

Eel Follow Up Assessment – Pêcheurie barrage d'Arzal (Arzal Dam Fishery)

Follow Up Assessment against:

Component 1: Generic Requirements

Component 2: Glass eel fisheries

Component 7: Traceability

Completed by

Mr Max Goulden & Mr David Elliott

09th December 2015

FINAL

1. Introduction

This document presents the report completed after the follow up audit carried out under the Sustainable Eel Standard (Version 5, 21st June 2013), and Sustainable Eel Methodology (Version 1, 21st June 2013) against the Pêcheurie barrage d'Arzal (Arzal Dam Fishery) for glass eel, hereafter referred to as the Arzal Glass Eel Fishery. This assessment has been completed against Components 1: Generic Requirements, Component 2: Glass eel fisheries and Component 7: Traceability of the Standard only.

The follow up assessment is of the Arzal Dam Fishery for glass eels (*Anguilla anguilla*). The fishery is operated by up to 60 separate vessels using circular nets (one on each side of the vessel) which are towed. The fishery is located on the Villaine River below the Arzal dam in a region referred to as BRE30.

The Unit of Certification (UoC) for this fishery has been previously determined as follows;

Geographical Location:	Villaine River (below the dam) in BRE 30
Fishing Method:	Trawl fishing from boat
Life Stage:	Glass Eels (Elvers) only.
Eligible Fishers:	The fishery currently consists of a total of 60 fishermen. The definitive list of eligible fishermen is maintained, per season, by the Committee Regional De Peche (and the most recent version is attached as an Annex to this report).

Only product originating from the UoC determined above is eligible to carry a claim against the Sustainable Eel Standard (providing a pass is awarded to the fishery).

2. The assessment

This report represents the findings from a **follow up audit** which was completed on the fishery on the 09th December 2012 by Mr Max Goulden (Lead Auditor) and Mr David Elliott (Translator). The audit assessed the changes that had been effected by the fishery since the previous audit and during the new seasons (commencing on the 1st December 2015). The visit consisted of a visit to the fishery on the evening/morning of the 08th and 09th December to witness the fishing and interview the fishermen and glass eel buyers. The auditors were taken fishing aboard the vessel 'Galipetant' (SN 667156). A follow up meeting was held with Mr Guillaume Le Priellec (the nominated representative of the fishery) on the morning of the 09th December 2015 to discuss the findings of the visit.

The **initial assessment** of the fishery was completed by Mr Max Goulden (Lead Auditor) and Mr Gwendal Le Fol (Trainee Auditor) of MacAlister Elliott and Partners Ltd, who visited the Arzal Fishery on the 12th and 13th of February 2015.

3. Client Contact Details

Client Contact Name	Guillaume Le Priellec
Client Address	Comite Regional Des Peches De Bretagne, 10 Quai De Houat, 56170, Quiberon, France
Client Email	glepriellec@bretagne-peches.org
Client Phone Number	02 97 50 07 90

4. Results of the assessment

Following the initial assessment of the fishery in February 2015 the following outcomes were determined.

The Arzal Glass Eel Fishery has passed Component 1: Commitment to Sustainability and legality

that the Arzal Glass Eel Fishery scored 2 **green scores** , 3 **amber scores** and 1 **red score** against Component 2 (Glass Eel Fisheries) and therefore **should not be considered sustainable under the SEG standard, Component 2: Glass Eel Fisheries.**

that the Arzal Glass Eel Fishery scored 4 **green scores** and 0 **amber scores** against Component 7 (Traceability) and therefore **should be considered sustainable under the SEG standard, Component 7: Traceability, providing the Condition of Certification noted below is completed by the client in the deadline specified.**

A summary of the reasons for the provision of a Red Score indicator for Component 2 (Glass Eel Fisheries) were also provided in the table below for clarity)

COMPONENT 2 – RED INDICATORS		
Criteria	Relevant Requirement	Reasoning for not meeting Requirement
Criteria 3 (Mortality)	<i>'i) fishing is at slow speed (no more than 1.5 knots relative to water)'</i>	Fishing currently occurs at a speed of 3 knots (estimated average) relative to water
Criteria 3 (Mortality)	<i>'v) vivier tank on board and in use'</i>	Around 50% of the current fishing vessels do not have a vivier tank onboard and in use

The assessment team noted during this initial assessment that the fishery could not pass the SEG standard due to the reasons specified above but that should evidence relating to the corrections of the red indicators given here be provided then it may be possible for the team to update the certification recommendation to the SEG Committee without requiring a further audit (provided this takes place before the start of the next eel fishing season). The assessment team would then review these changes at a Year 1 annual surveillance audit during the 2015/2016 season.

On the 13th November 2015, MEP received information from the fishery showing that a number of new regulations had been implemented for the current 2015/2016 season. These new regulations included the following (initial translation and wording)).

ARTICLE 7:

1. Longueur des navires : Seuls les navires inférieurs à 10 mètres hors tout sont autorisés à exercer la pêche sur l'estuaire de la Vilaine.

Length of the vessels: Only vessels under 10m are authorised to fish on the Vilaine estuary.

2. Achat de la pêche : L'achat de la pêche de civelles sur l'estuaire de la vilaine par les mareyeurs devra exclusivement s'effectuer sur la cale de la vieille roche en amont.

Purchase of catch: The purchase of the glass eel catch on the Vilaine estuary by the wholesalers will exclusively take place on the "vieille roche" slipway.

3. Maillage des tamis : Le maillage des tamis utilisés pour la pêche de la civelle est au maximum de 1,3 mm pour l'entonnoir et 1 mm pour la réserve à civelles.

Mesh size of sieve: The mesh size of the sieves used for glass eel fishing is a maximum of 1,3mm for the funnel and 1mm for the glass eel storage end (loose translation).

4. Stockage à bord d'un navire : Pour la pêche à la civelle, les pêcheurs utilisant un navire ont l'obligation d'avoir un vivier de stockage d'une contenance minimale de 80 litres d'eau avec un système d'oxygénation. Aucun dispositif ou contenant ne doit entraver la libre circulation des civelles à l'intérieur du vivier.

