

## Star Trading FIP Bait Sourcing Policy

**October 2025**

**Version 1.0**

### Policy Statement and Scope

The following policy outlines Star Trading’s policy for sustainable bait sourcing. This policy applies to the purchase of all bait sourced for disbursement to Star Trading partner fisheries.

### Definitions

**Comprehensive Fishery Improvement Project (FIP)** – multi-stakeholder effort to address environmental challenges in a fishery; a Comprehensive FIP addresses the principles of the MSC Fisheries Standard; in order to qualify, FIPs must be public and rated by the Sustainable Fisheries Partnership (SFP) with a score of D or higher

**MSC Risk-Based Framework (RBF)** – mechanism developed by the Marine Stewardship Council (MSC) to assess data-limited fisheries against the technical standards of the MSC Fisheries Standard; the RBF relies on information collected in workshops with fishery stakeholders, and any data available from the fishery

**Overfishing** - removal of a species of fish (i.e. fishing) from a body of water at a rate greater than that the species can replenish its population naturally

**Overfished Fishery** – fishery in which overfishing has caused the stock biomass to fall below the Maximum Sustainable Yield or target reference point as determined by the fishery management system

**Productivity Susceptibility Analysis (PSA)** - assesses how likely a stock is to recover when depleted, as well as how likely other species are to interact with fishing gear

### Revision History

Date	Version	Comments
October 2025	1.0	New Policy

## Policy

Star Trading, and their supply chains, are socially responsible companies committed to responsible practices in all that they do. The purpose of this policy is to aid in the prevention of sourcing bait from an overfished fishery where overfishing is also occurring, and to mitigate the risk of unintentionally straining a specific fishery due to multiple fisheries sourcing significant volumes of bait from the same vulnerable fishery.

In order to mitigate the above risks, the Star Trading seafood procurement team utilize the following requirements:

1. For each potential purchase of bait, companies will collect a completed Fisheries Certificate of Origin – Bait Species to determine the specific fishery source. This form can be found in appendix A and will be shared with Star Trading on a biannual (6month) basis.
2. For all potential bait fisheries in the Star Trading supply chain, the MSC Risk-Based Framework will be utilized to assess the technical performance indicators against the MSC Fisheries Standard:
  - a. A Productivity Susceptibility Analysis (PSA) will be conducted to generate a Marine Stewardship Council (MSC) score for all bait fisheries:
    - i. Results of the PSA will be contained in the “Star Trading Bait Sourcing Profile Report”.
3. Each bait fishery will be classified into one of three categories:
  - a. Purchase:
    - i. Bait under this classification may be purchased without any further conditions.
  - b. Purchase with Consideration:
    - i. Bait under this classification must be involved in an active Comprehensive Fishery Improvement Project (FIP).
    - ii. Evidence of FIP participation must be collected prior to execution of the purchase.
  - c. Avoid:
    - i. In general, bait fisheries in this classification should be avoided.
    - ii. In emergency situations, it shall only be purchased via a Management of Change (MOC) approved by the Star Trading management, or equivalent member of senior management.
4. The Star Trading Bait Sourcing Profile Report will be reviewed and updated every two years or sooner if there is a Regional Fisheries Management Organization (RFMO) stock status report published that will impact PSA scoring for the fishery.
5. Prior to the execution of the Contract of Purchase, companies will review the completed Fisheries Certificate of Origin – Bait Species to confirm purchasing status of the bait stock within the Star Trading Bait Sourcing Profile Report.