (5)
- b. ☐ No (-1)

33. How does your company deal with your suppliers when you find abuses?

- a. ☐ We immediately sever our business relationship with the supplier regardless of the severity of the abuse (-1)
- b. ☐ We do not sever the business relationship with the supplier even if it is a severe abuse and even when it cannot be effectively remediated through our leverage. (-1)
- c. ☐ We sever our business relationship with the supplier if it is an incredibly severe¹¹⁹ abuse that cannot be effectively remediated. (1)
- d. ☐ We sever our business relationship with the supplier if it is a repeat abuse that demonstrates we lack the leverage to ensure our supplier complies with our policies. (3)
- e. ☐ We exercise our leverage to ensure effective remediation of violations that are not incredibly severe, and do so with a clear, benchmarked, and time-bound plan, and work with our suppliers to educate them on human rights and ensure no future such violations occur. (5)

CURRENT SOURCING (20%)

34. Do you sell any of the following species of tuna in your wetcase, frozen foods, or shelf-stable categories? (You must indicate a “Yes” or a “No” (Y/N) for each item. Each “N” response receives 1 point, each “Y” response receives 0 pts.)

- _____ Atlantic Bluefin tuna (*Thunnus thynnus*)
- _____ Pacific Bluefin tuna (*Thunnus orientalis*)
- _____ Southern Bluefin tuna (*Thunnus maccoyii*)
- _____ Yellowfin tuna (*Thunnus albacares*) from the Indian Ocean
- _____ Yellowfin tuna (*Thunnus albacares*) caught with drifting longlines
- _____ Yellowfin tuna (*Thunnus albacares*) caught with FAD-caught purse seine
- _____ Bigeye tuna (*Thunnus obesus*) from the Indian Ocean
- _____ Bigeye tuna (*Thunnus obesus*) caught with drifting longlines
- _____ Skipjack tuna (*Katsuwonus pelamis*) from the Indian Ocean
- _____ Skipjack tuna (*Katsuwonus pelamis*) caught via FAD-caught purse seine
- _____ Albacore tuna (*Thunnus alalunga*) caught with drifting longlines
- _____ Longtail tuna (*Thunnus tonggol*) from the Indian Ocean
- _____ Longtail tuna (*Thunnus tonggol*) caught with drift gillnets

If applicable, please list which products your stores carry for each of the three brands below. 2 pts for each brand not carried.

- _____ Bumblebee brand tuna products: _____
- _____ Chicken of the Sea brand tuna products: _____
- _____ Starkist brand tuna products: _____

35. Do you sell any of the following shelf-stable tuna products?

For each cell in the chart, if applicable, please fill out the brand name of the tuna AND country of origin. For example, in the top-left empty cell, one might fill in “Acme Select pole-and-line skipjack” from the Maldives. If there are multiple examples per cell, please list all. For purposes of this question, the same source tuna that is offered in water or oil should be considered as a single SKU, and not as different variants depending on packed liquid. (Scoring: 2pts per example (SKU) listed, total maximum number of points is 12 for the whole question.)

Please enter the brand and the country of origin for each space, if applicable.	Pole and line or troll-caught tuna	Handline-caught tuna	FAD-free purse seine caught tuna
Private-label brand			
National brand			

36. How much of your TOTAL amount of tuna sold (across all categories) is caught using these methods? (For example, if 10% of your company's tuna by volume (across fresh, frozen, and shelf-stable categories) is caught via pole and line, then indicate that figure in the blank.)

	Percentage currently sourced in this manner
Pole and line	_____% (Percentage multiplied by 3 is the score for this entry.)
Troll or handline	_____% (Percentage multiplied by 3 is the score for this entry.)
Purse seine	_____% (Percentage multiplied by 0.7 is the score for this entry.)
FAD-free purse seine	_____% (Percentage multiplied by 2 is the score for this entry.)
Longline	_____% (Percentage multiplied by 0.5 is the score for this entry.)
Longline w/ bycatch mitigation	_____% (Percentage multiplied by 0.7 is the score for this entry.)
Drifting gillnet	_____% (Percentage multiplied by 0.5 is the score for this entry.)
Other: _____	_____%

Note on scoring: the total possible points for this chart is 300. The total points will be divided by 30 to fit a 10-point scoring scale, so that a perfect score for this question would be 10 points out of 10.

37. In what ways has your company considered how its purchasing practices (e.g., price demands) might affect the human rights of workers in its supply chain? (Please explain, and choose all that apply.)

