



Sustainable  
*Eel* Group

# The SEG Standard

A Best Practice Code of Conduct for a Responsible Eel Sector

For Consultation. 16 June – 15 July 2026



## The SEG Standard

### Versions Issued

Version No.	Date	Description of Amendment
1	November 2010	Initial version prior to pilots
2	January 2011	Amendments following several pilots
3	13 May 2011	Amendments to standard following further pilots
4	15 Nov 2012	Addition of Traceability section, amendment of standard
5	21 June 2013	Review of all components of the standard, new draft prepared for review.
5.1	17 October 2016	Update to account for changes to SEG website as.org instead of.com
5.2	25 November 2016	Removal of link to extant document
6.0	June 2018	Substantial revision over 12 months and extensive stakeholder consultation
6.0a	December 20	Minor revisions following auditor feedback
6.1	July 2022	Minor revisions following auditor feedback
7.0	16 November 2023	Substantial revision over 12 months and extensive stakeholder consultation
7.1	21 December 2023	Update to section 1 to clarify legal jurisdiction
7.2	17 January 2024	Update to Criterion 1.4 to clarify that segregation in tanks applies to all operators, not just eel farms.
7.3	1 November 2024	Change of registered address.
7.4	23 June 2025	Update to UBO clause, section 9.3 & criterion 1.6; update to ICES glass eel index graphs, update to registered address.
7.5	18 September 2025	Minor amendments / corrections
7.6	20 January 2026	Criterion 1.3: Change of threshold from 95% to 75% Update to Claims – 5.6.1
8.0 V1d4	June 2026	Separation of Standard and Rationale. Focus on conformance criteria. For consultation as part of Revision to V8.0

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Version 8.0 V1d4

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## 1. Purpose of this document

**The primary purpose of this document is for the public consultation of this version (Version 8, draft 3) of the SEG Standard during the period 16 June – 15 July 2026.**

This is the SEG Standard. It describes briefly how the Standard system works and then the compliance indicators for each of the criteria. Its target audience is:

- SEG Clients - those seeking certification
- Auditors and Conformity Assessment Bodies (CABs) – those assessing compliance with the standard
- NGOs and other stakeholders – those wishing to assess the efficacy of the Standard.

To understand the reasoning behind and rationale it, you are invited to read: [103b SEG Standard Rationale](#).

## 2. Aims of this revision

This is a substantial revision to the SEG Standard version 7. According to the [114 Terms of Reference](#) for its revision, the key aims of this Standard are to:

- be shorter, focusing on the compliance indicators only,
- be clearer and simpler to understand and apply – for operators, auditors and observers,
- reduce unnecessary duplication and complexity,
- improve the rigour and consistency for certification and assurance,
- enable the SEG Standard certification scheme to be compatible in the future with being accredited to ISO 17065 (the international standard outlining requirements for bodies certifying products, processes, and services).

## 3. Applicability and responsibility

The Sustainable Eel Group (SEG) is responsible for the content and publication of the SEG standard.

The official and working language of the SEG standard is English. It is translated and made available currently in French, Dutch, German and Spanish. Other translations will be provided on request. All translations are made with oversight and responsibility by the Sustainable Eel Group. In the case of any inconsistency caused due to translation, the default English version shall be referred to.

The latest version, and translations, are available at: <https://www.sustainableeelgroup.org/download/>.

Users of the standard (clients and conformity assessment bodies) are responsible for ensuring they are using the latest version at the time of assessment.

The SEG Standard crosses national boundaries and is intended to apply to the capture and trade in the European eel across its natural range. SEG is a Belgium registered organisation and therefore gives primacy to EU Law.

## 4. The Sustainable Eel Group – our purpose

The Sustainable Eel Group (SEG) is the leading international collaboration of scientists, conservation groups, the commercial sector and advisors, solely dedicated to the protection and recovery of the European eel (*Anguilla anguilla* L.)

We are a not-for-profit, non-government organisation, registered in Brussels and with collaborators from across Europe and beyond. Our influence must be Europe-wide and beyond to help the European eel, which is a single, mixed, genetically similar, panmictic stock.

## Our vision

We wish to see:

***Biologically safe wild eel populations, distributed throughout their natural range, fulfilling their role in the aquatic environment, recovering in line with the protection targeted by the Eel Regulation.***

Given the depleted state of the stock, this requires major protection and recovery.

This is defined in more detail, with the strategies designed to achieve these, in our [009 Theory of Change](#).

## 5. The purpose of this standard

This standard has been developed as part of our solution for the recovery of the European eel. The objectives of this standard are defined in the [114 Terms of Reference](#) for its revision and in [103b SEG Standard Rationale](#).

The aim of the SEG standard is to:

**Define criteria by which each step in the chain of custody in the commercial eel sector can be assessed for its responsible minimisation of negative impacts and contribution to the protection and recovery of the eel population.**

## 6. Scope

The SEG Standard applies to the fishing, aquaculture, trade and transportation of the European eel *Anguilla anguilla* (Linnaeus, 1758) and eel products within coastal, estuarine and freshwater systems throughout its natural range.

The standard includes provisions for the monitoring of the trade in live eels and for the trade of eel products from source fishery to end consumer.

Geographically, it covers the natural biological range of the eel in its continental phase, from North West Africa, the Mediterranean, the whole of Europe, to the North Cape of Scandinavia. Illegal trade transcends those boundaries – routes are via European and North African outlets mostly to the Far East; predominantly China.

## 7. How the Standard works

### 7.1 Structure

The standard is structured as described below. The rationale for each of these components is described in more detail in [103b SEG Standard Rationale](#).

Heading	Description
Component	The broad topics of the standard; the different parts of the eel sector
Criteria	The separate tests within each component for which the organisation will be assessed
Indicators	The descriptors of each level for compliance for: <ul style="list-style-type: none"><li>• Full compliance ('Responsible')</li><li>• Minor non-compliance</li><li>• Major non-compliance</li><li>• Critical non-compliance</li></ul> Note that these descriptors are compatible with ISO 17065.
Exceptions	Where there are exceptions to the standard that may be applied

### 7.2 Components

The standard is divided into the following components:

- Component 1: - Core requirements:
  - Commitment to legality
  - Contribution to eel conservation projects
  - Traceability
  - Mitigating reputational risk
  - Ultimate Beneficial Owner
- Component 2: Glass eel fishing
- Component 3: Yellow and silver eel fishing
- Component 4: Eel buying and trading
- Component 5: Eel farming
- Component 6: Restocking
- Component 7: Processing, wholesale and retail supplies

Component 1, 'Core Requirements' applies to every organisation that wishes to be assessed against any of the other components that applies to them. This has no exceptions and is mandatory.

