

Focus Group on PEFCR for Marine Fish Products

Minutes

Friday, 3 December 2021 (14:00 – 16:00 CET)

Zoom (Online)

Work language: EN

Welcome from the Secretariat

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

Adoption of draft agenda and of the last meeting minutes (18.11.21): adopted

Action points of the last meeting

- **State-of-play of the decision made during the last meeting - information**
- Next meeting:
 - Secretariat to circulate a Doodle poll to determine the date of the next meeting (last week of November / first week of December)
 - Doodle poll was circulated
- 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
 - Written questions submitted and answered
 - DG ENV and DG MARE expressed willingness to organise a training session
- Agribalyse:
 - Presentation about the Agribalyse system to take place in a future meeting
 - Presentation by Solène Chambard scheduled

Written Questions to the Technical Secretariat

- **Overview of the replies**
- **Exchange of views**

Click [here](#) to access the written questions and replies.

Daniel Weber (European Fishmeal), in relation to question 5, commented that the production processes to transform raw material into fishmeal and fish oil vary significantly. Some processing plants use natural gas, while others might use brown coal. This could have significant impact on the



environmental footprint of the product. Mr Weber highlighted that fishmeal and fish oil are not covered by the PEFCR Feed for Food Producing Animals.

The Secretary General stated that, in his understanding, in the production stage, fishmeal and fish oil are covered by the PEFCR for Marine Fish Products. Therefore, in the future, when PEFCR for processed fish products are established, the processing of fishmeal and fish oil would be covered too.

Daniel Weber (European Fishmeal) wanted to know the timeframe for the development of PEFCR for processed fish products.

The Secretary General took note of the question, in order to submit it to the Technical Secretariat. The Secretary General informed that the Technical Secretariat expressed willingness to cooperate with the FG, including through the participation in future meetings and additional questions.

Jennifer Reeves (MSC) stated that the answers to questions 9 and 10 required additional discussion with the Technical Secretariat.

Solène Chambard (ADEPALE), in relation to question 10, argued that, if there is no method or criteria to quantify biodiversity impacts, the collection of data on biodiversity impacts should not be mandatory. The collection of data on biodiversity is positive, but should be voluntary, since it is not actually integrated in the PEF. Ms Chambard added that the PEF methodology already requires a substantial amount of mandatory data.

Jennifer Reeves (MSC) agreed with the previous intervention. Ms Reeves wondered if the provision of biodiversity data affected the PEF results of the product, particularly if the operator is not able to provide that type of data.

The FG proceeded to analyse figure 4-2 of the [report](#) “Greenhouse gas emissions of Norwegian seafood products in 2017”.

The Secretary General commented that the figure seemed to demonstrate a bigger impact on the environmental footprint of transport through air when compared to road and ferry. The Secretary General also commented that, when transporting via road and ferry, the increase in distance did not seem to have a significant impact on the result.

Solène Chambard (ADEPALE) explained that, in her experience with LCA and PEF, transport does not have a significant impact on the overall result. Climate change is only one indicator out of sixteen.

Jean-Marie Robert (EAPO), in relation to the scoring under impact category 1 “climate change”, stated that he would like to better understand the differences in the results.

Solène Chambard (ADEPALE) stated that it could be relevant to analyse more deeply impact category 1 “climate change” to understand better the impact of transport.



Christine Absil (Good Fish), based on her previous involvement with LCA studies, stated that transport did not have a significant impact on PEF results for frozen fish. There is only a significant impact when products are transported via air. In a LCA study of wild and aquaculture Pangas catfish products in Vietnam, the LCA results of the wild caught products were worse due to the production method, while the transport method had little impact. Ms Absil added that the use of trawl methods tends to have a significant impact on the carbon footprint.

Training Session on PEF in the Marine Fish Sector

- **Information about the proposed scope and organisation**

The Secretary General reported on his contacts with DG MARE, DG ENV, and the Technical Secretariat. DG ENV expressed significant interest in the organisation of a training session for the marine fish sector and provided a proposed scope. In these contacts, the Secretary General informed DG ENV about the interest of the members in having practical examples (e.g., Dutch brown shrimp and canned tuna), in understanding the importance of transport and the biodiversity considerations, and in the relationship with the marketing standards framework.

The Secretary General explained that the training session would be one to two hours. DG ENV expressed preference to a session open to everyone, especially members of Advisory Councils. In the contacts, the Secretary General offered to assist in the co-organisation, particularly to ensure English, Spanish and French interpretation. He also shared the [link](#) to the training sessions available online.

Christine Absil (Good Fish), in relation to the scope, emphasised the importance of knowing more about the application and the relationship to the ongoing revision of the marketing standards framework. Ms Absil expressed opposition to a preponderance of PEF over sustainability information. The relevance of PEF to compare between seafood products is minor. Therefore, if there is a preponderance of PEF, consumers could be misled.

