

Updated: 21 January 2018

Name & Organisation	SEG Standard para ref	Comment/issue	SEG Response
Tony Norman The Lugg and Arrow Fisheries Association tony@theleen.co.uk		The SEG have finally recognised that the European Eel is classified by the IUCN as CRITICALLY ENDANGERED. As such we continue to believe that all exploitation of the species should cease. The licensing system merely enables the illegal trade to exist. Instead we believe that resources should be put to improving access, habitat, water quality and policing of hydro power and illegal trading.	
Ian Mculloch The Golden Valley Fish and Wildlife Soc. Goldenvalleyfishandwildlife@hotmail.co.uk		We are totally opposed to any Europe-wide standard for eel exploitation that allows the capture and export of the European Eel (<i>Anguilla anguilla</i>) at its juvenile stage. The catch-and-export trade is, we believe, largely responsible for the near-total collapse in our eel stocks. Any "sustainable" standard, while this is allowed to continue, is none other than meaningless window-dressing at best, and facilitating extinction at worst."	
Nick Longman Monnow Rivers Association mrnick922@gmail.com		There should be a total ban on ALL fishing for or use of eels in the UK (except possibly for limited translocation within the country for conservation purposes)	
Dr Fatima Wariaghi Faculté des Sciences Rabat, Université Mohammed V Agdal, Morocco Wariaghi_fatima@yahoo.fr	Composant1/ Conditions générales	Les autorités des pays doivent signer cet état d'engagement et appliquer une nouvelle loi et la mettre en vigueur pour sanctionner toutes les compagnies qui pratiquant la pêche illegale des civelles et qui ne respectent pas la tranche importante de l'engagement qui est la pratique du repeuplement. The authorities of the countries must sign this state of commitment and apply a new law and put it into force to sanction all the companies that practice the illegal fishing of glass eels and which do not respect the important part of the commitment which is the practice of the restocking.	
	Composant2/ Pêcherie de civelles	La pêche des civelles doit être limitée voir interdite dans la zone de PGA, il faut réglementer seulement la pêche des anguilles argentées et jaunes. Fishing glass eels should be limited or prohibited in the PGA area, only the fishing of silver and yellow eels should be regulated.	
	Composant5/ Repeuplement	Le repeuplement doit être exigeable surtout, dans les zones à barrage entravant la migration de l'anguille. The repopulation must be required especially in the dam zones hindering the migration of the eel.	
Jérémie Souben CNPMEM/ CONAPPED jsouben@comite-peches.fr	General comment 1 + p2	It is good to have a final translation in French by a professional. It could be indicate that the English and French versions are equally important and both are official version.	

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	General comment 2	As evoked by the SEG, the escapement target (40% of the pristine biomass) is difficult to assess and other objectives may be more appropriate. The habitats of the eel are so degraded that the 40% target seems illusory as long as the non-fishing mortality factors are not reduced. This approach must take into account the means implemented and envisaged by the RCE 1100/2007 to achieve the final exhaust objective and not only the escapement target. In this approach, it is possible to quote the reduction of the commercial fishery foreseen by the RCE 1100/2007. The French fisheries has achieved its objective and has significantly reduced its fleet to reduce its fishing effort by more than 60%. A criterion on the reduction of national commercial activity since 2007 must be included in the standards.	
	General comment 3	In this version of the standards it is implied, for some criteria, that the prerequisites are the use of the legal framework. This approach calls for not stigmatizing non-certified stakeholder as poachers. Certification for all fisheries must remain voluntary.	
	General comment 4	Overall, to justify sustainability, the social and economic pillars must not be neglected.	
	General comment 5	For glass eels fishing, the objective is not to increase the overall market but (i) to increase the market share of certified eels and (ii) to reduce the market share of non-certified eels. This objective of reducing the "uncertified" market raises the question for the French representatives and the place of professionals without certification. Certification is voluntary	
	General comment 6	For the yellow eel and silver eel fisheries, the SEG considers that individuals are part of the reproductive potential and that fishing can be sustainable only when the escape objective is reached. Some of fisheries need to fish yellow/silver eels to maintain livelihoods.	
	General comment 7	Given the cost of certification and the commitments made by those involved in the sector, it is difficult to see to whom the components of the standards "restocking" and "contribution to a healthy aquatic environment" are intended.	
	General comment 8	Examples to justify sustainability are based on Parrett and Arzal. Particular attention must be paid to the fact that the most degraded estuaries will be classified as sustainable fisheries. We should not have a message in favor of environmental degradation. With current definition, some fishermen in a healthy open estuary could not have a sustainable fishery...	
	General comment 9	On restocking, the criteria chosen for certification are the definition of restocking in RCE 1100/2007 The French stakeholders does not conceive of any other approach for restocking than that described by the EU n ° 1100/2007. The resumption of its fundamentals in a certification challenges the realization of other actions of restocking.	