### 7.3 Methodology

7.3.1 The criteria are assessed for the organised seeking SEG Certification (the 'Client') through audit by a 'Conformity Assessment Body' (CAB), sometimes also known as a 'Certification Body' (CB). The CAB

is an accredited, professional organisation independent of SEG to provide a third party assessment service. The CAB is contracted to SEG who maintains oversight of the system and services provided.

7.3.2 The Client is encouraged to complete a self-assessment against the components of the standard that apply to them. This is so that they understand the standard, their requirements, and to be prepared for independent assessment.

7.3.3 Each criterion for each component is assessed according to the descriptors for the indicators of conformance, i.e.:

- Full compliance ('Responsible')
- Minor non- conformance
- Major non- conformance
- Critical non- conformance

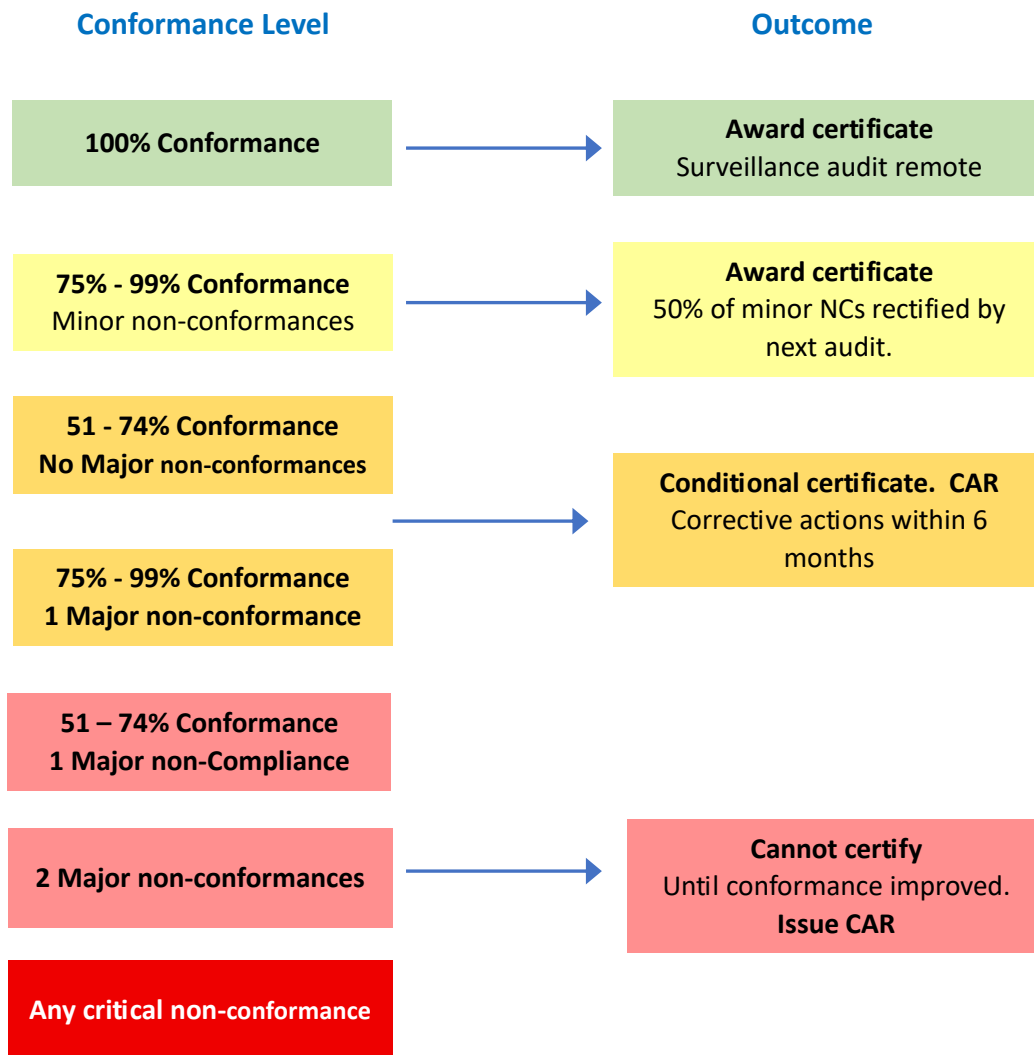
7.3.4 Ideally, a client is aiming to meet 100% conformance ( = 100% 'Responsible'). But a client can be certified with 75% of criteria at full conformance, as long as the remaining criteria re at 'minor non-compliance'.

7.3.5 The following shall apply according to levels of conformance:

Level	Compliance	Outcome
1	<ul style="list-style-type: none"> <li>• 100% conformance</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Fully certified</b></li> </ul>
2	<ul style="list-style-type: none"> <li>• 75 - 99% conformance</li> <li>• 1 – 25% minor non-conformances</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Certified</b></li> <li>• Client must rectify 50% of those minor-non-conformances by next audit in 2 years</li> </ul>
3	<ul style="list-style-type: none"> <li>• 51 - 74% Conformance</li> <li>• No Major non-conformances</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Can be 'conditionally' certified</b></li> <li>• Conditional on:               <ol style="list-style-type: none"> <li>(1) Provision of a credible Correction Action Plan</li> <li>(2) the major non-conformance being rectified within 6 months, unless specified differently in the Criterion (3 - 12 months)</li> </ol> </li> </ul>
	<ul style="list-style-type: none"> <li>• 75 – 99% conformance</li> <li>• 1 major non-conformance</li> </ul>	
4	<ul style="list-style-type: none"> <li>• 51 – 74% Conformance</li> <li>• 1 Major non-conformance</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Cannot certify</b></li> <li>• Can conditionally certify when at least one of those major non-conformances meets that in Level 3 above</li> <li>• Can certify when both major non-conformances meet that in Level 1 or 2 above</li> </ul>
	<ul style="list-style-type: none"> <li>• 2 major non-conformances</li> </ul>	
5	<ul style="list-style-type: none"> <li>• Critical non-conformance</li> </ul>	<ul style="list-style-type: none"> <li>• <u>Any</u> critical non-conformance would mean <b>cannot certify</b> until they are resolved according the Levels described above</li> </ul>

These are presented in a different way in the following decision diagram.

