

## Culimer USA’s Sustainable Seafood Program

Culimer USA LLC recognizes the importance of conserving the natural environment, preventing the depletion of natural resources (UN SDG 12 & 14), and upholding labor rights throughout our supply chains and in our company (UN SDG 3 & UN SDG 10). Culimer USA’s core purpose, to **Enrich Society Through Food**, supports people’s daily lives along the entire supply chain, from bait to plate. As an influential buyer, importer, and distributor of seafood from global producers, Culimer USA has developed and embedded resources detailing the company’s commitments and expectations of its supply chain partners:

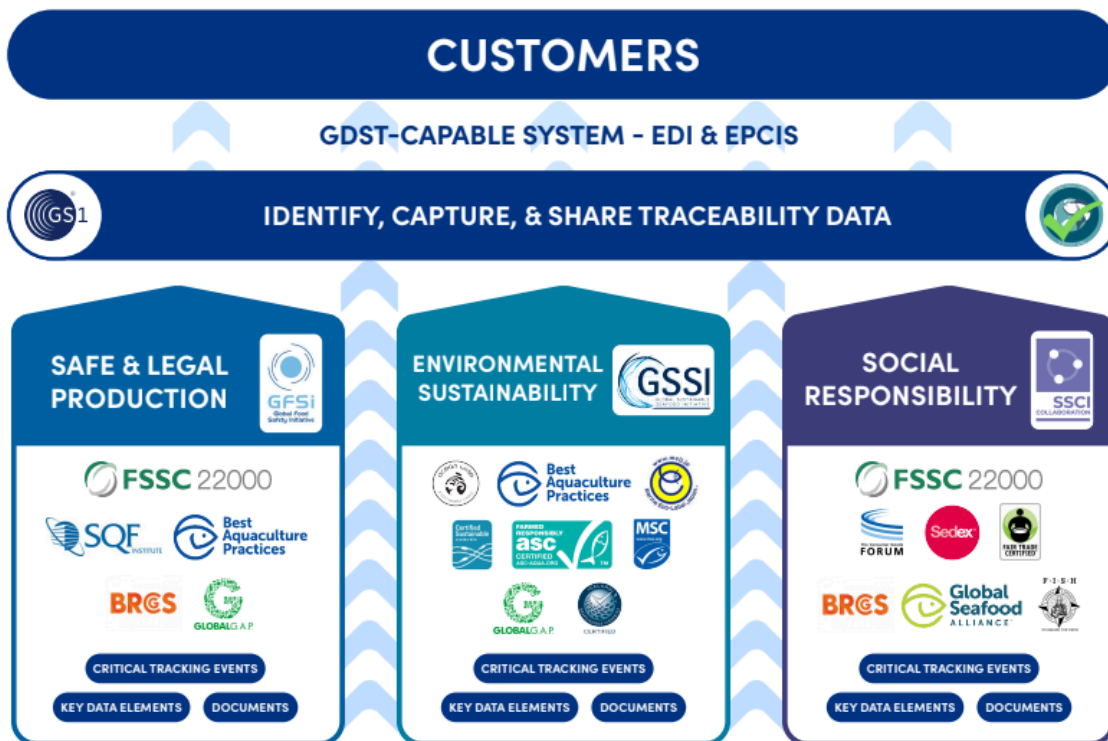
- **Sustainability & Tuna Sourcing Commitment:** Culimer USA recognizes that tuna has unique traceability, environmental, and social responsibility challenges that require a distinct approach.
- **Supplier Code of Conduct:** This is a foundational element of Culimer USA’s operations. The Code of Conduct ensures that everyone involved in Culimer USA’s supply chain upholds the highest safety and quality standards through systematic control.

### Approach

To achieve our vision and make progress toward our goals, we will use our due diligence framework (see right) to systematically and proactively address the environmental and social impacts within the seafood supply chain. Culimer USA defines ‘Sustainability’ based on the United Nations’ definition as “.....meeting present needs without compromising future generations’ ability to meet their needs.” (UN, 2023).



