# Amendment to SEG Standard Criterion 1.3

10 February 2026

## Summary

Following a recent consultation a clause in the SEG Standard has been revised: at Criterion 1.3, the threshold for the amount of SEG certified eel an organisation must trade to gain or maintain its SEG certification has reduced from 95% to 75%.

SEG aims to return to the 95% threshold in the future, probably in a step-wise process, but will review other risks and factors as it does so.

## Background

During December 2025 SEG conducted a consultation with its stakeholders on a proposed change to Criterion 1.3 of the SEG Standard, i.e. changing the threshold to trade in SEG Certified eel from 95%:

| | |
|---|---|
| **Responsible indicators** | • The organisation trades in 95 - 100% of SEG certified responsibly sourced eel from the glass eel supply chain and has the documentation to demonstrate that. |

**This briefing provides the results and outcome of that consultation.**

## Results of the Consultation

Consultee comments were received from ten stakeholders, summarised as follows:

| Consultee Type | Country | Preferred Option |
|---|---|---|
| CAB Auditor | France | 1 |
| CAB Auditor | Netherlands | 1 |
| Trader | UK | 1 |
| Trade Association | Germany | 3 |
| Farm | Germany | 3 |
| Farm | Sweden | 3 |
| Farm | Netherlands | 3 |
| Farm | Netherlands | 3 |
| Farm | Netherlands | 4 |
| Processor | Netherlands | 3 |

The consultation paper and the responses received are published at SEG website. For Data Protection purposes, identities are removed.

**Summary results:**

- Comments were received from 10 stakeholders, which is 12% of the 83 contacted directly.
- Comments were received from a range of stakeholder types (5), with the majority (5) from eel farms.
- Comments were received from a range of countries (5) with the majority (5) from the Netherlands.

**The most popular preferred option was Option 3 (6 of 10 = 60% of responses) – i.e. to change the threshold to 75%.**

## Discussion of consultee comments

Whilst there was a clear preference for Option 3 (changing the threshold to 75%), due consideration should be given to all comments provided as there could be compelling reasons to consider other options that might be more important than following just the majority view.

**Discussion of Key Comments Received**

| Option | Consultee | Key Comments | Discussion |
|---|---|---|---|
| 1 | CAB Auditor | The Auditor was principally concerned with fairness and equality between clients – i.e. anyone assessed at a new threshold will be treated differently to those assessed previously | • The difference and 'inequality' is accepted and recognised.<br>• However, whenever the Standard changes, new assessments are with changed criteria so there is frequently 'inequality' for a limited period. This applies to all standards when they change. |
| | CAB Auditor | From a professional and strategic standpoint, my clear recommendation is to maintain this threshold unchanged. The current level of rigour is functioning well, it is defensible, and—most importantly—it is delivering tangible results. Lowering the threshold at this stage would undermine the progress already achieved and weaken the credibility of the system. | • The high level of rigour achieved is valued and remains a longer term goal |
| | Trader | 'You have to stay with the 95% certification'. | • No reasoning was given for this comment so it is difficult to give additional credence to this. |
| 2 | There were no preferences for Option 2 | | |
| 3 | Farm x 2<br><br>Processor | Several consultees made comments similar to the effect of:<br>'An eel farm must operate at full capacity, regardless of the availability of SEG certified glass eels'. | • This is a compelling argument. Whilst there is a desire by all to continue towards 100% SEG Certified, collectively we cannot expect organisations to restrict or go out of business if there is a restricted SEG Certified supply. |

| | | | |
|---|---|---|---|
| | Farm | Still ambitious given the percentages achieved in reality allowing more time for people to adjust to a new realistic percentage. | • This recognises the balance of a high % threshold but still being realistic. |
| | Trade Association | • This is a practical solution<br>• It provides no excessive demands on the value chain | • SEG wants the change to be each practical and to not cause any unfair demands on those in the market. |
| **4** | Farm | Option 4 | • No reasoning was given for this comment so it is difficult to give additional credence to this. |

## Other considerations

**Risk to the integrity and credibility of the SEG Standard**

An important consideration for SEG, made clear in the consultation document, was the risk that any reduction in the threshold might be regarded as a 'downgrade' of the SEG Standard and therefore a reduction in its credibility and integrity.

This risk did not seem very apparent in the comments provided by consultees. The most relevant comment related directly to this was: '*In my opinion, option 3 does not have to be a "downgrade". Something that works in theory may not always work in practice, and this is certainly not a bad thing when it comes to developing the SEG standard. I think this will make it easier to achieve the long-term target of 95 to 100%.*'

**Mitigating the risks**

The key identified risk identified was a possible perceived 'downgrade' of the SEG Standard. This can be mitigated by:

- Publishing that the 95 – 100% target is still an objective and could be achieved in 5% steps in 4 – 5 years.
- SEG Certified eels will still be available in the market and are subject to the rigorous SEG assurance system for certification, traceability and labelling.

**Other key comments**

- Practicality, the ability for the sector to function and for there for be choice in the market is vital.
- Setting a threshold too high could result in some operators to be unable to trade at all and have the unintended consequence of causing monopolies.
- We need to be careful about unwittingly creating monopolies that might not be compatible with EU legislation - The 75% target might be at the higher end of what is acceptable and 95% might be unacceptable. That must be researched further before increasing the threshold again.
- Whilst a lower threshold should enable more operators to trade, with regards to the integrity of the SEG Standard, the most important factors are:
  - That SEG Certified eels are available in the market, and are subject to the rigorous SEG assurance system for certification,
  - That only SEG certified eels are labelled as such and are clearly separated from non-certified eels.

## Outcomes

Following the recommendations of the SEG Standard Revision Team, the SEG Board has agreed and implemented the following:

- To change the SEG Standard for the threshold for Criterion 1.3 to be set at 75%.
- To keep the long term aim to achieve the 95% target. Ideally to increase on a step-wise basis.
- However, as that 95% level has risks, for those to be further reviewed in consultation with the sector before any changes are made.

**SEG Board**
6 February 2026