### 7.3.6 Decision diagram



#### Key

NC = Non Compliance

CAR = Corrective Action Report

### 7.4 Transition to the new Standard

The revised standard, Version 8.0, will be applicable from 1 October 2026. However, it is not practical to expect existing clients to be immediately compliant with all new criteria. The following transition arrangements shall therefore apply:

#### 7.4.1 Existing certificate holders

Existing certificate holders shall be re-audited to the new standard according to their current audit schedule. If the audit is due between 1 June and 1 October 2026, they may request an extension to be audited to the revised standard in October 2026.

#### 7.4.2 New applicants

When new clients apply for certification, the new standard shall apply.

### **7.5 Allowable Claims**

Those certified to the SEG Standard will be able to make the following claims:

- *Certified responsibly sourced European eel \**
- *Complies with good practices for the protection of the European eel, from fishery to customer.*
- *Making a contribution to the protection and recovery of the European eel.*

\* This is the core /key claim that clients will be encouraged to use.

Full details are in: [205 SEG Claims & Labelling Guide](#). Note that this has been developed to align with the [Empowering Consumers for the Green Transition Directive](#).

## 8. The Standard

The indicators only are described in this section. They are described in more detail, with guidance notes in [103b SEG Standard Rationale](#), and with more specific guidance for some criteria below.. Those are for the use of clients and auditors where supplementary explanation or clarification may be required.

<b>Component 1 – Core requirements. Applies to all applicants</b>	
<b>Criterion 1.1: Commitment to legality</b>	
<b>See Guidance below</b>	
<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>The organisation has not been convicted for any major eel fishing or trading offences or three minor offences in the past three years (see definitions in guidance below)</li> <li>The organisation (except fisheries) provides an ‘extrait de casier judiciaire’ or equivalent from the country's authority, or other declaration that indicates a legal history that matches these indicators.</li> </ul>
<b>Minor Non-conformance</b>	<ul style="list-style-type: none"> <li>The organisation (except fisheries) is unable to provide an ‘extrait de casier judiciaire’ or equivalent from the country's authority to indicate a legal history that matches these indicators.</li> <li>The organisation or individual is under legal investigation by enforcement authorities but has not yet had charges laid.</li> <li>NB such information must be in the public domain or confirmed by enforcement authorities.</li> </ul>
<b>Major non conformance</b>	<ul style="list-style-type: none"> <li>The organisation is under legal investigation by enforcement authorities <b>and had charges laid</b>. In this circumstance, whilst not (yet) prosecuted, the organisation shall have certification suspended* pending the outcome of that investigation, depending on the seriousness (see guidance below) of the alleged offence. That shall apply whether the client is already certified or is an applicant. * NB ‘Suspended’ = temporarily withdrawn whilst under investigation – not fully withdrawn</li> <li>The organisation provides a false declaration</li> </ul>
<b>Critical non conformance</b>	<ul style="list-style-type: none"> <li>The organisation or any other or senior manager or owner within its Ultimate Beneficial Owner (UBO) has been convicted for a serious (see guidance) eel related offence within the last three years</li> </ul>

### Guidance: major and minor offences (examples only – not comprehensive):

<b>Major offences</b>	<b>Minor offences</b>
<ul style="list-style-type: none"> <li>Trafficking/smuggling (export/import) of European eels</li> <li>Mis-use of the EU legal market: fraudulent restocking, consumption, and farming to illegally export glass eels.</li> <li>Hiding the IUU origin of glass eels</li> <li>Criminal network involvement: Knowingly selling to traders who are to sell to illegal markets / can't show adequate proof that they are selling all their stock to legitimate markets – criminal network / organised crime</li> <li>Fraud / document fraud (e.g., mis-declaration of BL, forged purchase invoice) / money laundering</li> <li>Major Illegal, Unregulated, and Unreported (IUU) fishing offences. E.g., inaccurate reporting by fisher (&gt;5kg glass eels, 50 kg yellow eels)</li> </ul>	<ul style="list-style-type: none"> <li>Illegal, Unregulated and Unreported (IUU) fishing offences</li> <li>Fishing contrary to local regulations, e.g. location, gear, speed etc.</li> <li>Inaccurate minor reporting by fisher (&lt;5kg glass eels, 50 kg yellow eels)</li> <li>All other lesser sentences and sanctions</li> <li>And fines below €5,000</li> </ul>

- Where the defendant has been or could be subject to a penal sentence, i.e. an actual or suspended prison sentence
- Or fined €5,000 or more

## Criterion 1.2: Contribution to Eel Conservation Projects

See Guidance below

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• The organisation makes the required financial contribution to an Eel Stewardship Fund <u>or</u></li> <li>• It has provided 100% of the required (see guidance below) in-kind or financial contributions towards eel conservation projects <u>and</u></li> <li>• Is a supporting member of SEG, paying its annual membership fee</li> </ul>
<b>Minor Non-conformance</b>	<ul style="list-style-type: none"> <li>• The organisation is a supporting member of SEG, paying its annual membership fee <u>or</u></li> <li>• It has provided 50 - 99% of the required in-kind or financial contributions towards eel conservation projects or has credible plans to achieve the 100% in the next 12 months</li> </ul>
<b>Major non conformance</b>	<ul style="list-style-type: none"> <li>• The organisation is not a member of an Eel Stewardship Fund but is willing to do so <u>or</u>:</li> <li>• It has provided less than 50% of the required in-kind or financial contributions towards eel conservation projects</li> </ul>
<b>Critical non conformance</b>	<ul style="list-style-type: none"> <li>• The organisation is not a member of an Eel Stewardship Fund <u>or</u></li> <li>• It has made no financial or in-kind contributions to eel conservation projects in the last 12 months <u>and</u></li> <li>• Has no credible plans to do either in the next 12 months</li> </ul>

