

Focus Group on PECFR for Marine Fish Products

Minutes

Thursday, 18 November 2021

10:00 - 12:00 CET

Zoom online meeting

Welcome from the Secretariat

Adoption of draft agenda: adopted

Click [here](#) to access the Secretariat's presentation.

Membership of the Focus Group

- **Introduction roundtable**

The members proceeded to introduce themselves, highlighting their interest in the purpose of the Focus Group.

Chair of the Focus Group

- **Election by the members**

The members agreed that meetings should be moderated by the Secretary General. Otherwise, a system of rotation could be established.

Terms of Reference

- **Overview of purpose, proposed outcomes, timeline, resources**
- **Exchange of views on expectations for future discussions and draft advice**

The Secretary General provided an overview of the [Terms of Reference](#) adopted by Working Group 3. The Secretary General asked members whether their organisations contributed to the First Open Consultation for the Marine Fish PECFR.

Jennifer Reeves (MSC) explained that MSC submitted a high-level document, without going into technical details, recalling concerns previously expressed to DG ENV. The comments focused primarily on the coexistence of existing standards. Her organisation drew attention to the different results achieved through standards focused on the production stage vs the results of a full life cycle



assessment. In the case of fisheries, full life cycle assessments do not provide information on the most pressing issues affecting sustainability of stocks.

Christine Absil (Good Fish) explained that Good Fish also submitted a high-level document. The draft report's methodology does not touch upon the most pressing issues. Furthermore, it is not clear how it relates to the other initiatives being developed by DG MARE, such as the revision of the marketing standards framework. According to information previously provided by Commission representatives, these initiatives are independent from each other. Nevertheless, in Ms Absil's view, for the supply chain operators and for the consumer, these initiatives are very similar, since these are both about sustainability information presented on a product.

Jennifer Reeves (MSC) added that her organisation's contribution also emphasised the need for coherence between policy initiatives. Their contribution referred to the achievements of life cycle assessments and of sustainability standards. MSC is organisation that this could lower the bar on environmental criteria for fisheries, plus potential consumer confusion or mistrust due to lack of coherence between the information provided on labels. Their contribution also made a reference to the recognition of single-issue logos.

The Secretary General recalled that, in December 2020, the MAC adopted advice about DG ENV's public consultation on a potential legislative proposal on substantiating green claims, which already included several high-level comments. The Secretary General emphasised that, this time, the European Commission encouraged the MAC to provide specific/technical comments on the open consultations for the marine fish PECFR.

Jean-Marie Robert (EAPO), taking into account that the PECFR project focused on unprocessed fish products, argued that it would be much more relevant to develop rules for processed products. Carbon emissions are much more relevant in relation to transport and way of processing. Therefore, Mr Robert wanted to know if there was also a Technical Secretariat for processed fish products.

The Secretary General responded that, from his understanding, the European Commission made a selection of only a few product category types and there was no Technical Secretariat working on processed products.

Ioannis Pelekanakis (FEAP) stated that, from his understanding, the aim was to have a comparative assessment between other unprocessed farmed products. At a later stage, it could potentially be expanded to include processing and transport. There are already some standardised tools to measure carbon emissions during transport, which takes into account the distance and the means of transport. Therefore, it is important to first start by analysing the emissions of unprocessed fish products.

Jennifer Reeves (MSC) highlighted the development of different public and private initiatives on life cycle assessments, such as Agribalyse in France. Therefore, it would be relevant to proceed with a



comparative analysis of initiatives in the public and private sectors. Ms Reeves exemplified that, in some of these systems, there was no available scoring for fish products transported by plane.

The Secretary General suggested that, if members were interested, some presentations about other systems could be scheduled for the next meetings.

Solène Chambard (ADEPALE) informed that her association was involved in some of the work of Agribalyse. Agribalyse provides mean data on the life cycle assessments for food products. The aim is to develop reliable ways to communicate with consumers. The PEF methodology is extremely complex and requires significant amounts of information, in order to communicate to consumers. Consumers prefer information that is simple and easy to understand, such as the Nutri-score. It is difficult to translate PEF data into clear consumer information, particularly participation in specific sustainability initiatives. It is particularly difficult to demonstrate differences between products of the same category, such as comparisons between two fish products. Ms Chambard highlighted that France wishes to be a pioneer in environmental information.

Gerd Heinen (DG MARE) stated that he was not aware of other work on processed products. The Technical Secretariat excluded processed products. Nevertheless, certain preparatory processing processes, such as filleting, cutting, freezing, are in the scope of the Technical Secretariat's work. Other processing processes, such as marinating, smoking, preparing, are out of the scope. In the future, potentially, a broader category for processed food products could be developed. Mr Heinen offered to check with his DG ENV colleagues about this possibility.