- a. ____ We preferentially source from suppliers that meet or exceed internationally-recognized human rights and environmental sustainability standards. (4) Explain: _____
- b. ____ When significant (and positive) regulatory developments or improved buyer practices occur, we support such reforms by absorbing at least some of the increased costs associated with these reforms. (2) Explain: _____
- c. ____ When significant (and positive) regulatory developments or improved buyer practices occur, we support such reforms by absorbing a proportion of the increased costs based on proportion of profit. (4) Explain: _____
- d. ____ We have reformed our purchasing practices in another way, as follows: _____ (1)
- e. ____ We have not yet given this area any consideration. (0)

CUSTOMER EDUCATION/LABELING (5%)

38. Apart from country of origin, what other traceability information do you provide to customers to assist them in making environmentally sustainable and worker-friendly tuna choices while shopping in your stores? Do you label your private label seafood products either on the label or via a QR-code on the label with information on the following? (Choose all that apply; each option worth 1 point unless otherwise stated)

- a. ☐ Species name (common name, e.g., “skipjack”)
- b. ☐ Certification status (if applicable) according to a GSSI-recognized certification scheme (e.g., MSC)
- c. ☐ Sustainability status according to Monterey Bay Aquarium’s seafood watch criteria (e.g. red/yellow/green labeling)
- d. ☐ FAO catch area (its region number)
- e. ☐ Detailed fishing method (e.g., longline, FAD-free purse seine) (2)
- f. ☐ Port of landing
- g. ☐ Catch vessel and day of catch
- h. ☐ The flag state of the fishing vessel (2)
- i. ☐ Worker-specific information (e.g., “union produced”)
- j. ☐ other, please describe:

39. How do you ensure the most environmentally sustainable choices for tuna are easy to find, clearly labeled, and promoted in store? (Please select one, and provide photos to receive credit.)

- a. ☐ All Pole & line, FAD free, or MSC tuna are easy to find and promoted with shelf signs or banners (2)
- b. ☐ All shelf-stable tuna OR all of our own-brand pole & line, FAD free and MSC tuna are easy to find and promoted with shelf signs or banners (1)
- c. ☐ Some sustainable tuna products are promoted with basic labeling as part of the on-shelf pricing labels (0.5)
- d. ☐ None of the above (0)

OTHER POLICIES OR PRACTICES

40. Do you have any other or specific policies regarding sustainability or human rights for your own brand tuna as compared to other brands? If so, please describe. (No points are allocated for this question.)

41. Are there any other related policies or practices that your organization employs that are not specifically listed here? For example, a specific policy related to providing wifi for fishers on board fishing vessels or policies related to marine sanctuaries. (No points are allocated for this question.)

