Position Statement

Plant-based Ingredients

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This position statement outlines BioMar's requirements for sourcing agricultural commodities and their derivatives. All BioMar suppliers must also comply with the Responsible Sourcing Policy and Code of Conduct for Suppliers. In addition to these internal requirements, BioMar is committed to sourcing plant-based ingredients that meet the needs of our customers certified to best-practice industry standards, such as Global G.A.P, Best Aquaculture Practices (BAP), and Aquaculture Stewardship Council (ASC).

Scope

In scope of this position statement are all ingredients originating from crops but not including feed additives with a plant-based carrier matrix. The requirements in this position statement must be fulfilled by all BioMar business units following the target dates. For BioMar business units manufacturing ASC Feed, compliance must be achieved by the ASC transition period end-date. Future additions to the BioMar Group of companies will have 24 months to reach compliance, following a regionally appropriate action plan signed by executive management.

Risk Assessment

BioMar has aligned with the Due Diligence guidance for risk assessment published by OECD[1]. The BioMar Due Diligence Assessment Methodology (BioMar DD) is a classification approach used to determine the risk level of raw materials (RMs) as "high", "medium", or "low". High-risk RMs are derived from crops with known risks related to the rule of law, human rights, and deforestation/conversion of natural habitats (i.e. soy and palm). Low-risk RMs are those where an adequate amount of documentation exists to rule out specific legal, environmental, and social impacts. RMs passing the BioMar DD with low risk can be utilized without restrictions. Medium risk exists when there is not enough information to clearly determine low risk status. If low risk cannot be determined, then the RM and the RM Ingredient Manufacturer will be subject to an action plan. The action plan will include milestones and target dates that focus on prevention, mitigation, and/or remediation of the identified risk(s). In cases where the ingredient manufacturer is unwilling or unable to engage in an action plan, BioMar will cease sourcing from that ingredient manufacturer.

Sourcing Requirements

Deforestation and Conversion Free

BioMar is committed to deforestation and conversion-free supply chains (D/C-free) for the sourcing of all plant-based ingredients. High risk ingredients (soy and palm) should not originate from cropland deforested or converted from natural habitats after December 31st, 2020 (cut-off date) with a target date of December 31st, 2025[2]. For high volume and other plant-based ingredients, a cut-off date of December 31st, 2020, shall apply with a target date of December 31st, 2030. High volume ingredients are

[1] OECD Due Diligence Guidance for Responsible Business Conduct - OECD
[2] Due to the complexity of the supply chain for soy lecithin and similar derivatives which represent a minor proportion of BioMar's overall soy sourcing, a target date of 2028 shall apply.

categorized based on the collective majority volumes calculated excluding high risk ingredients. Other ingredients refer to the remaining part of plant-based ingredients which are neither high risk nor high volume. These ingredients will be risk assessed and subject to an action plan if required, with the purpose of ensuring compliance with the target date. Proof of compliance with BioMar's D/C-free commitment shall include evidence gathered during the BioMar DD process for evaluating raw materials and suppliers. Furthermore, suppliers are encouraged to share their own D/C-free commitments.

Traceability

BioMar requires traceability documentation for each delivery declaring the ingredient name, crop name, country of crop production, country of raw material production, and the certification status of the agricultural crop (i.e. ProTerra, RTRS, etc.). In addition, for raw materials derived from soy and palm, the region/state/municipality of crop production is required per January 1st, 2027. If the BioMar supplier of certified soy and palm is different from the producer, then the supplier must have a Chain of Custody or verified traceability system.

Circular and Restorative Practices

Circular economy principles and restorative practices are necessary to improve the long-term sustainability of our supply chains. Restorative ingredients are RMs that significantly reduce ecosystem impacts and move agriculture towards net-positive environmental outcomes compared to current agricultural practices. Suppliers practicing or transitioning towards restorative farming practices and/or focusing on circular production inputs (i.e. recycled water and nutrients) and renewable energy will take precedence in the BioMar portfolio. Our circular and restorative ambitions seek to progressively decouple feed supply chains from directly competing with food security. Our target is to source 50% of BioMar's raw materials from circular or restorative ingredients by 2030.

Definition list

ASC
Aquaculture Stewardship Council

BAP
Best Aquaculture Practices

Conversion
Change of a natural ecosystem to another land use or profound change in a natural ecosystem's species composition, structure, or function. Note: Deforestation is one form of conversion (conversion of natural forests). Change to natural ecosystems that meets this definition is considered to be conversion regardless of whether or not it is legal.

Conversion-free
Commodity production, sourcing, or financial investments that do not cause or contribute to the conversion of natural ecosystems (as defined by the Accountability Framework). No-conversion refers to no gross conversion of natural ecosystems. The terms "no-conversion" and "conversionfree" are used in favour of "zero-conversion" because "zero" can imply an absolutist approach that may be at odds with the need to sometimes accommodate minimal levels of conversion at the site level in the interest of facilitating optimal conservation and production outcomes.

Deforestation
Loss of natural forest as a result of: i) conversion to agriculture or other non-forest land use; ii) conversion to a tree plantation; or iii) severe and sustained degradation. Loss of natural forest that meets this definition is considered to be deforestation regardless of whether or not it is legal. – The Accountability Framework's definition of deforestation signifies "gross deforestation" of natural forest where "gross" is used in the sense of "total; aggregate; without deduction for reforestation or other offset."

Deforestation-free
Commodity production, sourcing, or financial investments that do not cause or contribute to deforestation (as defined by the Accountability Framework). The AFi recognises the High Carbon Stock Approach (HCSA) as a practical tool to implement no-deforestation in the tropics, in contexts wherethe tool has been validated.

Global G.A.P
Global Good Agricultural Practices

High-volume plant ingredients
This applies to ingredients which collectively make up the majority of the total plant ingredient volume, i.e., ≥ 50%, after high risk ingredients (soy and palm) have been deducted.

OECD
Organisation for Economic Co-operation and Development

RM(s)
Raw material(s)

RTRS
Round Table on Responsible Soy Association

References

Internal

BioMar Group Code of Conduct for Suppliers

BioMar Group Marine Ingredients Position Statement

BioMar Group Responsible Sourcing Policy

BioMar Group Sustainability Report

External
Aquaculture Industry standards

- Aquaculture Stewardship Council (ASC)
- Best Aquaculture Practices (BAP)
- MarinTrust
- Marine Stewardship Council (MSC)

Accountability Framework Initiative (AFi)

Global Good Agriculture Practices (Global G.A.P)

Organisation for Economic Co-operation and Development (OECD)

Round Table on Responsible Soy Association (RTRS)

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