



Resource Use and Circular Economy Policy



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Program
ZA RIBARSTVO
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HR-EKO-01
EU Agriculture



fish from
Croatia



GLOBALG.A.P.



	RESOURCE USE AND CIRCULAR ECONOMY POLICY	OB PK/09
		Review: 1
		Date: 26/11/2025

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1 Scope, Responsibilities, and Policy Availability

Activity:	NACE – A 03.21 Marine aquaculture - Hatchery, farming, grading, processing, packaging and distribution of Mediterranean white fish
Registered offices:	Cromaris d.d. , Gaženička cesta 4b, 23 000 Zadar Cromaris Italia Sr.L. , Via delle Industrie n 2/1 31032 Casale sul Sile TV, Italia
Contact for policy-related enquiries:	e-mail: info@cromaris.hr
Policy prepared by:	Head of ESG, Finance
Policy approved by:	Management Board Member and Director of Finance
Person responsible for policy implementation:	President of the Management Board (CEO)
Sustainability matters (material topics) covered by the Policy::	- Resource inflows, including resource use - Resource outflows related to products and services - Waste
Methodology:	- Proprietary fish feed formulations - Technical documentation for packaging (in line with PPWR requirements) - Weighing of by-products and waste - Analyses performed by accredited laboratories
Baseline/target year for reducing waste volumes and increasing by-product recovery::	- By-products from processing – annual target: share used for animal feed > 90% - Mortality from farms – annual target: recovery rate > 90% - Waste – targets depend on the type of waste
Policy scope of application:	Locations under financial and operational control: - Hatchery Nin, fish farms Lamjana, Košara, Lavdara, Kudica, Velo Žalo, Žman i Budava, processing and distribution centre in Gaženica, Cromaris Italia, retail shops and fishmongers in Zadar (Fish-point), Zagreb (2), Rovinj (1), Preko (1) and Vir (1) Significant parts of the value chain: - Fish feed manufacturers, packaging manufacturers, product carriers, local communities, waste management, customers and consumers
Responsibilities of organisational units for drafting and coordinating policy implementation:	Finance, Research & Development and Commercial Excellence in cooperation with other organisational units
Policy review frequency:	Annually following the double materiality assessment
Alignment of the Policy with the European Sustainability Reporting Standards (ESRS):	The Policy is aligned with the requirements of: - ESRS 2 General Disclosures – MDR-P Policies adopted to manage material sustainability matters - ESRS E5-1 Policies related to resource use and circular economy
Alignment of the Policy with key global, EU and Croatian climate and environmental strategies, action plans, legislation and certified management systems:	The Policy is aligned with the key requirements of: - New Circular Economy Action Plan COM(EU) 2020 Waste Management Act of the Republic of Croatia (OG 84/21 and 142/23) - Regulation (EC) No 1069/2009 on animal by-products and derived products not intended for human consumption (ver. 14/11/2019) - Regulation (EC) No 767/2009 on the placing on the market and use of feed (ver. 26/12/2018) - Regulation (EU) No 1380/2013 on the Common Fisheries Policy (ver. 1/1/2023) - Aquaculture Stewardship Council (ASC) Seabass, Seabream and Meagre Standard - GLOBALG.A.P. Integrated Farm Assurance standard for aquaculture - ISO 14001:2015 Environmental Management System standard - Regulation (EU) 2018/848 on organic production and labelling of organic products (status as at 25.3.2025) and Bio Suisse standards
Key legislation with which operations will be aligned::	Regulation (EU) 2025/40 on packaging and packaging waste
Policy availability:	The Policy is published in Croatian and English: - https://cromaris.com/hr/politike-odrzivosti/ - HR - https://cromaris.com/sustainability-policies/ - EN

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2 Material Impacts, Risks, Opportunities and Indicators

Significant impacts, risks and opportunities related to resource use and the circular economy are analysed and assessed as part of the double materiality assessment process for each reporting year. For each impact, risk and opportunity, targets, measures and performance indicators are defined in order to monitor the achievement of targets and the effectiveness of the measures implemented. The Resource Use and Circular Economy Policy and Cromaris' Strategic Business Plan are aligned with the results of the double materiality assessment.