References

- 1 Food and Agriculture Organization of the United Nations. November 4, 2017. *An overview of the global tuna market*. <https://www.fao.org/in-action/globefish/fishery-information/resource-detail/en/c/880744/>
- 2 Galland, G Ph.D. April 28, 2023. *Global Tuna Fisheries—Worth \$40 Billion a Year—Still Face Threats*. The Pew Charitable Trusts. Available online at: <https://www.pewtrusts.org/en/research-and-analysis/articles/2023/04/28/global-tuna-fisheries-worth-40-billion-a-year-still-face-threats>
- 3 About Seafood. Aug, 2024. *Tuna Fish Market Insights*. SkyQuest. Available online at: <https://aboutseafood.com/tuna-council-3/tuna-facts/>
- 4 2021 Global Estimates of Modern Salary https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@ed_norm/@ipecc/documents/publication/wcms_854733.pdf
- 5 <https://news.mongabay.com/2023/12/still-on-the-menu-shark-fin-trade-in-u-s-persists-despite-ban/>
- 6 ALDI. n.d. *ALDI US Seafood Buying Policy*. Aldi US Corporate. Available online at: https://corporate.aldi.us/fileadmin/fm-dam/Corporate_Responsibility2/ALDI_US_Seafood_Buying_Policy_2016_update_FOR_WEBSITE_1_.PDF
- 7 ALDI. 2024. *Corporate Sustainability - Environment - Fish & Seafood*. ALDI US. Available online at: <https://corporate.aldi.us/corporate-sustainability/environment/fish-seafood/>
- 8 ALDI. 2024. *Corporate Sustainability - Supply Chain - Human Rights*. ALDI US. Available online at: <https://corporate.aldi.us/corporate-sustainability/supply-chain/human-rights/>
- 9 ALDI. Feb, 2021. *International Policy on Forced Labor*. (p.1-5) ALDI South Group. Available online at: <https://sustainability.aldisouthgroup.com/files/forced-labour-policy>
- 10 ALDI. May, 2021. *International Position Statement on LIVING WAGES AND LIVING INCOMES*. ALDI South Group. Available online at: <https://sustainability.aldisouthgroup.com/files/living-wages-and-living-incomes-position-statement>
- 11 ALDI. Dec, 2023. *Business Partner Sustainability Standards*. ALDI South Group. Available online at: <https://sustainability.aldisouthgroup.com/files/2023-business-partner-sustainability-standards>
- 12 ALDI. Feb, 2021. *International Policy on Forced Labor*. (p.1-5) ALDI South Group. Available online at: <https://sustainability.aldisouthgroup.com/files/forced-labour-policy>
- 13 ALDI. Feb, 2021. *International Policy on Forced Labor*. (p.1-5) ALDI South Group. Available online at: <https://sustainability.aldisouthgroup.com/files/forced-labour-policy>
- 14 ALDI. 2024. *Corporate Sustainability - Environment - Fish & Seafood*. ALDI US. Available online at: <https://corporate.aldi.us/corporate-sustainability/environment/fish-seafood/>
- 15 ALDI. July, 2015. *ALDI "Social Standards in Production"*. ALDI South Group. Available online at: <https://sustainability.aldisouthgroup.com/files/aldi-social-standards-in-production>
- 16 ALDI. n.d. *ALDI US Seafood Buying Policy*. Aldi US Corporate. Available online at: https://corporate.aldi.us/fileadmin/fm-dam/Corporate_Responsibility2/ALDI_US_Seafood_Buying_Policy_2016_update_FOR_WEBSITE_1_.PDF
- 17 ALDI. 2024. *Corporate Sustainability - Supply Chain - Human Rights*. ALDI US. Available online at: <https://corporate.aldi.us/corporate-sustainability/supply-chain/human-rights/>
- 18 Whole Foods. January 2023. *Whole Foods Market Supplier Code of Conduct*. Whole Foods Market. Available online at: <https://assets.wholefoodsmarket.com/www/company-info/Whole%20Foods%20Market%20Supplier%20Code%20of%20Conduct%202023.pdf>
- 19 Whole Foods. January 2023. *Whole Foods Market Supplier Code of Conduct*. Whole Foods Market. Available online at: <https://assets.wholefoodsmarket.com/www/company-info/Whole%20Foods%20Market%20Supplier%20Code%20of%20Conduct%202023.pdf>
- 20 Whole Foods. 2022. *Whole Foods Sustainability Report 2022 - Supply Chain Social Responsibility*. (p.18) Whole Foods Market. Available online at: https://assets.wholefoodsmarket.com/www/missions-values/WholeFoodSustainabilityReport_2022.pdf
- 21 Greenpeace. May 31, 2021. *FORCED LABOUR AT SEA: The case of Indonesian Migrant Fishers*. Greenpeace Southeast Asia and SBMI. Available online at: https://www.greenpeace.org/static/planet4-southeastasia-stateless/2021/05/ef65bfe1-greenpeace-2021-forced-labour-at-sea-digital_final.pdf
- 22 Whole Foods. 2024. *Seafood Standards Like Nowhere Else*. Whole Foods Market. Available online at: <https://www.wholefoodsmarket.com/quality-standards/seafood-standards>
- 23 Whole Foods. Feb 3, 2021. *Whole Foods Market Canned Tuna Sourcing Policy*. Whole Foods Market. Available online at: https://assets.wholefoodsmarket.com/www/Whole_Foods_Market_Canned_Tuna_Sourcing_Policy_2.3.21.pdf
- 24 Whole Foods. 2024. *Seafood Standards Like Nowhere Else*. Whole Foods Market. Available online at: <https://www.wholefoodsmarket.com/quality-standards/seafood-standards>
- 25 Ahold Delhaize. 2022. *Human Rights Report 2022*. Ahold Delhaize. Available online at: <https://media.aholddelhaize.com/media/zprnx2ho/ahold-delhaize-human-rights-report-2022.pdf?t=637902991090930000>
- 26 Ahold Delhaize. 2022. *Human Rights Report 2022*. (p.12). Ahold Delhaize. Available online at: <https://media.aholddelhaize.com/media/zprnx2ho/ahold-delhaize-human-rights-report-2022.pdf?t=637902991090930000>
- 27 Ahold Delhaize. 2022. *Human Rights Report 2022*. (p.37). Ahold Delhaize. Available online at: <https://media.aholddelhaize.com/media/zprnx2ho/ahold-delhaize-human-rights-report-2022.pdf?t=637902991090930000>
- 28 Ahold Delhaize. 2022. *Human Rights Report 2022*. (p.10). Ahold Delhaize. Available online at: <https://media.aholddelhaize.com/media/zprnx2ho/ahold-delhaize-human-rights-report-2022.pdf?t=637902991090930000>
- 29 Ahold Delhaize. 2022. *Human Rights Report 2022*. Ahold Delhaize. Available online at: <https://media.aholddelhaize.com/media/zprnx2ho/ahold-delhaize-human-rights-report-2022.pdf?t=637902991090930000>
- 30 Ahold Delhaize. 2022. *Human Rights Report 2022*. (p.30). Ahold Delhaize. Available online at: <https://media.aholddelhaize.com/media/zprnx2ho/ahold-delhaize-human-rights-report-2022.pdf?t=637902991090930000>

