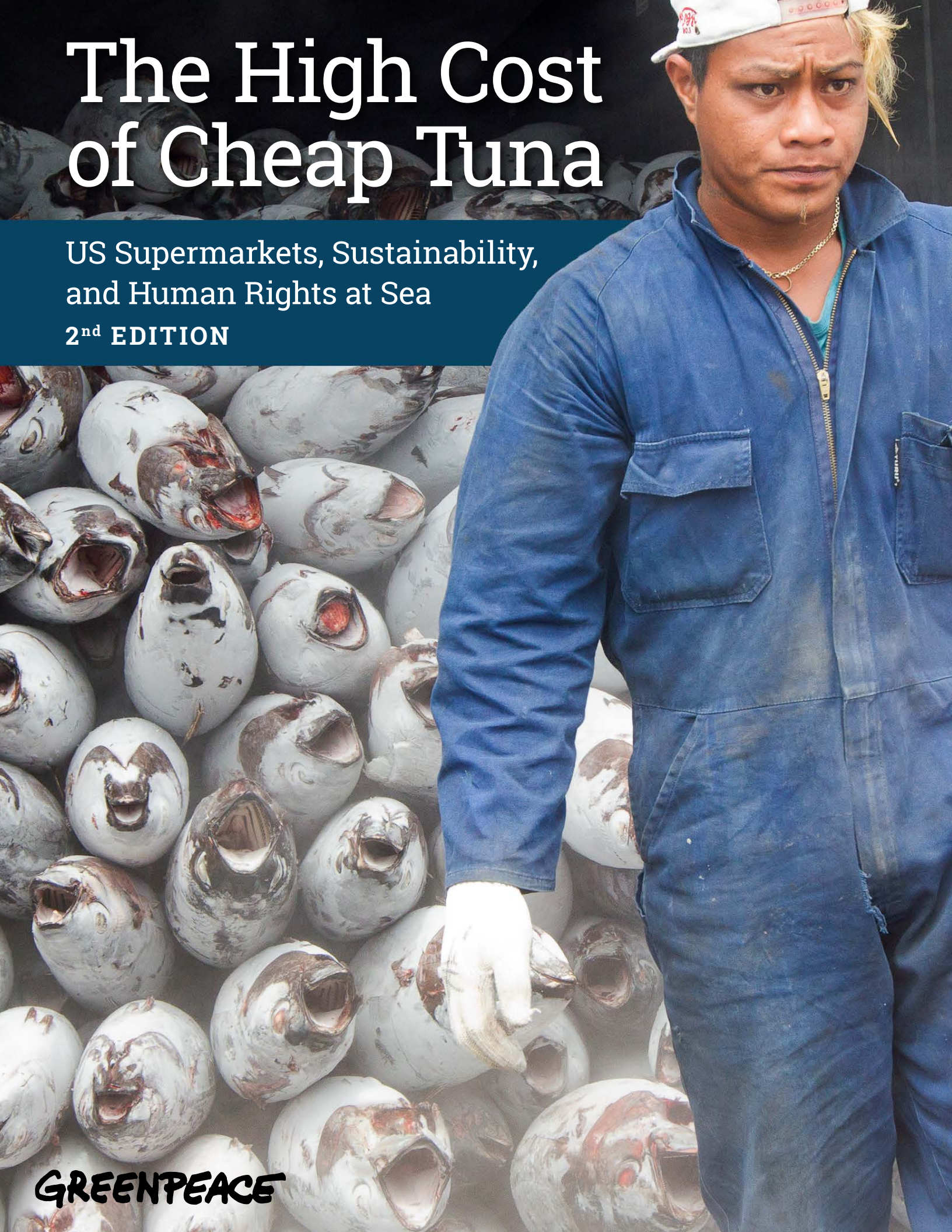


The High Cost of Cheap Tuna

US Supermarkets, Sustainability,
and Human Rights at Sea

2nd EDITION

GREENPEACE



GREENPEACE

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.

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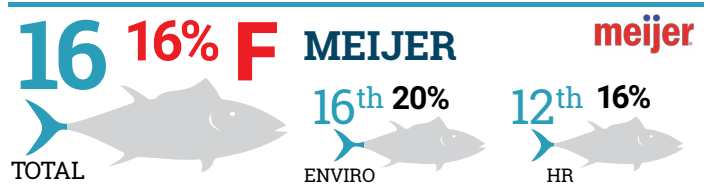
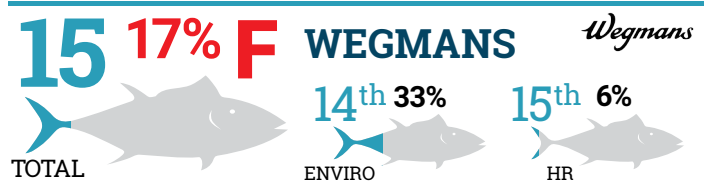
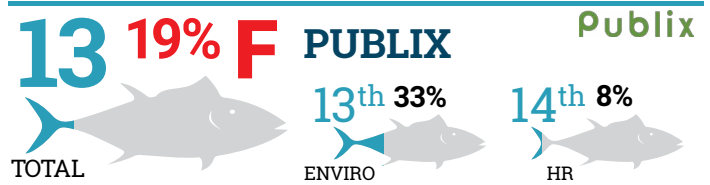
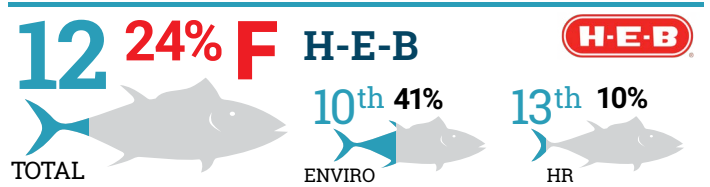
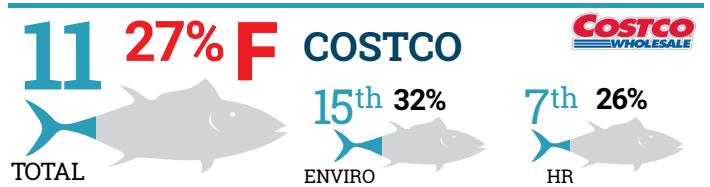
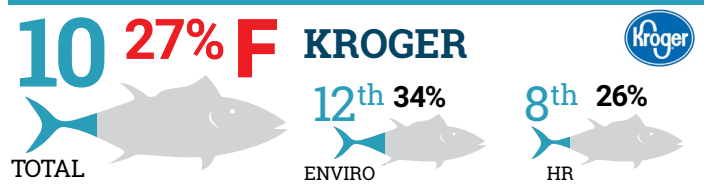
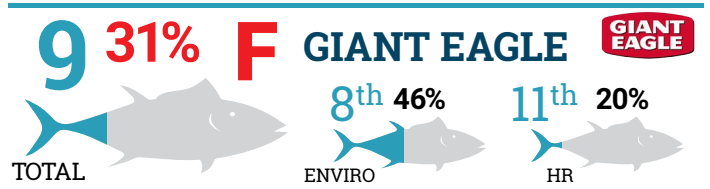
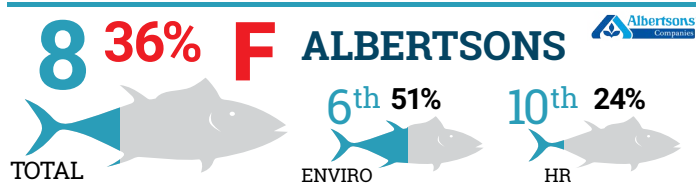
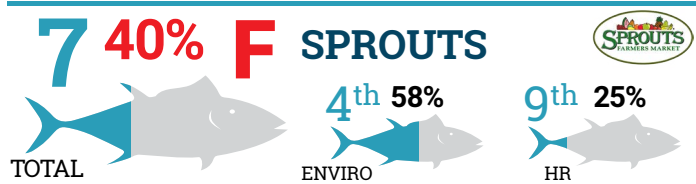
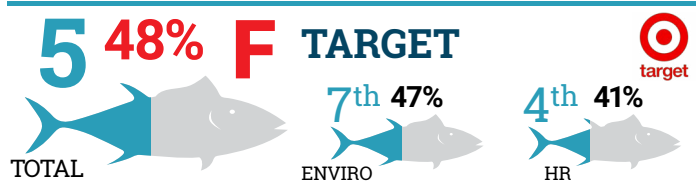
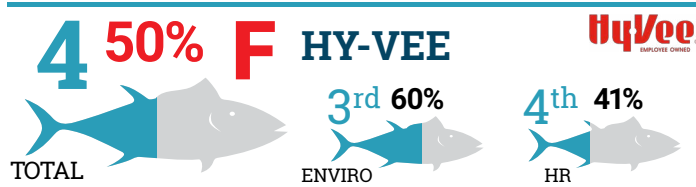
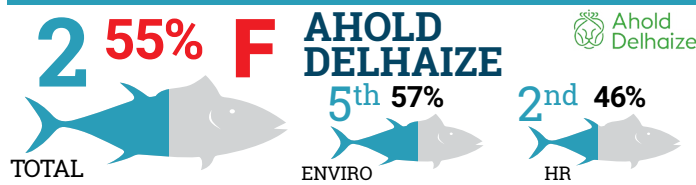
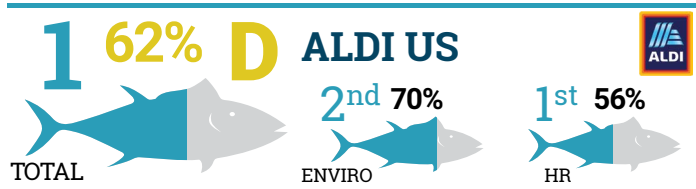


An underwater photograph showing a large school of tuna swimming in clear blue water. In the lower-left corner, a diver in a black wetsuit is visible, swimming towards the left. The scene is illuminated from above, creating a bright, ethereal atmosphere.

Table of Contents

4	2022 Tuna Retailer Scorecard
5	Introduction
8	Results & Findings
17	Conclusion
18	Retailer Profiles
35	References
37	Appendix: 2022 Retailer Survey

2022 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 second scorecard measuring the human rights and sustainability practices of major US supermarkets in tuna supply chains, all but one retailer received a failing score. Overall, we saw only marginal improvements in scores since last year.

That said, this report shows some early signs of movement in the right direction — a handful of retailers, while not nearly doing enough to get them across the line of a passing grade, have still recorded healthy improvements in their scores. And one — Aldi — has even managed to pass by a whisker.

In 2021, Greenpeace USA released the [first edition of the High Cost of Cheap Tuna](#) — a report that assessed 16 major US tuna retailers and ranked them based on their environmental and human rights policies pertaining to their tuna supply chains. All 16 retailers surveyed in that report received failing scores, demonstrating a disturbing lack of focus from the industry towards growing human rights and forced labor concerns in global tuna supply chains.

Since the release of the first edition of the High Cost of Cheap Tuna, sustainability and human rights concerns in the tuna industry persist. According to the latest stock assessments, among the 23 major commercial stocks of tuna, five are either subject to overfishing or are already overfished^[1]. At the same time, reports of serious human rights violations and forced labor in global seafood supply chains continue to surface. A recent report found that 100,000 fishing-related deaths occur each year — three to four times previous estimates^[2]. These deaths and human rights abuses are most prevalent on fishing vessels associated with Illegal, Unreported, Unregulated (IUU) fishing practices. Together, labor abuse and Illegal, Unreported, and Unregulated (IUU) fishing are undermining the social and environmental sustainability of fisheries, with wide-ranging impacts, including the loss of individual human rights and nutritional and economic benefits to fishing communities and governments^[3].

The US is one of the largest importers of tuna in the world and US grocery retailers make a lion's share of the revenue in the tuna industry — in 2018, tuna vessels worldwide netted \$11 billion. Yet grocery stores earned almost four times that amount from their sales of tuna products in the same year^[4]. US retailers have the economic power to influence change in the global tuna industry, mainly through their sourcing decisions and business practices. The goal of the first edition of this

The US is one of the largest importers of tuna in the world and US grocery retailers make a lion's share of the revenue in the tuna industry - in 2018, tuna vessels worldwide netted \$11 billion. Yet grocery stores earned almost four times that amount from their sales of tuna products in the same year^[4].

report was to measure the extent to which US retailers are rising to this opportunity and provide a benchmark against which to measure future progress. Since the first edition revealed retailers have a long way to go towards adequately addressing these issues in their supply chain, it became clear that there was a strong need to continuously track progress and to keep the pressure up to lead to meaningful and lasting change. That is the goal of this and all subsequent editions of this report.

As was the case with the first edition, the results this year are poor across the board. Of the 16 retailers surveyed, 15 received failing scores, and overall there were only marginal improvements in scores since last year. That said, this report shows some early signs of movement in the right direction — a handful of retailers, while not nearly doing enough to get them across the line of a passing grade, have still recorded improvements in their scores. And one — Aldi — has even managed to pass by a whisker. As a result, while this report illuminates a disappointing state of affairs, it ultimately provides an optimistic outlook that the industry as a whole will more fully embrace policies and practices that ensure tuna sold in the US is caught in a manner that is sustainable

and ensures that those responsible for its catching and processing are treated justly, remunerated fairly, and meaningfully engaged in social responsibility initiatives.

However, given the results so far, it seems certain that such change will require consistent pressure on retailers. This report, and future editions, are a part of that pressure, highlighting those retailers that are falling far short of what is required and recognizing those that take progressive actions. Ultimately, however, consumers must also contribute to this pressure by demanding that their grocery chains take swift and meaningful action. The power of individual and collective action is the best hope of bringing about a sustainable and equitable future.