Sustainability Factors	Impact / Risk / Opportunity	Short- / Medium- / Long-term	Indicators
Resource inflows, including resource use			
Quantity of fish feed consumed per tonne of harvested fish	Positive effect on the business	Long-term	Reduction in the intensity of fish feed consumption per tonne of harvested fish compared with 2024 – %
Composition of raw materials for fish feed production	Positive effect on the business and the upstream value chain	Long-term	Reduction in the share of fishmeal and fish oil from wild catch in fish feed compared with the previous reporting year – %
Quantity of plastic PET and paper and cardboard packaging used for packing products	Positive effect on the business and the downstream value chain	Short-/medium-term	Reduction in the share of PET plastic and paper and cardboard packaging in total packaging compared with 2025 – %
Changes in requirements for packaging labelling, recyclability and recycled content in packaging in direct contact with food	Political, legal and technological risk to the business and the upstream value chain	Medium-/long-term	Share of packaging suppliers that have launched activities to align their packaging with the new requirements in the reporting year – %
Resource outflows related to products and services			
Quantity of by-products from fish sorting, processing and packing that is not landfilled	Positive effect and business opportunity	Short-term	Mass and share of by-products from sorting and processing used for the production of pet food – kg and %
Quantity of surplus fish after customer orders and filleting sold to customers	Positive effect and business opportunity	Short-term	Mass of surplus fish sold via the Fish-point outlet in Gaženica – kg
Waste			
Quantity of dead fish from farms (mortality) that is not landfilled	Positive effect on the business	Short-term	Mass and share of dead fish (mortality) recovered in biogas plants in total mortality – kg and %
Quantity of non-hazardous and hazardous waste that is not landfilled	Positive effect and business opportunity	Short-term	Mass and share of waste in total waste generated that is sent for recovery – kg and %
Quantity of hazardous and non-hazardous waste that is landfilled	Negative effect on the business	Short-term	Mass and share of landfilled hazardous and non-hazardous waste in total waste – kg and %
Recyclability of waste packaging	Positive effect on the business and the upstream value chain	Short-/long-term	Share of damaged plastic packaging returned to packaging suppliers for material recovery (recycling) – %
Quantity of waste from Cromaris products at customers that is not landfilled	Positive effect on the downstream value chain	Short-term	Mass and share of waste that is not landfilled – kg and %
Use of waste nets from farms in other industries	Positive effect and business opportunity	Long-term	Mass and share of waste nets used in other industries – kg and %

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3 Policy Principles

The Resource Use and Circular Economy Policy is based on the principles of the circular economy and waste management.

3.1 Circular economy principles

- a) Keeping materials, goods and products in use for as long as possible
- b) Reducing waste generation and pollution
 - i. Preventing waste generation
 - ii. Re-using products and items for the same purpose for which they were produced
 - iii. Recovering waste through material recovery (recycling)
 - iv. Recovering waste for energy
 - v. Landfilling waste where none of the above options in the waste hierarchy is available or where they would lead to unreasonable costs and shift pollution to other environmental media
- c) Activities and measures to reduce waste must not have adverse effects on the other environment components – water, the sea, soil and biodiversity – or on society – employees, suppliers, local communities, customers and consumers

3.2 Waste management principles

- a) Polluter pays – to bear the costs of waste management and pay fees for the management of specific waste streams
- b) Proximity – to deliver waste to authorised waste management companies in line with the proximity principle
- c) Traceability – to deliver waste to authorised waste management companies accompanied by a Waste Consignment Note (PL-O) and waste analyses, where applicable

4 Objectives

4.1 General objectives

- a) Report on resource use and on business activities in line with circular economy principles in sustainability reports and, where relevant, on social media and in direct communication with employees, suppliers, local communities, customers and consumers
- b) Calculate and disclose in the sustainability report key performance indicators for sustainable activities and operations, in accordance with the EU Taxonomy technical screening criteria for the circular economy, where applicable
- c) By 2028, analyse the applicability of green public procurement criteria to the procurement of significant goods, works and services.

4.2 Resource inflows, including resource use

- a) Fish feed suppliers shall ensure that the production of fish feed and its placing on the market comply with EU and Croatian legislation on fish feed production and marketing, as well as with Cromaris' Fish Feed Quality Policy.

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- b) Continuously optimise fish feed consumption per tonne of harvested fish in order to shorten the production cycle, reduce the organic load on the sea and seabed, and mitigate impacts on biodiversity and the conservation status of marine species.
- c) Reduce the share of PET plastic packaging in direct contact with food in total packaging by $\geq 50\%$ by 2027 compared with 2025
- d) Reduce the share of paper and cardboard packaging used for packing products in total packaging by $\geq 50\%$ by 2027 compared with 2025
- e) Continuously monitor the development of new techniques applied by packaging suppliers with the aim of increasing recyclability and the recycled content of packaging in direct contact with food, and assess their applicability within Cromaris

