



2024

MARINE SUSTAINABILITY POLICY
FRINSA DEL NOROESTE, S.A.



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1| Principles of marine sustainability

Here at FRINSA DEL NOROESTE, aware of the importance underlying the ongoing sustainability of marine resources to which we are committed, we have been taking action to ensure that our day-to-day activity is carried out in an ethical and responsible way, having as little negative impact as possible on the environment. The **principles** on which we base our **commitment to marine sustainability** are:

1. **Protection of the marine environment, conservation of resources** and maintenance of marine **biodiversity**; in short, the defense of **ecological balance**.
2. **Planning and rational use of marine resources**, bringing to bear **scientific knowledge, reliable data** and exercising **caution** and **sound judgement** when taking decisions.
3. **Development of responsible fishing and aquaculture**, avoiding both **overfishing** and **excess fishing capacity**.
4. Creation and conservation of **Marine Reserves**.
5. Promotion of **less aggressive fishing methods** with the aim of respecting non-target species and reducing negative environmental impact.
6. Fight against Illegal, Unreported and Unregulated (**IUU**) fishing.
7. Publicly condemn the **Shark finning** practice.
8. Reduction and Control of "**by-catch**".
9. Promote among our purse seiners suppliers the **use of non-entangling FADs** and **reduce the use of FADs** according to the management plans of the Regional Fisheries Management Organizations (RFMOs).
10. **Fair purchase** of raw materials **from sustainable and responsible fisheries and farms**.
11. **Traceability** throughout "*from the sea to the plate*".
12. **Transparency** and fair practice in process, commitment, and action.

Logically, we are one of the main interested parties in ensuring that **healthy** populations of tuna and other fisheries species grow to reach levels of **optimum balance**.

Being both involved and co-responsible, it is in our interest that **resources are used rationally** and able to meet existing and future demand in an **environmentally friendly and sustainable** way.

FRINSA DEL NOROESTE has joined forces with organizations at the forefront of marine resource sustainability, which is why we form part of, and work alongside, the Foundations and Organizations listed at the end of this document.

FRINSA DEL NOROESTE has been a pioneer in providing customers with canned sea products made from raw materials obtained in ways which are less aggressive for non-target species and more respectful of the environment.

We have undertaken a number of **actions and commitments** listed below.

2| A commitment to ongoing improvement

At FRINSA we believe that a proper understanding and **prior analysis of the risks** associated with the raw materials we purchase is essential for the development and correct implementation of our sustainability policy.

FRINSA works in close collaboration with suppliers to identify products which do not meet the highest standards of sustainability and to promote the setting up of Fishery/Aquaculture Improvement Projects which contribute to a **global increase** of sustainable fishing products on offer.

To achieve this goal, FRINSA requires its suppliers to adopt a model of ongoing improvement to guarantee the sustainability of products supplied and to evaluate the decrease in risks associated with fishing and aquaculture activity.

3| Collaboration with Regional Fishing Management Organizations (RFMOs)

We support the RFMOs in their marine Resources and Sustainability initiatives.

We send fisheries traceability data of our raw materials, very useful for scientific research.

We provide **full retention** of tuna, **by catch** reduction and studies of the **impact** of retention on non-target species.

We provide and request a **100% Coverage of Observers** on all the fleets of tuna seiners, with a view to extending this to other fleets at a future date.

We promote the **training of Skippers** of longline vessels in questions of **good fishing practices**.

We favour the implementation of efficient data management methods to allow a greater check on captures and to facilitate total product traceability, as with **Unique Vessel Identifiers** or **Vessel Monitoring Systems**.

We are improving the **monitoring, checking** and continuous **inspection** of available resources, in the belief that these allow a more sustainable management of resources.

We collaborate in the **eradication of shark finning**, in accordance with our specific policy (*see annex*).

We collaborate in **researching** marine resources and the promotion of **scientific marine knowledge**.

We encourage the creation and conservation of **Marine Reserves** and the protection of breeding and spawning grounds, and we promote the rehabilitation of damaged marine ecosystems.

4| Cooperation with the local population

We collaborate in the responsible development of local peoples, their integration into coastal zone planning, and the creation of jobs, giving a boost to the economies of communities that live on fishing and to the development and conservation of knowledge.

5| Commitment to responsible and sustainable purchasing

Throughout the raw material purchasing process, FRINSA DEL NOROESTE always keeps in mind its ever growing **commitment to sustainability**.

This is why we only buy products from fisheries which fulfill the **precautionary principle** and **safeguard** marine resources, and which contribute to the development of responsible and environmentally friendly fishing.