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	General comment 10	<p>On restocking, it seems important to recall that RCE 1100/2007 makes it possible to revise the percentage of glass eel for restocking (60%) in the event of a fall in the market price of restocking compared to that of consumption. This emphasizes that sustainability must take into account social and economic aspects and not just environmental criteria.</p> <p>RCE 1100/2007 (paragraph 2): “In the event of a significant decline in average market prices for eels less than 12 cm in length used for restocking in eel river basins as defined by Member States, compared to the price of eels less than 12 cm in length used for other purposes, the Commission should be authorised to take appropriate measures which may include a temporary reduction in the percentage of eels less than 12 cm in length to be reserved for restocking”</p>	
	Cover	Good to see all this pictures	
	P 5 (cf general comment 3)	« Diminish practices and markets that don't meet responsible standards “ The certification must be a voluntary process. If you are not certified you will be eliminate?	
	P 9	<p>“sustainable yield for the total stock cannot be set until the species is in recovery”</p> <p>This is the French system validated by Europe since the validation of the EMP. Do you want no quota in France? It could be better to have also a quota for others glass eel fisheries in Europe</p>	
	P 10 (cf general comment 2)	You use BBest mathematical models to justify sustainability. It s better to focus on the means implemented and not only on escapement and mathematical models.	
	P 12 (cf general comment 8)	Responsible definition could be used only for closed, degraded or little estuaries. A fishery on healthy and open estuary can't be responsible?	
	P 13 (cf general comment 10)	<p>You need add : Provided there is no price difference between the consumption market and the restocking market 60% should go for restocking</p> <p>RCE 1100/2007 makes it possible to revise the percentage of glass eel for restocking (60%) in the event of a fall in the market price of restocking compared to that of consumption. This emphasizes that sustainability must take into account social and economic aspects and not just environmental criteria.</p>	
	P14	<p>“Use of farmed eels for consumption reduces the pressure on wild yellow and silver eels from fisheries where the eels are destined to become the spawning escapement. “</p> <p>Glass eels fishermen could also be yellow eel fishermen. You can not have opposition between glass eel and yellow/silver eels fishers</p>	

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	P14 (cf general comment 8)	<p>“Overall, the use of surplus glass eels provides a positive contribution to recruitment and population locally and elsewhere in Europe, whilst also providing a market for high quality and high value food for humans. “</p> <p>The key point of justification is based on the effectiveness of restocking and mortality dependent density. There is a better use of glass eels arriving in the watershed compared to natural colonization. Fishermen share this vision of restocking. However, other estuaries (especially large catchments) will not be able to use this justification. On large catchments such as the Loire or the Gironde, how can we justify the fact that natural recruitment is too abundant compared to the capacity of the environment? It lacks an approach on the qualitative aspects of the receiving environment (growth, mortality factor ...). In this part, which speaks of sustainability, the social and economic aspects have been completely lost and the focus is solely on the resource. Larger estuaries with less visible anthropogenic mortality factors can hardly justify their sustainability with the use of the above definitions.</p>	
	P18 issues	The quota is not define by the demand. Such as all the fisheries with a quota the EU rules to define TAC et quota are used (scientist + socio economic advice)	
	P18 (cf general comment 3 and 5)	<p>« • Discourages and reduce illegal practices and trading • Discourages and reduce unsustainable practices »</p> <p>The SEG targets illegal trade and unsustainable practices. What the definition of unsustainable practice ? with no certification?</p>	
	P18	<p>“The illegal trade (measured as the unaccountable reported catch in Europe) reduces by 10% per year over the next 10 years. “</p> <p>How to have a target figures on illegal market? It s illegal so you don’t have figures</p> <p>How can the legal chain have quantified targets on reducing illegal traffic?</p>	
	P19	<p>“Improved financial viability of NGOs to undertake eel conservation work “</p> <p>need to be change by “Improved financial viability of stakeholders to undertake eel conservation work”</p> <p>Which NGO? NGO which want only ban fisheries won’t save the eel.</p> <p>There is not only NGO involved in conservation work (eg restocking)</p>	
	P 20 cf general comment 3 and 5)	<p>« decreased market share for uncertified eel”</p> <p>It shouldn’t be a target to decrease the uncertified market.</p>	
	P 23	<p>Examples include the parasites such as the swim-bladder nematode, <i>Anguillicola crassus</i>, viruses such as EVEX (Eel Virus European X) and alien species such as the invasive shrimp, <i>Dikerogammarus villosus</i>.</p> <p>It is necessary first to know the impact of these diseases and to know their cartography</p>	
	P23	The fishery conducts good biosecurity measures such as the disinfection and drying of nets between each fishing trip.	

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		Impossible to implement and the interest is limited	
	P23	<p>“The use of chemicals follows legal requirements of the EU and of the country concerned “</p> <p>Using a legal framework to be certified. Are you considered illegal if you are not certified?</p>	
	P25 (general comment 2)	You shouldn't have a Bbest target but a target on the meaning implement to reach this aim	
	P25	<p><i>“There is an obvious temptation to sell to buyers who will offer the best price. That price is determined by the market and the illegal market often offers a higher price “</i></p> <p>Obviously, the purchase must be legal. In the absence of certification the fisherman would be seen as having an illegal activity?</p> <p><i>“Certified buyers must sell only to legal markets so it follows, that to be responsible, certified fisheries must only sell to certified buyers”</i></p> <p>Today, you only have one glass eel buyer certified. It is important to allow to sell not only for glass eel buyers certifies</p>	
	P26 (general comment 4)	<p><i>“SEG does not support the capture of glass eels for direct consumption as we believe it is poor use of the stock and does not support a positive contribution”</i></p> <p>Impossible to stop the glass eels market consumption (historic market). How explain for ecological reason why it is better to eat farmed eel than glass eels?</p> <p>The social and economic pillars are clearly forget here. If you want to reach the sustainability, you have to consider economic and social approach</p>	
	P26 (general comment 2)	<p>“progress with EMP”</p> <p>To reach the EMP target you need to reduce all humans mortality and not only professional fisheries. So the fisheries are not responsible if the target is not reach (pollution, dam...). You need to have an approach on the meaning used.</p>	
	P27 (general comment 8)	The table of good practice guide is good. you need to consider it to define the responsibility (open/not open estuary for example) (cf general comment 8)	
	P28	Rather than using the calculation of the mortality rate in the glass eel buyer it is possible to use the indigo carmine test to see the injuries after fishing. We use this test in french restocking action to assess the glass eel quality.	
	P29	<p><i>“Given the size, range and diversity of the stock of the European Eel, it is not yet possible to properly set Total Allowable Catch, Sustainable Yield or Catch Quotas.”</i></p> <p>The French scientist use this method.</p>	