4.3 Resource outflows related to products and services and waste

- a) Maximise the use of by-products and the recovery of waste
 - i. $\geq 90\%$ of fish processing by-products to be delivered to authorised companies for the production of pet food
 - ii. $\geq 90\%$ of waste from dead fish from farms (mortality) to be recovered in biogas plants
 - iii. To explore, by 2029, the potential use of fish bones and scales in the production of fertilisers and in the pharmaceutical and cosmetics industries)
- b) Continuously explore opportunities for using waste nets from farms as a raw material/by-product in other industries
- c) Separately collect significant special categories of waste at source according to their type and characteristics – paper and cardboard, plastics, textiles, waste electrical and electronic equipment, waste oils, waste batteries and accumulators, and waste plastic fishing gear – and to hand them over to authorised waste management companies
- d) Continuously reduce the volume of municipal waste and landfilled waste

5 Measures for monitoring the effectiveness of policy implementation

The following section describes the measures used to monitor the achievement of the objectives of the Resource Use and Circular Economy Policy.

5.1 Resource inflows, including resource use

- a) Once a year, analysing targets for resource inflows and their use and aligning them with new and revised requirements of relevant global, EU and Croatian strategies, plans and legislation
- b) Once a year, analysing performance indicators for the achievement of targets for resource inflows and their use and updating alignment with the objectives of the Strategic Business Plan

5.2 Resource outflows related to products and services and waste

- a) Once a year, analysing targets for resource outflows related to products and services and waste and aligning them with new and revised requirements of relevant global, EU and Croatian strategies, plans and legislation

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- b) Once a year, analysing performance indicators for the achievement of targets for resource outflows related to products and services and waste and updating alignment with the objectives of the Strategic Business Plan
- c) Once a year, informing fish feed and packaging manufacturers and waste management companies of Cromaris' greenhouse gas (GHG) reduction targets and collecting data on emissions intensity for the calculation of the Scope 3 carbon footprint, by 15 February of the current year for the previous reporting year
- d) Once a year, encouraging key employees, through targeted training, to reduce the volume of municipal waste generated

6 Human and financial resources for achieving circular economy targets

Own employees are involved in achieving the targets related to resource use and circular economy-related sustainability matters, with external experts engaged as needed. The sources of financing for measures to achieve circular economy are own funds, EU funds and the Environmental Protection and Energy Efficiency Fund applicable to the mariculture sector, as well as bank loans and credit facilities.

7 Stakeholder involvement in policy development and updates

Key stakeholders are involved in the development and updating of the Resource Use and Circular Economy Policy on the basis of the results of the double materiality assessment, which is carried out once a year for each reporting period. Stakeholders involved in the development of the Policy include the owner, Cromaris' employees, fish feed and packaging manufacturers, authorised waste management companies, key customers and consumers, as well as auditors of the quality and environmental management systems in accordance with ISO 14001, the Aquaculture Stewardship Council (ASC) Seabass, Seabream and Meagre Standard, EU Organic and Bio Suisse Organic. The forms of stakeholder engagement depend on the stakeholder group and may include workshops and meetings, surveys, conferences, professional and scientific events, round tables, membership in industry associations, internal and external audits, e-mail, social media and other relevant forms of communication.

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8 Linkage with policies governing other sustainability matters

The Resource Use and Circular Economy Policy is linked to the Climate Change Mitigation and Adaptation Policy, the Water, Marine Environment and Biodiversity Policy, the Impacts, Risks and Opportunities on Society Policy, and the Business Conduct Policy. The Impacts, Risks and Opportunities on Society Policy covers own employees, affected communities, and customers and consumers, while the Business Conduct Policy covers corporate culture, supplier relations, and animal welfare

Policy	Politika ublažavanja i prilagodbe klimatskim promjenama
Climate Change Mitigation and Adaptation Policy ESRS E1	- 5.2 (c) collection of emissions intensity data from packaging and fish feed suppliers and from authorised waste and by-product management companies for the calculation of Scope 3 greenhouse gas emissions
Water, Marine Environment and Biodiversity Policy – ESRS E3 and ESRS E4	- 4.2 (a) cooperation with fish feed suppliers – traceability and sustainable origin of raw materials - 4.2 (b) reducing impacts on biodiversity by optimising feed consumption
Impacts, Risks and Opportunities on Society Policy – ESRS S1–S4	- 4.1 (a) publication of the sustainability report and informing interested stakeholders
Business Conduct Policy – ESRS G1	- 4.1. c) uvođenje kriterija zelene javne nabave - 4.2. e) suradnja s dobavljačima ambalaža o mogućnostima proizvodnje ambalaže prema zahtjevima Uredbe EU o ambalaži i ambalažnom otpadu

Zadar, 26 November 2025

President of the Management Bord

Ivan Leko