



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

The Director-General

Brussels,
MARE/A2/LBS

Subject: AAC Recommendation on the Product Environmental Footprint Category Rules (PEFCR)

Dear Mr. Thomsen,

I would like to thank you for your letter of 24 March 2022 including the Recommendation on the Product Environmental Footprint Category Rules. We appreciate your support to the work on Product Environmental Footprint Category Rules (PEFCRs) for Marine Fish for human consumption, even if its scope does not cover all farmed aquatic products.

Thank you for sharing with us your concerns about the development of the PEFCRs as well as the consultation process. We would like to take this opportunity to clarify and share some information with you.

As you mentioned in your letter, the marine fish industry is currently developing specific PEFCR for marine fish. This process will allow the industry to better identify the sources of its environmental impact and reduce it. It will also allow measuring the performance of specific products against an average benchmark which is unique to the Environmental Footprint (EF) methods. This is work in progress. The PEFCRs for marine fish started after a call for volunteers was launched by the European Commission in 2019 and follows the procedure for developing PEFCRs as described in part A of Annex II of the Commission Recommendation (EU) 2021/2279⁽¹⁾.

The PEFCR for marine fish held **its first public consultation from 2 August to 4 October 2021**. The first consultation period lasted 9 weeks, a period longer than usual for the consultations organized by the Commission. Many comments from numerous stakeholders were received to improve the draft rules as shown here: [PEFCR for marine](#)

⁽¹⁾ [COMMISSION RECOMMENDATION \(EU\) 2021/2279](#) of 15 December 2021 on the use of the Environmental Footprint methods to measure and communicate the life cycle environmental performance of products and organisations

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[fish - stakeholder workspace - EU Environmental Footprint - EC Extranet Wiki \(europa.eu\)](#).

The **second consultation is expected to take place in summer 2023**. We would like to invite you to regularly check this website <https://www.marinefishpefcr.eu/> so that you are duly informed on the progress of this work.

We would like to inform you that the Commission, together with the Technical Secretariat of the PEFCR for Marine Fish, organized a webinar on the PEFCRs for marine fish in February 2022, which was translated into French and Spanish thanks to the Market Advisory Council (MAC). This webinar provides an overview of the PEFCR and is available (all language versions) at the following link: https://ec.europa.eu/environment/eussd/smgp/ef_trainings.htm. It addresses questions such as what is a PEFCR, why it is important and gives initial information to companies aiming at implementing Product Environmental Footprint studies under this PEFCR. We would like to invite you to share this webinar with your network so that fish farmers can get a better insight into the Product Environmental Footprint life cycle assessment.

As mentioned, the PEFCR for marine fish covers the full life cycle of the marine fish products including the production, manufacturing, distribution, use phase and end-of-life stages. It will include the 16 environmental impact categories, plus any other considered as relevant for this product group. This is a tool to calculate the environmental impacts of the products, but it is not a policy tool. Therefore, it does not set any requirements on the environmental performance of products. The PEFCR will identify the environmental hotspots of marine fish, so that companies can improve the environmental performance of the products along the supply chain and easily communicate it to the consumers. It can also support the development of policy tools.

The Taxonomy regulation is a policy tool that aims at redirecting the investment towards environmentally sustainable products and economic activities⁽²⁾. Taxonomy sets technical screening criteria at economic activity level against six environmental sustainability objectives. At this point, it has not yet been decided whether the Taxonomy initiative will address the aquaculture activity specifically. While there should be general consistency between the screening criteria in the taxonomy and the impact categories of the PEFCR, they will certainly not be identical, as the initiatives serve different purposes and hence aim at different and complementary objectives.

As regards the PEFCR's relation with Aquaculture Stewardship Council (ASC) standards, both initiatives are completely independent from each other. ASC is a private scheme which, together with other schemes, plays an important role in informing consumers. The PEFCR (as well as other sustainability-related initiatives by the Commission) aims by no means at replacing such private schemes. Instead, the envisaged PEFCR would complement other existing schemes by using a broad life-cycle based approach covering a wide range of impact categories that are currently not covered by private schemes.

Regarding the Scientific, Technical and Economic Committee for Fisheries (STECF) work on the "*Criteria and indicators to incorporate sustainability aspects for seafood products in the marketing standards under the Common Market Organisation (STECF-20-05)*", with respect to aquaculture a follow-up expert working group was established to

(²) [Taxonomy Regulation \(europa.eu\)](#)

continue the work on the sustainability assessment for aquaculture products. The report of this expert working group has recently been discussed and adopted at the STECF plenary in November (STECF PLEN 22-03), and is available [at this link](#). One of the objectives of this work was to also contribute to the future work of DG MARE on the guidance document on environmental performance of aquaculture, planned for 2023 as part of the implementation of the Strategic guidelines. Work on sustainability indicators planned in this context could be integrated in a broader framework for consumer information on the sustainability of food products that the Commission plans to propose in 2023 as part of the Sustainable Food System initiative foreseen in the Farm to Fork Strategy.

Finally, I would like to invite you to consult this document: [Find your EU funding programme for the environment - Publications Office of the EU \(europa.eu\)](#) where the different financial support options are described.

I am looking forward to our continued fruitful cooperation. Should you have any further questions on this reply, please contact Ms Pascale COLSON, coordinator of the Advisory Councils (Pascale.COLSON@ec.europa.eu; +32.2.295.62.73), who will forward them to relevant colleagues.

Yours sincerely,

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