



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

The Director-General

Brussels
MARE.A.4/GH

Subject: MAC advice on Product Environmental Category Rules (PEFCR) for Marine Fish for Human Consumption

Dear Ms Bermúdez,

Thank you for your email of 6 August 2024, on behalf of the Market Advisory Council, regarding the Product Environmental Category Rules (PEFCR) for Marine Fish for Human Consumption.

We appreciate the valuable policy recommendations and technical comments on the draft PEFCR document, recently subject to a public consultation. We have shared and discussed your feedback with our colleagues at DG ENV and the technical secretariat responsible for developing the PEFCR.

We would like to provide some context and address the key points of the MAC's policy recommendations, drawing on the general PEFCR expertise of our colleagues in DG ENV.

a) The primary goal of the PEFCR is to develop a single reference technical document that allows for the unambiguous quantification and comparison of the environmental impacts of products within its scope. To achieve this, the technical secretariat has aimed to keep the rules as simple as possible, while still addressing the technical complexities inherent in life-cycle assessments. We understand that this may present some challenges, but we believe that developing a simplified version of the PEFCR, in addition to the current version, would not be in line with Commission Recommendation (EU) 2021/2279 and could create confusion on the market if different operators use different methods to communicate their results.

b) We agree on the need to address fisheries-specific sustainability aspects that are not included in the 16 standard impact categories of the PEF method. Specifically, this concerns the sustainability of the targeted stock or species and the impact of fishing activities on the seabed. DG MARE has collaborated with the STECF to develop indicators for these two aspects, which the technical secretariat of the PEFCR plans to incorporate into the additional environmental information required in PEFCR studies. Furthermore,

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DG MARE is currently developing a publicly accessible information system, expected to be launched in 2025, to facilitate the use of these indicators by operators.

c) Data availability and administrative burdens can be a challenge for life-cycle assessments and other scientifically robust methods. However, we would like to highlight that, in the case of the PEFCR, training, data and tools are available to support the implementation of the PEFCR.

d) The current scope of the PEFCR only covers marine fish, and other product categories are excluded from its scope. If there is market interest, stakeholders are welcome to engage with DG ENV, either to consider the inclusion of additional food categories in future updates of the PEFCR or to establish a new PEFCR.

We have shared the MAC's technical comments with the technical secretariat, who will provide a response to each comment shortly. In cases where technical comments involve policy or general methodological aspects, the secretariat will coordinate its responses with DG MARE and DG ENV.

I am looking forward to our continued fruitful cooperation. Should you have any further questions on this reply, please contact Ms Julia Rubeck, our Advisory Councils coordinator, via the functional mailbox MARE-AC@ec.europa.eu or Gerd Heinen (gerd.heinen@ec.europa.eu; +32.2.298.03.42).

Yours sincerely,

[e-Signed]
Charlina VITCHEVA