- 31 Goldschmidt, B. April 10, 2024. *Walmart, Albertsons Among 1st to Sign Tuna Transparency Pledge*. Progressive Grocer. Available online at: <https://progressivegrocer.com/walmart-albertsons-among-1st-sign-tuna-transparency-pledge>
- 32 Albertsons. 2024. *Position Statements - At-Sea Transshipment of Tuna*. Albertsons. Available online at: <https://www.albertsonsoncompanies.com/our-impact/position-statements/default.aspx>
- 33 Albertsons. 2020. *Albertsons Companies' Due Diligence Progress: 2020*. Albertsons. Available online at: https://s29.q4cdn.com/239956855/files/our_impact/AlbertsonsCos_Due_Diligence_Plan.pdf
- 34 Albertsons. 2024. *Responsible Seafood - Traceability*. Albertsons. Available online at: <https://www.albertsonsoncompanies.com/our-impact/products/responsible-seafood/default.aspx>
- 35 Sustainable Fisheries Partnership. 2024. *Protecting Ocean Wildlife Pledge*. Sustainable Fisheries Partnership. Available online at: <https://sustainablefish.org/impact-initiatives/protecting-ocean-wildlife/reducing-bycatch/protecting-ocean-wildlife-pledge/>
- 36 Giant Eagle. N.D. *Tuna Policy*. Giant Eagle. Available online at: <https://www.gianteagle.com/about-us/sustainable-seafood/tuna-policy>
- 37 Giant Eagle. N.D. *Supplier Code of Conduct*. Giant Eagle. Available online at: <https://www.datocms-assets.com/25866/1704368324-final-giant-eagle-supplier-code-of-conduct.pdf>
- 38 WWF. April 23, 2024. *Global Fisheries Improvement Fund Supports First Project in Chile with Industry and Philanthropy Contribution*. World Wildlife Fund. Available online at: <https://www.worldwildlife.org/blogs/sustainability-works/posts/global-fisheries-improvement-fund-supports-first-project-in-chile-with-industry-and-philanthropy-contribution>
- 39 Ocean Disclosure Project. 2023. *Giant Eagle*. Ocean Disclosure Project. Available online at: <https://oceandisclosureproject.org/companies/giant-eagle>
- 40 Sustainable Fisheries Partnership. 2024. *Protecting Ocean Wildlife Pledge*. Sustainable Fisheries Partnership. Available online at: <https://sustainablefish.org/impact-initiatives/protecting-ocean-wildlife/reducing-bycatch/protecting-ocean-wildlife-pledge/>
- 41 Hy-Vee. 2023. *Seafood Procurement Policy*. Hy-Vee. Available online at: https://a9effd958e0dc59aaf3b-80520a33cc33a15351bd958c9b8ecc55.ssl.cf2.rackcdn.com/2023_HyVee_Seafood%20Supplier%20Expectations%20and%20Code%20of%20Conduct%20Letter_All%20Elements_Final.pdf
- 42 Hy-Vee. 2023. *Seafood Procurement Policy*. Hy-Vee. Available online at: https://a9effd958e0dc59aaf3b-80520a33cc33a15351bd958c9b8ecc55.ssl.cf2.rackcdn.com/2023_HyVee_Seafood%20Supplier%20Expectations%20and%20Code%20of%20Conduct%20Letter_All%20Elements_Final.pdf
- 43 Hy-Vee. 2024. *Seafood Supplier Expectations and Code of Conduct Letter*. Hy-Vee. Available online at: https://f0aa1588d63bbf876d65-3976be7afcf464b522431ef7c594a9c.ssl.cf2.rackcdn.com/2024_HyVee_Seafood%20Supplier%20Expectations%20and%20Code%20of%20Conduct%20Letter_Final.pdf
- 44 Hy-Vee. April 2023. *Public Report - Hy-Vee Tuna Fishing Vessel List - January - October 2022*. Hy-Vee and Fish Wise. Available online at: https://a9effd958e0dc59aaf3b-80520a33cc33a15351bd958c9b8ecc55.ssl.cf2.rackcdn.com/2023-04_Hy-Vee%20Tuna%20Vessel%20Name%20List_Public_FinalDraft.pdf
- 45 Hy-Vee. 2023. *Seafood Procurement Policy*. Hy-Vee. Available online at: https://a9effd958e0dc59aaf3b-80520a33cc33a15351bd958c9b8ecc55.ssl.cf2.rackcdn.com/2023_HyVee_Seafood%20Supplier%20Expectations%20and%20Code%20of%20Conduct%20Letter_All%20Elements_Final.pdf