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 2022, the survey expanded slightly once more, with the addition of a question on whether retailers have "a standalone human rights/labor policy that covers tuna procurement in your fresh, frozen, and shelf-stable categories."

With that addition, this year's survey contains 39 questions in six categories:

1. Tuna Procurement Policy
2. Traceability
3. Advocacy & Initiatives
4. Human Rights & Labor Protections
5. Current Sourcing
6. Customer Education & Labeling

The questions in these categories addressed the following areas:







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%)**
Are they able to trace all their tuna back to the individual vessel that caught them? Will they commit to making lists of those vessels public? How are retailers able to 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.

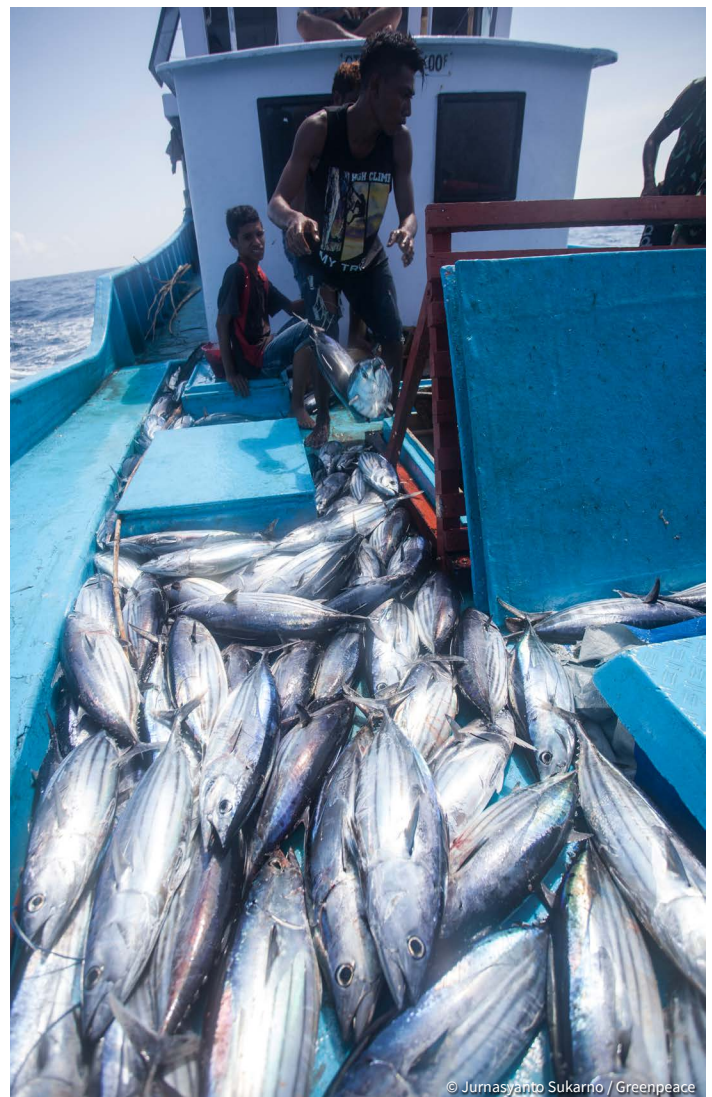
Category	Max raw points	Weighting
 Tuna procurement policy	89	20%
 Traceability	27	20%
 Advocacy and initiatives	29	10%
 Human rights and labor protections	51	25%
 Current sourcing	53	20%
 Customer education/labeling	14	5%

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 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, there is reason for optimism. Last year, 9 of 16 companies responded to our questions. This year, of the 16 companies that we approached, 11 — Ahold Delhaize, Albertsons, Aldi, Giant Eagle, Hy-Vee, The Kroger Company, Meijer, Southeastern Grocers, 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 five “non-responsive companies” — Costco, HEB, Publix, Walmart, 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.



Results & Findings



SCORES OVERVIEW

Results At A Glance

TOTAL SCORES:

- All but one retailer — Aldi — received failing scores.
- Aldi topped the rankings with an overall score of 61.51% or a D when converted to a letter grade
- Meijer came dead last with a disappointing 15.82%, followed closely by Wegmans (17.43%), Southeastern Grocers (17.73%), and Publix (18.53%).

ENVIRONMENTAL SCORES:

- All but two retailers — Aldi (69.96%) & Whole Foods (75.44%) — received failing Environmental scores.

HUMAN RIGHTS:

- All retailers received failing Human Rights scores
- All retailers scored worse on Human Rights than Environment

One Retailer Received Passing Scores

For the second year in a row, Aldi topped our retailer rankings, this time reaching an overall score of 61.51 percent, or a D when converted to a letter grade. While this is an improvement over last year's table-topping score of 59.77 percent, and means that Aldi is the first retailer to achieve an overall passing grade, alas, it is just barely a passing grade and certainly not a grade that one should be proud of in their report card. Along with every other retailer surveyed, Aldi scored an F on Human Rights but a 70 percent score in the Environment section carried it over the line overall. The only other retailer to score a passing grade in any section was Whole Foods, which topped Environment with a score of 75 percent but was dragged down to an overall failing grade by its much poorer performance on Human Rights. All other retailers failed on both sections. Every retailer scored worse on Human Rights than on Environment.

Growth Since Last Year

There are nonetheless reasons to be positive. No retailer's overall score declined, even as some retailers saw small decreases in one section or the other. Some showed solid overall increases: Giant Eagle and Southeastern Grocers by more than five percent, Kroger and Hy-Vee by more than seven, and Sprouts by a welcome 14.91 percent. More retailers responded to questions this year than last year, and several of those who did respond provided more detailed information than with past surveys.

The Worst Performers

Even amid a largely disappointing set of results, some retailers are notable for performing particularly poorly. Meijer came last overall with a score of 16 percent: its score on the Environment was 11.5 percentage points less than the next-worst-performing company in that segment, Costco. While few Human Rights scores could even be considered acceptable, Southeastern Grocers came last in that segment with an execrable 2.27 percent, which dragged the company down to 14th place overall despite a middle-of-the-pack ranking on Environment. Other notably poor performers included Wegmans, which finished 14th on Environment and 15th on Human Rights for 15th place overall; and Publix, which finished 13th in Environment rankings and 14th on Human Rights, for an overall 13th place.

When Greenpeace USA first started surveying companies on their sustainable sourcing policies over a decade ago, talk of Fisheries Improvement Projects (FIPs), bans on transshipment at sea and reduced bycatch was fairly new, and a long way from inclusion in seafood sourcing policies, assuming such policies existed at all. But, over the years these principles have moved to the mainstream and an increasing number of retailers have policies and commitments in place.

Despite years of guidance from international bodies, academic and NGO research and reports, shocking media exposés, and increasing consumer awareness, many companies have continued to ignore their responsibilities, while others have opted for surface-level changes without the deep engagement and understanding required to address these serious issues.

The similarities between where the industry was on environmental sustainability 10 years ago and where it currently is on human rights issues are hard to miss. Many companies appear not to have given it a thought, while even those who are leading the way still fall short in a number of areas. Despite years of guidance from international bodies, academic and NGO research and reports, shocking media exposés, and increasing consumer awareness, many companies have continued to ignore their responsibilities, while others have opted for surface-level changes without the deep engagement and understanding required to address these serious issues.

FINDINGS

The Good

Every Retailer Has Some Kind of Policy in Place

In response to questions on whether they had policies governing tuna procurement that consider both sustainability and labor/human rights concerns and whether those policies covered all tuna they sold, almost every retailer answered in the affirmative (or, if they did not respond to the survey, were judged from public records to have such policies). In fact, ten — Ahold, Albertsons, Aldi, Giant Eagle, HEB, Hy-Vee, Sprouts, Target, Walmart and Whole Foods — scored maximum points on these fundamental questions.

Most others lost points for having policies that covered less than 100% of tuna sold by them. For instance, while Meijer appeared to have a seafood sustainability policy, it was vague and didn't appear to apply to all tuna sold by them. Among all retailers, Southeastern Grocers was the only one that did not appear to have any labor/human rights policy at all.

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 [Q1-4](#) in the Appendix.

Many Retailers Are Able to Trace Tuna

All but two retailers profess an ability to trace every shop keeping unit (SKU) of tuna — fresh, frozen, and shelf-stable — down to the individual vessel that caught it, a positive development, given that traceability is fundamental to improving both environmental and human rights impacts associated with the tuna industry. Ahold, Aldi, Giant Eagle, HEB, Publix, SE Grocers, Sprouts, Wegmans and Whole Foods all scored maximum points on this question; only Costco, Kroger, and Meijer scored zero. However, when we asked all retailers whether they would commit to publishing a full list of the vessels from which they procure their tuna, all but one demurred; in contrast, Hy-Vee not only published its list in 2022 but has committed to doing so again. The question arises of just how valuable a traceability program can be if it is not also transparent and made available to the consumer; the fact that Hy-vee has done so, and continues to do so, demonstrates that it is clearly feasible.

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.



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Most Retailers Are Avoiding the Most Problematic Tuna Products

Following more than a decade of campaigning by NGOs, every retailer scored at least some points in response to the question of whether they avoid stocking some of the shelf-stable (or canned/tinned) tuna products that are known to be especially problematic, for example because of high levels of catch of non-target species. Ahold, Aldi, Hy-Vee, Sprouts, and Whole Foods scored maximum points here. Giant Eagle, HEB, and Kroger all saw improvement since last year. Whole Foods and Sprouts also scored highly on the question of how they sourced all their tuna products, and the extent to which they favored more sustainable fisheries practices such as pole-and-line. Meanwhile, Albertsons, Costco, Kroger, and Walmart showed positive progress in this area.

Our Asks: We ask that supermarkets don't sell tuna species caught using the methods most commonly linked to environmental harm and that they do not source certain at-risk species and/or stocks of tuna. For more information, see [Q34](#) and [Q36](#) in the Appendix.

The Promising

Progress on Policy Commitment to International Human Rights Frameworks & Principles

Most retailers expressed some level of commitment to respecting all internationally recognized human rights and fundamental rights at work across all activities throughout their supply chain. Points were awarded to those retailers who explicitly expressed adherence to, or guidance from, the United Nations Declaration on Human Rights, the UN Guiding Principles on Business and Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, and the ILO Work in Fishing Convention of 2007, all of which set out fundamental rights for workers generally and/or fishworkers specifically. Although most scored at least some points, few acknowledged the ILO Work in Fishing Convention, which we strongly encourage retailers to incorporate into their seafood policies as it provides very specific guidance on issues fishworkers face. Four retailers — HEB, Publix, SE Grocers, and Wegmans — scored zero points here; only Aldi scored the maximum.

Our Asks: We ask retailers to commit to upholding all internationally-recognized human rights and fundamental rights at work and to explicitly link that commitment to a slate of UN and ILO conventions, declarations, and guidance listed in Q6 of Appendix. Retailers must not cherry pick from among these standards or selectively apply elements of these standards. These standards must also be applied across all activities in their supply chain. For more information, see [Q6](#) of the Appendix.

Several Suppliers Are Showing Progress on Policies Related to Worker Recruitment

Several retailers declared that they require suppliers to recruit workers only through formalized avenues and agencies that are not on any government or NGO red lists, and forbid suppliers from charging those workers recruitment fees or subjecting them to wage deductions. In the past, few, if any retailers have paid attention to this important area. Because of this, we scored this question generously, wanting to acknowledge and encourage the few companies that showed some progress in this area, even when they could not provide guarantees that their suppliers abided by such policies. Six out of sixteen companies — Aldi, Costco, Hy-Vee, Target, Walmart, and Whole Foods — scored relatively well; all the others, however, fell short.

Our Asks: We ask that retailers have a policy of only working with suppliers who recruit workers through formalized venues and don't work with agencies that are on red lists. They must also comply with the Employer Pays Principle as set out in UN principles and explicitly prohibit the collection of any recruitment fees or wage deductions from workers. For more information, see [Q9-11](#) of the Appendix.



The Bad

Little Human Rights Due Diligence to Ensure Policies Are Adhered To

Even though there has been some progress in establishing human rights policies and conducting risk assessments, there is very little sign of retailers making efforts towards comprehensive human rights due diligence. We asked several questions in this regard, related to the extent to which they go beyond an audit-based approach (an approach which has been shown to be ineffective at addressing human and labor rights risks^[5]) to establish and implement a human rights due diligence framework, and assign senior level staff to track and respond to human rights risks and impacts in their tuna supply chains. Very few performed well: Not a single company received full points. In fact, the worst performers seemed to have barely considered the issue at all. SE Grocers scored just one point out of a possible 56, HEB zero, and Wegmans and Publix contrived to achieve negative scores.

Special mention, however, to Ahold, Aldi, Target, and Walmart, which have demonstrated progress in establishing some sort of system to track human rights risks. However, by themselves, these efforts fall short in

that they lack meaningful engagement with workers in their design, implementation, and governance; do not have effective and accessible grievance mechanisms, and continue to fall short in terms of remediation processes.

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 & 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. In addition, retailers must have processes in place for workers in their supply chains to lodge human or labor rights grievances directly with them and for those grievances to be remediated. For more information, see [Q22-33](#) of the Appendix.