Culimer USA’s Sustainable Seafood Program and commitments will be continuously updated as best practices for traceability and sustainability evolve. Culimer USA stays apprised of best practices by prioritizing partnerships and pre-competitive collaborations. Culimer USA commits to engaging in its supply chains as our due diligence framework outlines. It will continue taking action in pre-competitive forums and advocacy to positively impact fisheries and aquaculture production's social, economic, and environmental outcomes.



## 1) Safe and Legal Production

Culimer USA maintains rigorous quality control measures to deliver safe and high-quality food products by developing, implementing, and maintaining procedures that comply with our policies, applicable international, federal, state, and local laws and regulations, and Global Food Safety Initiative Standards ([GFSI](#)). Culimer USA complies with U.S. federal programs and policies and the recordkeeping needed to provide safe and legal products to its customers:

- NOAA [SIMP](#) is a risk-based traceability program requiring importers to provide and report key data from the point of harvest to entry into U.S. commerce. It includes 13 seafood species groups to combat [illegal, unreported, or unregulated \(IUU\)-caught and/or misrepresented seafood](#) from entering U.S. commerce.
- FDA [FSMA Section 204](#) requires that persons who manufacture, process, pack, or hold foods on the FTL, maintain records containing Key Data Elements (KDEs) associated with specific Critical Tracking Events (CTEs); and provide information to the FDA within 24 hours or within some reasonable time to which the FDA has agreed.
- CODEX [Hazard Analysis Critical Control Point](#) (HACCP) addresses food safety by requiring detailed control strategies (i.e., plans) to mitigate biological, chemical, and physical hazards from raw material production, procurement, and handling to manufacturing, distribution, and consumption of the finished product.

### **Culimer USA is committed to:**

- Combating IUU fishing issues through thoughtful purchasing and vigilant monitoring, and will never knowingly purchase or sell any products associated with IUU fishing
- Full FSMA Section 204 compliance by 1st January 2026
- Collect and review supplier HACCP plans and HACCP Letter of Guarantees annually as outlined in [21 CFR 123.12](#)

## 2) Environmental Sustainability

Culimer USA's sourcing seeks to minimize and prevent long-term impacts on the broader ecosystem. Culimer USA recognizes the importance of reducing bycatch and its impact on the marine ecosystem's long-term sustainability and the fishing industry's economic viability.

### **Culimer USA is committed to:**

- Holding an MSC and ASC Chain of Custody Certification
- Sourcing products with [GSSI](#)-recognized certifications
- Sourcing from credible FIPs and aquaculture improvement projects with a time-bound improvement plan and transparently reporting<sup>1</sup> on measurable progress.
- Sourcing from other resources that meet Culimer USA's high standards contained herein.
- Collaborating with stakeholders to promote best practices and sustainable fishing methods that improve fishing practices, such as using circle hooks and adopting best practices for handling and releasing bycatch

## 3) Social Responsibility

Culimer USA recognizes the importance of addressing social responsibility in seafood supply chains. Culimer USA acknowledges that the seafood industry has recorded human rights violations, and it aims to work in collaboration with suppliers and industry groups to identify, assess, and mitigate any relevant occurrences within its seafood supply chain. As a company implementing the Global Tuna Alliance 5-Year strategy, Culimer USA's social responsibility efforts include prioritizing implementing the Employer Pays Principle, compliance with the International Labour Organization's Convention 188, observer safety, and the International Maritime Organization Cape Town Agreement by 2025.

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<sup>1</sup>[FisheryProgress.org](#) is preferred. If FisheryProgress.org is not used, a credible alternative platform must include all public reporting elements required by FisheryProgress.org to maintain an active profile, including any applicable social responsibility requirements.