Our procurement commitment includes the **exclusion** of all fish and seafood species on **CITES appendices I & II** and seafood species classified in **IUCN Red List** as endangered and above.

Our suppliers must be committed to complying with local and national laws, EU norms and international agreements as well as following the criteria set out by the ISSF, the FAO Code of Conduct and, where applicable, the European Code of Responsible Fisheries Practices.

We neither purchase nor commercialize fish captured by large scale **drift nets** or other highly damaging methods.

We promote with our suppliers, to make all the possible efforts to avoid fishing during spawning periods, with the aim of allowing the reproduction of fish stocks in a natural way.

We uphold a priority purchasing commitment with ships listed on the **Proactive Vessel Register (PVR)** <http://iss-foundation.org/pvr/>. Our percentage of tuna purchases from large tuna seiners registered on the PVR is 100% agree ISSF conservation measures, and this our commitment for the future.

We favour the acquisition of **catches caught with environmentally friendly catching methods** that reduce the impact both on non-target species and on the environment, such as purse seine on free swimming tuna schools, pole and line, troll, mitigated longline, handline, among others.

We only purchase from purse seiners that have a public Policy of **use of non-entangling FADs agree PVR Register and specify Policies**. We promote the **reduction of the use of FADs** according to the management plans of the Regional Fisheries Management Organizations (RFMOs).

We require to our suppliers of tuna from longline fishing for the presence of observers during transshipments on the high seas and promote the **implementation of good practices on board** to minimize the impact on the incidental capture of sharks and turtles.

For the period 01/10/2022 to 31/12/2023, the percentage of our tuna purchases for each of the following Fishery Source categories are: Fisheries certified against the then current MSC Standard and eligible to use the MSC label: 45%; Fisheries that have entered full assessment for MSC Certification: 1%; Fisheries in the MSC Fisheries In Transition to MSC (ITM) program: 0%; Comprehensive FIPs publicly listed and have achieved progress within at least the past 24 months or are in their initial year listing: 17%; Comprehensive FIPs publicly listed but have not achieved progress within at least the past 24 months: 0%; and “none of the above”: 37%.

It is our intention to reduce the purchase of the volume percentages indicated as “none of the above” before 31/12/2025 by 15%. We also would like to increase our participation in Comprehensive FIPs and Fisheries in Transition to MSC (ITM) contributing to the sustainability of the marine resources. We intend to collaborate with other FIP or ITM participants to promote resource stability and long-term health of the marine species.

For the period 01/10/2022 to 31/12/2023 the percentage of our purchases for each of the following Supplier Source categories are: ISSF participating companies: 15%; Data Check Companies: 19%; direct from vessels: 15%; and none of the above: 51%.

It is our intention to reduce the purchase of the volume percentages indicated as “none of the above” before 31/12/2025 by 20%, increasing the quantities in the rest of the categories.

According to the ISSF 2023-2027 Strategic Plan our roadmap for 2024 to 2027 is:

- To increase the current percentage of our tuna purchases from Fisheries certified against the then current MSC Standard and eligible to use the MSC label by at least 20%.
- To decrease the percentage of tuna purchases from Comprehensive FIPs publicly listed but have not achieved progress within at least the past 24 months as much as we can.

- To decrease the percentage of tuna purchases from fisheries in the category “none of the above” as much it is feasible within the company’s procurement possibilities.

These efforts will be reviewed regularly to maintain these objectives focused in the company’s structure.

The percentage of our tuna purchases from Longline vessels, for the period 01/10/2022 to 31/12/2023, was 0,3% of the total tuna purchases. Of the total Longline purchases, 46% came from Longline vessels registered on the Proactive Vessel Register (PVR). It is our intention in this type of purchases to keep increasing from vessels registered on the PVR.

In an effort to contribute the rebuilding of the Indian Ocean yellowfin tuna population and according to the ISSF Conservation Measure, Frinsa will include in its purchasing plan the reduction of purchase volumes from this fishery at least 11% below the three-year average volume purchased between 2017 to 2019.

In short, at FRINSA DEL NOROESTE, both directly and through our involvement in the Foundations and Associations to which we belong, we try to **influence our suppliers’ attitudes** encouraging them to draw up, adopt and update their own sustainability policies.

6| Commitment to Training and Communication

Both within the Company and externally we encourage a **sustainable development policy**.

Information regarding the evaluation and degree of sustainability of FRINSA products is shared with our employees, given that this forms part of **in-house staff training**. This allows a greater understanding of the challenges arising in this area, enabling us to underline its importance when communicating to our customers. At FRINSA **we share** our sustainability policy with **customers, consumers, and suppliers** with the aim of **involving them** in improvements leading to more environmentally responsible practices.