### Guidance: Examples of expected 100% contribution to eel conservation projects

Type of organisation	Contribution to eel projects expected (any one of these)
<b>Processor</b>	<ul style="list-style-type: none"> <li>• ESF payments</li> <li>• 0.25% of gross sales price to eel projects</li> <li>• 1% of in-kind staff time</li> </ul>
<b>Eel Farm</b>	<ul style="list-style-type: none"> <li>• ESF payments</li> <li>• 0.25% of gross sales price to eel projects</li> <li>• 1% of in-kind staff time</li> </ul>
<b>Glass eel trader</b>	<ul style="list-style-type: none"> <li>• ESF payments</li> <li>• 0.25% of gross sales price to eel projects</li> <li>• 1% of in-kind staff time</li> <li>• Provision of nets / equipment to fishers to meet the SEG standard (to 2.5% gross sales price)</li> </ul>
<b>Glass eel fisher</b>	<ul style="list-style-type: none"> <li>• ESF payments (if/when they exist)</li> <li>• 0.25% of gross sales price to eel projects</li> <li>• Donation of 2.5% of eels to local eel restocking projects</li> <li>• € 150 contribution to SEG as a member (similar to MSC / ASC)</li> <li>• 1% of in-kind time</li> <li>• French glass eel fisher contributions to ARA for restocking.</li> </ul>
<b>Yellow / Silver eel fisher</b>	<ul style="list-style-type: none"> <li>• ESF payments (if/when they exist)</li> <li>• 0.25% of gross sales price to eel projects</li> <li>• Eels over the Dyke / Trap and transport</li> <li>• € 150 contribution to SEG as a member (similar to MSC / ASC)</li> <li>• 1% of in-kind time</li> <li>• Eel fisher contributions to ARA for restocking.</li> </ul>

<b>Yellow eel trader</b>	<ul style="list-style-type: none"> <li>• ESF payments (if/when they exist)</li> <li>• 0.25% of gross sales price to eel projects</li> <li>• € 150 contribution to SEG as a member (similar to MSC / ASC)</li> <li>• 1% of in-kind time</li> </ul>
<b>Fishery (eg. OP)</b>	<ul style="list-style-type: none"> <li>• ESF payments (if/when they exist)</li> <li>• 0.25% of gross sales price to eel projects</li> <li>• Donation of 2.5% of eels to local eel restocking projects</li> <li>• € 150 contribution to SEG for their certification (similar to MSC / ASC)</li> <li>• 1% of in-kind staff time</li> </ul>
<b>Examples of eel conservation projects:</b>	<ul style="list-style-type: none"> <li>• Eel passes</li> <li>• Habitat improvement</li> <li>• Protection from entrainment or entrapment in hydropower turbines</li> <li>• Restocking</li> <li>• Assisted migration of young eels up; silver eels down</li> <li>• Eel science / research</li> <li>• Donation of eels for restocking</li> <li>• Financial contribution to local ESF</li> <li>• Financial contribution to SEG</li> </ul>

### Criterion 1.3: Traceability - Record keeping and documentation

#### Responsible indicators

- The organisation operates a system that allows the tracking and tracing of all batches of eels from purchase to sale and including any steps in between. This includes the ability to track each batch delivered to a buyer to be connected back to a water, a time period) and specific fisherman/vessel.
- Certified and non-certified batches of eels of any life stage are kept in separate and clearly labelled tanks,
- There is 0% mixing of SEG certified and non-certified eels.
- 100% of batches of eels sold or labelled as SEG certified are done so correctly
- If a fisher or buyer, a tele-declaration system is used to report catches and trade,
- Batches of traded eels have the correct legal documentation for the country, e.g. veterinary certificate, Traces, etc.
- There are no examples of errors with Traces documentation in the last three years
- If sourced from France, it is clear whether the eels are from the consumption or restocking market and they are being sold for the correct purpose,
- Such segregation is maintained from point of collection through holding to sale and onward transport;
- On eel farms, Glass eels purchased for eel farming for consumption have only come from the glass eel consumption quota,
- The organisation 100% correctly uses batch-coding for labelling certified product, which can be on the packaging for the product, or included in the documentation (e.g. invoice) with the assignment, according to the SEG Claims and Labelling Guide
- All product to be sold as certified by an organisation is accompanied by an invoice which meets the following criteria:
  - Includes an appropriate batch code,
  - Includes a record of the quantity (no. & weight) of product and where it was sold.
- The organisation operates a system that also allows for the completion of a batch reconciliation of eel product by weight over a given period,

	<ul style="list-style-type: none"> <li>• The organisation ensures that any products wishing to make a claim as certified do not contain any non-certified eel-based ingredients,</li> <li>• The organisation maintains records for a minimum of five years.</li> </ul> <p><u>OR:</u> The client is certified to the MSC or ASC Chain of Custody standard</p>
<b>Minor non-conformance</b>	<ul style="list-style-type: none"> <li>• The organisation operates a system that allows the tracking and tracing of all batches of eels from purchase to sale and including any steps in between.</li> <li>• There has been less than 10% mixing of SEG certified and non-certified eels and these are verified as due to genuine errors or operational constraints (eg. number of tanks available) <ul style="list-style-type: none"> <li>○ Except on eel farms, up to 33% mixing of certified and non-certified * is permitted, due to constraints of number of tanks; but, through Mass Balance calculations, it can be shown that the number of eels sold as certified is not greater than the number bought.</li> </ul> </li> <li>• 90 – 99% of batches of eels sold or labelled as SEG certified are done so correctly according to the SEG Claims and Labelling Guide</li> <li>• If a fisher or buyer, a tele-declaration system is not used to report catches and trade,</li> <li>• There are examples up to two errors with Traces documentation in the last three years</li> <li>• Records are maintained for a minimum of three years</li> </ul>
<b>Major non-conformance</b>	<ul style="list-style-type: none"> <li>• The organisation operates a system that allows the tracking and tracing of all batches of eels from purchase to sale.</li> <li>• There has been 10 – 50% mixing of SEG certified and non-certified eels. <ul style="list-style-type: none"> <li>○ On eel farms, there has been 34 – 50% mixing *, due to constraints of number of tanks, but, through Mass Balance calculations, it can be shown that the number of eels sold as certified is not greater than the number bought.</li> </ul> </li> <li>• 50 - 89% of batches of eels sold or labelled as SEG certified are done so correctly according to the SEG Claims and Labelling Guide</li> <li>• Through mass balance calculations, eel farms handle 25 – 50% from SEG certified sources *</li> <li>• If a fisher or buyer, no system is used to report catches and trade,</li> <li>• There are examples of three or fewer errors with Traces documentation in the last three years</li> <li>• Records are maintained for 1 - 3 three years.</li> </ul>
<b>Critical non-conformance</b>	<ul style="list-style-type: none"> <li>• The organisation has no system to allow the tracking and tracing of all batches of eels from purchase to sale.</li> <li>• There has been more than 50% mixing of SEG certified and non-certified eels.</li> <li>• Through mass balance calculations, eel farms handle more than 50% from SEG certified sources</li> <li>• Less than 50% of batches of eels sold or labelled as SEG certified are done so correctly according to the SEG Claims and Labelling Guide</li> <li>• If a fisher or buyer, there is no reporting of catches or trade,</li> <li>• There more than three errors with Traces documentation in the last three years</li> <li>• Records are maintained for less than 1 year.</li> </ul>

