

## Focus Group on PEFCR for Marine Fish Products

### Minutes

Wednesday, 2 February 2022 (14:00 – 16:30 CET)

Zoom (Online)

Work language: EN

Welcome from the Secretary General, Pedro Reis Santos

Adoption of draft agenda and of the last meeting minutes (11.01.22): 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 (beginning of February 2022)
    - Doodle poll was circulated
- 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
    - Written questions were submitted to the Technical Secretariat
    - The Commission services were informed about the preference

#### Training Session on PEF in the Marine Fish Sector

- **Information about opening of registrations**

The Secretary General informed that DG ENV would be organising a training session on 15 February 2022, from 14:30 to 16:30 CET. The Secretary General communicated to DG ENV the importance of providing interpretation in English, French and Spanish. The MAC offered to cover the costs of interpretation.

*The members and the DG MARE representatives confirmed that they would be attending.*

#### 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.

- 6.7.3 Allocation – wild products

The Secretary General recalled that, at the previous meeting, a discussion took place concerning the use of the expression “targeted” and “non-targeted”. The Secretary wanted to know if members agreed that Table 6-3 should use the same wording as in Table 6-2, so “products going to direct human consumption” and “products not going for direct human consumption”. Another option mentioned by Mr Skontorp Hognes would be not to include the table. Therefore, companies would need present argumentations for their own values and allocations.

Jean-Marie Robert (EAPO) drew attention to the link with the treatment of discards and with the annexes. According to the annexes, depending on the scientific information, the scoring can vary based on: 1) stocks with scientific advice from ICES, 2) data-limited stocks for which the precautionary approach is applied, and 3) stocks under the IUCN Red List. Mr Robert did not know how much these categories would influence the scoring. Mr Robert emphasised that it would be unusual for a fishing vessel to target only one species. Multi-specific fisheries should not be penalised.

Christine Absil (Good Fish) underscored that the allocation was the most relevant issue in the methodology. The definition of “targeted fishery” is quite difficult. As an example, there are targeted fisheries of sole in the Netherlands, which implies the use of certain gear sizes, but sole might represent only 30% of the catch composition. Allocation based on weight would be quite different. Ms Absil added that it would be useful to hear from the experts about comparisons with other methodologies.

Jean-Marie Robert (EAPO) emphasised that, in the Europe, there are fisheries are multi-specific. Therefore, the Technical Secretariat should consider this issue fully.

Robert Parker (ASC) wondered how the allocation factors were determined, since the draft merely states that these were “set by expert judgement”. There seems to be a significant different on allocation factors for aquaculture and for wild products.

Christine Absil (Good Fish) wondered about the source of the expert judgement, since the industry must provide data.

Daniel Weber (European Fishmeal) wanted to know more about the decision to focus on products going to direct human consumption, wondering how other uses, for example pet food, would be covered and the impact on the PEF score.

Solène Chambard (ADEPALE) stated that perhaps the allocation factors for waste could also be used. It should be accounted that products can have other uses and are not lost.

Henrik Stenwig (Technical Secretariat) explained that the allocation factors were discussed during the entire development of the PEF CR. After input from several stakeholders, the Technical Secretariat concluded that many of the default values will not be included in the report. It will be the



responsibility of the applications to provide data. Therefore, it would not be appropriate to impose allocation factors. The values proposed in the first draft were based on estimations and assumptions. Before the supporting studies and the Second Open Public Consultation, the Technical Secretariat will be deleting several of the mentions of default values in the text. In relation to Ms Absil's question about expert judgement, Mr Stenwig that expert judgement corresponded to the members of the Technical Secretariat.

- 6.8 End-of-life, waste handling and recycling

Christine Absil (Good Fish) wanted to know if the processes listed in figure 6-2 would be counted in the same way or would there be a differentiation. For example, landfilling would be a less desirable outcome than a circular solution.