- 46 Hy-Vee. April 2023. *Public Report - Hy-Vee Tuna Fishing Vessel List - January - October 2022*. Hy-Vee and Fish Wise. Available online at: https://a9effd958e0dc59aaf3b-80520a33cc33a15351bd958c9b8ecc55.ssl.cf2.rackcdn.com/2023-04_Hy-Vee%20Tuna%20Vessel%20Name%20List_Public_FinalDraft.pdf
- 47 Hy-Vee. 2023. *Seafood Procurement Policy*. Hy-Vee. Available online at: https://a9effd958e0dc59aaf3b-80520a33cc33a15351bd958c9b8ecc55.ssl.cf2.rackcdn.com/2023_HyVee_Seafood%20Supplier%20Expectations%20and%20Code%20of%20Conduct%20Letter_All%20Elements_Final.pdf
- 48 Hy-Vee. 2023. *Seafood Procurement Policy*. Hy-Vee. Available online at: https://a9effd958e0dc59aaf3b-80520a33cc33a15351bd958c9b8ecc55.ssl.cf2.rackcdn.com/2023_HyVee_Seafood%20Supplier%20Expectations%20and%20Code%20of%20Conduct%20Letter_All%20Elements_Final.pdf
- 49 Kroger. Feb, 2022. *Human Rights Policy*. The Kroger Family of Companies. Available online at: <https://www.thekrogerco.com/wp-content/uploads/2022/02/Kroger-Human-Rights-Policy-Feb-2022.pdf>
- 50 Kroger. 2018. *Seafood Sustainability Policy*. The Kroger Family of Companies. Available online at: https://www.thekrogerco.com/wp-content/uploads/2018/12/The-Kroger-Co_Seafood-Sustainability-Policy_2018-July.pdf
- 51 Kroger. Feb, 2022. *Human Rights Policy*. The Kroger Family of Companies. Available online at: <https://www.thekrogerco.com/wp-content/uploads/2022/02/Kroger-Human-Rights-Policy-Feb-2022.pdf>
- 52 Kroger. Dec, 2022. *Vendor Code of Conduct*. The Kroger Family of Companies. Available online at: <https://www.thekrogerco.com/wp-content/uploads/2017/09/code-of-conduct.pdf>
- 53 Meijer. July 31, 2023. *Supplier Code of Conduct*. Meijer. Available online at: <https://vendornet.meijer.com/DocumentView/Download?fileName=Home/Documents/Supplier%20Code%20of%20Conduct.pdf>
- 54 Meijer. July 31, 2023. *Supplier Code of Conduct*. Meijer. Available online at: <https://vendornet.meijer.com/DocumentView/Download?fileName=Home/Documents/Supplier%20Code%20of%20Conduct.pdf>
- 55 Ocean Disclosure Project. N.D. *Meijer*. Ocean Disclosure Project. Available online at: <https://oceandisclosureproject.org/companies/meijer>
- 56 Target. September 2023. *2023 Sustainability and Governance Report - Purchasing Practices - Traceability (p.59)*. Target online. Available at: <https://corporate.target.com/getmedia/e4f81467-57ab-4787-a5a7-ab6efb7dd05c/Target-2023-Sustainability-and-Governance-Report.pdf>
- 57 Target. *Standards of Vendor Engagement*. Target. Available online at: <https://corporate.target.com/sustainability-governance/responsible-supply-chains/suppliers/standards-of-vendor-engagement>
- 58 Target. 2024. *Commitment to Sustainable Seafood*. Target. Available online at: <https://corporate.target.com/sustainability-governance/responsible-resource-use/environmental-impact-products/commitment-to-sustainable-seafood>
- 59 Target. 2024. *Commitment to Sustainable Seafood*. Target. Available online at: <https://corporate.target.com/sustainability-governance/responsible-resource-use/environmental-impact-products/commitment-to-sustainable-seafood>
- 60 Target. 2024. *Commitment to Sustainable Seafood*. Target. Available online at: <https://corporate.target.com/sustainability-governance/responsible-resource-use/environmental-impact-products/commitment-to-sustainable-seafood>