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	P29	<p>“There are good data which show to the satisfaction of the fisheries authority that the EU silver eel 40% escapement target (40% B0) is being achieved for the river or in the eel management district. “</p> <p>Cf general comment 2. We can't use B0 but the meaning use to reach this target</p>	
	P29	<p>“There is good progress with the Eel Management Plan “</p> <p>To reach the EMP target you need to reduce all humans mortality and not only professional fisheries. So the fisheries are not responsible if the target is not reach (pollution, dam...). You need to have an approach on the meaning used.</p>	
	P30	<p><i>“Fishermen only use legal gear [...] There is no evidence of systematic non-compliance.”</i></p> <p>This is an obligation to use of a legal gear and to send the catch data. Certification should not be misleading by pointing out that uncertified fisheries are illegal... The use of legality is obvious.</p>	
	P30	<p>In the mortality during fishing, you can use the carmin indigo test to assess the glass eel quality rather than the mortality in the tank of glass eel buyers</p>	
	P31	<p>“Fishermen have donated an average of at least 5% of their catch in the past 2 years to local stocking programmes,” change by</p> <p>Fishermen have sold an average of at least 60% of their catch in the past 2 years to local stocking programmes,</p> <p>Addition of criterion: In order to guarantee a non-revision of the percentage of 60% reserved for restocking as foreseen by the RCE 1100/2007, the buyers undertakes to offer a restocking price equivalent to that of consumption and which ensures the profitability of companies to justify sustainability</p> <p>Where are social and economic pillars to reach the sustainability?</p>	
	P32 (yellow and silver eel fisheries)	<p>As glass eel fisheries (3.1 and 3.2) it's better to use the meaning implemented rather than B0 or BBest. Also you can't have a target which involve all mortality factors. The escapement target involve a reduction of all kind of mortality</p>	
	P33	<p>Fishermen have sold an average of at least...</p> <p>Where are social and economic pillars to reach the sustainability?</p>	
	P35	<p>“The EU Regulation requires that 60% of glass eels from fisheries should be made available for restocking.”</p> <p>You can add:</p> <p>In order to guarantee a non-revision of the percentage of 60% reserved for restocking as foreseen by the RCE 1100/2007, the buyers undertakes to offer a restocking price equivalent to that of consumption and which ensures the profitability of companies to justify sustainability</p>	
	P40	<p>It is good to have the 5.8 criterion</p>	

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<p>Richard J Fordham Scandinavian Silver Eel richard@silvereel.se</p>	<p><u>1.4.3: Traceability – Record Keeping and Documentation</u> <p>p.22</p></p>	<p><u>“The organisation operates a system that allows the tracking and tracing of all eel from purchase to sale.....and specific fisherman/vessel.”</u> Not sure if this is meant for an eel farm. We normally receive eels once a year, have eels in 12 distinct size classes and keep the eels for up to 4 years (1kg plus). The eels are wild and grow at different rates which means regular grading to ensure similar sized eels are kept together to maintain good husbandry conditions. In the worst case we would need 48 tanks to keep years and sizes separate. Normally we limit the number of year classes but keep the size classes. A farm buying in at regular intervals during a season would need considerably more tanks to be able to keep deliveries with a gap of more than a month separate.</p>	
	<p><u>Criterion 3.7 – Fishermen donate a proportion of their catch for a positive contribution.</u> <p>p.33</p></p>	<p><u>“Fishermen have donated at least 10% of their catch for in the past 2 years to local restocking programmesmigration and escapement”</u> 10% seems a very high figure to donate for silver eels if eel farms are being asked to provide 10% for restocking of small eels.</p>	
	<p><u>Component 5 – Eel farming</u> <p>p.37</p></p>	<p><u>Mortality Rate During Culture.</u> I have looked at the explanation on p.37 and I am still not clear about what is meant by “total stock” on the farm. Is it the average stock (by number) on the farm for the year?</p>	
	<p><u>Component 5 – Eel farming</u> <p>p.37 <u>Feed</u></p></p>	<p>The cod roe we use is not from an MSC accredited fishery, but due to the very close scrutiny in the quarantine we are reluctant to change to supplier for fear of infecting the glass eels with a virus from a new area. Even if the cod roe is frozen it is possible for a virus to survive (IPN).</p>	
	<p><u>12.3 Use of Batch Codes and the SEG Label</u> <p>p.47</p></p>	<p>It is a backward step not to show the SEG logo to the consumer. How is a customer to know if the product follows the Sustainable Eel Standard? We have had only 100% Sustainable Eel Standard eels since the start of the Standard, both for consumption and restocking. The benefit to the eel is obvious across the whole supply chain where we and our suppliers are scrutinised at each step. This has a double cost because we pay a charge directly to SEG for our consumption eels (same as Stewardship funds) and incur extra costs all along the chain for complying with the SEG standard. This has put us at an economic disadvantage, but we have been able to show the SEG logo and believe that it has provided more protection for the eel and has been vital in maintaining our production of eel for consumption. Without being able to show the logo there is no economic incentive to change to the Standard compared to paying into a stewardship fund and not incurring any extra costs.</p>	