The Secretary General responded that that concern had been communicated to DG ENV and to DG MARE representatives, in order to be taken into account in the session's scope.

Jennifer Reeves (MSC) emphasised the importance of the training session including time for Q&A, in order to allow an open discussion.

Solène Chambard (ADEPALE) agreed with the previous intervention. Ms Chambard commented that a training of one to two hours seemed rather short. It should be at least two hours.

The Secretary General committed to conveying the members' preference for a 2h training with a significant Q&A section to DG ENV. In relation to the date, DG ENV representatives expressed preference for the second or third week of February. In these contacts, the Secretary General expressed preference for the first week of February, in order to better consider the feedback period of the Second Open Public Consultation.



Jean-Marie Robert (EAPO) noted that, due to the training session taking place in February, at the January Working Group 3 meeting, the FG would not be able to present a draft text, but only to report on the ongoing work.

The Secretary General recalled that the Second Open Public Consultation is expected to take place in February or March 2022. The feedback period of the First Open Public Consultation was quite long and was extended. In case the official deadline is missed, the Secretariat will submit the agreed contribution directly to DG MARE.

Agribalyse

- **Presentation of the system by Solène Chambard, ADEPALE**

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

Solène Chambard (ADEPALE) delivered a presentation on Agribalyse and on the French national experiments on environmental display for food products. Agribalyse has existed for 10 years and became open to the public on September 2020. The single score of the products, based on 14 impact categories, and the lifecycle are available online. Public availability aims to increase consumer knowledge. It also led to the development of private initiatives, such as Eco-Score, that communicate to consumers based on Agribalyse data together with other indicators.

In terms of regulatory context, before the development of Agribalyse, there was the AGEC Law (against waste and for circular economy), which foreseen an experimental project on the environmental performance of products. Agribalyse was developed to assist operators in the communication to consumers based on PEF. Afterwards, there would be a decree setting the methodology and procedures for the environmental display of the categories of good and services concerned. In August 2021, France adopted the Climate Law, which amended the AGEC Law, in order to introduce an obligation of communication to consumers based on LCA. The French legislation will no longer wait for the development of legislation at the EU-level.

In the context of the experimental projects on environmental information based on LCA, ADEPALE participated in a project led by ADEME, the French agency for ecological transition. The aim of the PEPEAT project was to determine how the PEF methodology would be a relevant tool to communicate environmental characteristics of food products to consumers. The Agribalyse database truly assisted in this objective. Data gathering for PEF requires many resources. Nevertheless, there are certain limitations, such as the lack of inclusion of biodiversity considerations and the difficulty for companies to communicate about sustainability initiatives. Therefore, LCA should be complement with other approaches and indicators. Ms Chambard expressed preference for the possibility of using Agribalyse, while also being able to specify certain data.

The key learnings from the projects were the importance of intra- and inter-category comparability, possibility of relatively short-term implementation through specific or semi-specific data, broad coverage of food products, preference for the use of specific or semi-specific data, need for further



work to address the limitations of LCA, importance of scientific basis and transparency of modulation/weighting balances, and that a simple and prescriptive format should be used.

In relation to pressure from private initiatives, the Eco-Score is the most present and influential, even though it is not the official score. The French government aims to develop its own methodology and scoring. ADEPALE is a member of the Partners Committee of the public initiative. Another influential private initiative is the Planet Score.

As for the next steps in the development of a national score, ADEME will provide an assessment report to the Parliament in the near future. Political consideration will take place to define the methodology for environmental labelling. 2022 would be a transition period to enrich the LCA method and improve the Agribalyse database. Sensitivity tests on intra-category differentiation will also take place. The promotion of the system would take place in 2023. The potential impact of the presidential elections in 2022 is unclear.

Christine Absil (Good Fish) wanted to know more about the discussions, in France, regarding the relationship between the Eco-Score, the proposed national initiative, and certification schemes.

Solène Chambard (ADEPALE) responded that the Scientific Council is opposed to the indicators used by the Eco-Score. In their view, the main focus should be the LCA indicators. On the political side, there is satisfaction that private initiatives are accelerating developments and implementation. ADEPALE agrees with the Scientific Council and is concerned with the political developments.

Jean-Marie Robert (EAPO) exemplified that his fishing vessels supplied tuna to the French processor Chancerelle, which means that there are tuna cans on the French market that would be in a perfect situation from the perspective of CO2 emissions. These products should achieve the most beneficial PEF result. At the same time, tuna cans supplied with tuna from the Indian Ocean should be on a different level. Additionally, tuna cans, in the French market, sourced in the Indian Ocean and transformed in Thailand should receive a less positive PEF result. Mr Robert expressed concern that the PEF methodology is mainly impacted by the fishing gear, while the transport bears little relevance. He wanted to know if, in the French initiatives, there were efforts to differentiate based on sourcing and the organisation of the value chain.