Henrik Stenwig (Technical Secretariat), concerning waste, explained that the PEF guidelines were followed. There is the possibility to apply the Circular Footprint Formula to be applied. There are ongoing discussions with the European Commission to determine how to apply the formula in the PEFCR. Products that have no net value for the applicant must be allocated to the main product. If there is a value, then it is not waste and is possible to assess the outcome.

Christine Absil (Good Fish) asked for more information about the Circular Footprint Formula.

Henrik Stenwig (Technical Secretariat) explained that it was about the calculation of benefits and allocation of flows, including when these flows enter a circular system.

- 6.9 Period of data collection

Robert Parker (ASC) wanted to know if the period of three years corresponded to calendar years.

Henrik Stenwig (Technical Secretariat) explained that, from their experience with PEFCR for animal feed, it was a challenge for the companies. Companies found the period to be too long. According to the PEF guidelines, the shortest timeframe is three years. These are not calendar years. After the pilot studies, it will be possible to analyse whether the timeframe is appropriate.

- 6.12 Biogenic carbon

Jennifer Reeves (MSC), in relation to the degradation of fish waste, wanted to know at what stage would this be accounted for.

Henrik Stenwig (Technical Secretariat) explained that there were not many situations where productions of methane in the seafood chain happens. Any places where it might be relevant, it is necessary to assess and quantify. For farmed products, there are rules determining that dead fish cannot be used neither for direct human consumption nor feed.

Robert Parker (ASC) highlighted the importance of these for aquaculture modelling. Mr Parker wanted to know if there was some guidance how to calculate these values per net pen.



Henrik Stenwig (Technical Secretariat) responded that values are provided.

Jean-Marie Robert (Les Pêcheurs de Bretagne) wanted to know if fish discarded at sea could be accounted for biogenic carbon. Discarded fish can work as a carbon trap.

Henrik Stenwig (Technical Secretariat) responded that discards are recorded as unladed mass, so there is no calculation. It counts as waste.

Jennifer Reeves (MSC) added that only landed fish under the minimum conservation reference size could be accounted here. There are exemptions that allow some discarding at sea. Ms Reeves wondered if there was sufficient data on discarded fish and landings of fish below the minimum conservation reference size.

Jean-Marie Robert (Les Pêcheurs de Bretagne) expressed doubt that such information would be available. Mr Robert questioned whether the PEFCR should be limited by the regulatory framework of the landing obligation in the EU. Fisheries in Norway and Iceland do not have the same rules on the landing obligation and the management of discards. Mr Robert emphasised the potential relevance of discards for the carbon cycle.

#### - 7. Life Cycle Stages

Christine Absil (Good Fish), in relation to Figure 7-1, stated that, if the figure was meant as a complete overview of fishing activities, some major elements were lacking. There are references of “lost fishing gear” and “benthic impacts”, but other biodiversity impacts are completely missing.

Henrik Stenwig (Technical Secretariat) responded that it was on purpose, since the quantification of biodiversity impacts is outside of the scope. There can be considered in the “additional environmental information” or “additional technical information” chapters of the PEFCR. There is no PEF method available to quantify and assess the biodiversity impacts.

Christine Absil (Good Fish) commented that, in terms of governance, it is important to consider how the PEF method will be applied in connection with other mechanisms, such as the revision of the marketing standards framework for fishery and aquaculture products. The figure, by referencing “lost fishing gear” and “benthic impacts” touches upon biodiversity elements. Therefore, Ms Absil wanted to know what impacts were being assessed. Ms Absil added that similar problems were likely being faced by the agricultural sector.

Henrik Stenwig (Technical Secretariat) explained that the reference to “lost fishing gear” and “benthic impacts” was connected to the “additional environmental information” and the “additional technical information”. This information could have relevance for the indicators being developed by DG MARE.

Christine Absil (Good Fish) stated that there are other activities that might be relevant to recorded, such as the bycatch of endangered species, which is quite relevant for other sustainability assessments. The figure should be focused on energy, instead of mentioning biodiversity. The reporting requirements should be either widened or removed.