**Culimer USA is committed to:**

- Support and implement the new standards for seafood under the [Sustainable Supply Chain Initiative](#) (SSCI) standard
- Prioritize sourcing from fisheries or farms that have implemented documented processes to comply with responsible practices related to human and labor rights.
- Implementing comprehensive due diligence processes, proactive actions with supply chain partners, focused on high-risk supply chains, and regular public reporting<sup>2</sup>
- Working with suppliers to resolve and remedy any issues that arise through a 12-month remedial process, followed by a reassessment
- Engaging with industry groups to tackle complex industry issues collectively (e.g., Global Tuna Alliance, World Benchmarking Alliance Seafood Stewardship Index).

## Traceability

Supply chain traceability creates the foundation for Culimer USA's commitment to sourcing food that is 1) produced safely and legally, 2) environmentally sustainable, and 3) socially responsible. Traceability is the ability to identify and trace the history of a seafood product throughout the supply chain. To trace a product back to its origin, key data elements (KDEs) are collected at critical tracking events (e.g., harvest, processing, shipping, etc.). Our company adheres to the [Global Dialogue for Seafood Traceability](#) (GDST) standard, and the GDST Basic Universal List of KDEs provides a comprehensive written guide to data points, their definitions, and how they are reported. The GDST standard eliminates all possible questions about definitions, facilitates interoperable data sharing, improves information verifiability, and reduces data reporting burdens.

Traceability is essential for supply chain management and food safety. At Culimer USA, we also leverage traceability data to evaluate sustainability, uphold social responsibility, and mitigate potential risks of IUU fishing in our supply chains. We collect traceability data in compliance with US Federal programs (e.g., FSMA Section 204, HACCP, SIMP) and to meet customers' expectations. We consider our suppliers & customers to be our partners. We actively participate in pre-competitive and industry groups to stay updated on best practices for traceability. Because of this, Culimer USA implements electronic traceability data collection and sharing through interoperable GDST-capable software platforms to meet both customer demands and industry best practices.

**Culimer USA has committed to:**

- Implementing the GDST standard and utilizing [Verified GDST-Capable](#) traceability vendor.
- Collaborating closely with each supplier to convey the needs clearly and collaborate to deliver the data needed.
- Collecting traceability data as guided by legal, customer, and industry requirements.

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<sup>2</sup> Culimer USA aligns with the U.S. Customs and Border Protection's [Reasonable Care Guidelines](#).

## Culimer USA's Seafood Supplier Expectations

Culimer USA has implemented a set of expectations that we expect all suppliers to comply with (see below graphic). These are essential in upholding our commitment to food safety and quality, seafood traceability, and responsible and sustainable sourcing. The expectations below include but are not limited to, conducting due diligence, maintaining documentation, and having internal controls in place to identify, mitigate, and remediate any issues.

Culimer USA's QA Department will collaborate closely with each supplier to understand their specific needs and customize the traceability process accordingly. This collaboration ensures that the traceability information provided meets our strict standards and aligns with our company's goals. Depending on product or source-specific risks, our company may require additional risk-mitigation measures. Such measures may include further training, onsite audits, incoming/outgoing QA oversight, sourcing and operational changes, or implementation of specific GFSI-benchmarked certification.

By adhering to these expectations and collecting and sharing required key data elements (KDEs) (Table 1), suppliers demonstrate their commitment to responsible practices and contribute to our collective efforts to promote transparency, traceability, and sustainability in the food supply chain.

### Traceability

- ✓ Suppliers shall provide electronic traceability data using a Verified GDST-Capable solution to ensure that the origin and movement of products can be accurately tracked and verified.
- ✓ Suppliers shall capture and share the required KDEs (Table 1), Chain of Custody data, and documentation, and comply with relevant legal requirements (FSMA 206, SIMP, HACCP).
- ✓ All seafood shall be fully traceable from the point of catch/harvest (i.e., fishery, aquafarm, ranch).