Storage onboard of a vessel: For glass eel fishing, fishermen using a vessel shall be equipped with a vivier tank of at least 80 litres water capacity and an oxygenation system. No mechanism or recipient shall block the free circulation of glass eels inside the vivier tank.

5. Vitesse de pêche : Pour la pêche à la civelle, la vitesse en action de pêche ne doit pas dépasser 3 nœuds (inférieur ou égale à un nœud par rapport à l'eau).

Fishing speed: For glass eel fishing, the active fishing speed must not exceed 3 knots (inferior or equal to one knot with relation to the water).

6. Durée du trait de pêche : Pour la pêche à la civelle, la durée moyenne du trait de pêche (ou l'intervalle entre la calée et la levée) ne doit pas être supérieure à 20 minutes.

Fishing set duration: For glass eel fishing, the average duration of the fishing set (or interval between the setting and retrieval) must not exceed 20 minutes.

ARTICLE 13:

Pour la civelle, les déclarations de captures doivent faire l'objet d'une déclaration sous 24 heures à FRANCE AGRIMER, conformément à l'arrêté ministériel du 8 octobre 2014. Pour les autres espèces, les captures sont soumises à l'obligation de déclarations statistiques qui doivent être effectuées tous les mois auprès des services des Délégation à la Mer et au Littoral dont dépend le navire, en tant que de besoin.

Les pêcheurs sont astreints à utiliser le système de télé déclaration : « TELECAPECHE » pour déclarer leur capture par SMS ou internet à l'issue de leur pêche.

For glass eel, catch declarations must be declared within 24 hours to FRANCE AGRIMER, in accordance with the ministerial order of 8 October 2014.

AND

Fishermen are obliged to use the declaration system "TELECAPECHE" to declare their catch by SMS or internet once fishing has ended

A copy of the complete legislative document (the '2015 078 - DELIBERATION « CMEA-CRPM-2015/2016-B » DU 06 NOVEMBRE 2015) is attached as an Annex to this document.

From this evidence it was clear that efforts had been made to bring the fishery into alignment with the Sustainable Eel Standard. It was considered prudent that a follow up audit be completed to determine the effectiveness and implementation of these requirements during the new season. This report presents these findings. For ease, the amendments to the rationale scoring have been added in red text to the original rationales presented during the February 2015 audit. As a result, the new results of the assessment of the Arzal fishery are as follows;

The Arzal Glass Eel Fishery has passed Component 1: Commitment to Sustainability and legality

that the Arzal Glass Eel Fishery scored 5 **green scores** and 4 **amber scores** against Component 2 (Glass Eel Fisheries) and therefore **should be considered sustainable under the SEG standard, Component 2: Glass Eel Fisheries (with a borderline pass).**

that the Arzal Glass Eel Fishery scored 4 **green scores** and 0 **amber scores** against Component 7 (Traceability) and therefore **should be considered sustainable under the SEG standard, Component 7: Traceability, providing the Condition of Certification noted below is completed by the client in the deadline specified.**

A number of conditions to certification are raised by the auditor and are considered mandatory to the maintenance of the certificate. ;

CONDITION 1 (By catch): A study is to be completed by an external company/individual to consider by-catch quantities across the fishery and relevant species, population status, endangered status etc.... This study should be completed within the four year life cycle of any certificate awarded (failure to complete is likely to result in a future red score being provided for this criteria). **The assessors note that this condition has already commenced with the collection of by-catch from a selection of fisheries and its analysis.**

CONDITION 2 (Fishing Mortality Rates): The fishery is required to complete an independent assessment of the quantity (weight) of eels being discarded (dead or alive) during the fishing process (prior to landing). This assessment should be completed yearly during the certificates 4 year period and should cover a random selection of vessels and fishing periods to determine a representative sample.

CONDITION 3 (Traceability): Examples of complete fiche documents (stating BRE 30: SEG Arzal) and fisherman's invoices (stating SEG Certified and showing the SEG certificate number shall be sent to the assessors within one month of certification being granted (and the fishery being 'in season')

5. Next Audit

At the completion of the audit the client was assessed against the risk assessment set out in the Methodology. This is set out in the table below.

Question	Performance of Client At Audit	Yes	No
1	Has the client been part of any external investigation which may be of concern to SEG AND/OR been suspended from any other certification standard?	Enhanced Surveillance	Go to Q2
2	Has the client received a borderline pass ¹ for a Component in its previous audit?	Enhanced Surveillance	Go to Q3
3	Does the client only buy and sell product (does not physically handle it?)	Minimum Surveillance	Go to Q4
4	All other scenarios	Standard Surveillance	Go to Q5

	Certification Audit	Year 1	Year 2	Year 3	Year 4 Recertification Audit
Minimum Surveillance	On-Site Audit	Remote Audit	Remote Audit	Remote Audit	On-Site Audit
Standard Surveillance	On-Site Audit	No Audit	On-Site Audit	No Audit	On-Site Audit
Enhanced Surveillance	On-Site Audit	On-Site Audit	On-Site Audit	On-Site Audit	On-Site Audit

¹ A borderline pass is considered a pass that occurs when one less amber indicator is received then would be required to fail (i.e. 5 Green indicators and 4 Orange indicators) or when a company is certified with equal number of orange and green indicators.

As the client has been seen to fall into the Enhanced Surveillance bracket, the next audit will be due around December 2016 (in 1 years' time) and shall be an on-site audit.