Solène Chambard (ADEPALE) responded that the existence of only one score for the product, while not accounting for origin, processing method, and transport, is one of the identified limitations of the Agribalyse database. The French government is aware of this limitation. In the development of the system, the most common tuna cans in the market have been used as reference for a means value. The Data Quality Rating (DQR) is also required in the PEF methodology. ADEPALE requested the development of tools to allow companies to provide some of their own data. ADEPALE also asked for a different weighting for transportation. There is agreement that these tools should be developed, but, in the short-term, these are not available.



Christine Absil (Good Fish) emphasised that a serious downside of the PEF methodology is that it does not take into account if it is a regional product. A product from intense aquaculture imported from Asia could achieve a better PEF result than a locally caught product.

Solène Chambard (ADEPALE) explained that there are efforts to complement the PEF methodology with the integration of new indicators or with additional weighting. During the course of the upcoming year, there will be tests to improve the LCA.

Jennifer Reeves (MSC) wondered if the objective of the French government was to have their system replicated at EU-level, particularly through the French Presidency of the Council. Ms Reeves wanted to know more about the difference between the Eco-Score and the Planet Score.

Solène Chambard (ADEPALE) explained that both the Eco-Score and the Planet Score were private initiatives. The Eco-Score was implemented by software applications. The Planet Score is mainly led by organic production associations. The LCA methodology tends to value intensive production better than organic production. Therefore, the Planet Score aims to take better account of the impact of pesticides. The French government plans to do its own initiative. In the view of the government, pesticides are already accounted for under the ecotoxicity impact category. At the same time, some of the indicators of the Eco-Score are not fully scientifically based. Ms Chambard agreed that the French government likely had the ambition to influence EU developments.

Jennifer Reeves (MSC) commented that the final objective was likely the development of a simple front-of-pack label to communicate to consumers.

Solène Chambard (ADEPALE) responded that it is a complex discussion, since the PEF methodology is not as simple as the Nutri-Score. One single score might not be sufficient to communicate environmental performance. In the long term, a label similar to the Nutri-Score is likely to be developed. Significant information to consumers will be required, in order to ensure that they understand the aggregated data.

First Open Public Consultation

- **Continuation of 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.

- Requirements: Life Cycle Inventory
- List of mandatory company-specific data – Farmed products

Leonidas Papaharisis (FEAP), in relation to the mandatory company-specific data for farmed products, stated that it would be possible to provide some of the listed information, if farmers were informed about it. Mr Papaharisis expressed doubts concerning the possibility to verify the accuracy of the data.



The Secretary General explained that matters of control and accuracy are out of the scope of the Technical Secretariat's draft report. These matters will be dealt with it by the legislative proposal of DG ENV, at a later stage.

Christine Absil (Good Fish) wondered about the data collection process. It will likely be quite difficult to collect data for imported products.

The Secretary General recalled that, according to the Technical Secretariat, the primary data will need to be provided by the primary producers. The same requirement applies to imported products sold in the EU market. Without that data, it will not be possible to do a PEF profile. Depending on the requirements of the upcoming legislative proposal, there will be limitations to the environmental claims present on the packaging of these products.

Jennifer Reeves (MSC) agreed that, if imported products do not supply the data, these will not be able to make environmental claims. Ms Reeves wondered about the controls on the accuracy of the data. It could potentially undermine products in the EU market that are effectively controlled.

The Secretary General stated that these discussions will likely take place when DG ENV develops the legislative proposal on substantiating green claims. The proposal will probably include rules on the control and accuracy of data.

Leonidas Papaharis (FEAP) suggested the inclusion of “chemicals used”, “environment of operation (e.g., grasslands, wetlands, marine)”, and “system of farming (extensive, intensive, semi-intensive)” in the list of mandatory company-specific data. Mr Papaharis exemplified that, in the case of Pangas catfish farmed in East Asia, the feeding with animal by-products, such as grass fish, could have a better PEF result than other farming operations that use cooked fishmeal, because of the energy consumption in the cooking process. He argued that this imbalance should be taken into account.

Christine Absil (Good Fish) agreed with Mr Papaharis concerning the chemicals used, particularly the use of antimicrobials. The issue of the sustainability of the feed is similar to the problems with biodiversity impacts of wild catch fisheries. The impacts of the sourcing of the feed are not fully covered by a PEF profile. There are environmental and social impacts. Information on the ecological impact of the sourcing of the feed could be useful. It demonstrates the limited applicability of the PEF methodology.

