



Report on the Commission information meeting on the methodology for Product Environmental Footprint for marine fish (wild and farmed)

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Organised by the Aquaculture AC with support from the North Western Waters AC

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1 Welcome

The Chair of the AAC's Working Group 3 on Horizontal Issues welcomed all participants to the meeting.

The Commission launched a consultation on the PEF methodology and the ACs were invited to participate by the deadline of 20 September which is very short given the complexity of this issue. Since the topic is of relevance to all members of the AAC, the Secretariat contacted the Commission to arrange today's workshop in order to identify what issues the AAC should give priority to when responding to the consultation.

The meeting is open and attended by several other Advisory Councils.

2 Brief tour de table of present EC experts from DG ENVI and DG MARE

The attending Commission representatives introduced themselves and clarified that the consultation was launched by the technical secretariat and not by the Commission.

3 Presentation by the EC of the consultation (DG ENV)

(You can find the presentation by DG ENV here [\(link\)](#).)

More than 10 years ago the Commission commenced work on the Environmental Footprint (EF) method with the aim of developing a lifecycle analysis method that could be applicable to policy proposals and that would allow calculation of the environmental footprint in a comprehensive manner. The aim was to have a method based on which information could be obtained that is reproducible, comparable and verifiable.

In 2010 the Council asked the Commission to develop a harmonised approach, while at the same time the industry was also interested in developing this. In 2013 the first version of the EF method was published officially as Commission Recommendation 2013/279/EU.

Main features of the EF method:

- Avoid trade offs between different value chain steps and between different environmental impacts (Life cycle approach)
- Tested between 2013-18
- Based on international best practice

The EF method currently covers 16 environmental impacts each of which is measured, normalised and weighted leading to a single score per product. Continuous work is being carried out on improving this method and adding other environmental impacts, for example on biodiversity.

The Commission and stakeholders from different parts of the world made great investments in the pilot phase.



There are numerous category rules that have been developed to date. From 2019 more work started on new Product Environmental Footprint Category Rules (PEFCR) including this one on marine fish. This work is initiated through stakeholder consultation and expressions of interest in a category.

The PEFCR process consists of 19 steps. The Technical Secretariat (TS) has to prove their ability to develop a PEFCR and also their representativeness regarding the market. They need to prove that they cover 51% of the market. If this condition is not met, the Commission becomes part of the TS to ensure that all relevant aspects are considered.

The full process takes approx. 3 years. Once the TS is approved by the Commission the work on the PEFCR can start on a representative product. In the case of marine fish this covers both wild catch and farmed. To create the representative products, data sets are needed which are then tendered. The TS then creates the first draft of the PEFCR which leads to the first consultation where the information is made publicly available for comment. Based on this the draft document is improved. For each representative product included in the PEFCR, three supporting studies need to be carried out to test the PEFCR and to ensure that the rules are clear, and the data sets are good. Based on this, secondary data set are published leading to an updated version of the PEFCR. This is followed by a second consultation period resulting in a further update to the draft which then is reviewed by a panel of LCA experts.

The final version of the PEFCR is validated by the Technical Advisory Board and the EF subgroup which is a group of Commission experts including representatives from the Member States and the industry with a more strategic view on the issue. The Technical Advisory Board is a separate group of Commission representatives with specific LCA expertise¹.

The final PEFCR is published online.

The documents related to the consultation are available [here](#)². The priority documents for review by the AAC are:

- 1 PEFCR draft v1 ([link](#))
- 2 Comments should be made in the Excel file available for download from the site (Marine Fish PEFCR – Comment form template – PEFCR Draft v1)
- 3 Review Panel study containing the results of the two representative products ([link](#))
- 4 Comments should be made in the Excel file (Marine Fish PEFCR - Comment form template – PEF-RP Report v1)
- 5 Marine Fish PEFCR – Comment form template – PEFCR Draft v1 (Excel file for download)

¹ The members of the TS are listed in Chapter 3.6 of the Product Environmental Footprint Category Rules (PEFCR) for unprocessed marine Fish Products Draft v1 for 1st OPC ([link](#)).

² Please note that the link provided in the presentation works only if you have log on credentials for the EU web portal.



When participating in the consultation it is vital to submit proactive comments supported with additional documentation where possible or necessary.

This PEFCR is not being written by the Commission, but the Commission supports the TS which is composed of experts in the marine sector, research institutes and NGOs in order to find a balance.

4 Q&A with the meeting's participants

What are the expected timelines for the final adoption of the PEFCR?

Publication of the final PEFCR is expected for the end of 2022.

Are there any different files more important for wild caught fish?

No, both are in the same document. Some sections are the same for both, however, there are also some sections pertaining solely to wild caught fish.

Considering the technical level required to respond to the consultation - is it not possible to extend the deadline which was launched during the summer period?

The deadline in theory is already in four weeks. The Commission already requested an extension of the deadline beyond the initial 4 weeks until 20 September.

The AAC and the NWWAC have written to the Technical Secretariat requesting an extension of the deadline. We are awaiting their response.

Does the method take into consideration only negative impacts on the environment, or does it also examine the positive ones such as ecosystem services?