## \* Guidance and notes

1. These thresholds will be time-limited (1 – 2 years, 2026 – 2027). They will be increased towards the 100% desired level.
2. The ‘mixing’ is permitted from different (certified and non-certified fisheries), in eel farms only on this temporary basis.
3. Operators can purchase SEG certified and non-SEG certified product, but, subject to the above exception, batches must be clearly separated and properly labelled.
4. Importantly: (a) 100% eels are traceable from SEG certified sources and/or (b) it is not possible to sell more certified eels than non-certified.

### Mass Balance of SEG-Certified Eels in Aquaculture

A certified aquaculture operator may only sell SEG-certified eel where at least 67% originates from SEG-certified glass eels that have been purchased and recorded by the operator.

The operator shall maintain a complete and auditable record of all receipts, mortality, stock movements and sales of SEG-certified eels. These records shall enable auditors to verify the number of SEG-certified animals throughout the entire production cycle.

The total number of SEG-certified eels sold by the operator as SEG-certified product shall never exceed the total number of SEG-certified glass eels received, minus the documented mortality occurring during the growing period.

The calculation shall be as follows:

*Maximum number of SEG-certified eels that may be sold = number of SEG-certified glass eels received – documented mortality of SEG-certified eels.*

The operator shall record mortality based on farm records, production reports, or other verifiable documentation.

SEG-certified and non-SEG-certified eels may be co-mingled during storage, rearing, handling and harvesting, provided that a verifiable mass balance system is maintained and all SEG certification claims are supported by auditable records. Physical separation of certified and non-certified eels is therefore not required.

The operator shall ensure that the number of SEG-certified eels claimed and sold never exceeds the number available under the mass balance calculation.

During each audit, the auditor shall verify that:

- a) the number of SEG-certified glass eels received has been accurately recorded;
- b) mortality has been recorded and is supported by verifiable evidence;
- c) the number of SEG-certified eels sold does not exceed the quantity available under the mass balance calculation; and
- d) all SEG certification claims are fully supported by the operator’s records.

Any sale, claim or representation of SEG-certified eel that exceeds the quantity available under the mass balance calculation shall constitute a major non-conformance.

**Criterion 1.4: The risks of reputational damage to SEG are identified and prevented or mitigated**

See Guidance below

<b>Responsible indicators</b>	• Risk Score of 0 – 5
<b>Minor Non-conformance</b>	• Risk Score of >5 – 10
<b>Major non conformance</b>	• Risk Score of >10 – 20
<b>Critical non conformance</b>	• Risk Score of >20

**Guidance: The Reputation and Trade Risk Matrix**

\* Scores: 0 = no risk  
5 = possible / some risk  
10 = Significant risk identified

RISK	Risk Score *
<b>Due Diligence Checks GENERAL. In the last 12 months:</b>	
<b>Third Party Due Diligence Checks reveal concerns, for example: the organisation or key individual(s):</b>	
• Exists on any global watch list	0 - 10
• Are NOT Credit worthy	0 - 10
• Involvement of Government Officials gives rise to any reputational issues such as being linked to government investigations, litigation, financial difficulty, corruption, fraud or other misconduct	0 - 10
• Screening names of Boards and key employees and key contacts against any relevant global lists and watch lists such as the UK and EU Sanctions List (the UK Sanctions List)	0 - 10
• The third party is owned or controlled by an entity or individual(s) on any of the aforementioned lists (because even if a third party, or controlling organisations, is not on a sanctions list, a close relationship with a sanctioned entity might also present risk);	0 - 10
• Business credit report checks on the third party, such as those prepared by credit reporting agencies reveal concerns;	0 - 10
• General review of publicly available information on third parties business and reputation reveal concerns.	0 - 10
• Check against the EU or Country Corporate Sustainability due diligence directive reveals concerns.	0 – 10
<b>Due Diligence Checks TRADE. In the last 12 months:</b>	
• End user is non SEG Certified	0 - 10
• Destination Country has UK and or EU Govt serious Travel Warning Advice risk as inspection in destination country not possible	0 - 10
• Destination Country has UK and or EU Govt Trade Advice that shows restrictions on General Trade	0 - 10
• Eel Management Plan is not Approved by ICES	

	<b>0 - 10</b>
<b>Total Score</b>	<b>0 - 120</b>

### Criterion 1.5: All organisations under the Ultimate Beneficial Owner are SEG certified

See Guidance below

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• The UBO is clearly identified, is legitimate and legally operated</li> <li>• All European eel related organisations owned or controlled by the UBO are clearly identified, legitimate and legally operated</li> <li>• The UBO and any European eel related organisations owned or controlled by it are SEG certified.</li> <li>• Risk score is very low: 0 - 10</li> </ul>
<b>Minor Non-conformance</b>	<ul style="list-style-type: none"> <li>• Risk score is low: 15 – 20 <u>OR</u></li> <li>• The organisation has possible ownership or management links to other eel business(es) which are not SEG certified</li> </ul>
<b>Major non conformance</b>	<ul style="list-style-type: none"> <li>• Risk score is medium: 25 – 40 <u>OR</u></li> <li>• The organisation has clear ownership or management links to other eel business(es) which are not SEG certified</li> </ul>
<b>Critical non conformance</b>	<ul style="list-style-type: none"> <li>• Risk score is medium or greater: &gt;25 <u>AND</u></li> <li>• The organisation has clear ownership or management links to other eel business(es) which are not SEG certified</li> </ul>

#### Guidance: Ultimate Beneficial Owner (UBO)

##### UBO to be assessed in two parts:

1. **Simple and obvious** – simple checks make it clear and obvious (a) who the UBO is and (b) that they own no other eel related businesses (90% of cases).
2. **More involved** – more detailed checks where the ‘simple and obvious’ test is not met.