Jennifer Reeves (MSC) wondered if the use of pesticides was taken into account.

Solène Chambard (ADEPALE) stated that, in the PEF methodology, the use of pesticides was considered under the impact category on ecotoxicity

Christine Absil (Good Fish) stated that ecotoxicity was about the persistence of chemicals. It might not consider antimicrobial agents, which is more of a health perspective.



Daniel Weber (European Fishmeal) wondered about the calculation of outputs and utilisation from aquaculture, for example the use of by-products from salmon farming for fishmeal production. Mr Weber wondered if this was covered under the “relative value/price of the fish co-products”.

Christine Absil (Good Fish) further wondered if it was included under “fish mass balance over the farming stage”.

- List of mandatory company-specific data – Wild products

Jennifer Reeves (MSC), in relation to the mandatory company-specific data for wild products, asked for more information about the concept of “fish mass balance of fishery”.

Jean-Marie Robert (EAPO), concerning the “energy (fuel) use in fishery”, taking into account equity between different fleets, highlighted that, for trawlers, there would be only fuel consumption, while, for netters and hook-and-line, it would be important to know the length of the nets used in the fishing trip. This would allow a more comprehensive understanding of the carbon impact. In relation to “yield in preparation onboard the fishing vessel (species-specific yield)”, Mr Robert wondered if the Technical Secretariat used the official EU-level whole fish conversion rates.

Christine Absil (Good Fish) stated that it was important to know the type of vessel, length of the vessel, capacity (gross tonnage), and type of fishing gear. These provide a lot of information about potential energy use. It would be easier to determine the existence of anomalies in the data. Ms Absil wondered if “fish mass balance” included discards.

Leonidas Papaharisis (FEAP) suggested the inclusion of horsepower too.

Jean-Marie Robert (EAPO) agreed that the mentioned data could be useful for quality control.

Jennifer Reeves (MSC) stated that, based on the mentioned data, it would be possible to develop profiles of expected fuel use per type of activity. It could be particularly interesting for third country imports.

Jean-Marie Robert (EAPO) exemplified that small fishing vessels targeting Blue Fin Tuna might need to spend significant time exploring before capture, while other times the capture can happen very quickly after leaving the port. Under the same population of fishing vessels, there can be wide variety of fuel consumption.

Christine Absil (Good Fish) commented that an average, taking into account stock size, would likely be possible. In the case of beam trawlers, fuel use is the most significant impact. Therefore, data about the fishery would be very important, especially in the case of potential illegal modifications to the horsepower of fishing vessels.

- List of mandatory company-specific data – All products (farmed & wild)



Christine Absil (Good Fish), in relation to the preparation, stated that it would be important to know the location of the preparation and the distances covered. There should also be information about the mean of transportation to the preparation plant.

Jean-Marie Robert (EAPO) expressed full agreement with the previous intervention.

Leonidas Papaharisis (FEAP) argued that it should cover both in-bound and out-bound transportation. It could also be useful to know the type of preparation and product (e.g., fresh, marinated, frozen, canned), water consumption, including type of water (e.g., marine water, freshwater), and waste.

- List of processes expected to be run by the company

Christine Absil (Good Fish) wondered about how mixing of lots would be addressed.

Solène Chambard (ADEPALE) and Jennifer Reeves (MSC) agreed with the relevance of the question.

AOB

- **Attendance of Aquaculture Stewardship Council (ASC) as observer**

The Secretary General recalled that, according to the rules of procedure, third parties can be invited to attend meetings as active observers. The aim is usually to have presentations and exchanges with external experts.

Jennifer Reeves (MSC) drew attention to the knowledge provided by ASC, which could be relevant to have in meetings.

Christine Absil (Good Fish) agreed that the participation of ASC in the FG could be quite relevant due to their technical knowledge.

The Focus Group agreed with the participation of ASC as active observer in meetings.



Summary of action points

- Next Meeting:
 - Secretariat to circulate a Doodle poll to determine the date of the next meeting (20-23 December 2021 or beginning of January 2022)
- PEF Methodology:
 - Secretariat to submit additional written questions to the Technical Secretariat
 - In relation to the training session, Secretariat to inform the Commission about the interest in holding a 2h session, which includes a significant Q&A section



Attendance List

Representative	Organisation	Role
Benoît Guerin	BG Sea Consulting	Observer
Christine Absil	Good Fish	Member
Daniel Weber	European Fishmeal	Member
Jean-Marie Robert	EAPO	Member
Jennifer Reeves	MSC	Member
Leonidas Papaharisis	FEAP	Member
Pedro Reis Santos	Market Advisory Council	Secretariat
Solène Chambard	ADEPALE	Member