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Policy Commitments Are Not Translating Into Changes in Sourcing & Purchasing Practices

Not one single retailer responded affirmatively to the question of whether they 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. To be fair, this question was an ambitious one, not least because only 20 countries have ratified this ILO convention. However, the principles enshrined in the convention should be a cornerstone for any procurement policy — and preferentially sourcing from companies that allow fundamental workers' rights should also be non-controversial. Retailers have shown they are prepared to draw red lines in their sourcing for fisheries that do not meet certain environmental standards, and we applaud them for that. But, the fact that they do not presently offer the same weight to workers' rights is a major failing.

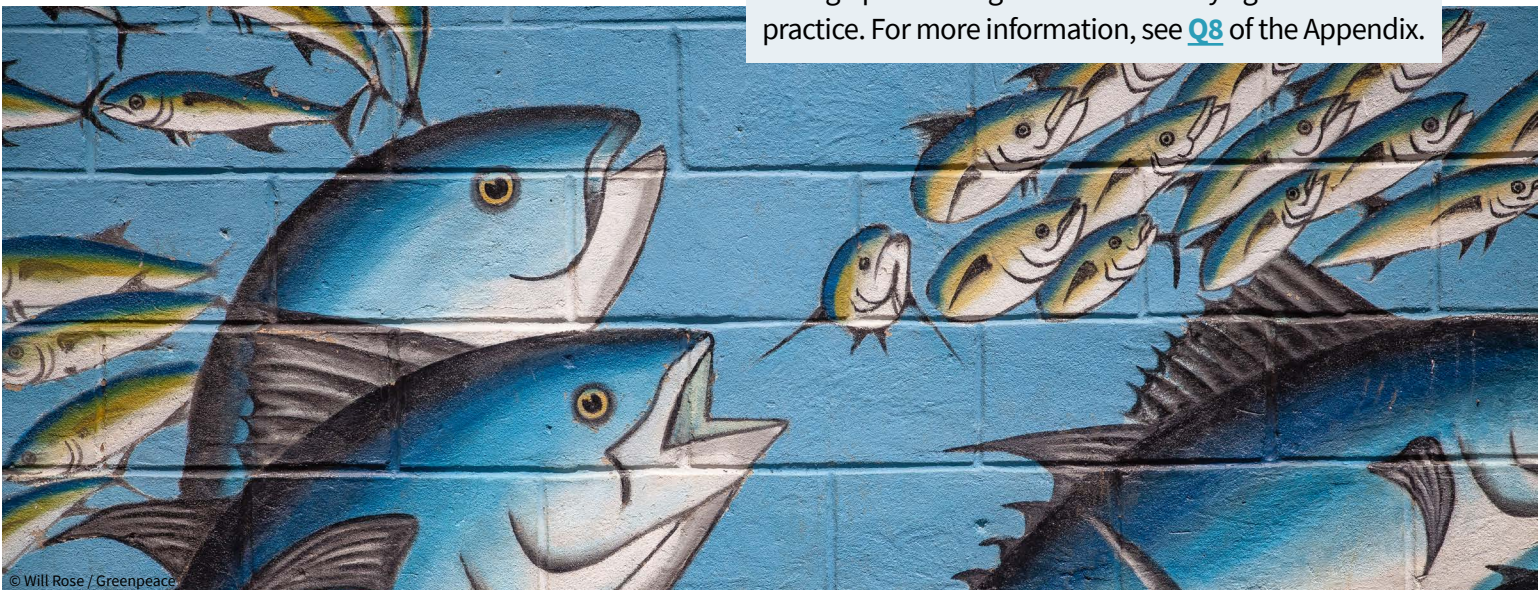
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Few Limits on Transshipment at Sea ...

Transshipment at sea — in which fish or marine wildlife is transferred from one vessel to another, allowing the fishing vessel to stay out at sea longer — is a major issue in global commercial fisheries. It often takes place on the High Seas, out of sight and beyond enforcement, and can lead to Illegal, Unreported and Unregulated (IUU) fishing. Because it enables ships to remain at sea for months or even years at a time (the vessels to which they transship fish generally provide fuel and supplies), it is also a means of exploiting workers, keeping them away from their homes and, often, from access to internet or cell service to communicate with anyone beyond their vessel.

Ahold, Aldi, Albertsons, Giant Eagle, Hy-Vee, Sprouts and Target claim to allow transshipment at sea only when there is 100 percent [observer coverage](#). However, in practice, the rates of observer coverage are extremely low. For instance, observers are present on only approximately five percent of tuna longliners in the Pacific Ocean⁶. Further, observers are usually deployed on the carrier vessel, meaning fishing methods, locations, and conditions aboard catching vessels are largely unmonitored. Observer coverage also does not address the human rights risks associated with transshipment, as observers currently do not have a mandate to report on working conditions of vessel crew. This policy, especially when coupled with concrete reporting requirements from suppliers about transshipment events, is, nonetheless, 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. By doing this, retailers can send a strong upstream signal in the industry against this practice. For more information, see [Q8](#) of the Appendix.





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... And Little Advocacy for Protection of Observers

There are other problems with using observer coverage as a pretext for allowing transshipment at sea — namely the lack of observer safety. Being an independent observer on a fishing vessel that is at sea for weeks or months at a time is a perilous undertaking: a 2020 report by the NGO Human Rights at Sea listed 10 recommendations for improving observer safety, citing the unexplained deaths of observers onboard two tuna purse seine vessels^[7]. However, when retailers were asked what steps they took to advocate for observer protection, only Ahold and Aldi were able to provide somewhat comprehensive responses; Costco, HEB, Hy-Vee, Kroger, Meijer, Publix, SE Grocers, Sprouts and Wegmans were not able to provide any response at all.

Our Asks: We ask that retailers advocate on international and regional levels for the adoption of policies and practices that heighten observer protection, including measures that ensure observer deaths are properly investigated. We also ask that retailers ensure observers receive heightened protections as human rights defenders and include them in their human rights due diligence process. For more information, see [Q20](#) of the Appendix.

Lack of Commitment to Workers' Safety and Well-Being

We asked retailers what steps they took to ensure the safety and well-being of the workers on the tuna vessels that supply them. Specifically, we asked if they require vessels to 1) comply with international safety standards, 2) provide vessel crews with adequate rest, nutrition and potable water at no cost and 3) spend a maximum of three consecutive months at sea.

Albertson's and Hy-Vee answered yes regarding vessel safety, rest, nutrition and potable water; Whole Foods answered yes to a maximum of three months at sea. Aldi did not answer yes to any but expressed its commitment to "ensuring safety and health at sea and ... supporting several efforts to raise standards for employment at sea." No other retailers scored any points at all on what we consider to be a basic and fundamental requirement to protect the safety and well-being of workers who are catching tuna in dangerous and often difficult conditions. This area must improve.

Our Asks: We ask that retailers require vessels in their supply chains to comply with international safety standards and provide crew with adequate rest (no less than 10 hours in a 24 hour period and 77 hours in any-seven day period), and free and adequate nutrition and potable water. Furthermore, the vessels that catch their tuna should spend a maximum of three consecutive months at sea and allow their crew unfettered access to port services for a minimum of 10 days when they dock. We also ask that they only source from suppliers that require a fishing crew manifest for each vessel. For more information, see [Q12](#) of the Appendix.

Lack of Traceability & Transparency

As previously mentioned, although most retailers claim an ability to track every SKU of tuna, only Hy-Vee expressed a willingness to publish a full list of their supplying vessels. Similarly, when asked what steps they are taking to combat fish fraud — the intentional mislabeling of fish and fish products, leading consumers to believe they are buying something that they are not — few were able to provide a detailed response. Only Albertsons, Aldi, Hy-Vee, Target, and Whole Foods were able to score maximum points on this question. The importance of these two intertwined issues is clear: consumers need to be able to make informed choices about the tuna that they buy and to selectively support those suppliers and retailers that are taking the necessary steps to provide products of the standard that those consumers desire. Retailers need to provide customers with the information they need to make the decisions they want, and customers in turn are entitled to feel confident that the fish they are eating is the fish they believe they have bought.

Our Asks: We ask that retailers commit to publishing the full list of their supplier's fishing vessels covering 100% of their tuna products. In addition, retailers must also take proactive actions to combat potential fraud by instituting chain of custody mechanisms for product verification, and implementing periodic monitoring and traceability audits. For more information, see [Q15-18](#) of the Appendix.



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Conclusion



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Overall, this year's report does provide some reasons to be optimistic that retailers are regarding their responsibilities on sustainability and human rights with increasing seriousness. More retailers responded to our surveys than before, and some who had previously been sparse in their responses, provided more detailed answers, suggesting they were giving the issues greater thought and consideration.

No retailer's score declined from last year, several increased and one — Sprouts — saw its total score grow by almost 15 percent. For the first time, one retailer, Aldi, achieved an overall passing grade.

However, that one passing grade was only a D. Of 32 total grades on Environment and Human Rights, 29 were Fs. Even the better-performing retailers frequently fell far short of minimum requirements and expectations, whether it be refusing to stock problematic species or brands of tuna, showing transparency in supply lines, or adopting proactive measures to ensure the well-being of the workers who catch the tuna they sell.

It is encouraging that the majority of retailers now have some policies in place requiring them to consider human rights and environmental concerns as an integral element of their tuna procurement. However, for far too many, their involvement in those issues does not extend far enough beyond that. Too many are too passive and reliant on their

suppliers or third parties to ensure that standards are met, particularly when it comes to ensuring that workers are treated justly and appropriately compensated. In addition, the complete lack of meaningful engagement with workers themselves in the design, implementation, and governance of the few social responsibility processes that are being implemented is particularly concerning.

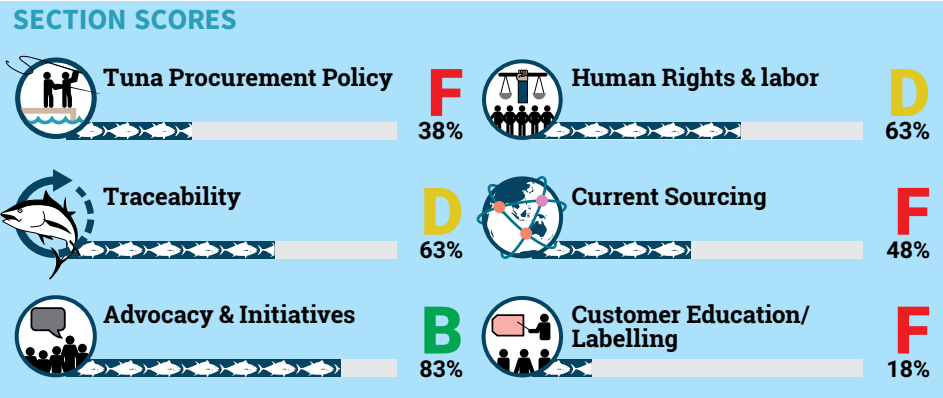
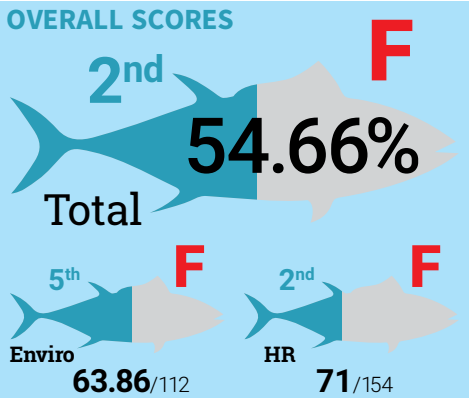
Greenpeace USA believes that among the US retailers, some of the largest players such as Kroger, Walmart, Albertsons, and Costco have an enhanced opportunity to influence change in this industry. With Kroger poised to capture an even higher market share due to its upcoming merger with Albertsons, its poor performance on the survey is especially notable and the industry-wide change it could make with increased engagement particularly marked.

It is our hope that with consistent monitoring and pressure, the industry will move in the right direction, taking decisive action to prevent environmental and human rights abuse in tuna supply chains. This is the goal of this and all subsequent editions of this report — to consistently track performance and inspire action. Armed with this information, consumers are ideally better equipped to demand swift change from their grocery retailer.

Progress is evident, but far too incremental. Far more can, and should, be done.

Retailer Profiles





Ahold answered the questionnaire and provided additional resources. It finished fifth on the Environment, second on Human Rights and second overall. Its total score increased by just under 2%, from 52.8% last year to 54.66% this year, primarily the result of a slight increase in scores on the **Human Rights & Labor Protections** and **Advocacy** sections.

Last year, we noted Ahold’s inaugural Human Rights Report^[8] as strong, noting that it stood out for its detailed understanding of the issues, its reference to international human rights instruments, and commitment to safeguarding migrants. The company followed that up in June 2022 with a second report that detailed actions taken towards further operationalizing its Human Rights Due Diligence plans^[9]. As a result, Ahold continues to boast a more developed due diligence framework than any other retailer.

The company also scored highly in the **Traceability** section for its auditing work, a section that covers both environmental and human rights issues^[10].

However, Ahold’s scores on catch methods employed in tuna sourcing (Current Sourcing section) declined marginally as compared to last year: their sourcing from pole and line, troll, and handline has decreased markedly while sourcing from purse seine has gone up dramatically.

Positive: As mentioned last year, Ahold’s initial Human Rights Report was a comprehensive and well-considered document, and the company has continued to show commitment toward human rights with the second edition of that report. On the **Tuna Procurement Policy** section, Ahold remains one of the only companies to express an explicit commitment to collective bargaining^[11], an issue that is gaining prominence as work to unionize fishers accelerates.