Henrik Stenwig (Technical Secretariat) emphasised that Figure 7-1 aims to illustrate of requirements to calculate the environmental footprint in accordance with the PEF. According to the PEF method, there is no requirement to calculate biodiversity impacts.

The Secretary General asked for more information on the meaning of “lost fishing gear” and “benthic impacts” in the context of Figure 7-1.

Henrik Stenwig (Technical Secretariat) responded that these were important for both calculation of footprint and as “additional information”.

Gerd Heinen (DG MARE) expressed agreement with several comments from Ms Absil. The PEF methodology has a fundamental gap in not capturing crucial aspects for wild fisheries, such as sustainability of the targeted stock, impact on the seabed, impact on sensitive species, among others. DG MARE recognises the limitations faced by the Technical Secretariat. However, if consumers and operators want to differentiate the sustainability of various fish products, there are factors that are more relevant than the 16 impact categories of the PEF method. Mr Heinen agreed that it was important to distinguish between different types of impacts. The revision of the marketing standards aims to develop indicators to measure fisheries-specific impacts. Coherence between the marketing standards, the PEFCR for Marine Fish, and the sustainable food system framework, particularly the horizontal food sustainability labelling, should also be kept in mind.

Henrik Stenwig (Technical Secretariat) explained that, in the first draft report, there was a proposal to calculate “benthic impacts”. Since then, the Technical Secretariat chose to remove the calculation of “benthic impacts” from the PEFCR.

Jennifer Reeves (MSC) expressed satisfaction that the Commission is taking into account the need for coherence. In relation to “lost fishing gear”, Ms Reeves wanted to know if it was included in the figure because of biodiversity impacts or carbon footprint impacts.

Henrik Stenwig (Technical Secretariat) responded that waste must be recorded, as part of the impacts calculated in the PEF.

Jennifer Reeves (MSC) requested more information about the calculation on the use of fishing gear. If nets are regularly lost at sea, an impact in the energy use would be expected. It would be impossible to calculate the impact of lost fishing gear on biodiversity.

Henrik Stenwig (Technical Secretariat) responded that the figure includes “maintenance of fishing gear” and “emissions to water”, which covers the issue. It is information required to assess the footprint in the scope of the PEFCR. Lost fishing gear also has relevance due to the impact of ghost fishing on biodiversity.

Daniel Weber (European Fishmeal) expressed concern with the reference to “Dead fish Etc. to ensilage or other products” in Figure 7-1. Small pelagic in the North Sea, such as herring, around half of the live weight of the fish goes to fishmeal and fish oil production. It is more than dead fish. It is a substantial part of the weight. Mr Weber suggested a change to “utilisation of by-products”.



Henrik Stenwig (Technical Secretariat) responded that the term “by-products” can have different meanings. The Technical Secretariat prefers the expression “co-products”. Mr Stenwig agreed that the expression “Dead fish Etc.” should be replaced.

Gerd Heinen (DG MARE), in relation to lost fishing gear, recalled that the PEF relies on information reported by the operators. Mr Heinen wondered about how the reported information would be controlled.

Henrik Stenwig (Technical Secretariat) responded that PEF is an accounting system. The results of the PEF for each operator will be checked by a third party. The control of fishing activities is outside the PEF method. It is an issue for enforcement authorities.

Solène Chambard (ADEPALE) recalled that, for cases where data is difficult to collect, generic data can be proposed. Ms Chambard if such data would be available to applicants.

Henrik Stenwig (Technical Secretariat) explained that, according to the PEF method, if the applicant is not able to get primary data, then secondary data can be used. The secondary data comes from databases approved by the European Commission. The Commission launched a tender to select the databases for the PEFCR. The launch of the supporting studies is awaiting this decision. It is obligatory for applicants to provide primary datasets for their own activities. When not possible, then applicants can use secondary data.

Robert Parker (ASC) commented that Figure 7-1 and Figure 7-2 use a significant amount of space for activities that are not significantly relevant. In relation to carbon footprint of fishing, the main issues are fuel, refrigerants and bait. Concerning bait, Mr Parker wanted to know if data modelling on the bait fishery was being treated the same way as the main fishery.

