

On the STECF report on Sustainability Criteria for Seafood under the CMO Marketing Standards

Background

Regulatory marketing standards for fishery products are established under the common market organisation (CMO; Regulation (EU) No 1379/2013)¹. In 2019, an evaluation of the implementation of these marketing standards was carried out to assess whether they were still fit for purpose². The evaluation identified shortcomings regarding the effectiveness of the current marketing standards framework in achieving the objectives set out in the CMO Regulation of 2013. In particular, the existing marketing standards do not sufficiently contribute to a level playing field on environmental and social aspects and have not been equipped to deliver on the objective of enabling the EU market to be provided with sustainable products.

The revision of the marketing standards is included as an initiative under the Farm to Fork Strategy for a fair, healthy and environmentally-friendly food system³.

The Scientific, Technical and Economic Committee for Fisheries (STECF) of the European Commission published in April 2021 a report on *Criteria and indicators to incorporate sustainability aspects for seafood products in the marketing standards under the Common Market Organisation* (STECF-20-05)⁴.

The report

The STECF (EWG 20-05) had been requested to identify critical aspects of sustainability of fisheries and aquaculture products that could be incorporated into a system to inform consumers and actors along the supply chain. The objective being to compare the performance of seafood products, according to a set of criteria considered in a scoring system, with the long-term goal to incentivise improvement in both sourcing and production practises. This work aimed to identify suitable criteria and indicators and to assess their potential to be incorporated in regulatory marketing standards for both fishery and aquaculture products on the EU market, independently of their origin (domestic and imports).

The overall approach of the STECF intends to initiate and/or encourage a virtuous cycle of improvement and a continuous dynamic of progress towards less ecological and environmental impacts and higher social standards in seafood production and trade.

¹ Regulation (EU) No 1379/2013 on the common organisation of the markets in fishery and aquaculture products
<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013R1379&from=EN>

² Study, evaluation of the marketing standards framework for fishery and aquaculture products
<https://op.europa.eu/en/publication-detail/-/publication/9480757a-100c-11ea-8c1f-01aa75ed71a1/language-en/format-PDF/source-110372510>

³ Farm to Fork Strategy for a fair, healthy and environmentally-friendly food system
https://ec.europa.eu/food/farm2fork_en

⁴ Scientific, Technical and Economic Committee for Fisheries (STECF) – Criteria and indicators to incorporate sustainability aspects for seafood products in the marketing standards under the Common Market Organisation (STECF-20-05)
<https://publications.jrc.ec.europa.eu/repository/handle/JRC124927>

In its report, STECF proposes a system of sustainability indicators based on a relative scoring system with sustainable/not sustainable criteria. Seafood products are assessed to be relatively more/less sustainable than another seafood product across a set of criteria. However, the report informs that the standardisation in the sustainability scoring between aquaculture and fished products is not feasible. They imply that a given score is not comparable for both product types. Thus, the score itself should be clearly associated to the category of product it is referring to (aquaculture or wild product).

STECF considers this system differs from most certification and label schemes as it would not intend to establish whether a given product is sustainable or not. Thus, while the scoring would be mandatory (at least in the medium term), no absolute thresholds of sustainability would apply and only a relative ranking of products is targeted.

The FEAP position

1. The FEAP agrees that the existing marketing standards of the Common Market Organisation do not contribute to a level playing field on environmental and social aspects of fishery and aquaculture products. This is especially true for aquaculture products. Furthermore, current marketing standards have not been equipped to deliver on the objective of enabling the EU market to be provided with sustainable products.
2. This federation welcomes and appreciates this STECF initiative to establish marketing standards for aquaculture products that could be effective on encouraging less environmental impacts and higher social standards in aquatic food production and trade, besides providing better information to consumers.
3. The FEAP stresses that for many years it has underlined the urgent need to rebalance the level playing field for the import of aquaculture products into the Single market. This levelling action should address environmental, social, animal welfare and food safety aspects of fish production and processing.
4. However, the FEAP considers that the conclusions of the STECF report as it stands do not provide a sound basis for the development of policy options to include sustainability criteria in the marketing standards for fishery and aquaculture products.
5. The FEAP expresses its conviction that, instead of an aquaculture only scoring system, what the aquaculture industry needs is a “general food” sustainability and social scoring system in which consumers would be able to choose to buy the food with the least environmental and social footprint. The scoring system should not be based on an “aquaculture” stand alone scoring system, even separated from a potential “captured fish” scoring system. Tracing a parallelism, having a different *Nutriscore* system for each food product category would be greatly confusing for consumers.
6. Alternatively, the FEAP proposes transforming the STECF aquaculture alone scoring system into a “pass” / “not pass” system instead of a scoring system with steps.
7. The FEAP disagrees that the system proposed by STECF differs from most current certification and label schemes. More than 40 certification schemes/initiatives, self-reporting, regulatory reporting, etc., currently exist for aquatic products and consumers genuinely struggle to understand what value each other brings. Considering the consumer perspective any new scheme needs to be very carefully conceived. Currently, consumers must choose between foods based on their nutritional properties, health claims, environmental footprint, etc. as well as price, origin and many other certifications.

8. The FEAP remains at the disposal of the STECF and the European Commission to continue working for ways to offer consumers tools to allow them making better food purchasing decisions from a sustainability perspective.

FEAP, 9 June 2021

The Federation of European Aquaculture Producers is an organisation that represents the European fish farming profession and is based in Brussels. FEAP is composed of 24 national fish farming associations from 23 countries, both EU and non-EU. The combined yearly production of FEAP members surpasses 2,5 million tonnes of nutritious, safe, delicious and environmentally sustainable fish.

