



Recommendation on the Product Environmental Footprint Category Rules (PEFCR)

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1. Introduction

The European Commission's work on the Environmental Footprint (EF) method aims to develop a lifecycle analysis method that is applicable to policy proposals and that allows calculation of the environmental footprint in a comprehensive manner. The method should be reproducible, comparable and verifiable.

In 2010 the Council asked the Commission to develop a harmonised approach, while at the same time the industry was also interested in developing this. In 2013 the first version of the EF method was published officially as Commission Recommendation 2013/279/EU. The method, which was tested between 2013 – 18 and based on international best practises, avoids trade-offs between different value chain steps and between different environmental impacts (life cycle approach).

The EF method currently covers 16 environmental impacts each of which is measured, normalised and weighted leading to a single score per product. Continuous work is being carried out on improving the method and adding other environmental impacts, for example on biodiversity.

There are many category rules that have been developed to date. From 2019 more work started on new Product Environmental Footprint Category Rules (PEFCR) including one on marine fish. This work is initiated through stakeholder consultation and expressions of interest in a category.

A PEFCR process consists of 19 steps. The Technical Secretariat (TS) must prove their ability to develop a PEFCR and their market representativeness. The TS must cover 51% of the market. If this condition is not met, the Commission becomes part of the TS to ensure that all relevant aspects are considered.

The full process takes approximately 3 years. Once the TS is approved by the Commission the work on the PEFCR can start on a representative product. In the case of marine fish this covers both wild catch and farmed. To create the representative products, data sets are needed which are then tendered. The TS then creates the first draft of the PEFCR which leads to the first consultation where the information is made publicly available for comment. Based on this the draft document is improved. For each representative product included in the PEFCR, three supporting studies need to be carried out to test the PEFCR and to ensure that the rules are clear, and the data sets are good. Based on this, secondary data set are published leading to an updated version of the PEFCR. This is followed by a second consultation period resulting in a further update to the draft which then is reviewed by a panel of Life Cycle Analysis (LCA) experts.

The final version of the PEFCR is validated by the Technical Advisory Board and the EF subgroup which is a group of Commission experts including representatives from the Member States and the industry with a more strategic view on the issue. The Technical Advisory Board is a separate group of Commission representatives with specific LCA expertise.

2. The AAC position

The AAC supports the work on Product Environmental Footprint Category Rules for marine fisheries and aquaculture, even considering that it does not include other farmed aquatic products (freshwater



fish, shellfish, algae etc.). It helps consumers to make informed purchasing decisions, it allows for benchmarking, and it gives the basis for more transparent and trustworthy communication efforts.

However, the AAC has neither the time – given the short deadline – nor the competencies to comment on the relevant documents related to this first consultation.

The AAC makes reservations on the consultation and expresses its intent to engage with an external consultant to assist the AAC with drafting comments on the second consultation.

3. Recommendations

The AAC is concerned that most fish farmers have no insight into the Product Environmental Footprint life cycle assessment. For this reason, the AAC requests the Technical Secretariat of the PEFCR or the European Commission, to draft a document that explains the 'concept', how it will work and the relations with other initiatives on sustainability (Taxonomy regulation's technical screening criteria, STECF's criteria and indicators to incorporate sustainability aspects for seafood products in the marketing standards under the Common Market Organisation, ASC's certification scheme, etc.) and with the marketing standards of the Common Market Organisation in fishery and aquaculture products.

The AAC would like to request information to the Commission on the financial support options that exist for other aquaculture sectors to develop PEFCR initiatives (e.g. shellfish, freshwater fish or algae).



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