#### Safe & Legal Production

- ✓ Suppliers shall be certified to a GFSI standard. If not certified to GFSI standards, a letter of intent committing to certification must be provided.
- ✓ Suppliers shall fully comply with relevant U.S. legal requirements (FSMA 204, SIMP, HACCP).
- ✓ Suppliers shall align to standards outlined in the US Customs and Border Protection [Reasonable Care](#) guidelines.
- ✓ Suppliers shall provide a HACCP Plan in English, signed and dated by a qualified individual, and a HACCP Letter of Guarantee with current training records for the HACCP plan signatory.

#### Environmental Sustainability

- ✓ Seafood items shall come from fisheries/farms certified to one of the GSSI standards.
- ✓ For non-certified seafood, or other CCL-accepted products, improvement projects will be assessed on a case by case basis and can include:
  - Comprehensive FIPs with a progress rating of at least C are listed on [FisheryProgress.org](#).
  - Prospective FIPs or improvement projects demonstrating a commitment to a time-bound improvement process and transparent reporting.
  - Comprehensive aquaculture improvement projects<sup>3</sup>.

#### Social Responsibility

- ✓ At a minimum, a supplier-partner commitment to upholding international standards (Universal Declaration of Human Rights, ILO Declaration on Fundamental Principles and Rights at Work, UN Guiding Principles on Business and Human Rights, FAO Guidelines for Small-Scale Fisheries, OECD Guidelines for Multinational Enterprises)
- ✓ As CCL implements the SSCI standard, it will prioritize suppliers sourcing seafood from fisheries, farms, and processors certified to meet the Sustainable Supply Chain Initiative (SSCI) Standards.

<sup>3</sup> Comprehensive aquaculture improvement projects could include improvement projects with varying approaches (e.g., regional, jurisdictional) and will be assessed on a case-by-case basis.

## Culimer USA’s Key Data Elements Required for Traceability

The key data elements (KDEs) listed in Table 1 must be reported to Culimer USA through a verified GDST-Capable solution (e.g., Trace Register, Whole Chain) for each product or seafood source on a per-purchase order or shipment basis. These KDEs are organized by critical tracking event (CTE) and align with the Global Dialogue on Seafood Traceability 1.2 standards, which were created by the seafood industry to help standardize data collection across the seafood supply chain. Required KDEs are included to 1) meet legal requirements, 2) customer expectations, 3) industry best practice, and 4) assess Culimer USA’s environmental criteria. Culimer USA’s QA department will work with our suppliers on the required KDEs.

