Market Advisory Council

Advice

Development of Fishery Sustainability Indicators by STECF

Brussels, 30 January 2025

1. Background

In 2018, the European Commission launched an evaluation of the marketing standards framework for fishery and aquaculture products[1], which identified, among other key underlying issues, that there was a limited contribution to the sustainability (environmental, social, economic) of products marketed in the EU. In 2020, the Commission launched an inception impact assessment and a public consultation[2].

In May 2021, the Scientific, Technical and Economic Committee for Fisheries (STECF) published a report[3] on criteria and indicators to incorporate sustainability aspects for seafood products in the marketing standards under the CMO Regulation[4], which focused primarily on environmental sustainability and partially on social sustainability. Among the eight criteria suggested by the STECF report, DG MARE identified three of them as key sustainability hotspots: 1) fishing pressure, 2) impact on the seabed, and 3) impact on sensitive species.

[1] In this context, the MAC adopted an opinion on the framework for fresh products (28 March 2019), followed by an opinion on processed products (12 July 2019).
[2] Available on the European Commission's consultations page. The MAC adopted advice about the inception impact assessment (15 May 2020) and advice about the public consultation (4 February 2021).
[3] https://publications.jrc.ec.europa.eu/repository/handle/JRC124927
[4] Regulation (EU) No 1379/2013 of the European Parliament and of the Council of 11 December 2013 on the common organisation of the markets in fishery and aquaculture products

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On 15 October 2021, the MAC adopted advice about the incorporation of sustainability aspects in the marketing standards framework[5], which recommended, among other recommendations, for the European Commission to respect the concept of sustainability in the Common Fisheries Policy (Art. 2.1) which covers the three pillars of sustainability.

In December 2022, STECF published a follow-up report on the "Validation of selected sustainability indicators and underlying methodologies"[6]. The report endorsed the indicators on the sustainability of the targeted stock and impact on the seabed, proposing a product grading on a 5-scale (e.g., A-E), which could be in the future be incorporated in a general or a fishery-specific sustainability label.

Also in December 2022, the MAC adopted advice on the incorporation of measurement and communication on environmental and social sustainability in fishery and aquaculture products[7]. According to the majority of the membership, the legislative proposal on a Sustainable Food System Framework would be the most appropriate policy option, instead of integration of the sustainability criteria in the marketing standards framework.

In April 2024, STECF published the 23-18 report on fishery sustainability indicators[8], which covers the testing of a pilot tool that operationalises an indicator to score a given fisheries product in relation to the sustainability of the targeted stock / species. The report also covers the methodology for an indicator on the impact on sensitive species and its scoring, particularly in terms of feasibility and operationality of the indicator.

[5] MAC Advice on "Incorporation of Sustainability Aspects in the Marketing Standards Framework" (15 October 2021)
[6] https://stecf.jrc.ec.europa.eu/ewg2212
[7] MAC Advice on "Incorporation of Measurement and Communication on Environmental and Social Sustainability in Fishery and Aquaculture Products" (13 December 2022)
[8] https://stecf.jrc.ec.europa.eu/documents/d/stecf/stecf_23-18_sustainable-fisheries-indicators

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According to information provided by the responsible DG MARE official[9], DG MARE was no longer pursuing the integration of the new tool into the marketing standards framework. Nevertheless, DG MARE aims to proactively increase transparency. The tool is expected to be in place in 2025 for voluntary use by operators and consumers. The sustainability criteria are supposed to be based on traceable information, such as the fishing gear and the catch area. Whether this initiative will be connected with policy initiatives remains unknown.

2. Indicators on the stock status, on the bycatch of sensitive species, and on the impact on the seabed

The STECF 23-18 report develops indicators on the stock status, on the bycatch of sensitive species, and on the impact on the seabed, providing an overview of the information used, the score range, and the coverage of wild-capture seafood products.