Jennifer Reeves (MSC) highlighted that the fish supply chains are some of the most complex in the world. The product can pass through different parts of the world for processing and packaging. Therefore, it is important to keep in mind the volume of sales of processed fish products.

Daniel Weber (European Fishmeal), in relation to the scope, stated that it was difficult to see how feed and feed ingredients were integrated in the PEF methodology, particularly for farmed fish products. Fishmeal and fish oil are not included in the PEFCR for feed producing animals, but it is not clear whether it is included in the PEFCR for marine fish products.

Gerd Heinen (DG MARE) highlighted that the PEF methodology covers 16 impact categories. Mr Heinen was unsure about how feed was covered by these impact categories.

Jean-Marie Robert (EAPO) wanted to know, in relation to the output, if the Focus Group could only comment on the PEFCR for Marine Fish Products developed by the Technical Secretariat or if it would be possible to consider wider scopes.

The Secretary General emphasised that the main aim, as encouraged by DG MARE, is to comment on the draft of the Open Consultation for the Marine Fish PEFCR. Nevertheless, if there were other issues



of interest to the members, the Secretariat would aim to accommodate these in the draft agendas of future meetings. If relevant, reference to other topics could be included in the draft contribution.

Jennifer Reeves (MSC) suggested that, in the development of the work, in case of questions, the Technical Secretariat could be contacted to potentially answer these. Ms Reeves was also interested to know the key differences between the PECFR for marine fish products and other PECFR for land-based products. Several private initiatives received criticism for the focus on land-based production.

Gerd Heinen (DG MARE) expressed support for the possibility of inviting the Technical Secretariat to collaborate in the future work of the FG. Mr Heinen highlighted that the PEF methodology is standardised and based on 16 impact categories. Actual impacts obviously vary between the product categories. Some of these 16 impact categories will be more relevant for marine fish than others.

First Open Public Consultation

- **Exchange of views about the draft report**

The Secretary General proceeded with an overview of different sections of the draft report, providing members with the opportunity to comment on each section.

- “General Information about the Marine Fish PECFR”

Jennifer Reeves (MSC) wondered about how wild salmon was covered, since salmon can be fished in freshwater, but live at sea.

Christine Absil (Good Fish) requested the same clarification for eel.

Jean-Marie Robert (EAPO) would like a clarification of whether the scope includes both fish caught in EU waters and elsewhere.

The Secretary General stated that, according to his understanding, the scope covered all fish sold in the EU market, regardless of it being produced in the EU or outside.

Gerd Heinen (DG MARE) agreed with that understanding. Mr Heinen highlighted that the draft report included several references to farmed salmon.

Christine Absil (Good Fish) wondered about whether other processing stages would be covered in future projects. Otherwise, the relevance of the PECFR could be questioned.

Daniel Weber (European Fishmeal) highlighted that “figure 3-2 system scope farmed marine fish products” explicitly includes feed ingredient processing. At the same time, section 3.2.1 on the feed



for fish farming and system boundaries states that the PECFR refer to feed for food-producing animals. Mr Weber exemplified that, for salmon farming, one of the most important steps for carbon emissions is the production of fishmeal and fish oil, which are not included in the PECFR Feed for food-producing animals. In his view, fishmeal and fish oil should explicitly be included in the PECFR for Marine Fish. His organisation would be willing to provide data on carbon emissions of fishmeal and fish oil.

Christine Absil (Good Fish) expressed concern about the lack of rules for fishmeal and fish oil. It would be another situation where it was not possible to evaluate the actual impact on fish stocks. If PECFR includes biodiversity information, it could still be difficult to compare footprint scoring with biodiversity scoring.

Jennifer Reeves (MSC) wondered about who will be expected to provide the primary data and how the data will be verified, particularly verifications that the data is correct and that the methodology was followed.

Gerd Heinen (DG MARE) agreed that it was fundamental to know the differences between primary and secondary data as well as the verification of the data.

Jennifer Reeves (MSC), in relation to default values and data, expressed concern about the potential risks of using generic data, since these can lead to less accuracy and the provision of misleading information to consumers. Ms Reeves suggested asking the Technical Secretariat for some examples of how the default values can be considered conservative / less favourable. Ms Reeves also wondered about how many times, in the context of one assessment, could default values and data be used. Additionally, there significant costs associated with the compilation of data.

- “Requirements: Scope”

Jean-Marie Robert (EAPO) expressed concern that transport only appears linked to “distribution”. Mr Robert exemplified that Alaska Pollock is fished in Alaska, transported to China for preliminary processing, and then sent to the EU for sale. He argued that transport should also be part of the “raw material acquisition”.

