



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES
Maritime Policy and Blue Economy
The Director-General

Brussels
MARE.A.4/GH

**Subject: Market Advisory Council (MAC) advice on the Development of
Fishery Sustainability Indicators by the STECF**

Dear Ms Bermúdez,

Thank you for the advice of 30 January 2025 on the development of fishery sustainability indicators by the Scientific, Technical and Economic Committee on Fisheries (STECF). We appreciate the time and effort taken by the Market Advisory Council (MAC) to examine the matter and provide recommendations.

We acknowledge the MAC's emphasis on respecting the concept of sustainability in the Common Fisheries Policy (CFP), which includes environmental, social and economic aspects. In this context, we would like to highlight that developing social sustainability indicators at product level can be particularly challenging, especially when they require traceable information and data. The efforts by the STECF working group on social data and the planned annual social report will help to better address social variables and indicators in the future.

The idea of a general approach enabling the comparison of products between different food categories, as advocated in the MAC advice, has its merits. However, before launching such a broad policy initiative, we believe it would be essential to test certain key fisheries-specific sustainability indicators, such as those developed by the STECF. This would ensure that they can be reflected in a general consumer information approach if it materialises, but also provide added value to consumers on a stand-alone basis as a purely voluntary information tool.

We appreciate the MAC's suggestion to consider the Product Environmental Category Rules (PEFCR) for marine fish. The PEFCR method and its 16 environmental impact categories do not reflect fisheries-specific aspects, namely the impact on the targeted fish stock and the impact on the seabed'. Since these were developed by the STECF, we are already working closely with our colleagues in DG ENV to integrate both approaches in the forthcoming PEFCR.

We note the MAC's recommendation to engage with other Advisory Councils (ACs). We will follow-up on this recommendation and offer the members of all other ACs to engage

Ms. Yobana Bermúdez
Chair
Market Advisory Council
Regus EU Commission
6 Rond-Point Robert Schuman
B-1040 Brussels
BELGIUM

Commission européenne/Europese Commissie, 1049 Bruxelles/Brussel, BELGIQUE/BELGIË - Tel. +32 22991111
Office: J-99 05/014 - Tel. direct line +32 229-50483

charlina.vitcheva@ec.europa.eu

in the testing of the planned information system and the underlying STECF methodology.

We recognise the importance of developing separate indicators for aquaculture products. With the support of the Aquaculture Assistance Mechanism, the Commission has been working on a document on environmental performance of aquaculture. This document will include a set of indicators of environmental performance. While aware of the need for the full assessment of the environmental footprint of a product presented to the final consumer via a full life cycle analysis, these environmental performance indicators will be at this stage limited to the assessment by the aquaculture producer of the activities at farm level. These indicators aim at providing guidance to aquaculture producers in documenting the environmental performance of their primary aquaculture activity. This information will be required when applying the PEF methodology. The definition of these indicators has been based on the two reports requested by the Commission to STECF, as well as the PEF method. We would also like to highlight that marine aquaculture products will be covered by the PEFCR for marine fish mentioned above.

Finally, we agree that it is important to evaluate the potential benefits and drawbacks of the sustainability indicators and their operationalisation in an information system. The testing phase currently taking place with the support of stakeholders from a wide variety of categories will contribute to that assessment. The information system's built-in feedback mechanism will also enable us to collect and incorporate feedback from users and stakeholders on an ongoing basis. This will allow us to refine the information system and its underlying data, ensuring that the system meets the needs of users and reflects future expert feedback.

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.

Yours sincerely,

Charlina VITCHEVA

c.c.: Pedro Reis Santos secretary@marketac.eu