- 61 Sprouts. N.D. *Supplier Code of Conduct*. Sprouts Farmers Market. Available online at: <https://www.sprouts.com/about/supplier-code-of-conduct/>
- 62 Sprouts. N.D. *Responsible Seafood Sourcing Policy*. Sprouts Farmers Market. Available online at: <https://www.sprouts.com/responsibly-sourced-seafood/sourcing-policy/>
- 63 Sprouts. N.D. *Commitment to Human Rights*. Sprouts Farmers Market. Available online at: <https://www.sprouts.com/about/commitment-to-human-rights/>
- 64 Sprouts. 2023. *2023 Impact Report*. Sprouts Farmers Market. Available online at: https://s28.q4cdn.com/791277983/files/doc_downloads/esg/2023/2023-impact-report.pdf
- 65 Sprouts. N.D. *Commitment to Human Rights*. Sprouts Farmers Market. Available online at: <https://www.sprouts.com/about/commitment-to-human-rights/>
- 66 Sprouts. N.D. *Responsible Seafood Sourcing Policy*. Sprouts Farmers Market. Available online at: <https://www.sprouts.com/responsibly-sourced-seafood/sourcing-policy/>
- 67 Costco. Dec, 2023. *SDG 14 Life Below Water - Seafood & Aquaculture - Canned Tuna*. (p.6). Costco. Available online at: https://mobilecontent.costco.com/live/resource/img/static-us-landing-pages/4f-8Seafood_Aquaculture.pdf
- 68 Costco. Dec, 2023. *SDG 8 Decent Work and Economic Growth - Human Rights - Stakeholder Engagement & Risk Assessment*. (p.2). Costco. Available online at: https://mobilecontent.costco.com/live/resource/img/static-us-landing-pages/2e.HumanRights_REVISED_May.pdf
- 69 Seafood Task Force (STF). 2024. *Progress*. Seafood Task Force. Online available at: <https://www.seafoodtaskforce.global/progress>
- 70 Costco. Dec, 2023. *Sustainability*. Costco. Available online at: <https://www.costco.com/sustainability-introduction.html>
- 71 Costco. Dec, 2023. *SDG 14 Life Below Water - Seafood & Aquaculture*. (p.1). Costco. Available online at: https://mobilecontent.costco.com/live/resource/img/static-us-landing-pages/4f-8Seafood_Aquaculture.pdf
- 72 Costco. Dec, 2023. *SDG 14 Life Below Water - Seafood & Aquaculture*. (p.3). Costco. Available online at: https://mobilecontent.costco.com/live/resource/img/static-us-landing-pages/4f-8Seafood_Aquaculture.pdf
- 73 Seafood Task Force (STF). 2024. *Mission, Vision & Approach*. Seafood Task Force. Available online at: <https://www.seafoodtaskforce.global/what/mission-brvision-br-approach>
- 74 Costco. Nov, 2018. *Supplier Code of Conduct - XII. Facility Audits*. Costco. Available online at: <https://www.costco.com/wcsstore/CostcoUSBCatalogAssetStore/Attachment/16w0604-sustainability-conduct.pdf>
- 75 Costco. Dec, 2023. *SDG 8 Decent Work and Economic Growth - Human Rights - Stakeholder Engagement & Risk Assessment*. Costco. Available online at: https://mobilecontent.costco.com/live/resource/img/static-us-landing-pages/2e.HumanRights_REVISED_May.pdf
- 76 H-E-B. 2022. *Sustainable Seafood*. H-E-B Newsroom. Available online at: https://newsroom.heb.com/community_trashed/our-promise/seafood-sustainability-at-h-e-b/
- 77 H-E-B. 2024. *H-E-B Seafood Policy*. H-E-B. Available online at: <https://www.heb.com/static-page/article-template/H-E-B-Seafood-Policy>
- 78 H-E-B. June 2021. *Supplier Code of Conduct*. H-E-B. Available online at: <https://storage.googleapis.com/supplier-prod-portal-storage/file-objects/PORTAL/73251d83-5411-4b4e-8ccd-206a78eeeed5>
- 79 H-E-B. *Seafood Sustainability Table*. H-E-B. Available online at: https://images.heb.com/is/content/HEBGrocery/PDF/seafood-sustainability-table.pdf?_gl=1*za5kh2*_ga*Mzk30TkxOTMxLjE3MTk0NTE4NzA.*_ga_WKSH6HYPT4*MTcxOTQ1MTg3MC4xLjAuMTcxOTQ1MTg3MC4wLjAuMA