As the Commission services expect operators and consumers to be the end users of the new tool, including through potential links with policy initiatives on sourcing and on consumer information, the topic is highly relevant for the MAC, namely on ensuring a common methodology and aims. Nevertheless, for the development of the technical aspects of the indicators, it would be relevant for the Commission services to consult the regional fisheries Advisory Councils and the Aquaculture Advisory Council (AAC), focusing on the target species / production methods under their competence, as the indicators primarily focus on environmental sustainability and rely on data from primary producers and management bodies. Such consultations, by accounting for regional practices, could also help ensure that the indicators are accurate and locally relevant.

[9] Meetings of 4 June 2024 and 17 September 2024 of Working Group 1.

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3. Coverage of aquaculture products

The STECF was tasked with the development of sustainability indicators for fishery and for aquaculture products. Separate Expert Working Groups were established for aquaculture and for fishery products. The latest report focuses exclusively on fishery products, developing indicators that are not applicable to aquaculture products[10]. As the development of indicators for fishery products is reaching its final stage, it remains unclear whether fishery and aquaculture products will eventually be grouped together under the upcoming voluntary tool.

Due to the different environmental impacts along the supply chain, for example on the use of chemicals, feed from aquatic resources and terrestrial resources, and to the operational contexts, the environmental indicators for aquaculture products would necessarily have to be different from those for fishery products. The existence of separate private sustainability certification schemes in the market, for example the Marine Stewardship Council (MSC) and the Aquaculture Stewardship Council (ASC), illustrates these differences.

If the Commission services proceed ahead with the development of sustainability indicators for fishery products, it would be relevant to continue the work on a distinct set of indicators for aquaculture products, ensuring a parallel treatment, the highest possible level of comparability between sectors, and a level-playing-field for products competing in the same market, especially as the production and consumption of aquaculture products increases. As a distinct set of indicators is developed, it should separately account for the various groups of species (e.g., finfish, shellfish). In the case of overlapping data sources, there should be streamlining of data collection methods.

[10] In 2023, STECF published a report reviewing the proposed sustainability criteria and indicators for aquaculture (STECF-22-13)

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Nevertheless, as previously expressed, the most appropriate policy option for the incorporation of measurement and communication on environmental and social sustainability in fishery and aquaculture products would be to be integration into an horizontal framework, such as the planned Sustainable Food System Framework, allowing consumers to make comparisons across all food products placed in the EU market (both aquatic and terrestrial), instead of a mere competition between fishery products and aquaculture products. At the same time, as a proposal for the Sustainable Food System Framework has not been tabled for the moment, there should be a discussion on whether the criteria to measure environmental and social sustainability in fishery and aquaculture products could be included in the Common Market Organisation (CMO) Regulation.

4. Coverage of prepared and preserved products

As outlined in the STECF report 20-05, currently, the rating tool, planned to be released in 2025, cannot be put in place for prepared and preserved products (Chapter 16 of the Combined Nomenclature), because the tool is based on the minimum consumer information requirements of Article 35 of the Common Market Organisation (CMO) Regulation, which are only mandatory for fresh and chilled products (Chapter 03 of the Combined Nomenclature).

In the view of Conxemar, EAPO, EJF, Europêche, ETF, FEDEPESCA, Good Fish Foundation, Oceana, and OP Omega3, if the Commission proceeds ahead with the development of sustainability indicators, to ensure a level-playing-field for the products placed on the EU market, enhance marketability, and ensure fair competition, these should apply to all fishery and aquaculture products regardless of their form or outlet. The planned extension of minimum traceability information for Chapter 16 products in the context of the recent revision of the Fisheries Control Regulation could help achieve this. A potential revision of Article 35 of the CMO Regulation to extend the scope of the consumer information rules to Chapter 16 products could also allow it.

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In the view of AIPCE, ANCIT, ANFACO-CECOPESCA, CEP, FEICOPESCA, Unione Italiana Food, PACT'ALIM, and PSPR, the approach of STECF 20-05 report is not appropriate, as Article 35 of the CMO Regulation concerns exclusively the information provided to the consumer, displayed on the packaging or the sale of non-prepacked products. The environmental labelling policy developed by the EU should include all products in the food chain and ensure equal treatment regardless of the level of processing. The traceability implemented by the processing sector allows the transcription of sustainability elements into a future environmental labelling system. While the development of sustainability indicators is highly relevant and useful for the construction of a global environmental labelling indicator, the work mentioned in the STECF 23-18 report is exclusively linked to information on the target stock, so it is not relevant to translate into the state of processed products, as there are many other elements to account for. In their view, the issue of environmental labelling could be discussed again in the context of the next revision of the CMO Regulation and of a harmonised approach with all the food chain.