##### Step 1: Simple and Obvious Check

From company, chamber of commerce and UBO registrations, it is clear and obvious:

- a) Who the Ultimate Business Owner is
- b) That they are closely involved in running the business and are not a ‘shell company’ or dissociated with the eel business under assessment
- c) That they don’t own any other eel related business

If any of these don’t apply, proceed to step 2.

## Step 2: The UBO Risk Matrix

\* Scores: 0 = no risk  
5 = possible / some risk  
10 = Significant risk identified

Risk / Descriptor	Risk Score
<b>LEGAL / ESSENTIAL</b>	
<b>Ownership</b>	<b>0 – 10</b>
<b>Ownership and Voting rights</b> <ul style="list-style-type: none"> <li>• Is there formal ownership, such as through an investment holding structure?</li> <li>• Has the group (if there is one) or applicant declared the organisations are linked?</li> <li>• Are the organisations owned or run and controlled by members of the same family, or a similar previous employee(s)?</li> <li>• Is ultimate ownership hidden in offshore organisations or by use of nominees?</li> <li>• Working capital – where does this come from and who owns it.</li> <li>• Bank authority and signatures</li> </ul>	
<b>Control *</b>	<b>0 – 10</b>
<b>Control and Control structures, starting with the President/Chair and the other directors</b> <ul style="list-style-type: none"> <li>• e.g. Is there any extensive overlap in officials and personnel between organisations? Identify the staff and their roles?</li> </ul> What does the legal constitution say about voting rights?	
<b>ADDITIONAL – TO HELP IDENTIFY THE UBO</b>	
<b>Ownership</b>	<b>0 – 10</b>
<b>Organisation address. Sites, HQ</b> E.g. Is there clear difference in address or are there overlaps?	
<b>Buildings ownership and use</b> Are landholdings under a group's operational control?	
<b>Equipment, vehicles ownership and use</b> E.g. Who owns the equipment and/or transportation systems being used?	
<b>Control *</b>	<b>0 – 10</b>
<b>Leadership, Management, Staffing structure.</b> <ul style="list-style-type: none"> <li>• What are these and how do they operate both formally and informally?</li> </ul> Who has authority to hire and fire. To spend money and to make leadership, management and control decisions?	
<b>Management Control systems</b> Who controls these? Is there common usage between companies?	
<b>Transport and Distribution control</b> Who controls these? Is there common usage between companies?	
<b>Accounts, Expenditure decisions and sign offs</b> Who controls these? Is there common usage between companies?	
<b>Salary source, payroll</b> Who controls these? Is there common usage between companies?	
<b>External Communications – e.g. website, and claims</b> Who controls these? Is there common usage between companies?	
<b>Internal communications, e.g. meeting structures, job descriptions</b> Who controls these? Is there common usage between companies?	
<b>Sales:</b> who leads sales and makes decision to take the order, set delivery timelines and at what price?	
<b>Ownership and control</b>	<b>0 – 10</b>
<b>Finance &amp; working capital</b>	

<ul style="list-style-type: none"> <li>• how is this governed and controlled and owned?</li> </ul> <p>Are there contractual or other financial arrangements that indicate that one party controls the performance of another?</p>	
<b>Total Risk Score</b>	<b>0 – 60</b>
<p>* Control in this regard means the possession of power to direct, restrict, regulate, govern or administer the performance of the other organisation(s) through authority, rights, contact or other means.  Note: Control may exist irrespective of the percentage share of ownership. However, it is deemed to exist (unless evidence points to the contrary) when an organisation or individual owns more than 50% share interest in another legal entity.</p>	

## Further Guidance

### 1. Apply the following guidance as a process:

It is likely to be necessary to check organisation registrations, share certificates, organisational structures and operations. Also, whilst the EU has a UBO Register, each country may have its own legislation and definition for UBO matters. This will be a starting point.

### 2a. Has the applicant filed a UBO declaration with the local commercial register?

- Ask for (i) a copy of the declaration and (ii) a copy of the receipt of filing issued by the commercial register.
- The CAB shall not only refer to this declaration (which is not verified in substance by the local commercial register). That said, it is a prerequisite which enables the CAB to check if the applicant complies with local applicable laws concerning UBO, it being understood that, based on most local laws, the UBO and the directors are criminally liable for any false information contained in such declarations.

### 2b. Does the applicant meet the following UBO definition?

There is no universal definition. SEG is applying the following, having taken legal guidance. It may evolve with further experience.

**'Ultimate Beneficial Owner' (UBO) in this context means any individual who directly or indirectly owns more than twenty-five percent (25%) (or less if that is applicable by law in the country of the applicant) of the shares or voting rights of an organisation or otherwise exercises, by any other mean, control over the decisions of the shareholders or over the management of the organisation.'**

'Organisation' in this context means any individual, any business or any kind of legal entity (company, association, etc.) or group of organisations.

Each organisation seeking certification shall be considered according to identifying its UBO and any other affiliated eel trade related organisations. Each organisation seeking SEG certification must be audited and certified in full. It is not sufficient to have selected parts of the organisation or of the group certified. This is to ensure transparency and traceability and to show that the whole organisation and the whole group is committed to it – not just selected parts.

As such, if one or more eel trade related organisations under a common UBO ...

- has been convicted of or is under legal investigation for a 'major offence' (see SEG Standard Criterion 1.1 and guidance above)
- fails to provide accurate information and/or provides misinformation during a SEG certification application process; an audit and/or an inspection and is refused SEG certification; and/or
- fails the SEG certification process; an initial audit or inspection and is refused SEG certification; and/or
- is assessed as having a Major or Non-Compliance Criterion 1.5.

... SEG certification cannot be awarded to other eel trade affiliated organisations and to the extent that an organisation already holds SEG certification, such SEG certification shall cease and be withdrawn on no less than 30 days' notice to such organisation.

If one or more organisations under the UBO fails a subsequent audit or inspection (following SEG certification), the Corrective Action or Suspension or Withdrawal of the certificate shall only apply to those organisations that have not achieved the SEG Standard, except to the extent that the acts and omissions of such organisation fall within points (a) to (d) above.

### 2c. Is the applicant under a common UBO?

Analyse the organisational criteria in the following table to understand if there are commonalities clear differences between organisations, and possibly also over time (as a new applicant may have changed or evolved from a previous organisation).

Analyse the organisation from leadership, management and control perspectives looking for commonalities and also clear differences. Consider overlaps and the organisations recent evolution.