1. Component 1 - Commitment to Sustainability & Legality

1. Commitment to sustainability & legality (See Note 1)	
green score indicator	All trading and commercial relationships are aligned with SEG goals AND the organisation has declared to the assessor any historic conflicts of interest with regard to eel sustainability AND there is no evidence of illegal trading and/or of circumventing the EU Eel Regulation AND any evidence of illegality by commercial partners or other organisations is immediately reported to the appropriate authorities.
red score indicator	The organisation or a member of the organisation has been arrested on suspicion of illegal buying, holding, selling or trading of eels in the last 12 months, AND/OR for failure to declare eel fishing or trading activities appropriately to the authorities, AND/OR for other serious breaches of national or international eel regulations; AND/OR credible sources suggest that the organisation has been involved in serious breaches of national or international eel regulations in the last 12 months (the above applies to close business partners of the organisation, which members of the organisation must reasonably have known about, without the organisation informing the appropriate authorities); AND/OR the organisation is involved in activities which put in serious question their commitment to sustainability.
Discussion	<p>The Arzal Glass Eel Fishery has made significant changes to its practices in recent years. Previously it was considered to be one suffering from high mortality and unsustainable fishing practices (a 'quantity over quality' approach). This has changed significantly recently with reductions in fishing effort (the fishery used to be over 200 vessels and is now only 56), changes in trawl speed and new more sustainable gear. This change gives the assessors confidence that the fishery is attempting to improve is sustainability and provide higher quality fish (hence aligning with SEG goals).</p> <p>No evidence of illegal activity in the fishery was provided or obtained during the assessment. As discussed later in the assessment, the small compact nature of the fishery is likely to make illegal practices more difficult to complete.</p> <p>In summary, the assessors can see no reason (nor have been presented by any party) as to why Component 1 cannot be provided a Green score.</p>
Score	A green score indicator is provided here

2. Component 2: Glass Eel Fisheries

1. The management target (40% escapement or otherwise) is being achieved (See Note 2)	
Weighting: 2	
green score indicator	The Eel Management Plan is approved and there are good data which shows with reasonable confidence that the EU silver eel escapement target is being achieved in the eel management district.
amber score indicator	The Eel Management Plan is approved and there is evidence that it is being implemented.
red score indicator	The Eel Management Plan is not approved AND/OR there is little evidence of it being implemented AND/OR key parts of it are not being implemented AND/OR there is strong evidence of widespread non-compliance which is undermining implementation.
Discussion	<p>The French national Eel Management Plan was approved in 2010 by the European Commission.</p> <p>Last year, at the request of the European Commission, ICES completed a ‘REPORT FROM THE COMMISSION TO THE COUNCIL AND THE EUROPEAN PARLIAMENT on the outcome of the implementation of the Eel Management Plans, including an evaluation of the measures concerning restocking and of the evolution of market prices for eels less than 12 cm in length’. This report can be found at the following link http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52014DC0640&from=EN .</p> <p>This report considered the progress of the Eel Management plans across all member states. For France it looks at data from 2009 – 2012. This is analysed further in Annex 1. IT is clear that although the French management plan is a and remains approved it remains well behind target to allow it to meet the 40% Escapement target (when considering all areas of the plan together). That said it is also clear that significant progress has been made in certain areas such as the reduction in fishing effort.</p> <p>In summary an amber score is provided as some evidence of implementation is available but it remains some way behind its required level to meet the 40% escapement level.</p> <p>During the follow up audit further information was obtained in relation to the 40% escapement target, much anecdotal and expected to be updated soon by ICES.</p> <p>Further information has been provided by scientists working on the estuary (and district) and this is summarised below.</p> <p>It is clear that the fishing effort has been greatly reduced over the last decade. Furthermore, the Arzal now has a fish pass on it which has witnessed the highest migration levels ever seen in the past two years. The fishery has also completed some up river restocking. All of these allow an indication of</p>

	<p>escapement to be determined but data is still lacking on other areas such as the yellow eel fishery and its impacts. Furthermore, no recent data has been made public on this and or the regions ability to meet the escapement targets.</p> <p>Based on the evidence provided it does appear that the fishery (and Brittany) is certainly on target to achieving its escapement target. It cannot be stated with reasonable confidence though that it is meeting the EU silver eel escapement targets. On this basis the assessors must provide an orange indicator here and look forward to receiving further data and information in relation to the Eel Management Plan and the escapement targets.</p> <p>The assessment team also wish to mention that they feel strongly that the situation would greatly benefit with further engagement between the fishery and the scientific community and an up to date independent assessment on the estuaries estimated escapement figures.</p>
Score	An amber score is provided here.
2. The fishery is well-managed (See Note 3)	
Weighting: 2	
green score indicator	Fishers are licensed and provide logbook data AND data on catch and effort are collected and analysed regularly by the management agency (at least annually at the end of the season), AND data are made available to the management agency at any time if required AND data are considered to be accurate, useful for statistical purposes and provide a comprehensive picture of the glass eel fishery under assessment AND fishermen only use legal gear AND enforcement is in place throughout the fishing area with no evidence of systematic non-compliance.
amber score indicator	Fishers are licensed AND data on catch and effort are collected and analysed regularly by the management agency (at least annually at the end of the season) AND data are considered to be accurate and provide enough information on the glass eel fishery under assessment for management and to track annual trends in glass arrival AND fishermen only use legal gear AND there is no evidence of systematic non-compliance.
red score indicator	There is evidence of illegal fishing that may adversely affect the fishery AND/OR data are not collected on catch and effort AND/OR data are too inaccurate or partial to provide enough information for management AND/OR there is evidence of systematic non-compliance in the fishery (e.g. widespread use of illegal gear, misreporting of catches, failure to respect quotas, closed periods or other management regulations, or other).
Discussion	<p>The fishery consists of a total of 57 fishermen all of whom are licensed to fish within the BRE30 zone. Licences are agreed before any fishing season commences (meaning that no licences are granted during the fishing season itself). The assessors verified the list provided for the assessment with the vessels seen during the fishing observation and found all to correlate.</p> <p>Data is recorded using two methods in the fishery.</p> <p>The first is the traditional ‘carte de fiche’ or logbook. This is carried by all fishermen and a copy must be provided to the buyer and the authorities every 24</p>