5. Social and economic pillars of sustainability

The 23-18 report focuses on indicators on environmental sustainability. Under the advice on "incorporation of sustainability aspects in the marketing standards framework", the MAC expressed the view that the concept of sustainability in the Common Fisheries Policy, which covers the three pillars, should be respected, while also providing specific recommendations on social and economic criteria.

In line with previous recommendations, the MAC recognises the importance of respecting the three pillars of sustainability, in alignment with the objectives of the Common Fisheries Policy. The combination of information on the three pillars of sustainability into a single toolset can be quite complex, and there is a need to ensure that there is no oversimplification and that information for consumers and operators is balanced. Nevertheless, it would be relevant for DG

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MARE and STECF to initiate work on the social and economic sustainability through expert advice. In this work on social sustainability, DG MARE and STECF could consider existing initiatives, such as the European Sustainability Reporting Standards.

The additional work could include also potential integration of multifactorial sustainability approaches, such as of Life Cycle Assessment, after the stabilisation of the environmental information.

In practice, in the market, there are separate private initiatives for each pillar of sustainability. In the case of initiatives on social aspects, there are examples such as the ISO 22000 and 26000 standards, but robust, credible, auditable assessment systems and global standards are lacking, as it is difficult to evaluate labour conditions, salary distribution, and other factors at a global scale. Nevertheless, the Certification and Ratings Collaboration[11], based on high-level principles for socially responsible seafood, serves as a positive example of a basis for the development of practical indicators on social aspects. Furthermore, it is important to keep in mind recent policies connected to social sustainability, such as the Regulation against forced labour[12], and the Corporate Sustainability Due Diligence Directive[13], plus, under the Fisheries Control Regulation, forced labour is classified as a serious infringement.

If work is initiated by STECF on the social and economic pillars of sustainability, it would be relevant to consider the ratification of the eight fundamental Conventions of the International Labour Organisation (ILO), particularly Convention 188 on Work in Fishing. The ratification of other international agreements with relevance to mitigate the risks from human rights abuses, unsafe worker conditions aboard vessels, and illegal fish supplies should also be considered, such

[11] https://certificationandratings.org/
[12] MAC Advice on "Forced Labour in the Fisheries and Aquaculture Market" (30 November 2023)
[13] MAC Letter on "Implementation of the Forced Labour Regulation and of the Corporate Sustainability Due Diligence Directive in the Fisheries and Aquaculture Sector" (4 November 2024)

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as the Port State Measures Agreement and the Cape Town Agreement. To support fairness within the fishing business, it could be relevant to consider vessel labour practices, including alternative payment models and worker representation for fishing crews.

As for economic aspects, it can even more difficult to integrate in practice, as, by definition, a company will always seek profitability and economic sustainability. Previously, under the "Recommendations for the inclusion of indicators of economic sustainability in the STECF's The EU aquaculture sector report"[14], the MAC and the AAC suggested the inclusion of a special chapter on economic sustainability. ROI, EBIT, labour productivity and capital productivity were listed as examples of valid and reliable indicators of economic sustainability.

Available data, including economic studies, from national and regional authorities on the fisheries and aquaculture sector can provide useful inputs for potential social and economic indicators.

6. Added value of the tool

In line with the effort to proactively increase transparency, DG MARE will be making the upcoming tool available for the use by operators and by consumers. Therefore, it is relevant to consider the added value for operators and for consumers, the added value when compared with existing legislation and the voluntary initiatives in the market, and the intelligibility of the suggested A-E grading for operators and consumers.