**Table 1.** A list of KDEs are required to share with Culimer USA for wild and farmed seafood products.

<b>Traceable Object Information:</b> product identification information to be collected for all CTE below and shipping <ul style="list-style-type: none"> <li>● Product Ownership (during ownership transfer, suppliers must capture the source and destination description of owning parties)</li> <li>● GTIN (e.g., linking product identifier that meets FSMA 204 requirement for traceability lot code)</li> <li>● Product Form</li> <li>● Weight/Quantity</li> <li>● Species</li> </ul>		
Production Method: Wild	Production Method: Farmed	
<b>Fishing CTE</b> <ul style="list-style-type: none"> <li>● Production Method (<i>wild</i>)</li> <li>● Gear Type</li> <li>● Catch Area (granularity depends on species/fishery) <ul style="list-style-type: none"> <li>○ FAO Major Fishing Area or Sub-areas</li> <li>○ Exclusive Economic Zone (EEZ)</li> <li>○ Regional Fishery Management Organization (RFMO)</li> <li>○ Sub-national permit areas (e.g., Alaska)</li> </ul> </li> <li>● Date(s) of Capture (e.g., harvest date)</li> <li>● Vessel Name</li> <li>● Vessel Registration</li> <li>● Vessel Flag</li> <li>● Harvest Certification (<i>when applicable</i>) <ul style="list-style-type: none"> <li>○ Certification type and valid certification code (e.g., MSC and MSC code)</li> </ul> </li> <li>● Fishery Improvement Project (<i>when applicable</i>) <ul style="list-style-type: none"> <li>○ FIP name and member sourced from</li> </ul> </li> </ul>	<b>Location Master Data (<i>required for all farmed CTEs</i>)</b> <ul style="list-style-type: none"> <li>● Location Name</li> <li>● Location ID (e.g., facility license/authorization)</li> <li>● Location Geo-Coordinates or Address (GLN)</li> <li>● Location Country</li> </ul>	
		<b>Hatchery CTE</b> <ul style="list-style-type: none"> <li>● Harvest Certification (<i>when applicable</i>) <ul style="list-style-type: none"> <li>○ Certification type and valid certification code (e.g., BAP H code)</li> </ul> </li> </ul>
		<b>Feedmill CTE</b> <ul style="list-style-type: none"> <li>● Harvest Certification (<i>when applicable</i>) <ul style="list-style-type: none"> <li>○ Certification type and valid certification code (e.g., BAP M code)</li> </ul> </li> </ul>
	<b>On Vessel Processing CTE (<i>when applicable</i>)</b> <ul style="list-style-type: none"> <li>● Product Origin</li> <li>● Chain of Custody Certification (<i>when applicable</i>)</li> </ul>	<b>Farm CTE</b> <ul style="list-style-type: none"> <li>● Farm Site Name</li> <li>● Date of Harvest</li> <li>● Farming Method (e.g., pond, cages, reservoir, etc.)</li> <li>● Harvest Certification (<i>when applicable</i>) <ul style="list-style-type: none"> <li>○ Certification type and valid certification code (e.g., ASC chain of custody code or BAP F code)</li> </ul> </li> </ul>
<b>Transshipment CTE (<i>when applicable and required by SIMP</i>):</b> <ul style="list-style-type: none"> <li>● Transshipment Vessel Name</li> <li>● Transshipment Vessel Unique ID</li> <li>● Transshipment Location</li> <li>● Dates of Transshipment</li> <li>● Chain of Custody Certification (<i>when applicable</i>)</li> </ul>		
<b>Landing CTE (<i>required by SIMP and FSMA 204</i>)</b> <ul style="list-style-type: none"> <li>● Landing Location</li> <li>● Dates of Landing</li> <li>● Landing Authorization</li> </ul>		
<b>Processing CTE (<i>required for U.S. labeling laws and FSMA 204 for certain products</i>)</b> <ul style="list-style-type: none"> <li>● Product Origin (e.g., COOL)</li> <li>● Expiry/Production date</li> <li>● Chain of Custody Certification (<i>when applicable</i>) (e.g., MSC chain of custody code)</li> </ul>	<b>Processing CTE (<i>required for U.S. labeling laws and FSMA 204 for certain products</i>)</b> <ul style="list-style-type: none"> <li>● Product Origin (e.g. COOL)</li> <li>● Production date</li> <li>● Harvest Certification (<i>when applicable</i>) <ul style="list-style-type: none"> <li>○ Certification type and valid certification code (e.g., ASC chain of custody code or BAP F code)</li> </ul> </li> </ul>	

## Key Terms and Definitions

**At-sea Transshipment:** Transfer fish, supplies, or other cargo between vessels. In seafood supply chains, fishing vessels at sea offload the catch to a large refrigerated transport vessel (known as “carriers” or “reefers”).

**Child Labor:** Work performed by a person who is under the minimum legal working age to be employed as determined by (i) a Business’s or Supplier’s policy, (ii) the law of the jurisdiction in which the work will be performed, or (iii) the International Labor Organization Minimum Age Convention No. 138 - whichever indicates the higher minimum age requirement.

**Critical Tracking Event (CTE):** Instances where a product is moved between premises, is transformed, or is otherwise determined to be a point where data capture is necessary to trace a product<sup>7</sup>.

**EEZ:** The Exclusive Economic Zone is an area of coastal water and seabed within a certain distance of a country’s coastline, to which the country claims exclusive rights for fishing, drilling, and other economic activities.