Henrik Stenwig (Technical Secretariat) responded that, in terms of data, it is necessary to include data on bait. There might not be primary data for the supply chain of bait. Therefore, secondary datasets can be used. Mr Stenwig highlighted that the rules on required data and that the quality of the data provided are two separate issues. The quality of the data must be assessed for all relevant contributions. The system will be continuously improved.

Robert Parker (ASC) expressed interest in following developments concerning default values for bait and other drivers of impact. Mr Parker was also interested to know if bait for fisheries was the same as in bait for forage fish in the aquaculture model.

Henrik Stenwig (Technical Secretariat) highlighted that there are many different types of bait. As an example, there are line fishing operators in Norway that use octopus from South America as bait. Therefore, there is a process of catching and transport. Standardised data makes it easier to compare similar products. Bait can also have a circular economy component.

Christine Absil (Good Fish) highlighted that the PEFCR was covering many elements, but that only a few of those elements were significantly relevant. Ms Absil expressed hoped that, at the training



session, there would be a clearer picture of the different elements and weighing. For example, producers might find that spending time looking for information on lubricants might not be worth it.

Henrik Stenwig (Technical Secretariat) responded that, if calculations demonstrate that certain elements do not have a significant impact, then operators do not have to make significant efforts in looking for accurate data. As an example, for farmed salmon, the main elements are the use of vegetable raw materials in the fishmeal. In Norwegian productions, this led to a change from vegetable raw materials to other raw materials, in order to reduce the climate footprint. It serves a tool for operators to change their product to lower impact on the environment.

Jennifer Reeves (MSC) highlighted that there are retailers spending significant resources to develop specific methodologies. Therefore, it is important to consider the investment, in terms of time and funding, to develop public rules. It could be more relevant to invest in other issues that have more relevance for the sustainability of fisheries and aquaculture.

Daniel Weber (European Fishmeal), in relation to Figure 7-2, recalled his previous comments about the use of the expression “Dead fish Etc. to ensilage or other products”.

Robert Parker (ASC) commented that several elements in Figure 7-2 did not seem relevant enough to be mentioned on their own, for example on “Cameras, sensor, light system and other electronic equipment”. Mr Parker argued that the figure seemed to be from a net-pen perspective. It did not seem to provide a lot of information on recirculating systems, for example on the chemicals used and the infrastructure.

Solène Chambard (ADEPALE) wondered why there were “by-products” for aquaculture in Figure 7-2, but these were not included in Figure 7-1 concerning fishing.

Henrik Stenwig (Technical Secretariat) explained that the figure reflects the requirements in the Excel files. By-products of preparing wild fish are covered. Mr Stenwig recognise that it was important to have consistency between Figure 7-1 and Figure 7-2. In relation to Mr Parker’s intervention, Mr Stenwig highlight that these elements were relevant for grow out, recalling that the PEFCR is for marine aquaculture production.

Christine Absil (Good Fish) stated that there are other systems, such as brackish-water and pond systems, that can be classified as marine. Ms Absil wondered if there was a precise definition of the systems covered. All aquaculture systems should be considered.

- 7.1 Raw material acquisition and pre-processing
- 7.1.1 Fishing

Jennifer Reeves (MSC), in relation to Table 7-1, wondered about how “Transport of fishing vessel and catch to and from fishing ground” would be affected by fishing trips of several days without catch. Ms Reeves also wondered about how coherence would be achieved with the concept of “fishing activity” in other pieces of legislation.



Henrik Stenwig (Technical Secretariat) replied that the effect of fishing trips of several days was accounted for. Mr Stenwig underscored that Table 7-1 merely provides examples. The entire list of elements can be found in the Excel file.

- 7.2.2 Aquaculture: Production of juveniles

Robert Parker (ASC) commented that the cut-off point seemed to be the size of the fish, instead of the contribution to the impact. Usually, juvenile production does not contribute very much to the overall impact. Nevertheless, it could be more relevant to take into account contribution to the impact. Mr Parker also wondered about the datasets that will be used.