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		<p>People have said that supermarkets do not want any more logos. But a visit to the local supermarket shows how important they for people to make an informed choice. The MSC, ASC and stewardship funds all use logos to the end consumer - so why not the Sustainable Eel Standard logo? The other argument is that the standard is expensive to manage but this is a cost being born by the company being assessed. The income levied on the end consumer would be paid directly SEG and provide some form of stable income to help ensure its survival and help to avoid the chronic lack of funding.</p>	
<p>Christine Absil and Irene Kranendonk Good Fish Foundation christine@goodfish.guide irene@goodfish.guide</p>	<p>General</p>	<p>This new version of the standard has greatly improved over the previous one. We particularly appreciate the revision of the categories 'sustainable' to 'responsible' and 'aspiring'. This does reflect the status of a certificate much better.</p> <p>We were only wondering: is the SEG also going to adjust its name to REG? We assume that that would be quite far-reaching.... However, it should be made clear in all communication relating to the standard that it concerns 'responsible' rather than 'sustainable'. Potential misleading communication such as <i>'the certificate from the Sustainable Eel Group'</i> should be avoided at all times.</p>	
	<p>General</p>	<p><i>EU Eel regulation</i>: what if evaluation in 2018 demonstrates non-effectiveness of certain measures that are fulfilled in this standard? Is the standard going to be adjusted?</p>	
	<p>p. 8, sustainable development goals diagram/table</p>	<p><i>Environment</i>: water quality (PCBs, dioxines) is a major issue affecting eel populations.</p> <p><i>Economic</i>: what is the economic value/issue of 'navigation'?</p> <p>Hydropower and energy production are one in case of the eel.</p> <p>Eel culturists can be considered as economic player.</p>	
	<p>p. 8, economic value of eel fisheries</p>	<p><i>Whilst official figures are difficult to analyse, we estimate that the current economic value of the whole eel sector is €550M pa and employs about 10,000 people across Europe.</i></p> <p>What is the basis of this estimate? The figure shown only includes glass eel purchases in Holland which is not an indication of the entire eel sector.</p> <p><i>This covers from eel fishing to farming, restocking, consumption, plus research, administration, conservation projects and mitigation measures.</i></p> <p>Why are conservation projects included? These would not be necessary in case of a healthy eel stock.</p>	
	<p>p. 8</p>	<p><i>Given the poor status of the eel and its habitat, we can consider that the environmental aspects of the above diagram are diminished and under pressure, and that to restore the balance, a reduction in other pressures should be applied. The decline in catches and reduction in fishing has had an impact on the economics of the commercial eel sector.</i></p>	

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		<p>The decline in economic value of the eel sector is a direct consequence of the decline in eel catches and regulations, however the balance is not restored and the eel stock is still not showing signs of recovery. An active reduction in mortality and thus the commercial eel sector (the economic pressure) will be one of the necessary measures to restore the balance and to allow the eel stock to recover.</p>	
	<p>p. 8, figure impact on eel sector in Europe</p>	<p>-Please clarify why these figures are used to identify the value of the sector. Are other countries not relevant in terms of economic value? Also, the time frame is arbitrary. What was the the economic value of the eel sector in the last century (before the major decline)? In 2005, the status of the eel stock was already as dramatic as in 2015. The only apparent difference is the fact that no management measures had been taken then.</p> <p>- Please provide the same information and timetable for the Netherlands and Denmark. The number of production units (Denmark) is not an indication of eel production. The eel aquaculture production units in 2000 in Denmark: 25 (not 40 as in figure), with a production of 2674 tonnes. Highest number of production units in Denmark was 47 in 1990, with a production of 586 tonnes. So even though the number of production units has decreased considerably during those years, production has increased more than 4 fold! Number of production units in Denmark was 3 in 2016 with a production of 1072 ton. Using the same timeframe as the Netherlands in the same figure, you would end up with: 9 production units in Denmark in 2005, with a production of 1700 tonnes. And for 2016: 3 units, with a production of 1072 ton. This gives a slightly different but correct estimate of the developments in the eel sector. (references: page 47 in: http://ices.dk/sites/pub/Publication%20Reports/Expert%20Group%20Report/acom/2017/WGEEL/wgeel_2017.pdf And table 3.4 in: http://ices.dk/sites/pub/Publication%20Reports/Expert%20Group%20Report/acom/2015/WGEEL/WGEEL_CountryReports_2015.pdf)</p> <p>Text above estimates the value of the eel sector at €550M, in figure (below) €500M.</p> <p>Figure should show production and catch data instead of number of licences and number of farms.</p> <p>Include more countries instead of only the Netherlands to indicate the value of the eel sector and its development.</p>	
	<p>p. 5, section 3</p>	<p><i>The standard will support the collection and availability of the data necessary to monitor the efficacy of the standard in achieving its objectives.</i></p> <p>Will the data collection also expand beyond what is necessary for the SEG standard? This will benefit eel management in general.</p>	