In the **Human Rights & Labor Protections** section, Ahold’s human rights due diligence framework^[11] remains considerably more advanced than many other retailers, many of whom had none at all. Ahold’s work goes beyond surface level social audits and lays out a framework for dealing with a range of human rights impacts.

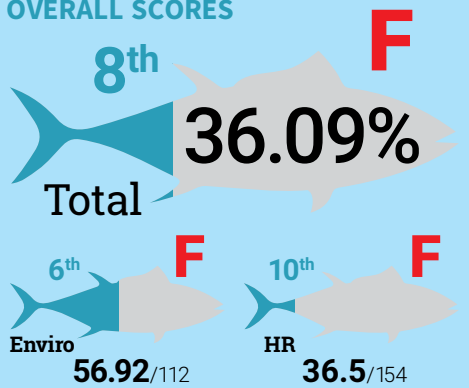
Ahold also scores highly for its **Traceability** work, a section that covers both environmental and human rights issues. And it topped the class with its work on **Advocacy**, having sent letters to governments, Regional Fisheries Management Organizations (RFMOs) and the UN on a number of issues related to the tuna industry — although we should note that this section inevitably favors larger companies with greater reach and resources.

Poor/Needs Improvement: Although it cites its whistleblower line^[9] as an example of the **grievance mechanisms** it provides, such lines are — given limitations in accessibility and opportunity, as well as language barriers and other issues — of limited effectiveness, particularly for those aboard distant water fishing vessels.

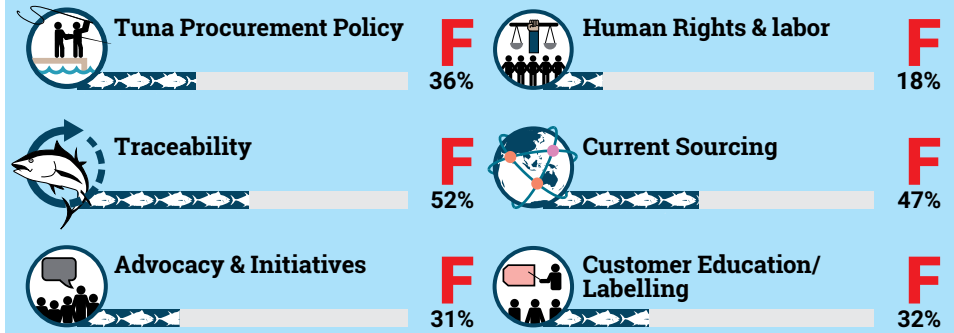
Relatedly, the company does not appear to have policies or programs in place that provides **access to remedy** for workers who are harmed; while it has piloted a program in the chocolate sector^[9], it has yet to consider this in the seafood space.

Although Ahold scores points in the **Current Sourcing** section for sourcing some shelf-stable tuna from more sustainable fisheries, its overall percentage of tuna caught using more destructive methods such as longlining and purse-seining remains far too high (77.6 percent and 15.2 percent respectively). In fact, its score in this area has declined from last year. Selling brands that do not meet Ahold’s own standards undermines the improvements their policies are driving. Refusing to stock brands associated with IUU fishing and other damaging environmental practices or human rights abuse would promote their own efforts further and provide clarity for their customers.

OVERALL SCORES



SECTION SCORES



Albertsons answered the questionnaire and provided additional resources^{[12][13][14][15][16]}. It finished sixth on Environment and 10th on Human Rights, for a position of eighth overall. Its overall score improved slightly due to a better performance in the sourcing category, specifically an increase in tuna caught from pole and line, troll and handline, and Fish Aggregating Device (FAD)-free purse seine methods. It is also commendable that Albertsons made improvements in data collection and was able to provide data on shelf-stable tuna in addition to fresh and frozen; last year they provided data only on the latter.

It scores points on **Traceability** and efforts to combat fish fraud, boasting a traceability and verification system that includes implementation of technology to gather chain-of-custody information.

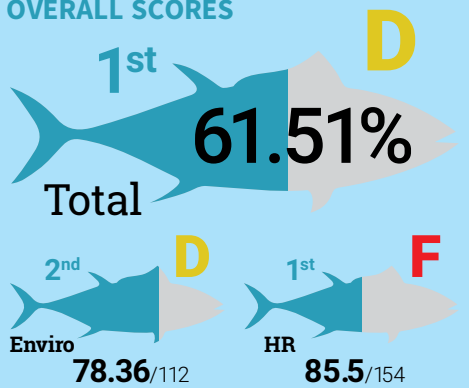
Positive: Albertsons has a public position on **transshipment-at-sea** of tuna^[14] that includes a requirement for suppliers to provide detailed reporting of transshipment events. Their position on transshipment also references robust national and international regulations related to vessel and crew safety and worker protections, including the Cape Town Agreement and the ILO's Work in Fishing Convention — C.188. However, the policy stops short of signaling a move toward phasing out transshipment.

Albertsons' work on **Traceability** was also commendable — including tackling fish fraud — despite not being able to trace 100 percent of their tuna back to the catching vessel. Albertsons appears to have developed a thoughtful approach that involves internal audits in partnership with a third-party organization, while not relying entirely on third parties. The implementation of technology to gather chain of custody data and assess risks also helps to improve oversight of supply chain risks

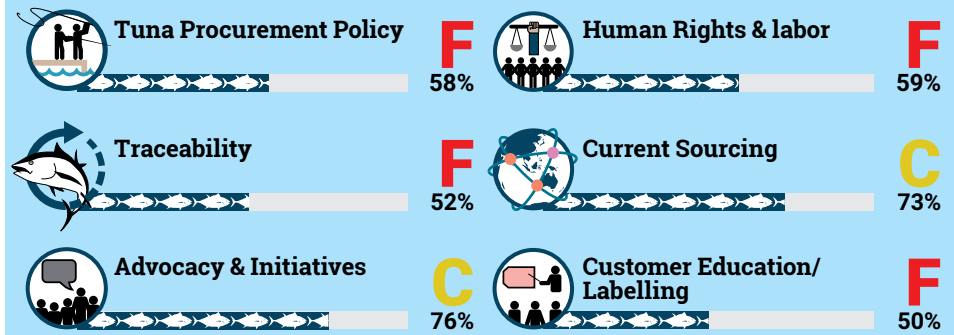
Poor/Needs Improvement: In line with many other retailers in the middle of the ranking, Albertsons scored well for having **Tuna Procurement Policies** in place, but missed out on points for lack of reference to specific instruments, particularly in relation to the UN Guiding Principles on Business & Human Rights (UNGP) and ILO Core Conventions.

Despite completing the survey, Albertsons skipped a number of questions in the **Human Rights & Labor Protections** section related to more specific aspects of their human rights due diligence work, including tracking & monitoring, grievance mechanisms and remediation. The importance of these elements in underpinning the effectiveness and real-world impact of a company's ethical policies meant leaving them blank hurt Albertsons's score. Finally, Albertsons cited its use of two widely available third-party audit certifications as evidence of its work to engage migrant workers in auditing and assessment processes; however, we had hoped to see a deeper and more deliberate approach to this important area that goes beyond third-party audits.

OVERALL SCORES



SECTION SCORES



For the second year in a row, Aldi — which responded to the questionnaire and provided additional resources — came first overall. Indeed, this year, it outpaced the competition comfortably. Although it only placed first in one category — **Tuna Procurement Policy** — it scored strongly across the board (second in **Advocacy, Sourcing, and Customer Education**; fourth in **Human Rights and Labor Protections, and Traceability**). Aldi’s comprehensive, stand-alone forced labor policy^[17] — which draws on a number of internationally recognized standards, including the UN Guiding Principles on Business and Human Rights (UNGP) — is especially notable. Its overall score improved by just under two percent (from 59.77% to 61.51%), thanks to slight increases in their **Traceability** and **Human Rights and Labor Protection** scores. As one of the only retailers to achieve a passing score for any section, they in fact managed two.

On **Traceability**, Aldi’s enhanced efforts to address fish fraud through traceability exercises at production facilities, random product checks, as well as supplementing third-party traceability audits with their own on-site visits, contributed to their improved performance.

On **Human Rights and Labor Protections**, their slightly improved score reflected efforts to develop and expand their human rights due diligence program — their Corporate Responsibility Supplier Evaluation (CRSE) program — as well as their efforts to improve worker engagement in their human rights impact assessments.

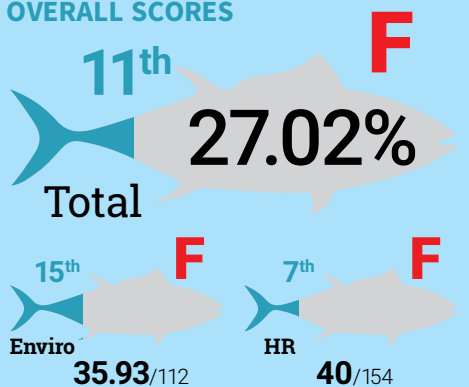
Positive: In the **Tuna Procurement Policy** section, Aldi scored well for having comprehensive, publicly available seafood and human rights policies^{[17] [18] [19]}. One of the purposes of this survey is to encourage and reward specific commitments in line with internationally recognized instruments and initiatives, and Aldi scored higher than most as a result of reference to these in their policies. Aldi’s International Forced Labor Policy^[17], which explicitly covers all stages of its supply chain, is guided by a number of international standards, including the UNGPs.

Aldi should also be commended for being the only retailer to explicitly advocate for a living wage for workers in its supply chain^[20], for having explicit requirements for documentation of worker payments, and for a clear and well considered process for dealing with cases of abuse.

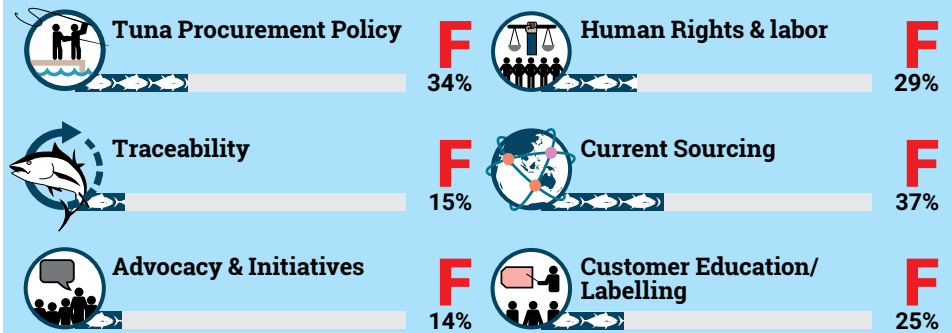
Poor/Needs Improvement: Although Aldi’s **Traceability** score improved marginally because of improved efforts to combat fish fraud, there is still some way to go. That said, there are promising signs, and although Aldi is unable to secure maximum points while its CRSE program is in development, we look forward to reporting positive results in the future when it is fully implemented across the supply chain.

While Aldi’s understanding and development of **grievance mechanisms** is more advanced than many others, points were unfortunately lost due to those mechanisms’ limited scopes. Greenpeace USA commends Aldi’s work with the Issara Institute (an NGO based in Southeast Asia that tackles issues of human trafficking and forced labor through worker voice), to promote worker voices in Thailand and we hope they will support implementation of this type of work across a wider section of their supply chain, including catching vessels.

OVERALL SCORES



SECTION SCORES



Costco did not complete a survey or provide materials again this year; last year's scores were updated with publicly available information. That was sufficient to result in a score increase of nearly three percent (from 24.29% to 27.02%), owing to a small improvement in scores in **Tuna Procurement Policy**, **Traceability**, and **Human Rights & Labor Protections**. Costco was 10th on Environment and a disappointing 13th on Human Rights, for an overall place of 11th.

One change that contributed to this slightly elevated score is Costco's work with the Seafood Task Force on suppliers' worker contracts, particularly around ensuring contracts are communicated clearly to workers in a language they can understand^[21]. Another is the company's work on enhancing traceability^[22] through an annual seafood survey and expanding this survey to suppliers for all their global locations.

In general, however, Costco's performance remains poor; despite its size and influence, it is solidly in the bottom half of our rankings and its environmental and sustainability scores are especially disappointing.

Positive: Costco deserves recognition as a founding member of the Seafood Task Force, a coalition of businesses and NGOs working to improve sustainability in the Thai seafood supply chain. Though the amount of specific information about the Seafood Task Force is limited, the Task Force has done some positive work, including in the area of recruitment. Though currently limited to Thailand, this engaged approach to supply chain oversight should be expanded to cover all aspects of seafood sourcing, particularly work aboard distant-water vessels.