Henrik Stenwig (Technical Secretariat) recalled that there is another document on representative products in PEF. This document provides information on the elements significantly contributing to the impact. Mr Stenwig highlighted that the values for small and larger fish would vary with the species. The PEFCR is covering all species.

- 7.2.2 Aquaculture: Marine net pen grow-out

Robert Parker (ASC) commented that, when modelling marine net pens, it was challenging to account for vessels that are not owned and maintained by the operator, but actually leased to different production sites. Mr Parker wanted to know if there was guidance on how to handle these situations.

Henrik Stenwig (Technical Secretariat) responded that there are many situations where there are different operators for specific processes. The fish farmer must collect data from their supply chain irrespective of the control of the factors. If the farmer is not able to provide primary data, then they can use secondary data from databases. Otherwise, it is not possible to undertake the PEF.

- 7.2.4 Aquaculture: Marine net pen grow-out

Robert Parker (ASC) wondered if the inventory spreadsheet of inputs and chemicals was exhaustive. There are several relevant chemicals used that are not listed.

Henrik Stenwig (Technical Secretariat) encouraged Mr Parker to contact the Technical Secretariat bilaterally to check the issue.

- 7.4 Retailer and consumer

Jean-Marie Robert (Les Pêcheurs de Bretagne) stated that it was unclear to him how it would be possible to know the waste in the consumer's stage.

Henrik Stenwig (Technical Secretariat) explained that the consumer's stage is an LCA requirement. Operators must forecast what will happen to their product in the retailer and consumer's stages. Secondary datasets are used in the assessments.





Jean-Marie Robert (Les Pêcheurs de Bretagne) commented that the purpose of undertaking this process was to provide information to the consumer. It is important to integrate the retailer's waste handling and energy consumption, but the process should end once the consumer buys the product.

Jennifer Reeves (MSC) wondered how other sectors, such as agriculture and textiles, were handling the consumer's stage in their own PEFCR. If the objective is to provide consumer information, the process should be relevant until the point of sale. Otherwise, the data is impossible to gather.

Henrik Stenwig (Technical Secretariat) responded that the prediction by the operator of what happens to a product several stages down the chain is meaningful for PEF. Secondary data is used. At the same time, consumers will likely not be interested in information about the average use of the product.

Jennifer Reeves (MSC) argued that the question about relevance should be posed to the Commission. Ms Reeves wondered about the relevance of collecting so much data, if the system relies so much on averages from secondary datasets.

Henrik Stenwig (Technical Secretariat) responded that the aim was to incentivise operators to change their product in ways that decrease the environmental impact of the consumer's stage. As an example, when exporting fresh fish from Norway to Japan, the use of air freight has a larger environmental impact than transport by vessel.

Jennifer Reeves (MSC) highlighted that the example provided was before the point-of-sale. Ms Reeves commented that it was not possible to collect primary data. Ms wondered, even if it was possible, for example, to distinguish between a consumer cooking a product with air fryer and with a pan, whether the impact was meaningful enough.

Henrik Stenwig (Technical Secretariat) stated that, for the operator, it was relevant to have the information, in order to be able to develop a more sustainable product. Mr Stenwig recognise that, when communicating to the consumer, it was less relevant. The PEF method is a tool for improvements at all stages of the value chain. If it is not possible to improve the environmental performance in the consumer's stage, the operator can focus on other hotspots.

Solène Chambard (ADEPALE) expressed agreement with the interventions of Ms Reeves and Mr Stenwig. If the objective is to provide information to consumers, like the Commission is considering, it is not appropriate to include the consumer's stage. Therefore, DG ENV should clarify why they are making it mandatory. Ms Chambard stated that having a global view could be useful to compare between products, for example to compared processed seafood products cooked in an industrial manner and products cooked at home.