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	p.10, section 5.4	<p><i>1. Until habitats are improved back to their 'pristine state' and 40% of B0 then becomes a realistic target, we consider that achieving a high proportion (70%+) of Bbest is a more suitable interim target, that reflects a responsible level of fishing and stewardship.</i></p> <p>Achieving this would be meeting this standard's 'Responsible' level.</p> <p>Bbest is in most Member States lower than 25% of the pristine state. So meeting 70% of Bbest is for some Member States only 17.5% of Bo. This should not be considered responsible.</p> <p><i>2. River catchments that are achieving a slower, but acceptable rate of recovery, 40 – 74.9% of Bbest, will be considered to be meeting this standard's 'Aspiring' level.</i></p> <p>See previous comment. 40-74.9% of Bbest comes down to 10-17.5% (or lower) of Bo for most member states. This is very low and most likely not leading to a recovery in the eel stock (only when ΣA is very low) (see figure p.11) and should therefore not be called 'Aspiring' level.</p> <p><i>2. but acceptable rate of recovery, 40 – 74.9% of Bbest</i></p> <p>Rate of recovery would mean that there is an <u>increasing</u> trend in the eel biomass. How will this be monitored? What if eel biomass is declining in an EMU?</p> <p><i>1. Until habitats / 2. River catchments</i></p> <p>These should both refer to the eel management units (EMU) of the EMP.</p>	
	p.10, section 5.4	<p><i>It helps to indicate that lower levels of control (eg. 70% Bbest), can assist <u>recovery</u>, albeit at lower rates.</i></p> <p>Recovery will only take place if ΣA is low enough (<0.8).</p>	
	P. 11, section 5.4	<p><i>Note that as freshwater habitat and migratory pathways are improved, Bbest will gradually increase and develop towards 40% of B0.</i></p> <p>Bbest will only increase if the eel population directly benefits from the increased or improved habitats, e.g. without increased fishing pressure or catches.</p> <ul style="list-style-type: none"> - If this is the case, and Bbest corresponds to 40% of Bo, will an 'Aspiring level' still be granted to an EMU with only 40-74.9 % of Bbest? 	
	p. 11, section 5.5	<p><i>Further, it refers to 'Eel that is traceable as caught from <u>a fishery that is achieving its interim target silver eel escapement targets, is well managed,</u></i></p> <p>A fishery itself does not have a target silver eel escapement. This is defined on the EMU level. So this would imply that a fishery can only be certified at the EMU level.</p> <p><i>Further, it refers to 'Eel that is traceable as caught from a fishery that is achieving its interim target silver eel escapement targets, <u>is well managed,</u></i></p>	

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		Which management does this refer to? Having an EMP or achieving the targets set in the Eel Regulation?	
	p. 12, section 5.6	<p><i>They will be invited to implement an improvement plan to achieve Responsibility at their <u>next assessment</u>.</i></p> <p>When will the next assessment take place?</p> <ul style="list-style-type: none"> - What if an 'Aspiring' organisation is not improving, for how long can it stay 'Aspiring'? <p>How many attempts to improve can be made before the 'aspiring' status is withdrawn?</p>	
	p.12, section 6.1	Definitions of positive contribution: to what area to these definitions apply? Does 'there being no eel sector' (definition 1) for example refer to the EMU, the EMP, the MS or Europe? Same accounts for definition 2.	
	General	Producers, processors and others can attain a certification whilst the targets in the EU eel regulation are not being met.	
	p.12, section 6.1	<p><i>Certified suppliers will have to demonstrate, <u>through independent assessment</u>, how they play their part in providing this positive contribution in the supply chain.</i></p> <p>Who will be responsible for doing the independent assessments? This should be a third party reporting, independent of the SEG.</p>	
	p.12, section 6.1	<p><i>SEG standard-compliant activities, e.g. fishing, make a positive contribution to eel populations compared to non standard-compliant activities, and <u>are close to being classified as Responsible</u>.</i></p> <ul style="list-style-type: none"> - How will this definition work when there are only standard-compliant fisheries in the area considered? Would this mean definition 1 must apply? <p>Define 'close to being classified as Responsible'. Will an implementation of an improvement plan be sufficient for this definition?</p>	
	p.13, section 6.1	<ul style="list-style-type: none"> • <i>In some west coast estuaries, the geography is such that more glass eels are concentrated than are needed to populate the catchment.</i> <p>The example provided here is indeed a good example of a catchment where more glass eels are concentrated than needed. However, we have a serious concern for demonstrating this for other catchments, in the UK and other western estuaries. Mainly in Portugal, Spain and France, there is a serious lack of data quantity and quality on fisheries statistics, habitat quality and glass eel recruitment.</p>	•
	p. 13, section 6.1	<p><i>Fishermen have sometimes recently provided juveniles for stocking locally – over barriers and into under-populated wetlands. This provides a positive contribution too and should be recognised.</i></p> <p>This positive contribution is not yet proven. This relocation is possibly into another catchment, over which scale is the positive contribution measured?</p>	