In the view of Oceana, OP Omega3, and PACT'ALIM, if the information is accurate, the tool would have added value by increasing transparency, guiding operators, particularly retailers, in their sourcing decisions, and aiding consumers in making informed choices, especially when there is a willingness on the part of distributors and consumers to purchase products with better

[14] AAC/MAC "Recommendations for the inclusion of indicators of economic sustainability in the STECF's The EU aquaculture sector report" (24 July 2023)

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sustainability indicators at a higher price. In comparison with existing legislation and voluntary labels, the tool could provide a standardised EU-wide assessment, while meeting consumers' increasing interest in sustainability[15]. An A-E grading system may be intuitive for both operators and consumers, but existing studies on consumer understanding must be taken into account, while also undertaking pilot testing to ensure clarity and beneficial impacts. The environmental scoring provided under Life Cycle Assessments can serve as an example. Oceana further highlights that the EU market still sources from some overfished stocks, and that certain fishing methods continue to negatively impact the seabed[16].

In the view of AIPCE, CEP and Conxemar, the tool would not bring added value due the overall complexity of combining the three pillars of sustainability into a single toolset, as merging them, particularly through an A-E grading system, would lead to oversimplification, and unbalanced information for consumers and operators. These members further add that the risk-based approach suggested by STECF would mean that the same species from different stocks and the same FAO area would be scored according to the lowest performing stock, which can lead to inaccurate scoring and species from sustainable stocks being poorly scored. The scoring of impacts by gear and habitat (and possibly target species) would be validated by a network of scientists, so the practical enforcement would likely be extremely difficult, especially for importers, and even for producers not familiar with the EUNIS list of habitats. There would also be limitations related to the control of voluntary declarations on habitats of fishing.

[15] According to a poll on seafood consumer information conducted by Oceana in Belgium, Cyprus, France, and Spain, 79% of the interviewed citizens considered it important to know if the fish they eat is overexploited or not, and 81% wanted to have information on the impact of the fishing method on the marine environment and the bycatch risk of sensitive species like turtles or dolphins. For more details, see: https://europe.oceana.org/press-releases/eu-citizens-strongly-support-expanded-consumer-information-for-seafood-products/.

[16] As an example, a study by a French consumer association showed that 81% of the fishmongers in supermarkets sold seafood fished with unsustainable fishing practices or from depleted stocks (see UFC-Que Choisir, Enquête sur la durabilité de la saisonnalité, des méthodes et des zones de pêche pour 8 poissons frais et pour le poissons surgelé, 23 September 2020)

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7. Use of the tool

For the moment, the planned tool will remain voluntary and the connection with potential policy initiatives remains to be decided.

The MAC maintains the view that the incorporation of measurement and communication on the sustainability of fishery and aquaculture products should be integrated into a broader horizontal legislative framework, such as the Sustainable Food System Framework, allowing the establishment of uniform requirements across all food sectors, and facilitating consumer awareness and understanding as well as implementation, while avoiding the proliferation of schemes. Nevertheless, in the view of Oceana, Good Fish, and WWF, as the proposal for a Sustainable Food System Framework does not go forward, and, as the indicators cover only fishery products for the time being, the CMO Regulation would be the most relevant policy option to integrate the indicators.

In the view of AIPCE, ANFACO-CECOPESCA, CEP, CONXEMAR, Europêche, FEICOPESCA, and PACT'ALIM, the tool needs further improvement to provide reliable information to consumers before its public launch. It should remain voluntary. If the tool is further developed, it could support the integration of fisheries-specific elements, provided they align with a new horizontal environmental labelling framework for all food products[17].

While these are different initiatives, it is relevant to consider the challenges faced by DG MARE, including in terms of feasibility, credibility, and need for credible assessment processes and

[17] In the view of OP Omega 3, the development of a voluntary tool, particularly through the integration of further food sectors, is beneficial to ensure the reliability of the data and methodology as well as to gauge industry and consumer response before integration into legislative proposals.

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systems. Other recent and complimentary EU legislation with an impact on the communication of sustainability to consumers, such as the Green Claims Directive[18], also needs to be considered.