- 80 H-E-B. June 2021. *Supplier Code of Conduct*. H-E-B. Available online at: <https://storage.googleapis.com/supplier-prod-portal-storage/file-objects/PORTAL/73251d83-5411-4b4e-8ccd-206a78eeeed5>
- 81 H-E-B. *Seafood Sustainability Table*. H-E-B. Available online at: https://images.heb.com/is/content/HEBGrocery/PDF/seafood-sustainability-table.pdf?_gl=1*za5kh2*_ga*Mzk30TkxOTMxLjE3MTk0NTE4NzA.*_ga_WKSH6HYPT4*MTcxOTQ1MTg3MC4xLjAuMTcxOTQ1MTg3MC4wLjAuMA
- 82 H-E-B. 2022. *Sustainable Seafood*. H-E-B Newsroom. Available online at: https://newsroom.heb.com/community_trashed/our-promise/seafood-sustainability-at-h-e-b/
- 83 H-E-B. 2022. *Sustainable Seafood*. H-E-B Newsroom. Available online at: https://newsroom.heb.com/community_trashed/our-promise/seafood-sustainability-at-h-e-b/
- 84 H-E-B. 2022. *Sustainable Seafood*. H-E-B Newsroom. Available online at: https://newsroom.heb.com/community_trashed/our-promise/seafood-sustainability-at-h-e-b/
- 85 H-E-B. June 2021. *Supplier Code of Conduct*. H-E-B. Available online at: <https://storage.googleapis.com/supplier-prod-portal-storage/file-objects/PORTAL/73251d83-5411-4b4e-8ccd-206a78eeeed5>
- 86 Publix. 2024. *Seafood Sustainability*. Publix. Available online at: <https://www.publix.com/products-services/seafood/sustainable-seafood>
- 87 Publix. 2024. *Sustainable Seafood*. Publix. Available online at: csr.publix.com/sustainable-seafood
- 88 Ocean Disclosure Project. 2021. *Publix*. Ocean Disclosure Project. Available online at: <https://oceandisclosureproject.org/companies/publix>
- 89 Trader Joe's. 2024. *FAQs - Product Information*. Trader Joe's. Available online at: <https://www.traderjoes.com/home/FAQ/product-faqs>
- 90 Eidelson, J. Jan 26, 2024. *Trader Joe's Follows SpaceX in Arguing US Labor Board Is Unconstitutional*. Bloomberg. Available online at: <https://www.bloomberg.com/news/articles/2024-01-26/trader-joe-s-follows-spacex-in-arguing-nlr-is-unconstitutional?sref=CgXrbSL6>
- 91 Eidelson, J. Jan 26, 2024. *Trader Joe's Follows SpaceX in Arguing US Labor Board Is Unconstitutional*. Bloomberg. Available online at: <https://www.bloomberg.com/news/articles/2024-01-26/trader-joe-s-follows-spacex-in-arguing-nlr-is-unconstitutional?sref=CgXrbSL6>
- 92 Trader Joe's. 2024. *FAQs - Product Information*. Trader Joe's. Available online at: <https://www.traderjoes.com/home/FAQ/product-faqs>
- 93 Walmart. April 20, 2023. *ESG Report - Social - Human Rights*. Walmart. Available online at: <https://corporate.walmart.com/purpose/esgreport/social/human-rights>
- 94 Walmart. Nov 2, 2018. *Human Rights Statement*. Walmart. Available online at: <https://corporate.walmart.com/policies>
- 95 Walmart. June 14, 2023. *Seafood Policy*. Walmart. Available online at: <https://corporate.walmart.com/policies>
- 96 Richard, M et al. June 14, 2023. *Raising Standards in Tuna Supply Chains: Walmart and Sam's Club Announce Enhanced Seafood Policy*. Walmart. Available online at: <https://corporate.walmart.com/news/2023/06/14/raising-standards-in-tuna-supply-chains-walmart-and-sams-club-announce-enhanced-seafood-policy>
- 97 Souza, K. Oct 29, 2022. *The Supply Side: Walmart's Great Value tuna helps support Marshall Islands*. Talk Business & Politics. Available online at: <https://talkbusiness.net/2022/10/the-supply-side-walmarts-great-value-tuna-helps-support-marshall-islands/>
- 98 The Nature Conservancy (TNC). N.D. *Walmart Inc. / Walmart Foundation*. The Nature Conservancy. Available Online at: <https://www.nature.org/en-us/about-us/who-we-are/how-we-work/working-with-companies/companies-investing-in-nature1/walmart/>