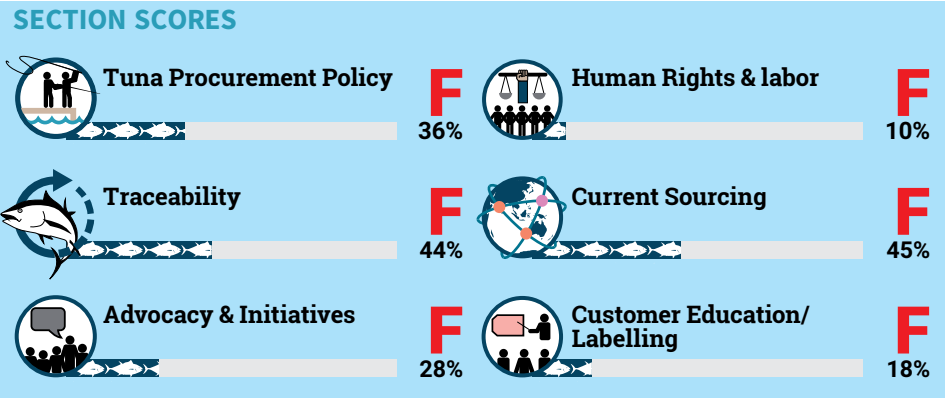
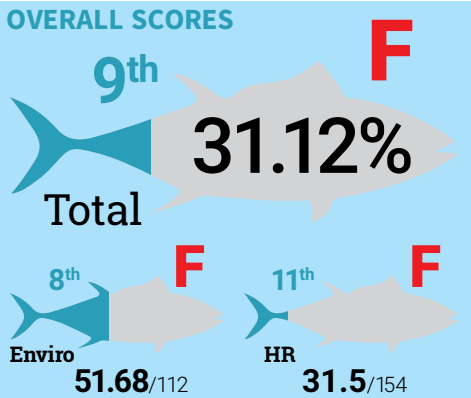
Costco also scores points in the **Human Rights & Labor Protections** section for monitoring and addressing issues with suppliers, as well as its work with third parties to analyze risk across its entire supply chain.

Poor/Needs Improvement: The same issues that dragged down Costco's score last year remain concerning. In the **Tuna Procurement Policy** section, its sourcing and seafood sustainability policies remain vague, as does its policy on human rights^[23]^[24]. Costco's human rights policy would be much improved if it was more clearly guided by specific international principles, such as the UNGPs, ILO Core Conventions and the ILO C188 – Work in Fishing Convention.

Costco also does not have a public **transshipment** policy, which is disappointing considering Costco's buying power, the exposure the issue has had in recent years, and its importance to sustainable fishing.

And for a retailer with such global reach, it is highly disappointing that Costco scores extremely poorly on **Advocacy**.

In the **Human Rights & Labor Protections** section, Costco lacks specific consideration of grievance mechanisms, due diligence frameworks or engagement with vulnerable groups, such as migrant workers, in their supply chains. In order to help embed these practices across the sector, all companies should make use of the UN Guiding Principles on Business & Human Rights to guide their policies.



Having not completed a survey last year, Giant Eagle did so this year and provided additional resources; we commend them for their engagement. This engagement, and the additional information the company shared, played a significant role in Giant Eagle’s score increasing from 25.93% to 31.12%. For instance, its score in the **Human Rights & Labor Protections** section increased from -2 last year to +5 as a direct result of its ability to share information that supported its survey response.

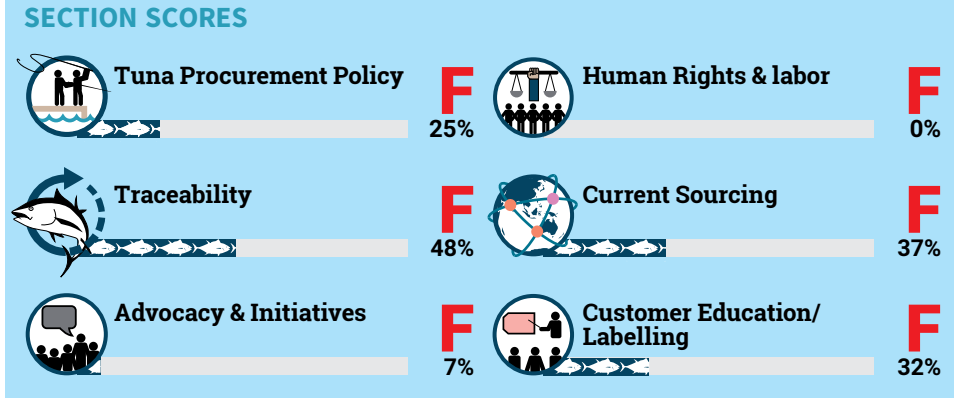
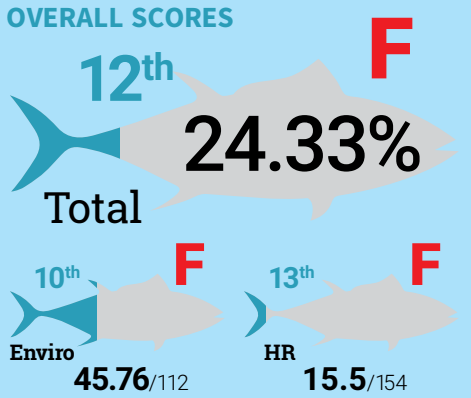
Similarly, improved performance on the human rights-related questions in the **Tuna Procurement Policy** section can be attributed to Giant Eagle’s recently updated Supplier Code of Conduct, which highlighted several of their positions on human rights in their supply chain^[25]. That said, the Supplier Code of Conduct does not go far enough in terms of alignment with international standards and treaties, and Giant Eagle’s overall performance was mediocre at best.

Positive: Giant Eagle continued their mediocre performance on environmental issues. Many of Giant Eagle’s responses related to environmental issues were positive: on **Traceability**, they claim to be able to trace every SKU of tuna down to the fishing vessel, they have two dedicated sustainability officers, and they explicitly commit to only allow **transshipment-at-sea** with 100 percent observer coverage^[26]. The company also included language in support of Marine Protected Areas (MPAs), and requirements around Fisheries Improvement Project (FIPs)^[27], and was the only retailer to mention the importance of sustainable bait fisheries for pole and line tuna.

Poor/Needs Improvement: While it is good to see that Giant Eagle recently updated its Supplier Code of Conduct and now has a basic Human Rights Statement in place^[28], they still have a long way to go. Their Supplier Code of Conduct and Human Rights Statement would benefit from alignment with and explicit reference to internationally recognized instruments such as the UN Declaration of Human Rights, ILO Core Conventions, and the ILO’s Work in Fisheries Convention, C188.

In addition, in the **Human Rights & Labor Protections** section, while they cite their 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. Instead, they continue to rely on third-party audits, an approach that has been shown to be inadequate and ineffective when it comes to addressing human rights issues in supply chains.

Giant Eagle puts considerable emphasis on educating customers to make “responsible and informed purchasing decisions” including educating staff to assist with this information. However, improvements to **sourcing policies** and inventory could assist those customers by ensuring that all seafood on the shelves meets rigorous sustainability and human rights standards. Stocking anything that doesn’t meet these standards undermines retailers’ sustainability efforts and creates uncertainty for customers.



H-E-B did not complete a survey; as a result, only publicly available information — including their Seafood Policy^[29] and Supplier Code of Conduct^[30] — was reviewed and used to score them. Based on this information, H-E-B finished 12th overall.

Like most other retailers, H-E-B scored points in the **Tuna Procurement Policy** section for at least having sustainability and human rights policies in place; it also did reasonably well in terms of **Traceability**, and for efforts to source only sustainable fish (**Current Sourcing**). However, the bright spots were few and far between; of 39 questions in the survey, H-E-B scored zero or negative points in 19. The slight increase in its score from last year was solely the result of this year’s survey including one more question.

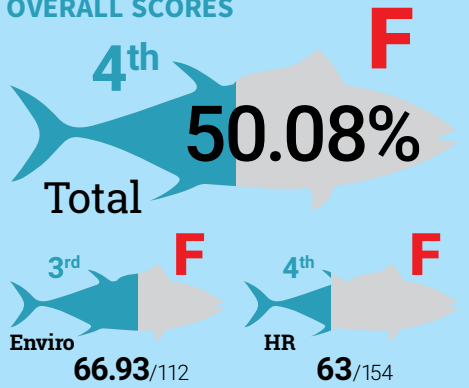
Positive: In the **Tuna Procurement Policy** section, H-E-B scored well for having policies in place and did have a good amount of detail regarding environmental specifics, including not sourcing from “red” fisheries and only sourcing tuna that is either MSC certified or making progress in a FIP^[29]. However, they could improve their score with some specific wording on Marine Protected Areas and sourcing only from “green” fisheries.

H-E-B also scored reasonably well for their work to improve **Traceability**, including commitments to not selling IUU fish and working with Trace Register to provide third party verification. One impressive and stand-out feature of this work was their product sourcing grid — essentially a publicly-available table of all the species they stock, country of origin, source, catch method, and sustainability rating, which is updated twice a year^[30]. Greenpeace USA would love to see other companies disclosing similar information in an easily understood format.

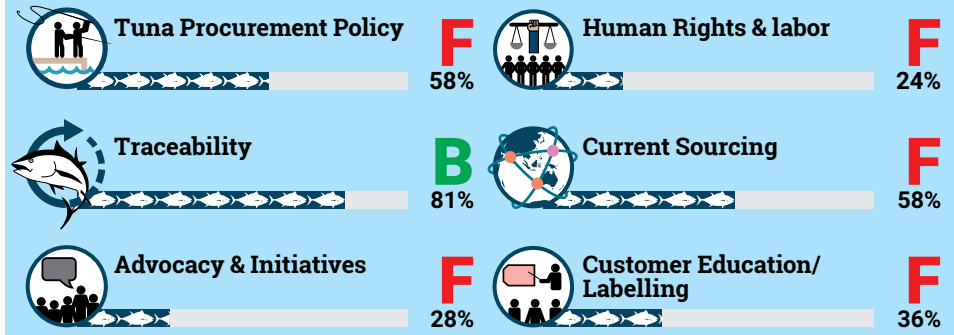
Poor/Needs Improvement: H-E-B’s scores on human rights questions suffered, like many others, from a lack of specificity. Despite recognizing that there are human rights concerns associated with the seafood industry, their statements are vague and are either not grounded in a policy framework provided by international instruments, such as the UN Guiding Principles on Business & Human Rights, or they fail to provide a practical explanation for how these requirements will be monitored or enforced. Discussions and understanding around the human rights impacts of global supply chains are well-advanced, but that fact is not reflected in much of H-E-B’s human rights work.

With more than half of the questions in the survey focused on human rights, H-E-B’s lack of a human rights policy played a major role in their poor performance.

OVERALL SCORES



SECTION SCORES



Hy-Vee answered the survey, provided additional materials, and was one of the strongest performers; together with Ahold and Whole Foods, it comprised a small group challenging for second behind Aldi. It finished joint first on **Tuna Procurement Policy**, first on **Traceability**, and fourth on **Current Sourcing**. Its overall score increased by just over 7%, from 42.92% to 50.08%, the second highest growth after Sprouts. Its Environmental score increased from 63.9 to 66.93 and its rating on Human Rights leaped from 48.5 to 66.

Last year, Hy-Vee was alone in committing to share its private label tuna supplier vessel list; in 2022 it not only followed through on that pledge^[31], but it also committed to updating the list again this year, leading to bonus points in the **Tuna Procurement Policy** and **Traceability** sections.

The growth in Hy-Vee’s Human Rights score is attributable to the company conducting social responsibility risk assessments to inform human rights risks and prioritize action. In 2021, it conducted a social responsibility deep dive, the results of which it is presently using to inform mitigation actions.

Overall, Hy-Vee has engaged positively on environmental issues but still has some way to go in fully addressing these issues. Its improved **Human Rights** score reflects the increased seriousness with which it is also beginning to address those issues, although this is still at a nascent stage.

Positive: Hy-Vee ranked joint first with Aldi in the **Tuna Procurement Policy** section, standing out for having significantly more detail and reference to international standards than most others^[32]. They had strong, internationally recognized requirements of their suppliers, including mandated rest times, crew conditions, and health and safety^[32].

Significantly, they were one of only two companies who explicitly referenced migrant workers in their supplier Code of Conduct. In particular, Hy-Vee expressly requires its suppliers to treat migrant workers the same as nationals, an extremely important provision when local laws often fail to grant migrant workers the same protections.

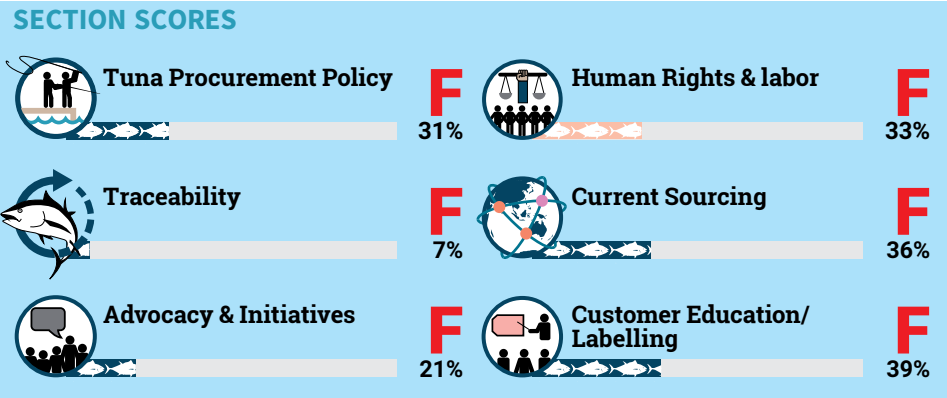
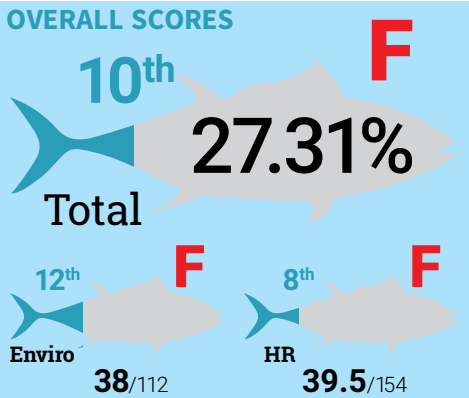
Hy-Vee’s **Traceability** work is strong and rooted in internationally recognized best practice^[33]. Their traceability work — including risk assessments and audits — in partnership with FishWise looks robust and well-considered, providing a strong framework on which to add an increased focus on human rights.