7| Traceability of our products

Our raw materials comply with the **rules of origin** and **rules on IUU fishing**. We demand that our suppliers, like ourselves, have available the relevant data to guarantee total traceability and pass on in a truthful manner the necessary information.

Through our management system, we can identify, define and put into practice a complete traceability process which guarantees reliable checking the procedence, the flow and the processes undergone by each and every one of our products **“from the sea to the plate”**.

8 | In conclusion,

By our actions and commitments, by our involvement in International Organizations and Foundations and by demanding **ever more responsible conduct** from our suppliers (and ourselves) we may state categorically that *the raw materials we purchase and the canned products we manufacture are sustainable today and will be sustainable in the future.*

At **FRINSA DEL NOROESTE** we know that all parties interested in preserving fishing resources must pull together to guarantee the future availability of food from the oceans. The only way to achieve this **goal** is by *underlining the importance of the sustainability of marine products as a resource and a common value asset shared by all.*

That is why
OUR COMMITMENT
to the sea is our raison d'être.

We preserve the best of the sea

ANNEX 1. INTERNATIONAL ORGANISATIONS TO WHICH FRINSA BELONGS

ISSF - International Seafood Sustainability Foundation. (<http://www.iss-foundation.org>). The ISSF is a Foundation made up of the major tuna processing industries, World Wildlife Foundation (WWF), scientists and other NGOs, who together and on the basis of scientific research, promote the identification and adoption of ecologically sustainable solutions.



IPNLF - International Pole and Line Foundation (<http://ipnlf.org/>). Promotes tuna fishing by the pole and line method, helping establish sustainable and responsible development in coastal communities at the same time raising consumer awareness of the benefits of this fishing method.



SFP - Sustainability Fisheries Partnership (<http://www.sustainablefish.org/>), SFP. This is a non-profit NGO whose mission is to involve the worldwide chain of fishing product suppliers in the recovery of fish stocks and the reduction of the environmental impact of fishing and aquaculture.



FoS - Friend of the Sea (<http://www.friendofthesea.org/ES>). The standards of sustainability of Friends Of The Sea are based on criteria which follow the directives of Food and Agriculture

Organization (FAO) for the eco-labelling of Fish and Wild Fishery and Marine Aquaculture products. Among other criteria, only products from populations which are NOT OVERFISHED (according to article 30 of FAO directives) may be certified this way.



Dolphin Safe Certification. [Dolphin Safe Fishing - International Marine Mammal Project \(eii.org\)](http://eii.org). Project Dolphin-Safe, started by Earth Island Institute many years ago has considerably reduced dolphin mortality.



MSC - Marine Stewardship Council (<http://www.msc.org>). The MSC, which awards sustainability certificates to those fisheries which have successfully passed a thorough assessment process, seeks to further promote the evolution of international sea product markets towards a model which rewards and encourages ecologically responsible practices.



ANNEX 2. ANTI- SHARK FINNING POLICY.

The International Seafood Sustainability Foundation (ISSF) defines **shark finning** as “*the practice of retaining shark fins and discarding the remaining carcass while at sea*”.

We are aware that shark finning contravenes the FAO Code Of Conduct For Responsible Fishing and its International Plan of Action for the Conservation and Management of Sharks. Neither does it respect a great number of resolutions passed by various international institutes and organizations. We know that shark finning causes death of an unaccountable number of sharks each year and threatens a species which is considered “*vulnerable*”.

For these reasons, Frinsa del Noroeste S.A., as a member of the International Seafood Sustainability Foundation (ISSF), taking into account the management measures applied by Regional Fisheries Management Organizations (RFMOs) and national and international norms for the conservation of marine life has established and incorporated into its raw material purchasing policy the following points:

- 1) **We condemn and forbid shark finning.**
- 2) We avoid any commercial dealings with vessels which have been identified by the Regional Organizations (RFMOs) or by national or international authorities as practitioners of shark finning and/or do not land all sharks with fins naturally attached, if retained.
- 3) We avoid commercial dealings with any company which has not forbidden and condemned the practice of shark finning. Further we do not conduct transactions with companies that do not have a public policy prohibiting shark finning and requiring sharks be landed with fins naturally attached, if retained.

Note.- As of 1 July 2023, proof of implementation of the public policy in paragraph 3 shall be required for purse seine vessels.

As of 31 December 2023, proof of implementation of the public policy in paragraph 3 shall be required for all other gear types, including longline vessels.