Christine Absil (Good Fish) agreed with the previous intervention.

Jennifer Reeves (MSC) agreed that it should be clear for which life cycle stages is transport taken into account. All transport should be included.

Christine Absil (Good Fish) suggested requesting the Technical Secretariat for practical examples, in order to better understand the data used. Ms Absil suggested the use of Dutch brown shrimp as an example, since it is sent to North Africa for processing, even though it is marketed as a local product.



Jean-Marie Robert (EAPO) added that tuna cans could be a good example. The EU industry uses tuna sourced by the EU fleet and by third countries. Therefore, it would be possible to clearly see the difference in scoring for products from the EU waters and from outside.

Solène Chambard (ADEPALE) explained that, based on her experience with Agribalyse, the most impactful stage in the PEFCR score is the production. For example, the score for organic products tends to be higher than for conventional products, as the production performance of organic products tends to be lower than of conventional ones, since the former use more resources. Under the current PEF methodology, transportation has a low impact on the score, even in cases of products transported from Asia to the EU, when compared to production.

Christine Absil (Good Fish) commented that it was likely due to the use of refrigerated vessels for the transport of fish products, instead of air transport. In relation to the “additional technical information” for farmed products, Ms Absil wondered about the usage of the information about density of fish in cage, since it seemed to be an animal welfare criterion.

Solène Chambard (ADEPALE) expressed doubts about the relevance of the system descriptions about the kind of containment. Ms Chambard wondered about the link with environmental impact. She expressed interest in better understanding the mentioned link.

Jennifer Reeves (MSC), in relation to the additional technical information for wild products, wondered if it would not be more appropriate to report on the FAO sub-area, instead of the FAO area, in order to ensure coherence with the revision of the marketing standards framework.

Gerd Heinen (DG MARE) informed that DG MARE would also be discussing that possibility with the Technical Secretariat. The revision of the marketing standards framework is still in progress. The revision will focus on more fisheries-specific sustainability aspects, such as fisheries pressure and potential impacts on sensitive species. For the additional technical information, the Technical Secretariat is trying to rely on existing rules and information. There is information already available thanks to the CMO Regulation and the FIC Regulation. It is important to account for future complementarity between the PEF methodology and the marketing standards framework.

Jean-Marie Robert (EAPO) expressed concern about the coherence between the different ongoing EU policy initiatives, including on consumer information, PEF methodology, and the marketing standards framework. For example, in a few years, there could be products labelled as “A” under the marketing standards framework, but with a negative score under the PEF. The contrary could also happen. There would also be issues of coherence between private initiatives and public EU rules. The key issue is to ensure appropriate information to the consumer.

Jennifer Reeves (MSC) agreed with the previous concerns. Ms Reeves exemplified that, potentially, retailers would be able to choose, among the different initiatives, to promote the information that



was more favourable to the product on sale. Some consumers are indeed interested in knowing the carbon emissions, but the majority might not be able to understand all this information.

The Secretary General encouraged members to focus on the technical aspects of the draft report. At the same time, the Secretary General recognised that there is a significant number of ongoing EU policy initiatives that will affect the administrative burden on operators and that will significantly increase the amount of information displayed on consumer facing packaging.

Christine Absil (Good Fish) argued that it was difficult to comment on the technical aspects when it is unclear how these will be used in practice and how coherence between initiatives will be achieved. Ms Absil emphasised, in relation to the additional technical information, that the definitions of “by-catch” and “main targeted species” are essential for the assessment of seafood. There is a significant risk of increasing consumer confusion, instead of better communication on sustainability. Therefore, it is extremely relevant to know more about the governance. Ms Absil added that it is not useful to proceed with the development of different initiatives in silos.

Solène Chambard (ADEPALE) highlighted that one of the limitations of the PEF methodology is that it does not analyse the impact on biodiversity. Therefore, the information on by-catch and targeted species will likely be used to introduce some biodiversity considerations. Ms Chambard wanted to know if the PEF methodology would introduce new criteria on biodiversity.

Jennifer Reeves (MSC) suggested the development of a document with general comments that could be transmitted to the Commission services alongside the technical comments.

The Secretary General suggested the inclusion of general comments as an introduction to the technical comments to be submitted. The Secretary General recalled that the main aim is to provide technical comments and that the MAC’s advice on “DG ENV’s public consultation on a potential legislative proposal on substantiating green claims” already touched upon several of the mentioned concerns. Therefore, he would like to avoid a repetition of work in the MAC.

Gerd Heinen (DG MARE) expressed understanding for the concerns about the complexity. The use of the PEF methodology will depend on the legislative proposal on substantiating green claims. Mr Heinen recognised that it could be difficult to analyse the methodology without knowing how it will be used. At the same time, he encouraged the FG to focus on the sixteen impact categories.