- 99 Pacific Island Tuna (PIT). 2021. *What we do*. Pacific Island Tuna. Available online at: <https://www.pacificislandtuna.com/whatwedo>
- 100 Walmart. April 20, 2023. *Human Rights*. Walmart. Available online at: <https://corporate.walmart.com/purpose/esgreport/social/human-rights>
- 101 Richard, M et al. June 14, 2023. *Raising Standards in Tuna Supply Chains: Walmart and Sam's Club Announce Enhanced Seafood Policy*. Walmart. Available online at: <https://corporate.walmart.com/news/2023/06/14/raising-standards-in-tuna-supply-chains-walmart-and-sams-club-announce-enhanced-seafood-policy>
- 102 Walmart. April 20, 2023. *Human Rights*. Walmart. Available online at: <https://corporate.walmart.com/purpose/esgreport/social/human-rights>
- 103 Wegmans. 2024. *Responsible Seafood Sourcing*. Wegmans. Available online at: <https://www.wegmans.com/responsible-seafood/>
- 104 Wegmans. 2024. *Wegmans Seafood Sourcing Policy 3.8*. Wegmans. Available online at: https://www.wegmans.com/wp-content/uploads/Wegmans-Seafood-Department-Sourcing-Policy_030824.pdf
- 105 Wegmans. 2024. *Wegmans Seafood Sourcing Policy 3.8*. Wegmans. Available online at: https://www.wegmans.com/wp-content/uploads/Wegmans-Seafood-Department-Sourcing-Policy_030824.pdf
- 106 Wegmans. 2024. *Wegmans Seafood Sourcing Policy 3.8*. Wegmans. Available online at: https://www.wegmans.com/wp-content/uploads/Wegmans-Seafood-Department-Sourcing-Policy_030824.pdf
- 107 UDHR: <https://www.un.org/en/about-us/universal-declaration-of-human-rights>
- 108 ICCPR: <https://www.ohchr.org/en/professionalinterest/pages/ccpr.aspx>
- 109 ICESCR: <https://www.ohchr.org/EN/ProfessionalInterest/Pages/CESCR.aspx>
- 110 ILO Core Conventions: <https://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm>
- 111 C188: https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C188
- 112 UNGP: https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf
- 113 To avoid confusion and aid in understanding, all salient terms of the contract must be verbally communicated to each worker as part of the onboarding process.
- 114 “Local” in this context means that, for example, distant water vessels flagged to Taiwan must pay its crew at least a living wage for Taiwan.
- 115 “Living wage” should be based on collective bargaining or an independently determined, established methodology. Companies should publicly disclose the methodology they use and work with trade unions and other relevant stakeholders to develop living wage benchmarks where they do not already exist.
- 116 <https://ohchr.org/Documents/Publications/MinnesotaProtocol.pdf>
- 117 Corporate Human Rights Benchmark (CHRB) defines Human Rights Due Diligence as “an ongoing risk management process that a reasonable and prudent company needs to follow in order to identify, prevent, mitigate and account for how it addresses its adverse human rights impacts. As set out in the UN Guiding Principles 17-21, this includes four key steps: assessing actual and potential human rights impacts; integrating and acting on the findings; tracking responses; and communicating about how impacts are addressed.”
- 118 “Senior level staff” should also include C-suite executives and Board members
- 119 According to the UN Guiding Principles on Business and Human Rights, severity is determined by an assessment of the scale (seriousness of harm), scope (number of individuals that are or will be affected), and irremediable character of the violation. A determination of severity does not require all three criteria to be met. There is no exhaustive list of “incredibly severe” abuses, but some examples include murder, disappearances, torture, and permanent or severe injuries (either physical or mental), including those that prevent the fisher from working or earning the same pay. In these instances, your supplier will not be able to restore those affected to a situation at least the same as, or equivalent to, their situation before the human rights abuse. When in doubt, retailers should consult directly with the affected people or their representatives before determining whether the abuse/s can be effectively remediated.