8. Recommendations

The MAC believes that, in the context of the further development of fishery sustainability indicators, in coordination with STECF, the European Commission should:

a) Take into account previous recommendations, particularly to respect the concept of sustainability in the Common Fisheries Policy, and the preference for the planned Sustainable Food System Framework as the most appropriate policy option for the incorporation of measurement and communication on environmental and social sustainability in fishery and aquaculture products – this would allow consumers to make comparisons on sustainability across all food products placed in the EU market[19];
b) As other aspects of environmental sustainability have been further developed under the 16 environmental impact categories of the Life Cycle Assessment approach, take into account previous recommendations on the Product Environmental Category Rules for Marine Fish for Human Consumption[20], an initiative developed by a group of external experts ("Technical Secretariat") at the request of DG ENV;
c) Encourage the other Advisory Councils to consider the technical aspects of the three indicators developed by STECF report 23-18, focusing on the target species / production

[18] MAC Advice on "Substantiation and Communication of Explicit Environmental Claims (Green Claims Directive)" (30 November 2023)

[19] As a proposal for the Sustainable Food System Framework has not been tabled, in the context of the upcoming evaluation of the provisions of the Common Market Organisation, the MAC commits to hold exchanges on the relevance of including the criteria to measure environmental and social sustainability in fishery and aquaculture products under that Regulation.

[20] MAC Advice on "Product Environmental Category Rules (PEFCR) for Marine Fish for Human Consumption (6 August 2024)

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methods under their competence, since the indicators primarily focus on environmental sustainability and rely on data from primary producers and management bodies;

d) If the development of indicators for fishery products proceeds ahead, pursue the work on a distinct set of indicators for aquaculture products, separately accounting for the various groups of species (e.g., finfish, shellfish), to ensure a parallel treatment, the highest possible level of comparability, and a level-playing-field;

e) Launch a call for collective renowned fisheries and aquaculture expertise, particularly social and economic scientists, to delve into the development of social and economic sustainability indicators, while accounting for existing labour practices, public data and studies, private initiatives and standards, the EU's legislative framework, and international agreements;

f) Ensure that further consideration is given to the expected or lack of added value for operators and consumers, especially in sourcing and purchasing decisions, including intelligibility of the suggested A-E grading, of the planned voluntary tool.

The present advice is, following the publication of the STECF reports on the matter, based on the initial understanding of the proposed criteria and tool by the members. As further steps are taken by DG MARE, including through the testing of the pilot tool, the MAC will aim to provide further advice, including through a better common understanding of the challenges, potential benefits, and relevant policy initiatives.

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Annex

	Information used (various detail levels)	Score range (maximum range from A to E)	Coverage of wild-capture seafood products in volume (actual level) including eventual unresolved cases – (*Not Available - NA*)
Indicator on the stock status (former 'fishing pressure indicator')			
System 1	IUCN stock status and sensitivity index	B to E	High coverage
System 2	Quantitative information on stock assessment (Biomass/MSY Btrigger, F/FMSY or FMSY proxy, Catch or effort advice)	A to E	Medium-low coverage (most EU products + well-advised imports)
Indicator on the bycatch risk of sensitive species (including so far marine mammals, seabirds, turtles and sharks)			
System 0	CMO mandatory gear list (7 categories)	A to E as some gears cannot have a bycatch risk	Very high coverage
System 1/2 to be implemented (see plan)	Commercial species name (CMO Regulation) + gears mostly based on Annex XI of Regulation (EU) No 404/2011 (32 categories) + FAO fishing area + eventual downgrade from the number of impacted sensitive groups and quality of bycatch risk information (4 criteria)	A to E	High coverage (90%)
Indicator on the impact on the seabed (from the EWG 22-12 Report)			
System 1	CMO mandatory gear list (7 categories) including habitat type (EUNIS level 2 with the depth limits, 43 categories)	A to E as some gears cannot impact the seabed	High coverage
System 2	Voluntary in the FAO gear list (88 categories including 26 categories that are not in the CMO gear list) including habitat type (EUNIS level 2 with the depth limits, 43 categories)	A to E	High coverage
Future "System 3"?	Regional specificities by FAO area on water depth and fraction of trawled surface area.	A to E	

Fig. 1 - Table summarising the main information types used by each scoring system for the three selected indicators (Source: STECF Report 23-18)

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