	<p>hours for all catch landed. The fiche provides data on the quantity landed, who has caught it and the method used. It does not specific the exact location of the catch however (just that it is caught in the BRE district).</p> <p>A second more innovative system is also being used by the fishery. A system called Telecavicelle involves the fishermen providing by SMS, a catch quantity, whether it was for consumption or for restocking and the location of capture. This is then correlated within the system centrally by the CRPEM allowing them to monitor catch levels and remaining quota. This system was reviewed by the assessors during the audit and seemed to represent an excellent improvement on the purely paper based system.</p> <p>It appears that the data provided in the Arzal Glass Eel Fishery is of a relatively high standard (certainly compared to many other glass eel fisheries in France). The use of the Telacivelle system has been widely adopted and seems to show accurate real time data which can then be correlated against the Fiches records (once recorded by the authorities) and the data provided by the buyers. This system allows for accurate and realtime controls of the fisher quotas (both for consumption and restocking).</p> <p>Quotas are controlled centrally by Mr Guillaume Le Priellec. The initial quota is split between all of the licensed fishermen up to the 1st January. The remaining quota is then again divided among the active fishermen (to avoid unused quota remaining with fishermen who are not fishing). Quota levels after the 1st January appear to be controlled almost on a day by day basis by Guillaume Le Priellec to ensure its efficient use.</p> <p>The small and relatively compact nature of the fishery (just 56 vessels fishing in one specific area) makes it easier for the authorities to check and control any use of illegal gear. No reports have been forthcoming regards illegal activity in the fishery and the close proximity of all the fishermen make ‘<i>self-policing</i>’ much more likely.</p> <p>Recent amendments to regulations now stipulate that landings may only be made and sold at the quayside. This has further enhanced the ability of the fishery to be controlled and monitored by the authorities.</p>
Score	A green score indicator is provided here
3. Mortality during fishing is minimised (See Notes 4 & 5)	
Weighting: 2	
green score indicator	Fishing is by hand-held nets OR fishing from vessels meets the following criteria: i) fishing is at slow speed (anchored in current or speed of no more than 1 knot relative to water); ii) haul duration is on average no longer than 20 minutes, with the maximum duration not more than 30 minutes; (iii) mesh size of cod end no greater than 1mm (iv) rest of the net designed such that glass eels do not become trapped or abraded; v) vivier tank on board and in use; AND fishermen can demonstrate that the mortality rate of the catch over the duration of holding in the storage facility is <4% for each batch captured.
amber score indicator	Fishing from vessels meets the following criteria: i) fishing is at slow speed (no more than 1.5 knots relative to water); ii) maximum haul duration no longer than 30

	<p>minutes; iii) mesh size of cod end no greater than 1mm; iv) rest of the net designed such that glass eels do not become trapped or abraded; v) vivier tank on board and in use; AND fishermen can demonstrate that the mortality rate of the catch over the duration of holding in the storage facility is <8% for each batch captured.</p>
<p>red score indicator</p>	<p>The fishing technique does not meet the amber requirements, AND/OR mortality rate in the storage facility exceeded 8% for one or more batches in the last 12 months.</p>
<p>Discussion</p>	<p>The fishery is operated by boats only and uses two separate methods and net types. The nets do not differ greatly and consist of the following requirements.</p> <p>All nets have a maximum diameter of 1.2 metres at the entrance and cannot be more than 1 metre in length. The nets are conical shaped with a decreasing mesh size as you move towards the cod end. The only difference in the two net designs which are used on the river is the mesh size of the cod end which with one design is 0.9mm and with the other is 0.8mm. The below diagram shows the basic set up.</p> <div data-bbox="555 887 1342 1592" data-label="Diagram"> <p>The diagram shows a conical fishing net. On the left, a vertical double-headed arrow indicates the total length, which is 1 M 20. The top of the net is a wide opening with a diameter of 1200 mm, indicated by a circle with a diagonal slash and the number 1200. The bottom of the net is a narrow opening with a diameter of 400 mm, indicated by a circle with a diagonal slash and the number 400. The net is divided into two sections. The upper section is labeled '1300 gr' and the lower section is labeled '1000 gr'. To the right of the lower section, there is a circle with a diagonal slash and the text '300 <math>< \phi < 400</math>' and 'retrissement avec 4 pines.'</p> </div> <p>These nets represent a vast improvement on previous nets used in the fishery and all people consulted agree that they have led to a dramatic reduction in the mortality of eels during fishing.</p> <p>These nets are used by one of two methods;</p> <ol style="list-style-type: none"> 1. The first involves the nets simply being dragged slightly below the water surface on either side of the boat. With this method fishermen claim to raise the nets every 10 minutes to check for catches 2. The second method involves the use of a 5 metre wooden pole (average size

although no legal requirement) to which the nets are attached. These are then pushed down into the water column and tied to the side of the boat, allowing the fishing to occur at levels up to 8 metres below the surface. With this method it was widely agreed that the nets are held under the water for a longer duration (mainly due to the effort in retrieving and resetting the nets).

The speed that fishing is completed is hard to determine. During our observations fishing was seen to be occurring at around 3 knots and this appeared to be widely accepted as the 'rough speed' It is clear though that the 1.5 knot requirement is not met by the fishery.

Haul durations have been discussed already but again it appears difficult to get an accurate figure on this. Most fishermen report that the average duration for fishing with the surface method is around 10 minutes and the pole method around 20 minutes. Some fishermen claim that it is common for the pole method to sometimes lead to haul durations of 30 minutes. On average however, it appears likely that the 20 minute average and 30 minute maximum haul duration is being met.

As already described the mesh size for both net types is less than 1mm. The nets also appeared well made and suitable for the avoidance of abrasions on the glass eels (indeed during the observation of fishing the quality of the eel seen appeared good).

Around half of the fleet currently operate a vivier tank on board. The other half though does not and hence store the eels dry. The vivier tanks that are used tend to include a filtering system to sort the eels from any other by catch.

The standard also required mortality rates in the storage facility to be assessed and determined as less than 4% (green score) or 8% (orange score) to pass the standard. To do this the main buyer of eels from the fishery Jerome Garruchaga was contacted to provide mortality rate evidence. Jerome informed MEP that mortality rates of 8-10% were seen regularly during the 2013 and 2014 season but that these had reduced to 3 to 4% during the current season (with the introduction of new nets in the fishery). This has not been backed up by documented evidence of any sort which would be an important condition of any future certification.

In summary the following parts of this criteria are not currently met by the fishery;

1. Fishing is not conducted at a speed of less or equal to 1.5 knots (relative to the water) as required for an amber score.
2. Not all vessels within the fishery operate with a vivier tank. This is a requirement for an amber score.