Finally, Hy-Vee was the only company who agreed to publish supplier vessel lists, and followed through on this agreement, demonstrating a commitment to transparency that no other company was willing to match^[31].

Poor/Needs Improvement: Although Hy-Vee saw an improvement in its Human Rights score, it left blank a whole series of questions regarding specific details of **human rights due diligence** as articulated in the UN Guiding Principles on Business & Human Rights (UNGP), such as remediation, worker engagement, and worker voice, and its score suffered as a result.

While it has made efforts to familiarize itself with its suppliers’ **grievance mechanisms**, it has yet to establish its own grievance mechanism and/or aligning existing mechanisms within the supply chain with the characteristics of an effective mechanism as highlighted in the UNGPs.

For a company that has made a number of positive improvements in sustainable seafood sourcing, Hy-Vee continues to source the majority of its tuna from damaging fishing methods, sourcing well over 90 percent from purse seine or longline; in fact, its score on **Current Sourcing** has marginally declined since last year.



Kroger submitted a survey and provided additional resources; it finished a disappointing 12th on Environment and eighth on Human Rights, for an overall position of 10th. Kroger’s score increased by a little over 7% this year, from 20.01% last year to 27.31% this year, with its Environment score jumping from 31.9 to 38, and its Human Rights total from 33.5 to 39.5.

These increases are attributable primarily to improved scores in **Current Sourcing**, and marginal improvements in **Tuna Procurement Policy**, **Traceability**, and **Advocacy** and initiatives. The improvement in **Current Sourcing** was the result of dramatically increasing their offerings of tuna from less environmentally damaging catch methods such as pole and line and FAD-free purse seine.

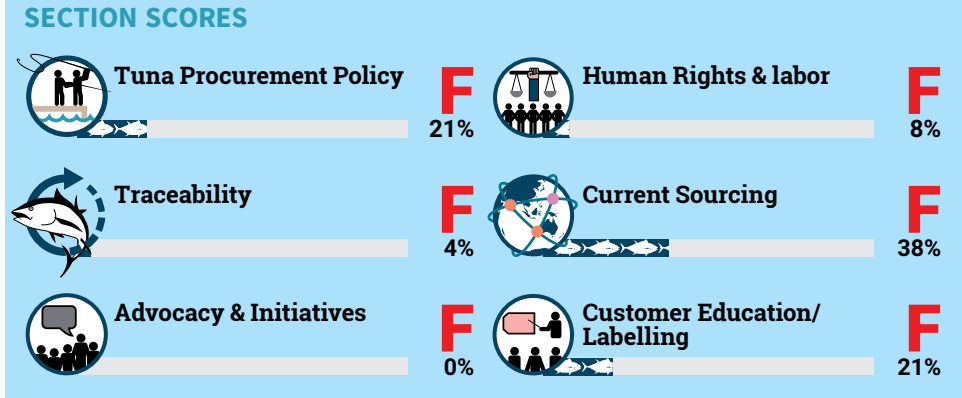
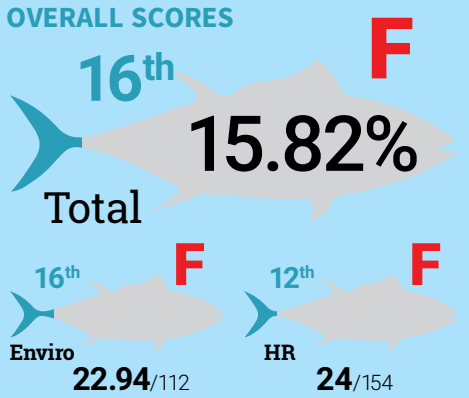
Their improved score in **Tuna Procurement Policy** stems from an updated human rights policy that explicitly commits them to upholding international instruments such as UN Guiding Principles on Business & Human Rights (UNGP), ILO, and the International Bill of Human Rights^[34].

Positive: While they didn’t have an improvement of their score in the **Human Rights and Labor Protections** section (since this section relates to systems for identifying, mitigating, and remediating human rights risks, not a stated human rights policy. Human Rights policies are covered in the Tuna Procurement Policy section), their commitment towards developing and operationalizing a more comprehensive **human rights due diligence** process and their commitments towards conducting human rights impact assessments are commendable^[35]. We look forward to seeing how these develop and translate into larger improvements in scores.

Poor/Needs Improvement: Despite a slight improvement in its **Traceability** score, Kroger finished second from last in this section, as it did last year. Its tracing program remains poorly developed and continues to rely heavily on the International Seafood Sustainability Foundation (ISSF)^[36], which cannot substitute for robust and well-considered in-house policies. Monitoring also relies too heavily on third parties, with audits only taking place annually.

On the issue of **transshipment-at-sea**, Kroger answered that, despite its centrality to a range of environmental and human rights issues in the tuna industry, they do not have a stance on it. This is extremely disappointing for a company of Kroger’s size and reach. Kroger’s voice can be a powerful driver of change on this issue.

While the company has made some efforts toward developing risk assessments and committing to conducting impact assessments, it is still lagging when it comes to **grievance mechanisms, remediation, and worker voice**. Kroger continues to cite their ethics helpline as a grievance mechanism^[34]; however, there are significant questions as to the suitability of such helplines for addressing potential issues in supply chains, particularly aboard distant water fishing vessels. In addition to this hotline, Kroger launched a Worker Voice Survey in 2019, through its social compliance auditing firm, ELEVATE, which “allows workers to share sentiment and feedback anonymously.” Such audits-based approaches have been found to be ineffective at addressing social or human rights issues. There is a need to go beyond this and adopt well-defined grievance mechanisms that align with the UNGPs.



Meijer completed the survey and indicated no change in its policies or actions from last year. Although its total score increased from 14.63% to 15.82%, this was solely the result of the addition of an extra question in 2022. Meijer scored poorly across the board and finished in 16th and last place overall.

It was one of very few retailers not to score maximum points from the first few questions, which merely asked respondents to describe their **Tuna Procurement Policies**; it also scored just one point out of a possible 27 on **Traceability**, zero on **Advocacy**, and just four on **Human Rights & Labor Protections**. Meijer’s failings are numerous but include: the lack of a policy on shelf-stable tuna, which accounts for most of the tuna sold in the US; an over-reliance on suppliers to self-report problems from chain of supply to human rights shortcomings; selling at-risk species such as bluefin tuna; and selling predominantly tuna caught by longlining and FAD-assisted purse seines, the two least selective methods.

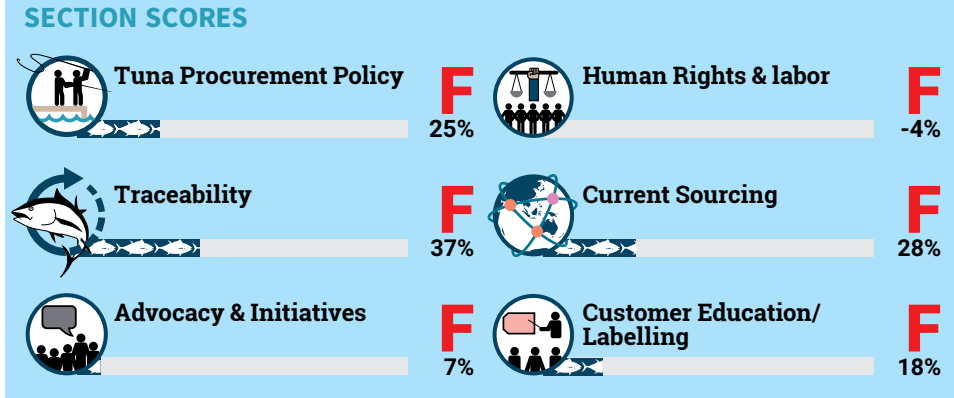
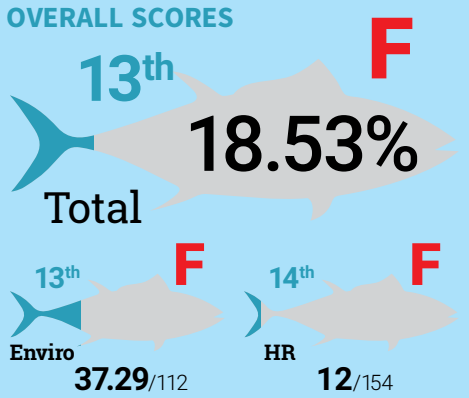
Positive: Outside of having at least some tuna procurement policies^[37] and expressing commendable support for collective bargaining, there is little positive to be said. A lot of improvement needs to be made across a range of categories — from **Traceability**, to **Advocacy**, and **Human Rights & Labor protections**.

Poor/Needs Improvement: Meijer’s scores were greatly harmed by the lack of a shelf-stable tuna policy. As a result, they could not score points on questions in the **Tuna Procurement Policy** section and came last in the **Traceability** section.

One of the weaknesses of Meijer’s **Traceability** work was its inability to independently verify traceability requirements, relying instead on ad hoc document requests to suppliers. Instead, supplier documentation, including monitoring and oversight, should be embedded into policy and practice. Supplier auditing was also weak, with an annual review of Tier 1 Own Brand suppliers leaving significant opportunity for abusive or exploitative practices to develop. Supplier auditing was also weak, with an annual review limited to Tier 1 Own Brand suppliers, that leaves significant opportunity for abusive or exploitative practices to develop.

Similarly, Meijer did not have a **human rights due diligence framework** in place, again relying entirely on suppliers to provide information. Though they completed their own survey, like many others, Meijer chose to leave large sections blank, in particular, the **Human Rights & Labor Protections** section.

Finally, Meijer had one of the lowest **Current Sourcing** scores, particularly among companies that completed their own survey. This came down to including at-risk species such as bluefin tuna in its product offering, as well as using damaging catch methods in already overfished areas. In addition, over 90 percent of Meijer’s tuna offering came from tuna caught using longlines or FAD-assisted purse seines, the two least selective methods.



Publix did not respond to the questionnaire, and its positions had to be largely inferred from publicly available information, primarily drawn from its “virtual store” website^[37]. When no information was available to answer a question definitively, no points could be awarded, contributing to Publix’s very low scores in all areas. There was a slight increase in its score, from 16.95% to 18.53% — the result of an additional two points picked up in the **Advocacy** section for the company endorsing the NGO Tuna Forum’s advocacy letters to RFMOs. However, Publix placed 13th on Environment, 14th on Human Rights, and 13th overall.

Positive: Publix scored well on initial questions about having policies in the **Tuna Procurement Policy** section, but fell down on the detail. It is at least encouraging that Publix recognizes the importance of making public commitments to sourcing sustainable seafood. Publix does acknowledge the importance of making public commitments to sourcing sustainable seafood. It also works with a number of important sustainability-focused organizations, including the Sustainable Fisheries Partnership and the Global Sustainable Seafood Initiative (GSSI). While engagement with outside organizations and initiatives is important, it does not substitute the need for a robust policy with clear steps towards implementation and ongoing monitoring. However, based on the available information, rapid improvements could be made through the process of codifying many of the things Publix already does or claim they want to do into a coherent policy.

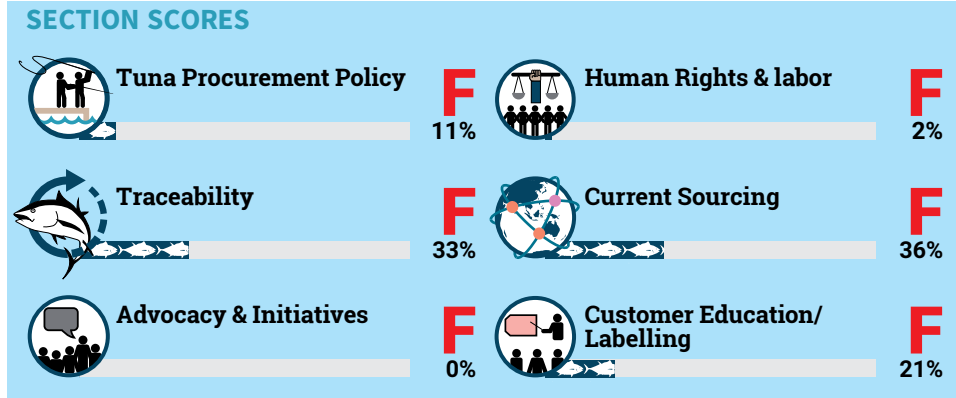
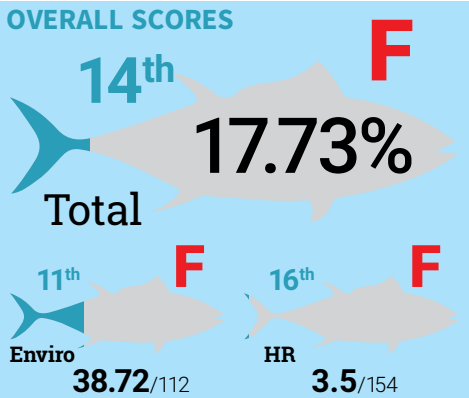
Further, on **Traceability**, Publix requires suppliers to maintain documentation on the products they provide to ensure full traceability, conducting “mock recalls” to verify their effectiveness, although there is no specific indication that this includes seafood — a supply chain with unique challenges and risks. This is a positive practice that could be improved and developed to include sustainability standards as well as human rights due diligence.