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	p.13, section 6.1	<ul style="list-style-type: none"> <i>In some other west coast estuaries, there are barriers to migration such as hydropower, water supply and flood management dams.</i> This is an example of a negative impact on the eel stock because of blocked migration ways rather than a positive contribution of a fishery. 	<ul style="list-style-type: none">
	p.13, section 6.1	<ul style="list-style-type: none"> <i>Fishing for these surplus glass eels and making good use of them in the supply chain in the sector is the basic premise for the commercial eel sector being able to provide a positive contribution to eel populations.</i> The examples mentioned are only 2 examples of cases where the contribution could be positive. Considering the lack of data and the wide area where eel occurs, these are exceptional circumstances. We have serious concerns on how to demonstrate 'surplus eels' and thus a positive contribution to the eel stock. 	<ul style="list-style-type: none">
	p.13, section 6.1	<ul style="list-style-type: none"> <i>The majority (at least 60%) should go for restocking, under the terms of the EU Eel Regulation.</i> How are individual eels selected for restocking? 	<ul style="list-style-type: none">
	p.14, section 6.1	<ul style="list-style-type: none"> <i>Use of farmed eels for consumption reduces the pressure on wild yellow and silver eels from fisheries where the eels are destined to become the spawning escapement.</i> The glass eels used in eel farms are also destined to become the spawning escapement. 	<ul style="list-style-type: none">
	p.14, section 6.2	<p><i>There have been numerous studies to review the effectiveness of stocking, with as many concluding that stocking is effective, as those challenging that view.</i> The examples mentioned here are all restocking practices done to supply eel fisheries, not to contribute to the spawning population.</p>	
	p.15, section 7	<p><i>In 2010 the Sustainable Eel Group approached the MSC to apply their standard to eel fisheries.</i> MSC should be involved to provide comments on the standard since there is overlap with the MSC standard.</p>	
	p.15, section 9	<p><i>In addition, the standard is designed to <u>require</u> those certified to a lower level to demonstrate improvement in their practices between successive assessments.</i> Where is this requirement specified and what are the consequences of non-compliance?</p>	
	p.17, section 10.3	<ul style="list-style-type: none"> <i>Organisations with a 50% or greater Responsibility score will achieve a Responsible level certificate award.</i> <i>Organisations not yet achieving a 80% Responsibility score will be required to identify and make improvements to achieve a higher score by their next assessment.</i> Are there any consequences involved when a higher score is not achieved? Is this documented anywhere? Not improving up to the minimum 	<ul style="list-style-type: none">

Name & Organisation	SEG Standard para ref	Comment/issue	SEG Response
		requirements before the next assessment in the MSC certification process will lead to a full withdrawn of the assessment.	
	p.18, criterion 1.1	<i>Criterion 1.1 Commitment to legality & sustainability</i> The description of this criterion only concerns legality, no sustainability issues are addressed.	
	p.19, criterion 1.3	<i>We believe that any such practices can be detected through mass-balance calculations during assessment for traceability. Other standards such as MSC and ASC permit other fish products at the trader's site.</i> Recent inspections have shown that also for ASC and MSC, this is a very difficult topic and hard to control. This can also be the case for the SEG, even with the best intentions. This can easily be avoided having operators to process only certified eel if they wish to have the label. This is a great opportunity for the SEG to ensure that truly only responsibly sourced eel carry the label.	
	p. 20, criterion 1.4	<i>Separation can be achieved through physical or temporal separation. However it is done, it must ensure that mixing will not occur. Certified products cannot contain any non-certified eel.</i> As recognised by SEG itself, this is prone to fraud. Only allowing operators to process certified eel would overcome this.	
	General	It is assumed that an increase in certified eel products will lead to a decrease in non-certified eel products and that the share of certified eel products will increase. This does not necessarily have to be the case, certainly when producers can trade in certified and non-certified eel at the same time and when fishing is not banned. How will the SEG actively promote their label, engage producers and selling points? It would be helpful (for sustainability and trafficking reasons) if only certified products can be sold on the markets, this will demand a strong lobby on the policy level.	
	p. 21, criterion 1.4.1	<i>Certified eel products can be clearly and easily traced back to a certified source.</i> This can be specified to 'all eel products' (both in the responsible and aspiring level). Pressuring producers and processors that are allowed to also handle non-certified eel to at least also ensure the traceability of their non-certified products.	
	Criterion 1.4 general	A producer that is both trading in certified and non-certified products can now ensure the traceability of the certified products. However, what about the traceability of non-certified products? If a producer is trading irresponsible (or even illegal) with the non-certified part of its products, will it still be allowed to carry the SEG label?	
	p. 23, criterion 1.5	<i>There are no, or very rare, examples of a disease or alien species associated with a batch of certified eel.</i> Quantify very rare.	
	p. 23, criterion	<i>Certified eel farmers and traders should not buy and resell infected eels.</i>	

Name & Organisation	SEG Standard para ref	Comment/issue	SEG Response
	1.5	Does this also account for the non-certified part of the eel products of a producer?	
	p. 29, criterion 2.1	<i>Weighting: 2</i> See previous comments on the level of Bo and Bbest.	
	p. 29, criterion 2.2	<i>Weighting: 2</i> As noted in the standard before, the Eel Management Plans are not having the anticipated positive effect. Implementation of (a part of) the measures in the Eel Management Plan is therefore not an indication of improvement in the eel stock status! This should not be a criterion of good practice for glass eel fisheries.	
	p. 31, criterion 2.5 and p. 35, component 4	<i>Fishermen have donated an average of at least 5% of their catch in the past 2 years to local stocking programmes, e.g. translocating over barriers to aid upstream migration and recruitment in the catchment (in criterion 2.8, p. 31)</i> <i>The EU Regulation requires that 60% of glass eels from fisheries should be made available for restocking. (in component 4, p. 35)</i> Is the donation of 5% of the glass eel catch for restocking programmes part of the 60% glass eel restocking? If this is the case, a bonus score will be given for a required practice.	
	p. 33, criterion 3.1	<i>“is being achieved for the river or in the eel management district.”</i> What is the unit of certification with the SEG standard? The targets in the eel management plans are all set based on eel management units that vary in size and area in and between member states. Eel management units/districts should be the scope on which of the escapement levels are measured that are applied in the standard.	
	p. 33, criterion 3.7	<i>“Fishermen donate a proportion of their catch for a positive contribution”</i> Rules or a protocol on how to select the proportion of the catch that will be restocked should be set up to prevent selection of the smaller or weaker individuals for restocking.	
	p. 33, criterion 3.7	<i>“Fishermen donate a proportion of their catch for a positive contribution”</i> The proportion used for restocking of the yellow and silver eel catches should be higher. The proportion of the glass eel catch to be used for restocking is 60% whilst the level for silver and yellow eel fisheries is set here at only 10% even though the standard acknowledges the importance of the contribution of yellow and silver eels to the spawning stock. See also the comments on Criteria and components scoring.	
	p. 33, criterion 3.2	<i>“There is good progress with the Eel Management Plan for the river or District”</i> Good progress with the Eel management plan is not an indication of good progress in the eel stock. Unfortunately, eel management plans that have been fully implemented do not show the anticipated effect.	