These two factors result in a red score being provided.

Furthermore, a condition to certification will be the requirement for documented evidence on mortality rates to be provided during the first year of certification.

During the follow up assessment it is clear that a number of changes have been made to the fishery, following the change of regulations for the fishery in November 2015.

- 1. It is now a legal requirement that all fishing vessels have a vivier tank located on-board the vessel. This tank is required to be at least 80 litres water capacity and be supported by an oxygenation/aeration system. During the follow up audit this change was indeed witnessed and all vessels could be seen to have the tanks on board. Some appeared to be using them more frequently than others but all vessels witnessed did place the catch in the vivier tanks during the process of fishing. It is therefore considered that this previous issue has been addressed.**
- 2. It is now a legal requirement that all fishing vessels operating in the fishery may not operate at a fishing speed exceeding 3 knots (and/or inferior or equal to one knot with relation to the speed through the water). During the follow up audit it was indeed clear that the fishing speed being employed has diminished (even since the previous visit in February 2015) and that vessels are maintaining a ‘Speed through the water’ of 3 knots or less. What is a little unclear though is how or if this actually meets this requirement? Sometime vessels are moving against a tidal flow meaning that the 3 knot speed is required to maintain any forward movement at all (and meaning that the 1 knot speed is being met). When moving with the tidal movement though it is clear that this speed is being breached (the vessels don’t regulate the speed through the different changes). A further discussion on this is presented below.**
- 3. It is now a regulatory requirement that tows do not exceed 20 minutes in duration. In practice, the assessors noted that an average duration of around 10 minutes appears to be normal. It is never less reassuring to see this requirement being added in to the fishery regulations.**

In order to score this rationale the assessment team wish to consider the reasoning for the requirements stated in the Sustainable Eel Standard. The aim of this rationale is to reduce mortality to low levels and ensure the survival of as many glass eels during fishing as is possible. The Arzal was once seen as one of the worst performers in this respect and it is clear that huge strides have been made in this regard. The viviers also all reported during this follow up visit that the quality of the eels being received has dramatically improved with the implementation of the new regulations and now sits below the 4% for each batch required for a Green score indicator.

Indeed all the rationales for a Green score have now been met with the possible exception of the fishing speed. Here the regulations have been put in place to meet the 1 knot speed required for Green but the auditors are not 100% sure that this is being met at all times of fishing.

	<p>Considering all the above information and arguments the assessment team are willing to grant a Green score indicator here but with two mandatory conditions being placed on the fishery.</p> <ol style="list-style-type: none"> 1. That the mortality rates being experienced by the viviers are monitored throughout the season and should the figures begin to rise above the 4% required for a green score the certification body is notified immediately. 2. Currently the fishing mortality that is experienced directly during the fishing activity is not recorded (indeed this is the case for all vessel based eel fisheries with the standard placing a reliance on the viviers mortality figures only). The assessment team do not feel this is sufficient and that efforts need to be made to determine what the mortality loss is during the actual act of fishing (i.e. how many glass eels are being discarded and not even presented to the viviers for sale). During the assessors fishing trips this quantity appears to be relatively low but is however not recorded. To do this the assessment team require the fishery to complete an independent assessment of the quantity (weight) of eels being discarded (dead or alive) during the fishing activity. This assessment should be completed yearly during the certificates 4 year period and should cover a random selection of vessels and fishing periods to determine a representative sample. <p>The assessment, based on the above argument and conditions recommend the provision of a green indicator here.</p>
Score	A green score indicator is provided here.
4. The fishery has negligible impacts on by catch species (See Note 8)	
Weighting: 1	
green score indicator	The fishery has a negligible impact on by-catch AND by-catch is returned to the water alive as gently and rapidly as possible.
amber score indicator	The fishery has low-level impacts on by-catch AND by-catch is returned to the water alive as gently and rapidly as possible.
red score indicator	The fishery has a severe impact on by-catch AND/OR by-catch is discarded dead
Discussion	<p>During the observation of fishing activities the assessors witnessed low levels of by catch. Indeed during a total haul duration of 30 minutes the only by-catch observed was a single fish (unidentifiable) and some jellyfish (although it must be noted that only the surface fishing method was observed). It did appear that by-catch levels were indeed negligible.</p> <p>That said, no data on by catch within the fishery is available and it was clear that the one juvenile fish caught was returned to the sea dead (despite the low haul duration time). Note 8 of this standard requires that the auditor see;</p> <ol style="list-style-type: none"> 1. A breakdown of the main species represented in the by-catch 2. Evaluation of the quantity of each species caught 3. Population status of these species in the area