Jennifer Reeves (MSC) explained that, from her interactions with the Technical Secretariat, they were also looking for feedback from the stakeholders on the appropriate methodologies to analyse the additional technical information and the additional environmental information.

Christine Absil (Good Fish) emphasised that the criteria proposed for the additional technical information was too generic and needs to be further complemented. In relation to the additional



environmental information, Ms Absil argued that information about the number of mammals and the number of birds was not relevant, if there was no information about the conservation status of the species. It is also necessary to know who will provide this information, since the information might not be available. Otherwise, it is preferable to not include “additional environmental information” on biodiversity impacts, such as quantification of biotic impacts, area trawled, and number of mammals and birds killed, since the PEFCR are clearly not prepared to adequately analyse these. Several of these requirements are already accounted for in the revision of the marketing standards framework and in existing private certification schemes, such as MSC.

Jean-Marie Robert (EAPO) expressed agreement with the previous intervention. Mr Robert wondered about where operators would be able to find the real data. In practice, it would be very difficult for operators to provide primary data. Therefore, it is preferable for the PEFCR to not foresee reporting on additional environmental information. Reporting on environmental information would be more appropriately covered by other mechanisms.

Jennifer Reeves (MSC) agreed with the previous statements. Ms Reeves also wondered about how the data on additional environmental information would be calculated to improve the PEF methodology. If the majority of actors need to use generic data, then it would become discriminatory.

Solène Chambard (ADEPALE) also agreed with the previous statements. It would be difficult to gather the data. It seems to be for example, too difficult to analyse the impact of killing a bird. It is unclear how these could be calculated in the PEF.

Ioannis Pelekanakis (FEAP), in relation to the additional environmental information for farmed products, stated that, for aquaculture farms in the sea, there were some specific measures applicable to deal with predators, such as cormorants. There is no consistent killing of mammals or birds. Some traps are used for the birds, in order to protect the fish, but not for hunting.

Jennifer Reeves (MSC) wondered about the killing of marine mammals, such as seals.

Ioannis Pelekanakis (FEAP) stated that there are incidents of marine mammals coming close to marine aquaculture nets, but that underwater mechanisms to ward them off are used, which do not kill. Mr Pelekanakis was not able to provide detailed information about freshwater farming, since this type of aquaculture deals with different predators and has different rules.

Christine Absil (Good Fish) argued that it would not be possible for aquaculture producers to provide the described additional environmental information. If provided, it would not be possible to know whether it was representative or not. Escapees are incidents. Therefore, there can be several years without escapees and then one huge incident.



Ioannis Pelekanakis (FEAP) expressed doubt about the relevance of information on escapees in relation to the objectives of the PEF methodology to report on environmental footprint.

Jennifer Reeves (MSC) wondered whether products from the time of the incident would have a different PEF scoring than products from different production periods. It would be important to know if the information would be expected to be constant or constantly changing.

Christine Absil (Good Fish) stated that, at present, some of the most relevant information is available in seafood rating schemes, such as Seafood Watch, that analyse production in a non-voluntary way. There are reports on some production systems.

Jean-Marie Robert (EAPO) emphasised that it was difficult to know how the PEF scoring was organised in practice. In order to provide technical comments, members need to better understand the scoring process, including through examples. Mr Robert suggested requesting a practical presentation from the Technical Secretariat.

Jennifer Reeves (MSC) wanted to know about the possibility to invite ASC representatives to participate in a specific meeting about aquaculture farming.

The Secretary General responded that it was possible to invite external experts to meetings.

Christine Absil (Good Fish) supported the participation of ASC as an observer in relevant meetings.

Gerd Heinen (DG MARE) committed to contacting DG ENV and the Technical Secretariat to organise a training session about the PEF methodology.

AOB

None.



Summary of action points

- Next Meeting
 - Secretariat to circulate a Doodle poll to determine the date of the next meeting (last week of November / first week of December)
- PEF Methodology
 - Secretariat to submit written questions to the Technical Secretariat
 - Secretariat to contact the Technical Secretariat and the European Commission to organise a training session, including practical examples, about PEF methodology
- Agribalyse
 - Presentation about the Agribalyse system to take place in a future meeting



List of attendees

Representative	Organisation
Alexandra Philipe	Market Advisory Council
Christine Absil	Good Fish
Daniel Weber	European Fishmeal
Gerd Heinen	European Commission
Gundula Broich	European Commission
Ioannis Pelekanakis	FEAP
Jean-Marie Robert	EAPO
Jennifer Reeves	MSC
Pedro Reis Santos	Market Advisory Council
Solène Chambard	ADEPALE

