OPINION on prEN/FprEN	
Name of submitting organization: ECOS	Submission date: 27/08/2024
Contact person: Fanny Rateau	
TC number: ☑ CEN/TC 466 ☐ CENELEC/TC ... ☐ Other ...	TC Secretariat: NEN
Procedure: ☐ Enquiry[1] ☑ Vote	Closing date: 29/08/2024 (parts 2, 4, 5 and 6) 05/09/2024 (Parts 1, 3 and CEN/TS 18101)
Standard (number & title):	

[1] For the Enquiry, this Opinion is made in addition to the submission of any detailed technical comments.

OPINION:

☑ **Favourable**

☐ **Not favourable**

Comments in support of the Opinion:

ECOS welcomes the final versions of EN 17988 series 'Circular design of fishing gear and aquaculture equipment', in support of the Single-Use Plastic Directive (EU) 2019/904 (SUPD). We support their content that follows the Commission Implementing Decision on a standardisation request M/574. We believe EN 17988 series can effectively support the reduction of the impacts of fishing gear containing plastics on the environment, including for developing national extended producer responsibility schemes for fishing gear, in line with the SUPD, and especially welcome:

- The waste hierarchy and circular economy principles from a lifecycle perspective have underpinned their creation, with waste prevention, minimisation of the use of substances of concern, resource and material efficiency, separate collection, high-quality recycling, increased use of recycled materials, the hierarchy of decisions at different stages and much more featuring in each of the six standards.
- In Part 2, the requirements for the user manuals and labelling can enable traceability and proper management during their lifetime, and identification of materials at the end-of-use stage.
- In Part 3, the technical requirements and recommendations can help support gear durability and longevity, e.g. through adequate maintenance, reusability, repair, remanufacturing and refurbishing, end-of use, including through reusable and/or recyclable components and packaging.
- In Part 4: the environmental and circularity guidelines, recommendations and requirements provide useful design criteria for retaining the value of fishing gear and aquaculture equipment, and their parts, at their highest levels, while minimising their negative impacts on the environment.
- In Part 5, the guidelines and fundamental principles for the development of circular business models, including concrete examples, can help develop supportive measures to stimulate their development.
- In Part 6, the requirements and guidelines for digitalisation of information of components of fishing gear and aquaculture equipment are useful for information exchanges between the relevant stakeholders in the value chain.

The related technical specification FprCEN/TS 18101 on terms and definitions is aligned with the most recent EU legal developments, including the new EU Ecodesign for Sustainable Products Regulation.

As regards **substances of concern (SoCs)**, we appreciate that FprEN 17988-4 requires to "minimise the content and release of substances of concern (SoC); replace by less concerning alternatives where possible." But it still allows the use of SoCs when essential and only recommends the use of "REACH approved materials, coatings/finishes with low environmental impact where feasible", provided they pass ecotoxicity tests. The standardisation request M/574 recommended that "any materials or components within fishing gear should be in line with the REACH regulation and should not contain (e.g. through plating or coating), or have as a manufacturing requirement, hazardous chemicals that pose a significant risk to human health or to the environment." We thus call for **further research on alternatives to SoCs in fishing gear and aquaculture equipment, especially coatings and finishes** (e.g. alternatives to antifouling and anti-corrosion surface treatments containing e.g. copper/zinc), **and on their essential uses for a future update of EN 17988 series.**

Moreover, when establishing a digitalised labelling system to trace fishing gear or aquaculture equipment**, the list of components and relevant materials, including SOCs** (not only regulated SOCs), **shall be included in a DPP by default** (not as optional information) and communicated throughout the supply chain, especially for their end of use.

Finally, we regret that **the reduction in the use of finite virgin plastic resources** in fishing gear and aquaculture equipment has not been addressed in detail in the FprEN 17988 series (just the recycled content aspects are considered). We thus encourage **further research on virgin plastic use reduction for a future revision of the EN 17988 series**, especially when the use is not essential and negatively impacting marine life (such as ending bottom trawl fishing, alternative design options without dolly ropes, alternatives to polystyrene boxes).

Please provide the following information which will help respond to the Opinion.

Is your organization actively participating in the development of the standard?

☑ Yes

☐ No

If yes, name of the expert(s):

During the standard's development phase, did you make comments?

☑ Yes

☑ to the WG

☑ to the TC/SC

☐ No

Were these comments accepted by the technical body?

☐ Yes

☑ Partly

☐ No

Comment: ...

If your Opinion is "Not favourable", is it in line with these earlier comments to the technical body?

☐ Yes

☐ No

If "No", why?: ……

☐ N/A

Annex(es) included with this Opinion (give details): ...