	<p>4. Protocols and methods for dealing with by-catch (as required) and catch survival rates</p> <p>The fishermen provided general agreement that by-catch is low and consists mainly of juvenile fish species and jellyfish. A definitive list of by catch is not available though. The quantities across the whole fishery are not known and since the species are not identifiable it is hard to provide a population status report. Methods for dealing with by catch are simply ‘to put them back in the water’ although it is unclear what else they could do here. Also based on our observations fish by catch tends to be dead on return to the water.</p> <p>Based on the discussion above the assessors have awarded an amber score here. It appears that the by-catch in the fishery is negligible but without clear data or evidence to support this, a green score is not felt to be merited. A condition has also been made for a study to be completed by an external company/individual to consider by-catch quantities across the fishery and relevant species population status etc.... This study should be completed within the four year life cycle of any certificate awarded (failure to complete is likely to result in a future red score being provided for this criteria).</p> <p>It is noted that this study on by-catch has commenced during the 2015/2016 fishing season.</p>																		
Score	An orange score indicator is provided here																		
5. The fishery has negligible impacts on rare or other protected species																			
Weighting: 1																			
green score indicator	The fishery has no direct interactions resulting in mortality or injuries with other species that are considered vulnerable, threatened, endangered or are protected under national or international law.																		
amber score indicator	Interactions, resulting in mortality or injury, with other species that are considered vulnerable, threatened, endangered, or are protected under national or international law, are rare and have no overall measurable impact on the population.																		
red score indicator	The fishery has interactions resulting in mortality or injuries, with species that are considered vulnerable, threatened, endangered or are protected under national or international law, which may have an impact at the population level.																		
Discussion	<p>As discussed during the previous criteria fishing by-catch appears very low but no specific data on what is caught is available to the assessors.</p> <p>To discuss these criteria in more detail it is important for us to consider first what the potential vulnerable, threatened, endangered species are within the geographical location of the fishery. Having reviewed species listed in Annex II of the 92/43/EEC directive of the Council for the Villaine Estuary specifically, the following key species are identified.</p> <table border="1" data-bbox="424 1861 1485 1995"> <thead> <tr> <th>Name</th> <th>Status</th> <th>Population</th> <th>Conservation</th> <th>Isolation</th> <th>Overall</th> </tr> </thead> <tbody> <tr> <td><i>Alosa alosa</i></td> <td>Concentration</td> <td>2%\geqp>0%</td> <td>Average</td> <td>Non-isolée</td> <td>Moyenne</td> </tr> <tr> <td><i>Alosa fallax</i></td> <td>Concentration</td> <td>2%\geqp>0%</td> <td>Average</td> <td>Non-isolée</td> <td>Moyenne</td> </tr> </tbody> </table>	Name	Status	Population	Conservation	Isolation	Overall	<i>Alosa alosa</i>	Concentration	2% \geq p>0%	Average	Non-isolée	Moyenne	<i>Alosa fallax</i>	Concentration	2% \geq p>0%	Average	Non-isolée	Moyenne
Name	Status	Population	Conservation	Isolation	Overall														
<i>Alosa alosa</i>	Concentration	2% \geq p>0%	Average	Non-isolée	Moyenne														
<i>Alosa fallax</i>	Concentration	2% \geq p>0%	Average	Non-isolée	Moyenne														

	<i>Lampetra planeri</i>	Résidence	2% \geq p>0%	Average	Non-isolée	Moyenne
	<i>Petromyzon marinus</i>	Concentration	2% \geq p>0%	Average	Non-isolée	Moyenne
	<i>Salmo salar</i>	Concentration	2% \geq p>0%	Average	Non-isolée	Moyenne
	<p>IT is clear that none of these species are currently listed on the IUCN Red List as Vulnerable or Endangered and so it appears unlikely that any rare or protected species are directly affected by the fishery.</p> <p>In summary, a green score is provided here for the fishery but a recommendation is also made that the study referred to the previous by-catch criteria considers directly if any of the species being caught are indeed rare or protected.</p> <p>It is noted that this study on by-catch has commenced during the 2015/2016 fishing season.</p>					
Score	A green score indicator is provided here					
6. The fishery has negligible impacts on habitats						
Weighting: 1						
green score indicator	The fishing gear does not cause any damage to the bottom.					
amber score indicator	Damage to the bottom by gear is limited or minimal.					
red score indicator	Damage to the bottom by gear is frequent or widespread.					
Discussion	<p>During the assessors observations it was clear that the surface fishing method employed has no interaction with the bottom whatsoever (it is simply not possible for the gear to reach the bottom).</p> <p>For the pole method it is apparently very uncommon for the gear to touch the bottom and certainly best avoided by the fishermen as it can cause damage to the fragile nets very easily.</p> <p>In conclusion it appears very unlikely that the fishing gear and methods described here causes more than limited or minimal damage to the bottom. It cannot be concluded though that none occurs through the pole fishing method and so an orange score is provided.</p>					
Score	An orange score indicator is provided here					

3. Component 7 - Traceability

This section is valid for any client taking ownership of SEG certified product and who wishes to sell it as such.

1. - Incoming Product (See Note 20)	
green score indicator	The organisation/fishery operates a system which allows incoming eel products to be traced back to a certified source.
red score indicator	The organisation/fishery is unable to demonstrate that product can be traced back to a certified source.
Discussion	<p>The provision of a list of approved fishermen for the fishery allows all buyers of SEG eel from the Arzal to confirm that the fishermen is covered by the certificate.</p> <p>The only risk that therefore exists is that the fishermen may fish for eel in other areas (as there license does allow) and bring it back to the Arzal for onward sale as SEG certified. To mitigate this risk it has been agreed that fishermen will include the specific wording ‘BRE 30 – SEG Arzal’ on the Fiche documents. This ensures that the fishermen are confirming the exact location of the fishing activity.</p> <p>A condition of certification has been raised here that asks for a copy of three separate fiche documents (from separate fishermen) be sent to the assessors within one month of certification being granted).</p>
Score	A green score indicator is provided here.
2. – Separation and Segregation of Product (See Note 21)	
green score indicator	The organisation operates a system which ensures that the product remains separated at all stages from arrival to dispatch from non-certified eel products AND the organisation ensures that any products wishing to make a claim as certified do not contain any non-certified eel-based ingredients.
red score indicator	The organisation has no system in place to ensure that certified and non-certified product remains separate at all stages OR non-certified and certified products have become mixed OR certified products (or products wishing to be certified) contain or could contain non-certified eel-based ingredients
Discussion	Since the whole fishery is being put forward for certification the need for separation and segregation is not required. Only product caught and landed at the Arzal dam will be eligible for certification but these are also the only eels that will be on board during a fishing trip.
Score	A green score indicator is provided here.
3. – Outgoing Product (See Note 22)	
green score indicator	<p>The organisation only labels certified products with the ‘SES’ ecolabel once it has been approved to do so through the signing of an ‘SES’ ecolabel licence agreement.</p> <p>All product to be sold as certified by an organisation meets the following criteria:</p> <ul style="list-style-type: none"> Any product labelling shall be accompanied by the ‘SES’ logo.