Poor/Needs Improvement: Publix published a new sustainability report in 2022^[38], but it suffered from the same problems as previous versions, including the fact that there is no mention of human rights and very little specific information on the company’s sustainable seafood sourcing. Companies that did not complete a survey nor have publicly available information on their human rights policy were unable to score any points for questions in the **Tuna Procurement Policy** section and Publix’s scores reflect that.

Not only did Publix finish last in the **Human Rights and Labor Protections** section, it scored negative points in this section owing to a complete lack of any sort of human rights or forced labor policies, besides a passing mention of zero tolerance against forced labor in their “Supplier Policies & Guidelines”^[39].

Publix also scored very poorly on **Advocacy** — managing to score only 2 points from a possible 29 for this section, as a result of limited public evidence that they use their position to advocate for positive change.

Southeastern Grocers



Southeastern Grocers did not answer the survey in 2021 but did so in 2022, for which it must be commended. However, most responses were lacking in detail, and many questions went completely unanswered — including all of the **Advocacy** section and large chunks of **Human Rights & Labor Protections** and **Current Sourcing** — requiring us to draw on publicly available information — mostly from their 2021 Corporate and Social Responsibility Report^[40], to score those sections.

The company's score did improve from a dismal 12.35% to a marginally less terrible 17.73%, owing largely to improved scores for traceability (from 2 points last year to 9 this year) and to a small improvement in the human rights section (from -4 to +1). This was because, by answering the survey, they were able to provide more information than is available publicly to support their responses. Overall, however, their performance remains abysmal; the company did not receive passing scores in any section and scored points on only nine out of 39 questions.

As with the 2020 version, its 2021 Corporate and Social Responsibility report did not include even one mention of human rights, and the company continues to have no discernible policy on **at-sea-transshipment, human rights due diligence, migrant workers, or grievance mechanisms**.

On the plus side, however, SE Grocers claims to be able to trace 100 percent of its tuna back to the source vessel.

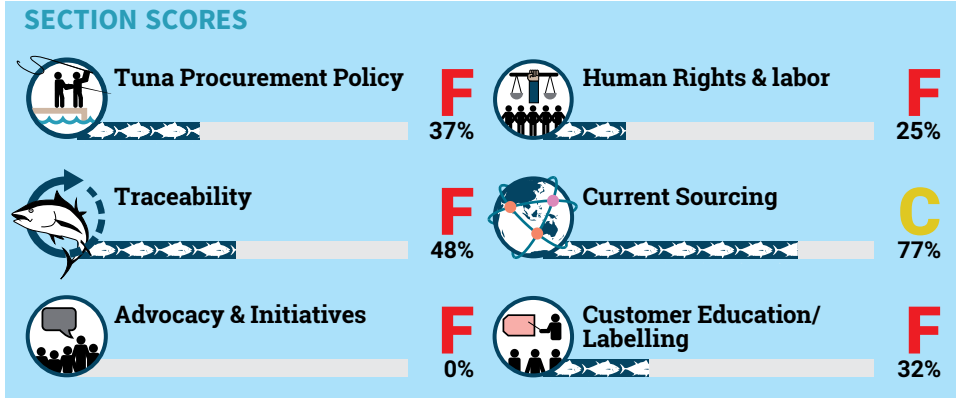
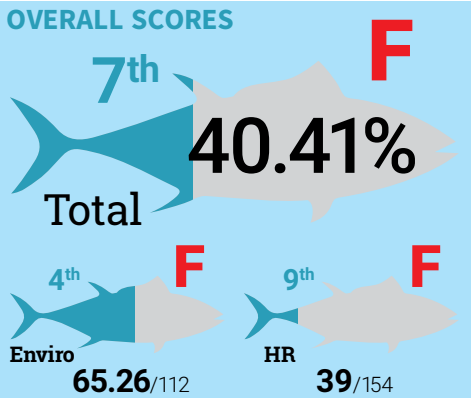
Positive: Southeastern Grocers are at least aware of many of the environmental issues linked to seafood supply chains and have made commitments to working with the Global Aquaculture Alliance (GAA), Sustainable Fisheries Partnership (SFP), the World Wildlife Fund (WWF), and the International Seafood Sustainability Foundation (ISSF). However, while committing to working with these organizations represents a positive step, it is not a substitute for robust **tuna procurement policies** guided by international instruments with clear plans for implementation.

Southeast Grocers appear to take the trust of their customers seriously, as well as considering their commitment to sustainable seafood to be part of this trust. Southeast Grocers should build on this premise by providing their customers with a thoughtful and robust seafood policy that ensures customers that their seafood is not damaging the environment or abusing the rights of those who produce it.

Poor/Needs Improvement: Southeastern Grocers' seafood policy needs significantly more detail on environmental issues, including policies on **transshipment at sea**, improved **traceability**, regular supplier audits and ongoing monitoring. There is much mention of "promises" and commitments to **sourcing sustainable seafood**, but without detail it is difficult to know what steps are being taken to assure this.

On **human rights**, Southeastern Grocers must first establish a human rights policy covering their entire supply chain, with specific considerations given to high-risk activities such as fishing. This policy should be rooted in internationally recognized principles and standards and guided by the UN Guiding Principles on Business and Human Rights.

Sprouts



Sprouts answered the survey and provided additional resources^{[41][42]}. It produced a fourth-place finish in Environment, but was only ninth on Human Rights, for an overall position of seventh. However, its score saw by far the largest increase of any retailer from 2021 to 2022, leaping from 25.5% to 40.41%.

One important reason for this increase was the publication in April 2022 of a new commitment to human rights which led to an increase in their scores on **Tuna Procurement Policy**. Their new commitment included explicit alignment with international instruments such as the UN Declaration on Human Rights and ILO guidelines^[43].

The company also instituted ongoing internal traceability audits and expanded the traceability of all tuna products down to individual fishing vessels — steps that resulted in its scores in the **Traceability** section jumping from an abysmal two points last year to 13 this year. Additionally, Sprouts has enhanced its supply chain monitoring.

It has also begun refining its **human rights due diligence framework**, and, although we could not award points for this in the **Human Rights & Labor Protections** section because the process is incomplete, we look forward to tracking its development.

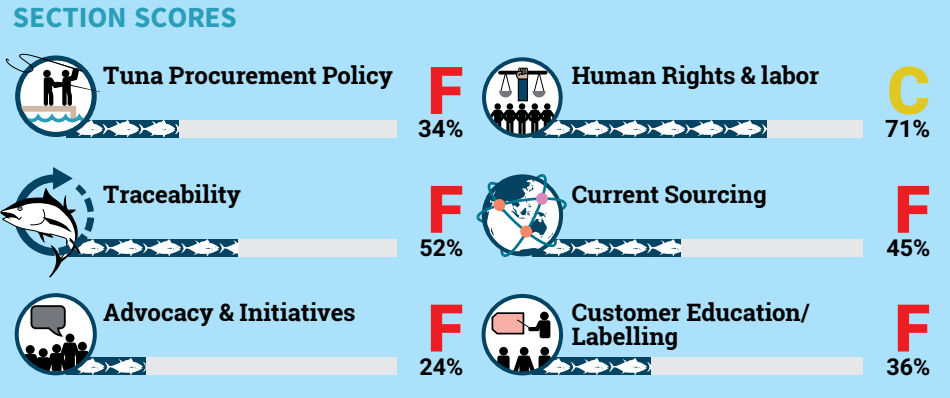
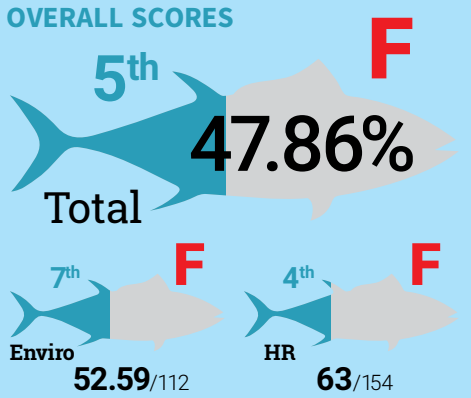
That said, while Sprouts has made important strides in advancing human rights, its scores are still short of passing, indicating much more work to be done.

Positive: Sprouts achieved its highest scores and ranking for the **Current Sourcing** section, which included questions on product offering and catch methods, as well as policy. Perhaps in a reflection of one of the strengths of being a smaller company, Sprouts got one of the highest scores for not stocking problematic species or brands. It scored joint highest with Ahold, Aldi, and Whole Foods for the number of risky tuna products they don't stock, stocking only four out of 13 of the riskiest products, and none of the high-risk brands. Additionally, just under 97 percent of all tuna it sells are caught by pole-and-line, trolls, or hand lines.

Poor/Needs Improvement: Despite commendable improvement to its policy and its risk assessment protocols, its Human Rights scores continue to be low. When it comes to several practical elements of a **human rights due diligence process** that is aligned with United Nations Guiding principles, it continues to lag on such areas as **remediation, grievance mechanisms, and worker engagement**. However, it is currently working on developing these and Greenpeace USA looks forward to seeing these develop further.

Recognizing that advocacy work favors larger companies with more resources, Sprouts was one of only two companies to score no points for the **Advocacy** section, and we would encourage Sprouts to make better use of their voice to drive important improvements.

Target



Target completed a survey and provided additional information, offering detailed explanations of many of its responses. It finished seventh on Environment and fourth on Human Rights, for an overall position of fifth. Its score of 47% was unchanged from last year, despite the addition of an extra question in the survey, as it performed slightly more poorly on Environment. That said, it performed well in several areas, especially in the **Human Rights and Labor Protections** section, where it was the top scorer.

Positive: Target’s Supply Chain Labor and Human Rights policy was detailed and addressed a number of systemic problems, such as recruitment^[44]. The policy aims to reduce the risk of recruitment associated debt by explicitly committing the company and its suppliers to abiding by the “Employer Pays Principle”. This requirement also forms part of their supplier reviews and audits, an essential step in ensuring compliance

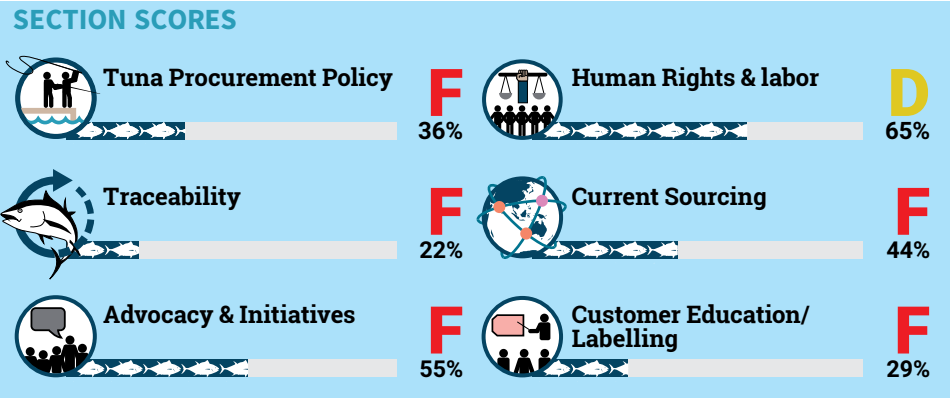
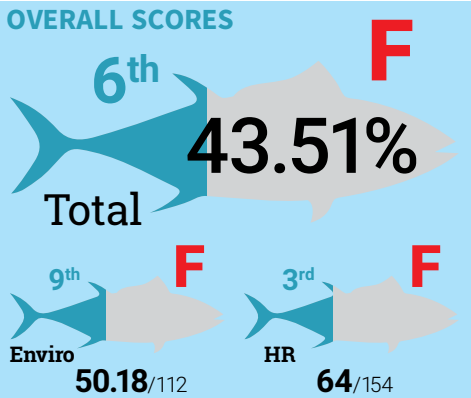
Target has also implemented a **human rights due diligence framework** that appears well-thought out and relatively comprehensive, including gathering a range of information all the way down to the vessels in its supply chain^[45]. Part of this framework includes specific engagement with migrant workers and the recognition that they represent a vulnerable group within the supply chain.

Target’s **traceability** system^[46] — including its actions to prevent fish fraud^[47] — appears robust and comprehensive, including the verification of custody on certification claims of FAD-free products.

Poor/Needs Improvement: Like most retailers, Target declines to publish a supplier vessel list, even though it publishes a list of supplier factories, which it says “creates meaningful opportunities to enhance responsible and sustainable production practices.” If it is true for factories, it is certainly true for fishing vessels, and a range of stakeholders — including customers and workers groups — can benefit from improved availability of this information.

Target’s explicit requirement of 100% observer coverage for tuna that is **transshipped at sea** is a starting point, but the more companies that prohibit this risky practice altogether — and independently audit to ensure compliance — the more quickly it can be eradicated.

Target has stated that they are working with their own brand suppliers to ensure workers are paid digitally by 2025. Payment documentation is an important aspect of ensuring workers in the supply chain are paid fairly, but this requirement can and should include all suppliers.



Walmart did not complete a survey; as a result, publicly available information — including its Human Rights Statement^[48], the Human Rights page on its website^[48], and its Seafood Policy^[49] — was analyzed and used to score the survey. Compared with many other companies, Walmart is fairly advanced with both the development of these policies and their communication of them. Despite the relative wealth of material available, we were unable to discern much progress since last year’s report, resulting in a marginal score increase that can be attributed entirely to the new question in the **Tuna Procurement Policy** section. Walmart finished ninth on Environment and third on Human Rights, for an overall rank of sixth.