Only negative impacts on the environment are considered, but it is possible to consider additional environmental information. However, everything that is in the PEFCR must be measurable and verifiable.

How can Advisory Councils feed into the consultations? Do we address recommendations to DG MARE and DG MARE then takes them into account when providing their input?

We will need to check this rule as the Technical Secretariat is working for the Commission but there should not be a problem in principle for the ACs to respond directly to the TS.

How does the PEFCR relate to the seafood sustainability information that is going to be introduced in the Marketing Standards? What is the link between the PEFCR, the environmental criteria in the Taxonomy Regulation and the STECF criteria and indicators to incorporate sustainability aspects for seafood products in the marketing standards under the CMO? How will this link to the technical screening criteria in the EU taxonomy file and the proposal for sustainability criteria in the marketing standards?



The Commission has several initiatives running at the same time including the marketing standards which are currently covering only fishery products. In the revision of the marketing standards the Commission is considering integrating a sustainability element. While both initiatives are complementary to each other, this PEFCR initiative is independent from the marketing standards initiative as the 16 impacts covered in the PEFCR do not cover some of the impacts which are more relevant for fishery products. The Commission would like to cover these under the marketing standards, specifically the impact on biodiversity.

Biodiversity has to be considered in the PEFCR calculations but at the moment there is no international standard or method available regarding how biodiversity can be considered as part of an LCA. A working group is in place to establish how biodiversity could be established as 17th indicator for the PEFCR. Results from this working group are expected by the end of 2022. When integrating the sustainability element in the marketing standard currently the only information considered must be easily traceable along the supply chain, i.e., criteria information which is already available at product level. The PEFCR goes beyond this basic information.

DG ENV is looking at adopting an initiative that would require companies to substantiate their green claims. This initiative was announced as part of the EU Green Deal and also in the Circular Economy Action Plan. This initiative is justified by the fact that we see an increasing number of misleading claims to attract consumer interest. This initiative is being considered for adoption later this year and is being prepared in close cooperation with DG MARE and DG JUST.

DG JUST also has a separate initiative “Consumer empowerment in the green transition” establishing a broader framework for the protection of the rights of the consumers against misleading claims.

As for aquaculture, water is the life environment for the fish and aquatic organisms. What do you consider as "water use" impact?

There is an indicator called “water use” as PEF is life cycle based, which means a product’s impact is considered from cradle to grave.

Are you sure the scores of PEFCR will comply with those of Taxonomy or STECF without confusion for the consumer?

Art. 14 of the taxonomy regulation contains a list of technical criteria, and one of those criteria includes the EF method, so there is methodological coherence. The objectives are different, as the taxonomy relates to activities for financing proposals, to allow investors to understand which initiatives are green and which are not. So, the main target here are investors and not consumers.

Once the PEFCR has been finalized we will be able to see if the scores line up.

The STEFC reference relates to the reports used in the context of the marketing standards. The PEFCR is a methodology which can be used on a voluntary basis. The work with the STECF on marketing standards is to add this sustainability aspect into these standards for all kind of products. These are not voluntary claims, and the STEFC work was carried out as part of a standard for regulatory purposes.

The link between these initiatives will likely be addressed in the AAC advice as a lot of Aquaculture operators are already certified to various sustainability standards, for example ASC or MSC. Is this link something that has been taken into account?



These are all private certifications with their own methodology which are totally independent from the PEFCR. This does not prevent any operators in the supply chain to use the PEFCR methodology. The methodologies followed by the PEFCR, and various labels focus on different aspects and for the moment there is no link between these initiatives and the PEFCR.

How will the data be verified by under the PEFCR?

Each PEF study has to go through an LCA critical review to verify that the study followed the PEFCR method, and that the primary data makes sense.

How do you calculate impact indicators/scores for fish feed?

During the pilot phase a PEFCR on feed was carried out, and this data will be used in the marine fish PEFCR. So, this information is already available and verified.

Can you say anything about costs involved in doing a PEFCR?

Identifying the cost is only really possible at the end of a PEFCR and depends on numerous factors, for example how many companies and how many representative products are involved, how much knowledge do the consultants have, many members are involved in the TS etc.

Who will carry out the PEFCR for any given company? How would anyone verify compliance by a company?

The PEFCR is written by the TS and not by a single company. Based on this PEFCR any company can carry out a PEF study for a specific product which can be done by any LCA expert internally or externally, or through a consulting agency.

Will there be a label for the retailers?

Currently the PEFCR, so the category rules, are being developed. The result could be rules to measure the environmental footprint. The PEFCR is not meant as a policy act. It is a methodological document which can be used to measure the environmental footprint of fish.

When developing the rules do you consider the auditability of the rules?

This is also part of this consultation to assist the TS and also because we know that for this product the market is very fragmented.

Will we still be able to input into the work of the TS after the consultation? Is this an ongoing process?

It is an ongoing process for the duration of the writing of the PEFCR. The TS decides if they can add members. If anyone would like to join the TS, please contact the TS directly.

5 Close of meeting

The Chair thanked the Commission representatives as well as all participants.