	<ul style="list-style-type: none"> • Products shall be accompanied by an invoice which: <ul style="list-style-type: none"> ▪ Includes the prefix ‘SES’ in the product description; ▪ Includes a record of the volume/quantity of product and to whom it was sold; ▪ Includes the certificate code on the invoice • The certificate code must be clearly related to the certified product only
amber score indicator	<p>The above requirements are met except that:</p> <ul style="list-style-type: none"> ▪ Products have not been correctly labelled through the invoice
red indicator	<p>Products or product invoices have been labelled as SES with the words SES or the SES Eco label despite not being completely derived from a certified source.</p>
Discussion	<p>Currently no product is being sold as SES by the fishery and so a green score is automatically provided here.</p> <p>A condition of certification though is provided which requires that all fishermen include on their outgoing invoices that product is ‘SES Certified’ along with the certificate number of the fishery (To be provided). Examples of this should be sent to the assessors within one of certification being granted</p>
Score	A green score indicator is provided here.
4. – Record keeping and documentation (See Note 23)	
green score indicator	<ul style="list-style-type: none"> ▪ The organisation operates a system that allows the tracking and tracing of all eel from purchase to sale and including any steps in between. In the case of live eels this should include the ability to track each eel in each batch delivered to a buyer to be connected back to a water, a time period (maximum duration one month) and specific fisherman/vessel. ▪ The organisation operates a system that also allows for the completion of a batch reconciliation of eel product by weight over a given period. ▪ The organisation maintains records for a minimum of three (3) years.
orange score indicator	<p>The above requirements are met except that records have been maintained for less than three (3) years</p>
red score indicator	<p>The organisation’s tracking and tracing system shows evidence that certified and non-certified product have become mixed AND/OR batch reconciliation records are unable to confirm that outgoing quantities are in line with incoming quantities.</p>
Discussion	<p>All product that is caught in the fishery can be traced back to a specific</p>

	<p>fishermen and a date of capture using both the paper and electronic systems.</p> <p>The fishery is able to show the total quantity of product that is caught over any given period and across an selected fishermen (or group of fishermen), This allows the incoming batch to be calculated. The quantity going out is not recorded by the fishery as it is seen to be same as that landed (i.e. it is caught and then sold). It is considered sensible that for future audits the viviers are asked to provide total incoming quantities for the fishery over a set period. This can then be compared to the catch records of the fishery to ensure that less (or the same (although unlikely) is being bought from the fishery then is being caught.</p> <p>Fishing records are currently maintained by CRPEM for a period exceeding three years.</p>
Score	A green score indicator is provided here.

ANNEX A: EEL MANAGEMENT PLAN SUMMARY TABLE

Measures in French EMP	Implementation Update:
Reduction In Fishing Effort	
Glass Eel Quotas	<p>Glass Eel Quotas have been put in place by the French authorities. These are provided to the individual districts with a 40/60 split between consumption and restocking.</p> <p>On the Arzal, the individual Fishermen are provided a quota for the period up to the 31st January. This quota represents the split between the total available and the number of fishermen that are licensed, After the 31st, the remaining quota is re-assigned to the active fishermen.</p> <p>AS the consumption quota approaches its limit the fishermen are individually informed (often on a daily basis) as to how much remains for them to catch.</p> <p>The quota system appears to be well implemented on the Arzal.</p>
Silver Eel Ban	<p>On the Atlantic seaboard, it is forbidden on the maritime side to fish for silver eel. It is authorised for professional fishermen on the fluvial side (not recreational), in certain areas, for certain periods and only with authorisation</p> <p>On the Mediterranean seaboard, silver eel fishing is completely forbidden for fluvial but authorised for professionals only (not recreational) subject to a specific season and authorisation</p>
Reduction in Fishing Effort	<p>France has seen quite a dramatic reduction in fishing effort for Glass eels since the introduction of the Eel Management Plan.</p> <p>The Arzal fishery itself has also seen this dramatic fall with licences now sitting at a total of 57 (a reduction of around 25% on last year)</p>
Increased Management and Controls	<p>It does appear that France has increased its management and control of the Glass eel fishery in recent years.</p> <p>Prosecutions are becoming more common and the presence of authorities at the fishing grounds (including the Arzal specifically) is a regular occurrence. A number of concerns do still exist though;</p> <ol style="list-style-type: none"> 1. It appears likely that a significant level of illegal fishing occurs in France (although it must be pointed out that evidence is often anecdotal in nature). The assessors believe this to be true but would also acknowledge that the French authorities are attempting to improve the controls and prosecution of illegal behaviour. 2. The current paper based landing system is incredibly onerous with regards to the collation of data. This often leads to significant delays between the submitting of paperwork and the detection of a problem. Paper based records also lead to large numbers of misread/illegible quantities being received which can cause further problems when total catch quantities are being considered. <p>The Arzal fishery itself certainly appears to be better managed and regulated</p>

	<p>than a number of other glass eel fisheries in France (helped in part by the isolated nature of the fishing). The electronic catch reporting system can only be seen as positive and represents the future.</p> <p>In summary, management and control in France does appear to be improving but still requires further improvement to reach the level when it is significantly contributing to the 40% escapement target.</p>
Barriers	
By-passing of 1500 barriers by 2015	<p>It is clear that this target remains a long way off for France as a whole.</p> <p>The Arzal dam does now have a specific eel bypass barrier</p>
Restocking	
Restocking levels met	<p>The French restocking levels do not appear to of been met. The EU Eel Management Plan requires France (and all other member states who allow glass eel fishing) to provide 60% of the capture to restocking projects within the EU.</p> <p>Currently in France, it is clear that some restocking is being completed but that the levels of this are not anywhere near the 60% required. Current estimates (as stated in the ICES report) have put the levels at around 20% (for 2014).</p> <p>Reasons often provided for this include a lack of demand and reduced prices.</p>
Water Quality	
Work relating to improved water quality	Little information provided
Control	
Controls on ecological impacts of construction	Little information provided
Control of illegal fishing	Prosecutions have increased recently although to what level illegal fishing continues is open to debate. The assessors believe the situations is improving but further work is still required.
Respect of rules by fishermen	As mentioned earlier, the Arzal does appear to be well managed and fishermen that were seen by the assessors were seen to be in line with the rules of the fishery.
Reduction in illegal trade in glass eels	Anecdotal evidence still suggests a large illegal trade in eels persists in France.