Walmart’s size and available resources provide a considerable advantage regarding engagement, involvement in groups and associations, advocacy, communication and other initiatives. However, commitment in this area is a matter of culture, and Greenpeace USA recognizes Walmart’s engagement and investment in many areas of this work. In some ways, Walmart’s size and influence allow it to set the agenda and drive the conversation, presenting an excellent opportunity for positive leadership. However, this is an opportunity Walmart has yet to fully embrace — it must do much more than it is currently doing in order to have such an effect on the industry.

Positive: Walmart has publicly accessible web pages detailing a range of policies, including Seafood, “Forced Labor Prevention” and “Human Rights Statement”.

Walmart was one of the only companies to have a standalone section on human rights, which covers all its business operations, as well as those of its suppliers and other third parties^[48]. Walmart also stands out for being explicit in its use of international instruments, which it says informs its response to human rights issues.

Greenpeace USA recognizes Walmart’s role as a founder and instrumental member of the Seafood Taskforce, a coalition of businesses and NGOs working to improve sustainability in the Thai seafood supply chain. Though currently limited to Thailand, this engaged approach to supply chain oversight should be expanded to cover all aspects of seafood sourcing, particularly work aboard distant-water vessels. Walmart’s significant philanthropic activity also funds a considerable amount of work on both sustainability and human rights issues in supply chains, including work by the Global Fishing Watch and the Issara Institute.

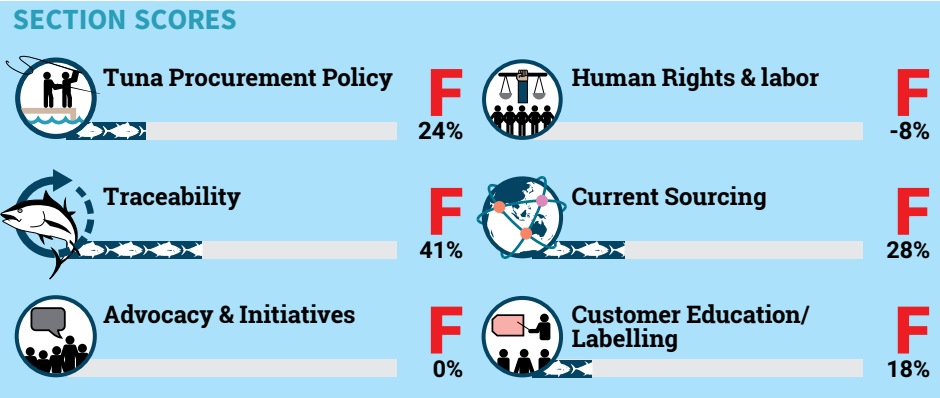
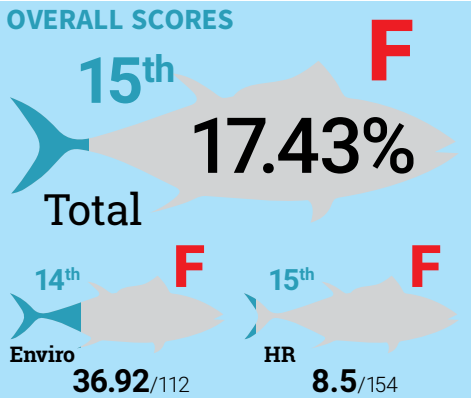
Advocacy is a key area where larger retailers with the resources and expertise to lobby for improvements to environmental and human right protections in fisheries outperformed smaller companies. In line with this, Walmart ranked third for its advocacy work, behind Aldi and Ahold Delhaize, and just ahead of Whole Foods. It is vitally important that a company of Walmart’s size and influence uses its position to push for improvements at a range of policy levels, and this work should be commended.

Poor/Needs Improvement: While Walmart’s sustainability and human rights policies are more detailed and better developed than most, many of the commitments detailed under its seafood policy are goals for 2025, and it is unclear how much progress has been made towards them^[49]. 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 on current work.

Like other retailers, Walmart’s policies leave out a number of important details, particularly with regard to **human rights**. For example, while Walmart does mention the need to ensure migrant workers are recruited responsibly, questions in this area sought specific recognition of the increased risks faced by migrant workers and the company’s work to mitigate them. Since Walmart did not respond to our survey, we were unable to award points for these elements.

Walmart continues to rely on third-party social audits when it comes to monitoring. It does have a **due diligence framework**, but unfortunately it is based on OECD guidelines, which do not include human rights nor apply to seafood supply chains^[48]. Similarly, a **grievance mechanism** is in place, but as currently constituted and presented it does not meet the UN’s guidelines. **Remediation** for those negatively impacted by Walmart’s business is also developing, though it is currently limited to its work with the Issara Institute (an NGO based in Southeast Asia that tackles issues of human trafficking and forced labor through worker voice) in Thailand and does not include workers on vessels.

Though we recognize Walmart’s role in funding work by the Global Fishing Watch on **transshipment-at-sea**, we were unable to find an explicit company position on this important issue. The centrality of transshipment to many environmental and human rights issues, as well as the history of focus it has received, warrants an explicit stand-alone position. In addition, positive leadership in this area can have a positive and much-needed galvanizing effect.



As was the case last year, Wegmans did not submit a survey; as a result, publicly available information — mostly drawn from its “Seafood Sustainability” website — was analyzed and used to score the survey^[50]. Because we could not find any updates or changes, Wegmans received the same score as last year, other than two points picked up as a result of this year’s additional question. It performed poorly throughout, finishing 14th on Environment, 15th on Human Rights, and 15th out of 16th overall. It fared especially poorly in some areas of the survey, scoring zero points for **Advocacy** and minus 4 on its **Human Rights and Labor Protections** processes. Wegmans’ policies were hard to find, and lacking detail; completing a survey would most likely improve future scores.

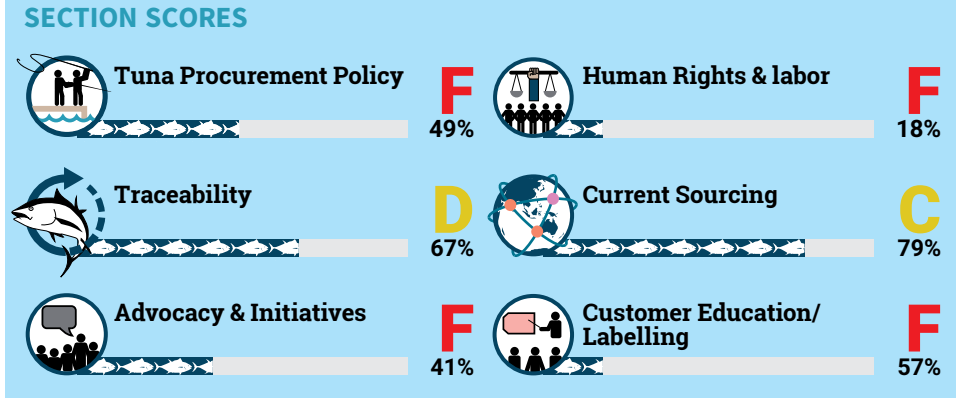
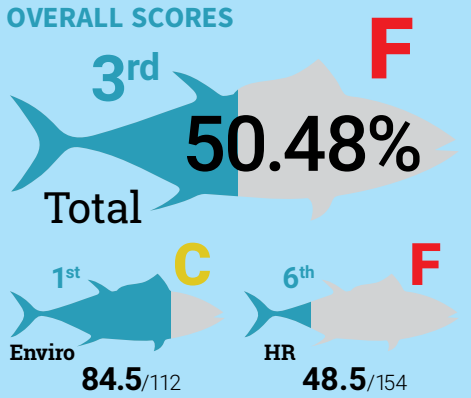
Positive: There is some reason for positivity: On **Tuna Procurement Policy**, Wegmans does have a web page dedicated to sustainable seafood policies and actions^[50]. Though, as with many retailers, Wegmans’ seafood sustainability webpage lacks both details and specific reference to international standards and policies. However, much of what is available appears to be moving in the right direction. Greenpeace USA commends their commitment to sourcing from fisheries that are certified sustainable or involved in a Fisheries Improvement Program (FIP). Commitments such as these are a positive start but would be improved by explicit bans on sourcing from “red” or “yellow” fisheries, shark finning, and vessels known to be involved in Illegal, Unreported, and Unregulated (IUU) fishing.

Wegmans also engages with organizations such as the Sustainable Fisheries Partnership (SFP), and is working to improve **traceability** through companies such as Trace Register. However, these initiatives can be further strengthened by creating robust sourcing and sustainability policies, and implementing ongoing monitoring and oversight.

Poor/Needs Improvement: The lack of detail and specific actions undermines positive commitments to improved sourcing, and makes it unclear how Wegmans will achieve its goals and aspirations. For example, one of the Wegmans’ “Best Practices” is for vessels to use “gear chosen to reduce bycatch.” It is unclear what this entails and therefore did not receive a full score. However, with more detail we could have scored it higher. Without detail, ongoing engagement and public communication, commitments, and statements is aspirational.

Wegmans appears to lack a **human rights policy** to cover its supply chains; developing one to cover its supply chain could enable it to make rapid and important improvements. The human rights of everyone impacted by any business operation are the responsibility of that business. Having a policy based on established human rights instruments — such as UN Guiding Principles on Business & Human Rights (UNGP) and ILO Core Conventions — would have greatly improved Wegmans’s ranking.

Based on the information available, Wegmans relies entirely on third-party audits to ensure its sourcing policies and standards are being met. However, while third-party audits do have value, it is vitally important for companies to establish some independent oversight and monitoring of their supply chains. Particularly with respect to human rights, third-party audits have regularly been shown to be inadequate, with abuses continuing in audited facilities.



Whole Foods answered the survey and submitted a large number of supporting documents^{[51],[52],[53]}. Whereas last year the company directed answers to human rights questions to an appendix that included very little relevant information that spoke to the specifics of the questions asked in the survey, this time it answered the questions directly and provided much more detail, including sharing relevant sections of its Supplier Code of Conduct^[54].

Whole Foods came top in Environment and third overall, with a score of 50.48% — an improvement on last year’s 46.45%, largely driven by improvements in the **Tuna Procurement Policy** and **Human Rights & Labor Protections** sections. Improved scores in the former resulted from a new, much more progressive policy to address recruitment-related risks in its supply chain. Improvement in the latter category was a consequence of the company expanding a risk-based human rights due diligence process to fresh and frozen tuna suppliers.

Positive: Whole Foods came top overall in the Environment category, driven by its high scores in **Traceability** and **Current Sourcing**. While nearly all retailers had policies in place, few of those policies contained such a high level of detail and robust references to international instruments.

Whole Foods also benefited from sourcing its canned tuna exclusively from pole and line vessels, meaning a number of risk factors — including isolation and long periods at sea — are significantly reduced.

The company has strong **traceability** requirements and is able to trace 100 percent of its tuna back to the catching vessel^[51]. As a result, it also scored highly for questions related to fish fraud and traceability audits.

Whole Foods also ranked first on **Current Sourcing**: out of 13 problematic species or catch methods surveyed in this report, Whole Foods stocks only four, and sells none of the brands identified as problematic. It also received the highest score for its catch methods, sourcing 100 percent of its canned tuna from pole and line or handline fisheries.

Poor/Needs Improvement: Whole Foods’ **Human Rights & Labor Protections** scores continue to lag: while its initial steps towards instituting **human rights due diligence** for its tuna supply chains are commendable, the company has not yet considered areas such as **worker voice, grievance mechanisms, remediation, and worker engagement**.

One surprising blemish on its otherwise positive performance on environmental issues was their lack of a position or policy on **transshipment-at-sea**. While we recognize that sourcing mostly from pole and line vessels in many ways mitigates the risks associated with transshipment, Whole Foods’s voice could be a powerful driver of change on this issue.

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Greenpeace USA's Tuna Grocery Retailer Survey 2022

What follows is a copy of Greenpeace USA's Sustainable and Worker Friendly Tuna Grocery Retailer Survey distributed to 16 major US retailers in 2022. 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),¹ the International Covenant on Civil and Political Rights (ICCPR),² and the International Covenant on Economic, Social, and Cultural Rights (ICESCR)³), **(2) the International Labor Organization's Core Conventions,⁴ and (3) C188 - Work in Fishing Convention.⁵ Furthermore, your company must adhere to the UN Guiding Principles on Business and Human Rights (UNGP).⁶**
- _____ 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 written⁷ 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)

1 UDHR: <https://www.un.org/en/about-us/universal-declaration-of-human-rights>

2 ICCPR: <https://www.ohchr.org/en/professionalinterest/pages/ccpr.aspx>

3 ICESCR: <https://www.ohchr.org/EN/ProfessionalInterest/Pages/CESCR.aspx>

4 ILO Core Conventions: <https://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang-en/index.htm>

5 C188: https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C188

6 UNGP: https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf

7 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.

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.

- a. _____ Yes, and we have provided examples of these contracts in our survey response. (5)
- b. _____ No (0)

11. As stated in our policy, our company only purchases tuna from suppliers who provide their workers with a local⁸ living wage.⁹ (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)

⁸ "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.

⁹ "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.

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.¹⁰ (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)

¹⁰ <https://ohchr.org/Documents/Publications/MinnesotaProtocol.pdf>

HUMAN RIGHTS AND LABOR PROTECTIONS (25%)

Human Rights Due Diligence¹¹

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 staff¹² 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)

¹¹ 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.”

¹² “Senior level staff” should also include C-suite executives and Board members

- 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 severe¹³ 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)

¹³ 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.

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)



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