

## **Eel Recertification – Dilvis / Gebr. Dil Import-Export BV (SES-C-003)**

### **Assessment against:**

Component 1: Generic Requirements  
Component 7: Traceability

**Completed by**  
Richard C Wailes

7<sup>th</sup> May 2015

**FINAL**

### **1. Introduction**

This document presents the report completed following the recertification audit carried out under the Sustainable Eel Standard (Version 5, 21<sup>st</sup> June 2013), and Sustainable Eel Methodology (Version 1, 21<sup>st</sup> June 2013) against Dilvis / Gebr. Dil Import-Export BV (henceforth Dilvis). This assessment has been completed against **Components 1 and 7** of the Standard only.

The assessment of Dilvis who are well established eel and fish smokers and traders supplying a large part of the Dutch Eel industry. Founded in 1884 and it is a family business (now fifth generation) with 10 employees in total. The emphasis is on sustainability with the website displaying this both on the e commerce shop and the main site.

Supplies are eels are sourced from mainly sustainable sources and Dilvis hope that the Lough Neagh Northern Irish Fishery can be certified soon to enable nearly everything to be sold as sustainable.

The operation is comprised of a Traditional Smoker, fifteen live eel holding tanks, processing and storage (chill and frozen) rooms and delivery business employing 10 staff in total. Eels are killed humanely in a stunning machine, gutted and cleaned, brined, smoked, chilled and either packed whole or in fillet form in vacuum packed pouches with SES marked labels for the Dutch and European markets (deliveries to Japan have stopped until the ICES status has been changed)

Approximately 250 tonnes in total are handled each year with sustainable eels from two suppliers - Aquacultuur Groesbeek and Scandinavian Silver Eels (SSE) – more than 60% in the last year were from certified sources though at present only the SSE supplies are sold as certified.

## 2. The assessment

The assessor was Richard Wailes of MacAlister Elliott and Partners Ltd, who visited Dilvis on the 7th May 2015.

The visit, which included a detailed site inspection, was undertaken led by Koen Dil (Managing Director – Dilvis), Hein Dil (Chairman) and Tim Eriks (Manager) during which all on-site procedures were explained and demonstrated in full.

The tour incorporated all areas of the site including goods intake, eel storage tanks, cold & chill stores, processing area, smoking area, packaging, labelling, invoice and data systems.

The path of the product from the start to finish of the client's Chain of Custody was traced, enabling the assessor to track two batches of sustainable product and be satisfied that the chain is secure throughout.

## 3. Client Contact Details

<b>Client Contact Name</b>	Koen Dil
<b>Client Address</b>	Kerklaan 40, 1921 BL, Akersloot, Holland
<b>Client Email</b>	koendil@dilvis.com
<b>Client Phone Number</b>	0031 251 312306

## 4. Results of the assessment

The outcome of this assessment is as follows;

Dilvis has passed **Component 1: Commitment to Sustainability and legality**

Dilvis scored **3 green scores** and **1 amber score** against **Component 7** and therefore **should be considered sustainable under the SEG standard, Component 7: Traceability**.

No recommendations were raised by the auditor as the Standard was fully understood and the traceability systems excellent.

## 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 <sup>1</sup> 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

As the client has been seen to fall into the Standard Surveillance bracket, the next audit will be due in May 2017 (in 2 years' time) and shall be an on-site audit.

The tables below give the Standard and a rationale for the score given. The score is highlighted in the appropriate colour.

## Component 1 - Commitment to Sustainability & Legality

1. Commitment to sustainability & legality <a href="#">(See Note 1)</a>	
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

<sup>1</sup> A borderline pass is considered a pass that occurs when one less amber indicator is received than 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.

	the appropriate authorities); AND/OR the organisation is involved in activities which put in serious question their commitment to sustainability.
Discussion	Gebr. Dil Import-Export BV is fully committed to sustainability of all the eels they smoke and these are aligned to the SES goals and their website has been updated to reflect this. There is no evidence of any illegal trading in eels.
Score	A Green score is fully justified

## Component 7 - Traceability

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

<b>1. - Incoming Product</b> ( <a href="#">See Note 20</a> )	
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	Each batch is fully identified from purchasing, intake, stunning, processing, smoking, packing and delivery. This is demonstrated through documentation from the suppliers showing that the eels are SES/SEG approved. Copies of the supplier certificates are held
Score	A Green score is fully justified
<b>2. – Separation and Segregation of Product</b> ( <a href="#">See Note 21</a> )	
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	When eels arrive they are held in separate tanks (15 in total) and are marked on a board accordingly. Non certified supplies and wild eels are also held and these are labelled “wild” etc so there is no chance of mixing. After been held in tanks they are taken out on a batch by batch basis, stunned, killed, de slimed and processed with the details of each batch being shown at every stage
Score	A Green score is fully justified
<b>3. – Outgoing Product</b> ( <a href="#">See Note 22</a> )	
green score indicator	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. All product to be sold as certified by an organisation meets the following criteria: <ul style="list-style-type: none"> <li>Any product labelling shall be accompanied by the ‘SES’ logo.</li> </ul>

	<ul style="list-style-type: none"> <li>• Products shall be accompanied by an invoice which: <ul style="list-style-type: none"> <li>▪ Includes the prefix 'SES' in the product description;</li> <li>▪ Includes a record of the volume/quantity of product and to whom it was sold;</li> <li>▪ Includes the certificate code on the invoice</li> </ul> </li> <li>• The certificate code must be clearly related to the certified product only</li> </ul>
amber score indicator	The above requirements are met except that: <ul style="list-style-type: none"> <li>▪ Products have not been correctly labelled through the invoice</li> </ul>
red indicator	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.
Discussion	An Eco label licence has not yet been applied for but the labels are marked correctly with the SES details shown on the labels and documentation out. This is matched to the batch number and production and expiry dates. The invoices show the correct information and copies were taken
Score	An Amber score is awarded as the full SES logo is not yet being used
<b>4. – Record keeping and documentation</b> ( <a href="#">See Note 23</a> )	
green score indicator	<ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ The organisation operates a system that also allows for the completion of a batch reconciliation of eel product by weight over a given period.</li> <li>▪ The organisation maintains records for a minimum of three (3) years.</li> </ul>
Amber score indicator	The above requirements are met except that records have been maintained for less than three (3) years
red score indicator	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.
Discussion	A full traceability system was demonstrated to the Auditor with batch codes, production codes and dates all linking in. Copies were taken of documentation which also showed the Mass Balance with inputs being linked to outputs and yields shown (normally around 48%). The input documentation could then be traced back to the supplier (SSE) and their batch documentation which in turn went back to the Glass eel supplier. All records are kept for three years plus
Score	A Green score is fully justified