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	p. 35, criterion 4.3	<p><i>"Buyers source at least 90% of their eels from certified suppliers"</i> Why is this criterion included or not set at 100%? This enables certified buyers to have non-certified eel.</p>	
	p. 36, criterion 4.7	<p><i>"The required percentage of glass eels is being used for restocking"</i> Rules or a protocol should be set up to avoid selection of slow growers and/or weaker individuals used for restocking.</p>	
	Criteria and components scoring	<p><i>Organisations not achieving a 50% Responsibility score will be recorded as achieving an Aspiring level</i> The MSC standard requires a minimum score of 80 on all criteria to be able to have the MSC label. A score between 60-80 requires improvement for the next assessment (in 5 years). If this is not achieved, the assessment will be withdrawn. Only when a score of 80 or higher is attained a fishery gets certified and is allowed to have the MSC label on their products. Even though MSC is a different standard, it can very well be used to compare the two standards. The SEG 50% responsibility score is much lower compared to MSC requirements. Only meeting 50% means that half of the criteria must be attained at a responsible level to be able to be certified as responsible. The standard would be greatly improved if the aspiring level would be attained at 60-80% and a score of 80% would lead to a responsible level and thus certification. This would increase the credibility of the standard and the positive impact it might have on the eel stock. Apart from the 'core' criteria it is also unclear how the remaining criteria contribute to the 50%, particularly under Component 3 - Yellow and silver eel fishing . As far as we understand, a fishery organisation who does not receive a 'responsible' because it is far from the escapement target, or well implemented management plan, would still be able to get a certificate, because the fishers are licensed and the fishery doesn't have impact on the benthos. Or because they donate 10% of the catch to a restocking program. That would be a far too easy way to get a 'responsible' certificate. E.g. where a fishery is far from the Bbest target, contributing 10% to restocking would not really be a demonstration of '<i>positive contribution</i>'. Also, the benthos-indicator is quite obvious for a demersal fishery, but does not apply to eel fishery. It would only make sense to award a certificate if the core requirement relating to that sector is fulfilled, i.e. for fisheries there should be a link to the escapement target and management effectiveness. The remaining criteria are supplemental.</p>	
	Criteria and components	Not achieving the responsible level would rate the assessed party as aspiring until the responsible level is achieved. Will in this case the party be classified	

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	scoring	as 'in assessment' or is the assessment withdrawn? How will this be communicated to the public and how many times will re-assessments take place until the responsible level is achieved? As it is set up now, every party seeking for certification will reach the aspiring level and a party cannot 'fail' to meet the standard and will be in assessment.	
	General comment	As we understand now, having a 'sustainable', 'responsible' or 'aspiring' escapement level in a catchment or eel management unit is not a criterion or core component in the standard for a producer to be able to have a responsible or aspiring level of certification. This means that if a producer is meeting the requirements for a responsible level, he/she will get certified even though he/she might be fishing in an area where the escapement level is defined 'aspiring' by SEG or even lower. This producer should not be able to get certified. The eel stock in that area is not recovering nor at a sustainable level. See also Criteria and components scoring.	
	General comment	The ICES advice for the eel stock of reducing anthropogenic mortality to as close to zero as possible is not followed by this standard. Anthropogenic mortality of eels will even be increased in some areas by certifying fisheries where there were no fisheries before or when fishing would be banned (definition 1 of positive contribution).	
	General comment	Who will be responsible for monitoring the fisheries on their positive contribution to the eel stock in a certain area? Data on fisheries statistics and stock status etc are not available for most areas. Including the impact of barriers and hydropower stations. Indicating that activities from certified producers will have a positive contribution is a difficult task. What will happen when a producer is meeting all the criteria from the standard but the positive contribution cannot be showed? Will the certification be withdrawn?	
Peter Wood UK Glass Eels peterwood@glasseel.com		<p>I see some of the revisions coming though in the last iteration of the standard.</p> <p>I would like you to consider if anonymous contributions should make any contribution to the standard. The process starts to lack transparency and accountability.</p> <p>There are still some areas that require further work and rather spend 6 hours on a further document may be best to discuss.</p> <ol style="list-style-type: none"> 1) If you exclude Spanish processers from the standard it conflicts with the ideas of Brundtland, this market is not going to go away. It is an important part of the market. It is an outlet for low cost black economy fish to be placed on the market to make it impossible for responsible processors to trade. Responsible traders should have the same opportunities to supply glass eels as processed eels. 2) The understanding of disease control and what and how it can be done is still a long way from development. 	

