

## Responsible sourcing in our business

In line with our ethical approach, which includes our commitment to sustainable best practice, we have set out detailed internal guidance to ensure that everything we use in our business is responsibly sourced.

When selecting goods, materials and services, we define a 'responsible' choice as one focused on the right standards of food safety, environmental integrity, animal welfare and social responsibility. To ensure this we need to:

1. Fully know and understand where, how and by whom all the ingredients, goods and services we buy are produced
2. Confirm that production standards have met (or exceeded) relevant industry best practice and relevant regulations.
3. Be sure that ingredients, goods and services have been produced in such a way as to minimise any negative impacts on the environment
4. Know that the supplier has treated all its workers with respect, provides the right level of workplace safety and support and pays an appropriate wage

More detailed criteria apply to different types of ingredients, goods and services. The most important of these are described below.

### A. Sustainable production of fish and seafood

JCS Fish Limited is focused on farmed fish such as Atlantic salmon and trout. We are highly experienced in our field with a close network of suppliers. We insist on application of the very highest standards at every stage of the aquaculture process. As a company, we support any research which fosters better fishing and farming methods, promotes ecological sustainability and leads to genuine benefits for the environment, industry and consumers

To help ensure our required standards are met, we will only deal with suppliers who are certified by one or more of these third-party certification standards for aquaculture, specifically:

- [GlobalGAP \(GGN\)](#)
- [Aquaculture Stewardship Council \(ASC\)](#)
- [RSPCA Assured \(Freedom Food\)](#)
- [Organic Food Federation](#)
- [Scottish Salmon Producers Organisation \(SSPO\)](#)

From September 2019, all standard (non-Organic) Atlantic salmon products in our BigFish brand have been sourced according to GLOBALG.A.P. (GGN) standards. In future this will allow us to put a number on our packs to allow consumers to verify the certified source of the salmon online.

Although most of our products are made with farmed fish, where we do occasionally use wild-caught species we will choose from sustainable sources, preferably those certified as such by a reputable third-party accreditation scheme such as the Marine Stewardship Council (MSC)

## B. Animal welfare in aquaculture

JCS Fish actively monitors its suppliers regarding best practice. This includes several welfare issues that specifically affect the aquaculture sector.

Animal welfare is also a key element of the third-party monitoring and certification schemes we use to assess the quality of our aquaculture suppliers (such as GlobalG.A.P.)

Farmed fish typically spend between 18 and 22 months in pens which allow the free flow of water (usually seawater). Producers must assess the health and behaviour of fish daily and record information on health, growth and the presence of sea lice. Veterinary health plans should be created for every farm location. At the point of slaughter, fish should be killed humanely without any unnecessary distress or discomfort.

**Sea lice** are a naturally occurring phenomenon in seawater which affects both wild and farmed salmon. The number in the environment can vary according to climactic and weather factors. Although not an issue in terms of food safety, excessive sea lice are detrimental to the health and wellbeing of farmed fish. A number of permitted control methods are used, including biological ones such as the introduction of 'cleaner fish' which feed on lice without harming salmon. Any such methods must be in line with best practice and the guidelines of relevant certification schemes.

We have robust procedures to check the quality of fish that arrives at our factory and any fish found carrying lice are removed from production.

**Predation by seals** is a common phenomenon affecting fish farms in open water. We require fish farmers to use non-lethal seal management techniques to prevent seals from killing and injuring farmed fish. A range of exclusion and deterrence methods are effective in preventing seals from attacking fish.

We require our suppliers to apply independently audited Environmental Management Systems (usually accredited to ISO 14001) with predator control plans specific to the location of each farm.

JCS Fish insists on excellent farm husbandry at all our supplying farms. As well as supporting best practice by insisting on third party certification, we actively support and endorse research by the aquaculture industry to find improved ways of maintaining the welfare of farmed fish, in line with best environmental practice.

## C. Genetically modified ingredients

It is JCS Fish policy that all our products should be free from genetically modified organisms, genetic modification & genetically modified DNA/protein.

We also guarantee that all the farmed fish we use are the product of normal reproductive methods and not the result of transgenic manipulation. We require our suppliers to demonstrate and certify that all feed used during production is free of GMO materials. Wild caught fish are inherently non-GM.

We require all new raw material suppliers to be subject to monitoring procedures based on risk assessment, to ensure our products remain free from any genetically modified material. All future products and materials will be carefully selected to ensure that JCS Fish maintains and retains its 'GMO Materials Free' status.

## ***Relevant regulations***

### Seafood sourcing

JCS Fish Limited adheres to the Food Safety Act 1990 and the BRC Global Food Standard requirements. The company has committed adequate and appropriate resources to implement this policy.

### GMO

All products manufactured by JCS Fish Limited, are to the best of our knowledge, free from GMO materials, as defined although not exclusively : The Genetically Modified Food (England) Regulations 2004 and European legislation governing the use and labelling of genetically modified foodstuffs and additives derived from these: Regulations 1829/2003/EC on GM food and feed and 1830/2003/EC on GM traceability and labelling, Directive 2001/18/EC on the deliberate release of GM organisms in to the environment. The company has committed adequate and appropriate resources to implement this policy.

## ***Responsibility***

The above general policy statement is supported by further documents, which describe the organisation and arrangements set in place for its implementation. The Director's aided by the management team is responsible for the co-ordination of these procedures.

<b>Name:</b> Andrew Coulbeck - Managing Director	
<b>Signed:</b> 	<b>Date:</b> 19/01/2021