**FAO:** Food and Agriculture Organization of the United Nations. The [FAO](#) defines major fishing areas which are used for fisheries management and jurisdictional purposes.

**Fishery Improvement Project:** A multi-stakeholder initiative designed to improve fishery sustainability. These projects involve collaboration between fishers, processors, suppliers, retailers, NGOs, and sometimes governments, aiming to address environmental challenges and improve fishing practices.

**Forced Labor:** Includes all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered themselves voluntarily<sup>4</sup>, encompassing traditional practices of forced labor as well as new forms of forced labor such as human trafficking<sup>5</sup>.

**Human Trafficking:** Human trafficking involves the recruitment, harboring, transportation, provision, or obtaining of a person for labor or for the purposes of a commercial sex act through the use of force, fraud, or coercion or for the purposes of subjection to involuntary servitude, peonage, debt bondage or slavery.

**IMO Number:** International Marine Organization number; an identification number allocated to a [specific maritime vessel](#).

**IUUF:** Illegal, unreported, and unregulated fishing.

**Labor Trafficking:** The act of recruiting, harboring, transporting, providing, or obtaining a person for involuntary labor or services employing force or physical threats, fraud or deception, or other forms of coercion.

**Remediation:** Activities, systems, policies, or procedures that Culimer USA or supplier establishes to address and remedy confirmed instances of human trafficking or forced labor, including child labor, in its operations.

**Remedies:** Financial or nonfinancial compensation awarded to victims of human trafficking or forced labor, including child labor.

**RFMO:** Regional Fisheries Management Organization (e.g., International Commission for the Conservation of Atlantic Tunas (ICCAT))

**Supplier:** Organizations and individuals in Culimer USA’s supply chain who contract directly with Culimer USA or a supplier of Culimer USA.

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<sup>4</sup> International Labour Organization (ILO). Forced Labor Convention, 1930  
[https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100\\_ILO\\_CODE:C029](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C029)

<sup>5</sup> ILO, General Survey on the fundamental Conventions concerning rights at work in light of the ILO Declaration on Social Justice for a Fair Globalization , Report of the Committee of Experts on the Application of Conventions and Recommendations, 2012, ILC.101/III/1B, para. 272.

**Supply Chain:** Any organizations or individuals involved in supplying, producing, processing or distributing Culimer USA's products from the point of origin to the point of sale, as applicable.

**Time-bound Improvement Process:** A time-bound improvement process is an internal, formalized agreement between Culimer USA and a supplier regarding a timeline for compliance with Culimer USA's Policy.

**Traceability:** The ability of each stakeholder in the supply chain who takes possession of the product to systematically identify a unit of production, track its location and associated sources (see KDE Table), and describe any treatments or transformations at all stages of production, processing, and distribution. This traceability must enable the product to be traced back to its original source(s) and comply with all applicable government regulations, such as the Seafood Import Monitoring Program (SIMP).

**Trafficking-related activities:** All activities that directly support or promote Labor Trafficking or Child Labor, including but not limited to:

- (i) using misleading or fraudulent recruitment practices during the recruitment of employees, such as failing to disclose basic information or making material misrepresentations regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, living conditions and housing (if employer-provided or employer-arranged), any significant costs to be charged to the employee, and, if applicable, the hazardous nature of the work;
- (ii) charging employees recruitment fees; and
- (iii) destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity documents, such as passports or drivers' licenses<sup>6</sup>.

**Verifiable Source:** Culimer USA, or parties authorized by Culimer USA (e.g., FishWise), can at any time request, and the supplier will provide, data or documents to verify the legality, traceability, or source information of a product's seafood ingredients. A source is verifiable if the requested data or documents can be proven accurate.

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<sup>6</sup> Tracking-related activities refer to those actions, usually employed by labor brokers, to facilitate Labor Tracking and Child Labor. These model policies use the definition contained in Executive Order 13627 issued by President Obama on September 25, 2012.