#### - 7.5 End-of-life fish consumer product

Jennifer Reeves (MSC) stated that several of the comments concerning section 7.4 were also applicable to section 7.5. Ms Reeves expressed scepticism that, without specific guidance, that the information would assist consumers make more informed decisions.



Henrik Stenwig (Technical Secretariat) exemplified that, in the case of fish products, it would depend on whether the fish is sold whole or already gutted and filleted. When the second option, the operator could use the cut parts for co-products, such as feed. Therefore, it would be useful for the operator to know the impact of cutting the product.

The Secretary General commented that, in Portugal, fish is usually consumed as a whole, while foreign tourists from Northern Europe tend to prefer to consume fillets.

Jennifer Reeves (MSC), in relation to Mr Stenwig's example, comment that she would expect that, in terms of environmental performance, it would be better to reduce the processing stages. Consumers will only look at the score without understanding the context. It also important to avoid a situation where operators "push" the environmental impacts to the next stage of the value chain.

Christine Absil (Good Fish) emphasised the importance of avoiding perverse incentives.

Jennifer Reeves (MSC) argued that the Commission should take into account how the consumer stage was addressed in the PEFCR for other food products.

Henrik Stenwig (Technical Secretariat) informed that PEFCR were established for other food products, including pasta and dairy products.

- 12 Annexes

Jean-Marie Robert (EAPO) wanted to know if a specific section on the calculation of benthic impacts would be included as mandatory information in the calculation of the PEF.

Henrik Stenwig (Technical Secretariat) explained that, in the draft report, the Technical Secretariat included a suggest method to calculate the benthic effects of the fishing. The authors of that method have stated that it is outdated. Therefore, that part will be removed from the draft report.

- **Way forward**

The Secretary General recalled that the FG analysed the entire draft report of the Technical Secretariat, with the exception of the datasets. The Secretary General encouraged members to attend the training session to be organised by DG ENV on 15 February 2022.

Henrik Stenwig (Technical Secretariat) informed that that the launch of the Second Open Public Consultation was delayed. The supporting studies will be launched by end of March/beginning of April. The supporting studies will take three months to conclude, which will require further revision. The Second Open Public Consultation would be expected to take place at the end of 2022.

The Secretary General suggested holding another meeting at the end of February or beginning of March 2022. The aim would be to discuss the outcomes of the training session and to consider the draft advice. Taking into account the delay of the Second Open Public Consultation, the Secretary General suggested to move ahead with the submission of the draft advice to Working Group 3 at the



29 March 2022 meeting. Once the Second Open Public Consultation is launched, the Focus Group could meet again to analyse the new version of the Technical Secretariat's draft report.

Jennifer Reeves (MSC) supported moving ahead, as quickly as possible, with the adoption of the draft advice, taking into account Commission's initiative on substantiating green claims as well as the initiative on the sustainable food system framework.

*The Focus Group agreed to move ahead with the consideration of the draft advice at the next meeting, aiming to put forward the draft to Working Group 3 at the 29 March 2022 meeting.*

## AOB

None.

## Summary of action points

- Next Meeting:
  - o Secretariat to circulate a Doodle poll to determine the date of the next meeting (end of February / beginning of March 2022)
- Draft Advice:
  - o Secretariat to circulate updated version of the draft advice for consideration by the members at the next meeting



## Attendance List

Representative	Organisation	Role
Alexandra Philippe	Market Advisory Council	Secretariat
Benoît Guerin	BG Sea Consulting	Observer
Christine Absil	Good Fish	Member
Daniel Weber	European Fishmeal	Member
Garazi Rodríguez	FEAP	Member
Gerd Heinen	European Commission	Expert
Gundula Broich	European Commission	Expert
Henrik Stenwig	Technical Secretariat	Expert
Jean-Marie Robert	EAPO	Member
Jennifer Reeves	MSC	Member
Pedro Reis Santos	Market Advisory Council	Secretariat
Robert Parker	Aquaculture Stewardship Council	Observer
Solène Chambard	ADEPALE	Member