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		<p>3) Welfare. While contributors were talking about the 5 freedoms European Food standard Agency has already published a paper on the welfare of farmed eels.</p> <p>4) Though SEG now recognises there are exacting standards for the transport of live vertebrates I do not think the message has sunk in that exacting standards do not permit an allowance for injured glass eels in a contract. Transport distances, tachograph limits and working time directives are being broken as a matter of routine for long transports.</p> <p>5) Understanding of medicine regulations and recording.</p> <p>6) Though some persons seemed to have some knowledge on slaughter of farmed animals nobody seemed to be aware of Species-specific welfare aspects of the main systems of stunning and killing of farmed Eels (<i>Anguilla Anguilla</i>) [1] published by European Food Standards Agency.</p>	
<p>Ingvild Harkes WWF Netherlands iharkes@wwf.nl</p>	<p>General</p>	<p>At this stage, WNF does not support commercial eel fisheries nor eel culture and therefore WNF does not support the SEG standard. Reason for this is the fact that a sustainable fishing level can only be achieved when the stock has recovered, which is not the case for the European eel. The approaches of the SEG standard are based on the economic considerations (eel exploitation) rather than biological/ecological arguments. The ICES advice to reduce anthropogenic mortality as close to zero as possible is not the starting point of the SEG standard.</p> <p>We do welcome the adapted terminology: Sustainably fishery now defined as a 'responsible' fishery provided it has a net benefit to the eel stock. However, considering the further details we are still not convinced that a certificate holder demonstrates 'responsibility'. A producer (e.g. fisheries) can be certified as 'responsible' if only 50% of the indicators reach the level of 'responsible'. The essential indicators that refer to stock recovery (Bo and Bbest) should at least be at the 'responsible' level if a producer should be allowed a certificate.</p>	
	<p>General</p>	<p>The approach lacks a strong quantified evaluation procedure – what are the indicators and methodology to measure the effect of the approach? Comment on the previous version, still not included in the current version.</p>	
	<p>General</p>	<p>'Net Benefit' has now been formulated as 'positive contribution'. However, the way 'positive contribution' is described is not convincing: Definition 1: Associated with a 'Responsible' Level of compliance. SEG standard compliant activities, e.g. fishing, make a positive contribution to eel populations compared to there being no eel sector – e.g. to there being no legal fishing.</p> <p>This is rather confusing. Does this mean that as long as the fishing is legal, it is regarded a 'positive contribution'? This is also suggested in the indicators under <i>Criterion 3.3: The fishery is well-managed</i></p>	

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		<ul style="list-style-type: none"> • <i>Fishers are licensed. At least 90% provide catch and effort data</i> • <i>Data on catch and effort are collected and analysed regularly by the fishery authority (at least annually at the end of the season)</i> <p>Being a licensed fishery where data and effort are collected is not exactly equivalent to a 'positive contribution'. We realise that eel fishery management can improve substantially with regard to registration and data collection. However, this is merely a pre-requisite for recovery measures. They cannot be considered as recovery measures in itself.</p>	
	General	To base the approach on a broad and generic definition focused on sustainable resource use by Brundtland, is foregoing all the detailed and available science on eel biology and advice to reach recovery that is present. The Brundtland quote underlies the Convention on Biodiversity which also supports the precautionary approach, which, particularly in the case of a critically endangered stock, should be the point of departure.	
	7	Escapement targets are now related to ICES (Bbest and Bo). However, challenging the escapement target will not help the process of recovery, particularly as there is no scientific backing of these statements. The adapted targets for the goals of responsibility are more realistic for the party looking for certification, however they are even further away from a sustainable level since Bbest is in many member states only a fraction of Bo. Therefore the 'aspiring level' as described is far away from a sustainable level/40% of Bo. Further, we notice that eel fishing is not acknowledged as a main factor to eel mortality.	
	8	The measurement area is not defined in the standard. It is for example not defined on which scale a fishery must have a positive contribution to the eel stock to be able to have a 'responsible' level of compliance. It is still very unclear which part of the standard refers to the impact on the entire eel stock and where it refers to the eel stock in a catchment area.	
	40	The rules and procedures do not include a protocol to actively include stakeholder to provide input or objections.	
Zoological Society of London Matthew.Gollock@zsl.org		<p>Just a quick note to say that unfortunately we're not going to be able to engage further in the consultation – the timing of the window so close to Xmas and other commitments meant that we can't meaningfully address the responses to our input or review the updated standard.</p> <p>That said, I have been asked to make two over-arching comments on behalf of ZSL:</p> <p>We have concerns that changing 'sustainable' to 'responsible' doesn't fully address the problem – it is replacing one term open to interpretation with another. At the very least, we think the definition under section 5.5 could be improved – throughout the document the term 'responsibility' is used, but here it is 'responsibly sourced', which</p>	

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		<p>isn't the same thing. 'Well managed' and 'handled' are also incredibly vague. The definition seems overly focused on fisheries, even though the standard applies equally to eel farms and retailers. Given that this is the text that will be referred to as how SEG define 'responsible', we feel it needs more work.</p> <p>Further, and relating to the point above, the uneven focus on certain elements of the supply chain – as we highlighted in a number of our comments on the previous draft – means that in our opinion the standard is not fully fit for purpose. The ethos must be embedded from source to sale – the consumer needs to be able to buy, if they wish, fully informed of what a product with the standard attached means, and at present, we don't feel the mechanisms to ensure this are in place. Our previous comments in relation to this are responded to, acknowledging that this needs addressed, but with no firm action to remedy the issue.</p> <p>We'll follow the progress of the standard review from other stakeholders in the new year.</p>	