	In line with required measures to meet the 40% escapement target
	Some progress has been made but not in line with required measures to meet the 40% escapement target
	No progress at all

ANNEX B: LICENSED VESSEL LIST

	N° LIC	Nom demandeur	Prénom demandeur	N° marin	Navire	Qam	N° navire
1	BZH 001	ANSQUER	YVES	91-2023	LE STEF	VA	882297
2	BZH 002	AUFFRET	JEAN MICHEL	77-3217	OCEANIA	AY	633259
3	BZH 005	BIZEUL	YVAN	86-2876	BASTHOSO	AY	930707
4	BZH 095	BOUGRO	BRUNO	79-1726	GALIPETANT	SN	667156
5	BZH 010	BOULANGER	FREDERIC	91-2016	APHRODITE	VA	711071
6	BZH 011	BOURSE	MICKAEL	91-1843	LA GAVRAISE	VA	614764
7	BZH 012	BOURSE	YOHANN	94-1791	VALINKA	VA	429732
8	BZH 014	CALLEJON	SANDRINE	98-1621	NAUTILUS	AY	894101
9	BZH 016	COCAUD	VINCENT	04-6356	IZEA	VA	539,813
10	BZH 017	COMES	FLORENT	91-2008	PETIT BRETON	AY	721300
11	BZH 018	CORLAY	MICKAEL	92-1961	LE TALIE	VA	465014
12	BZH 097	COUBARD	MAUD	06-6280	ORIGIN	VA	925295
13	BZH 019	CRENEGUY	DENIS	85-2869	CHAUMIERE DE LA MER	VA	280046
14	BZH 020	DAVID	RICHARD	95-1367	SAY MAGIK	AY	775410
15	BZH 021	DENIGOT	GUILLAUME	99-1668	EMMA LOAN	VA	510764
16	BZH 023	FAUCHE	DENIS	85-2639	HALIOS	VA	510764
17	BZH 026	GONZALEZ	FREDERIC	96-1543	SPEEDY	VA	514571
18	BZH 034	JOSSE	PHILIPPE	91-2020	L'ABALONE	VA	893429
19	BZH 035	JOSSO	CEDRIC	04-6097	LE LABORIEUX 4	AY	201062
20	BZH 036	JULIA MAGNEN	THIERRY	91-4794	ARCHIMEDE	VA	894064
21	BZH 039	LE BOULAIRE	JEAN FRANCOIS	91-1955	VERYGOUTTE	VA	707670
22	BZH 040	LE BOULAIRE	NICOLAS KARL	91-1954	GALAK II	AY	643205
23	BZH 041	LE BRAS	PASCAL	83-2856	BELLEVUE	VA	911672
24	BZH 098	LE CHANTOUX	FRANCK	91-1993	KYLJOH	AY	639135
25	BZH 044	LE FRANC	SERGE	91-1980	CASSIOPEE	VA	911746
26	BZH 048	LE GROS	ERIC	91-1956	L'ELAN	AY	846241
27	BZH 049	LE JOUBIOUX	CYRILLE	92-1799	LA LAMBADA	VA	760022
28	BZH 052	LE MOUROUX	JEROME	98-1614	JENNIFER	AY	924730
29	BZH 053	LE NIVET	MORGAN	96-1486	TAMATA ROA	AY	846866
30	BZH 054	LE PORT	PATRICE	87-2796	CHAL HA DICHAL	AY	460683
31	BZH 055	LE RAY	CHRISTIAN	81-2843	ALEA JACTA EST	VA	590003
32	BZH 056	LE ROY	FRANCOIS GILLES	97-1638	PHILEO	VA	900138
33	BZH 061	MALCOSTE	JOHANN	97-1554	CYBELE	AY	521844
34	BZH 062	MARTIN	ANDRE	79-3238	ETOILE DES MERS	VA	285098
35	BZH 063	MENAGER	MICKAEL	97-1699	OISEAU DES MERS	VA	731854
36	BZH 064	MENGUAL	FREDERIC	84-2883	NARVAL	AY	846740
37	BZH 066	MOBE	PIERRICK	92-1895	FANNY	AY	924721
38	BZH 067	MODICOM	JEAN FRANCOIS	06-6199	LE WIKING	AY	882561
39	BZH 068	MONTFORT	YANN	87-2678	ANEMONE DE MER	VA	688456
40	BZH 069	MORIN	JEAN FRANCOIS	95-1565	PIED NOIR	VA	307306
41	BZH 071	NICOLAS	PIERRIG	92-1803	BREIZH ATAO	AY	329710
42	BZH 102	NOBLANC	MANUEL	05-6041	LA RELEVE	AY	683172
43	BZH 072	NOEL	JONATHAN	03-5987	ETNA	VA	690794
44	BZH 073	PASCO	PHILIPPE	82-3076	TAMARIS	VA	429630
45	BZH 074	PELLETANT	STEPHANE	98-1762	MISTRAL	VA	228329
46	BZH 100	PERRAIS	CYRILLE	90-1989	LA BELLE BRISE	SN	274450
47	BZH 075	PERRODO	MICKAEL	88-1933	CLIPERTON	VA	678975
48	BZH 077	PHILIPPE	FRANCK	99-1776	MILA	VA	755387
49	BZH 078	PLUMER	GILLES	86-2660	ANTOINE	VA	688455
50	BZH 079	PORCHER	JAMES	82-3060	CAP EAU VENT	VA	926063
51	BZH 081	QUELLEC	YVAN	79-2941	LE FURNEZ 2	AY	928815
52	BZH 082	RICHEUX	PASCAL	82-3086	JOSY	VA	329179
53	BZH 101	RIO	ALEXANDRE	05-6222	ATLANTIDE	AY	929557
54	BZH 083	RIO	DAVID	00-5710	AZUR	VA	313370
55	BZH 085	RIVAL	JEROME	04-6419	BREIZ MA BRO	VA	307232
56	BZH 087	SOULLARD	JEAN MARC	91-1977	MACABI 1	AY	846739
57	BZH 088	SOURON	PASCAL	88-2202	LA BOHEME	AY	289226
58	BZH 089	SURZUR	FRANCK	85-2873	MA BRUNETTE	VA	173595
59	BZH 090	TRAVERS	AURELE	86-2666	LAURINOUC	AY	460501
60	BZH 091	TRIBALLIER	FREDERIC	94-2035	MA ROMANCE	VA	307049