In doing so, apply this process:

- i) Acquire the organisation's credentials (already covered in 2b)
- ii) Obtain a chart explaining the place of the applicant in the group it belongs to, i.e. detailing each level from the applicant until the ultimate organisation of its group, mentioning how the organisations are linked at each level (shareholding/voting right), for each organisation, its exact name and address, its registration number and the name of its directors and detailing the composition of the ownership of the ultimate organisation of the group (already covered in 2b)
- iii) Identify the UBO in each Company or organization:
  - 1) Perform an Anti-Money Laundering or Know Your Customer check of the UBO identified
  - 2) Complete the table below:

**2d. The table below is to assist the assessor in identifying the UBO.** There are legal / essential criteria and other / additional criteria to guide when the UBO is unclear.

### 3. Has the UBO been clearly identified?

- 3a. If the applicant clearly meets the criteria and the UBO is clearly identified and that this UBO is separate and not linked to another organisation, then the requirement is met and assessment can proceed.
- 3b. If there is clearly no UBO (i.e. there is no legal entity), or the UBO is not SEG certified, or other eel related organisations under the UBO are not SEG certified, the applicant will receive a major non-compliance which may prevent or delay certification, but this will be referred to the SEG Board for ratification.
- 3c. If it is unclear, you are unsure of the identity of the UBO or there is believed to be a risk (see Criterion 1.5 and Risk Matrix), the matter shall be referred to the SEG System Manager for consideration by the SEG Board.

## Component 2 - Glass eel fishing

### Criterion 2.1: Glass eel fishing is from a responsible fishery

#### Responsible indicators

- Fishing is in an area permitted by the fisheries authority (working to its Eel Management Plan) and
- The catch quotas and other applicable fishing restrictions are being observed (have been in compliance over the past 4 years)

#### Minor Non-conformance

- Fishing is in an area permitted by the fisheries authority and
- The catch quotas and other applicable fishing restrictions are being observed (have been in compliance over the past 2 - 3 years)

<b>Major non conformance</b>	<ul style="list-style-type: none"> <li>Fishing is in an area permitted by the fisheries authority <u>and</u></li> <li>There have been breaches of catch quotas or other applicable fishing restrictions between 1 and 2 years previously</li> </ul>
<b>Critical non conformance</b>	<ul style="list-style-type: none"> <li>Fishing is not an area permitted by the fisheries authority or</li> <li>There have been breaches of catch quotas or other applicable fishing restrictions in the last 12 months</li> </ul>
<b>Criterion 2.2: There is good progress with the applicant's responsibilities in the Eel Management Plan for the river or District</b>	
<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>There is credible progress with at least 75% of the actions relating to the fishery for the implementation of the Eel Management Plan.</li> </ul>
<b>Minor Non-conformance</b>	<ul style="list-style-type: none"> <li>There is credible progress with 50% - 74% of the actions relating to the fishery for the implementation of the Eel Management Plan.</li> </ul>
<b>Major non conformance</b>	<ul style="list-style-type: none"> <li>There is credible progress with 25 - 49% of the actions relating to the fishery for the implementation of the Eel Management Plan.</li> </ul>
<b>Critical non conformance</b>	<ul style="list-style-type: none"> <li>There is credible progress with 0 – 24% of the actions relating to the fishery for the implementation of the Eel Management Plan.</li> </ul>
<b>Criterion 2.3: The fishery is well-managed</b>	
<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>Fishers are licensed and provide catch and effort data via a tele-declaration system.</li> <li>Data on catch and effort are collected and analysed regularly by the fishery authority (at least annually at the end of the season).</li> <li>There is a data set for at least the last 5 years that is considered by the fishery authority to be accurate, useful for statistical purposes and provides a comprehensive picture of the glass eel fishery under assessment.</li> <li>Enforcement is in place throughout the fishing area and there is no evidence of systematic, regular or significant non-compliance.</li> <li>95%+ fishers have been in compliance with the requirements of the fishery in the past 12 months</li> <li>The fishery has a SEG Group Certification procedure and there is high compliance (75% +)</li> </ul>
<b>Minor Non-conformance</b>	<ul style="list-style-type: none"> <li>Fishers are licensed and provide catch and effort data.</li> <li>Data on catch and effort are collected and analysed regularly by the fishery authority (at least annually at the end of the season).</li> <li>There is a data set for at least the last 3 years that is considered by the fishery authority to be accurate and provide enough information on the glass eel fishery under assessment for management and to track annual trends in glass eel arrival.</li> <li>There is no evidence of systematic, regular or significant non-compliance.</li> <li>75 – 94.9% fishers have been in compliance with the requirements of the fishery in the past 12 months</li> </ul>
<b>Major non conformance</b>	<ul style="list-style-type: none"> <li>50 – 74% of fishers have been in compliance with the requirements of the fishery in the past 12 months</li> </ul>
<b>Critical non conformance</b>	<ul style="list-style-type: none"> <li>More than 50% of fishers have been in breach of the requirements of the fishery in the past 12 months</li> </ul>

## Criterion 2.4: Mortality during fishing is minimised

NB there are good practice guides for fishing and welfare

<b>Responsible indicators</b>	<ul style="list-style-type: none"><li>• Fishing is by hand-held nets and has effective nearby holding facilities <u>OR</u></li><li>• Fishing from vessels meets the following criteria:<ul style="list-style-type: none"><li>i) fishing is at slow speed (no more than 1 knot relative to water);</li><li>ii) haul duration is on average no longer than 20 minutes, with the maximum duration not more than 30 minutes;</li><li>iii) mesh size of cod end no greater than 1mm;</li><li>iv) rest of the net designed such that glass eels do not become trapped or abraded;</li><li>v) vivier tank on board and in use or glass eels kept moist in polystyrene boxes;</li><li>vi) fishermen maintain accurate daily records of mortality, including if kept temporarily at home, <u>OR</u></li></ul></li><li>• Fishers can demonstrate that the mortality rate of the catch over the duration of holding in the storage facility is less than 4% for each batch captured. <u>OR</u></li><li>• The Carmin Indigo or similar test indicates that mortality averages less than 4%</li><li>• The receiving trader reports that mortality in the first week of storage doesn't exceed 4%</li></ul>
<b>Minor Non-conformance</b>	<ul style="list-style-type: none"><li>• Fishing from vessels meets the following criteria:<ul style="list-style-type: none"><li>i) fishing is at slow speed (no more than 1.5 knots relative to water);</li><li>ii) maximum haul duration no longer than 30 minutes;</li><li>iii) mesh size of cod end no greater than 1mm;</li><li>iv) rest of the net designed such that glass eels do not become trapped or abraded;</li><li>v) vivier tank on board and in use or glass eels kept moist in polystyrene boxes;</li><li>vi) fishermen maintain accurate daily records of mortality, including if kept temporarily at home, <u>OR</u></li></ul></li><li>• Fishers can demonstrate that the mortality rate of the catch over the duration of holding in the storage facility is between 4% and 8% for each batch captured. <u>OR</u></li><li>• The Carmin Indigo or similar test indicates that mortality averages between 4% and 8%</li><li>• The receiving trader(s) report(s) that mortality in the first week of storage averages between 4% and 8%</li></ul>
<b>Major non conformance</b>	<ul style="list-style-type: none"><li>• Fishing doesn't meet the above best practice guidelines <u>or</u></li><li>• Mortality or indicators show average mortality to be greater than 8%</li></ul>
<b>Critical non conformance</b>	<ul style="list-style-type: none"><li>• Fishing doesn't meet the above best practice guidelines <u>and</u></li><li>• Mortality or indicators show average mortality to be greater than 8%</li></ul>

## Criterion 2.5: The fishery has negligible impacts on by-catch species

<b>Responsible indicators</b>	<ul style="list-style-type: none"><li>• The fishery has a negligible (less than 1% direct mortality) impact on by-catch</li><li>• By-catch is returned to the water alive as gently and rapidly as possible.</li></ul>
<b>Minor Non-conformance</b>	<ul style="list-style-type: none"><li>• The fishery has low-level (1 - 5 % direct mortality) impacts on by-catch</li><li>• By-catch is returned to the water alive as gently and rapidly as possible.</li></ul>
<b>Major non conformance</b>	<ul style="list-style-type: none"><li>• The fishery has medium level (5 - 10 % direct mortality) impacts on by-catch <u>or</u></li><li>• By-catch is not returned to the water alive as gently and rapidly as possible.</li></ul>
<b>Critical non conformance</b>	<ul style="list-style-type: none"><li>• The fishery has high-level (more than 10% direct mortality) impacts on by-catch <u>and</u></li><li>• By-catch is not returned to the water alive as gently and rapidly as possible.</li></ul>

## Criterion 2.6: The fishery has negligible impacts on rare or other protected species

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>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.</li> </ul>
<b>Minor Non-conformance</b>	<ul style="list-style-type: none"> <li>Interactions result up to 1% mortality or injury of species that are considered vulnerable, threatened, endangered, or are protected under national or international law.</li> </ul>
<b>Major non conformance</b>	<ul style="list-style-type: none"> <li>Interactions result in 1 – 5% mortality or injury of species that are considered vulnerable, threatened, endangered, or are protected under national or international law.</li> </ul>
<b>Critical non conformance</b>	<ul style="list-style-type: none"> <li>Interactions result in more than 5% mortality or injury of species that are considered vulnerable, threatened, endangered, or are protected under national or international law.</li> </ul>

### Criterion 2.7: The fishery has negligible impacts on habitats

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>The fishing gear does not cause any damage to the benthos (it never touches the bed)</li> </ul>
<b>Minor Non-conformance</b>	<ul style="list-style-type: none"> <li>Damage to the benthos by gear is limited or minimal (it very occasionally touches the bed: 1 – 2 times per year)</li> </ul>
<b>Major non conformance</b>	<ul style="list-style-type: none"> <li>Damage to the benthos by gear is occasional - it touches the bed 3 - 5 times per year</li> </ul>
<b>Critical non conformance</b>	<ul style="list-style-type: none"> <li>Damage to the benthos by gear is regular - it touches the bed more than 5 times per year</li> </ul>

### Criterion 2.8: Transport

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>The operator holds the relevant national or EU transport authorisations</li> <li>There is a documented Transport Plan in place to minimise travel time – this meets the Transport requirements for vertebrates</li> <li>Packing is done in a way that minimises handling, time and stress</li> <li>Eels are kept cool and wet with an adequate supply of oxygen</li> </ul>
<b>Minor Non-conformance</b>	<ul style="list-style-type: none"> <li>The operator holds the relevant national or EU transport authorisations</li> <li>There is no documented Transport Plan in place</li> <li>Packing is done in a way that minimises handling, time and stress</li> <li>Eels are kept cool and wet with an adequate supply of oxygen</li> </ul>
<b>Major non conformance</b>	<ul style="list-style-type: none"> <li>The operator doesn't hold the relevant transport authorisations</li> <li>There is no documented Transport Plan in place</li> <li>Packing is not done in a way that minimises handling, time and stress <u>or</u></li> <li>Eels are not kept cool and wet with an adequate supply of oxygen</li> </ul>
<b>Critical non conformance</b>	<ul style="list-style-type: none"> <li>The operator doesn't hold the relevant transport authorisations</li> <li>There is a no documented Transport Plan in place</li> <li>Packing is not done in a way that minimises handling, time and stress <u>and</u></li> <li>Eels are not kept cool and wet with an adequate supply of oxygen</li> </ul>

### Criterion 2.9: Biosecurity

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>Fishers only operate in the same river or estuary, with no risk of transferring diseases or alien species between catchments <u>OR</u></li> <li>The fishery conducts good biosecurity measures such as the disinfection and drying of nets and equipment between each fishing in different waters.</li> </ul>
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<b>Minor Non-conformance</b>	<ul style="list-style-type: none"> <li>• Fishers operate in different rivers or estuaries AND:</li> <li>• The fishery conducts good biosecurity measures such as the disinfection and drying of nets and equipment between each fishing in different waters.</li> </ul>
<b>Major non conformance</b>	<ul style="list-style-type: none"> <li>• Fishers operate in different rivers or estuaries AND:</li> <li>• The fishery does not conduct good biosecurity measures such as the disinfection and drying of nets and equipment between each fishing in different waters.</li> </ul>
<b>Critical non conformance</b>	<ul style="list-style-type: none"> <li>• Fishers operate in different rivers or estuaries OR:</li> <li>• The fishery does not good biosecurity measures such as the disinfection and drying of nets and equipment between each fishing in different waters.</li> </ul> <p>AND:</p> <ul style="list-style-type: none"> <li>• There has been history of serious eel diseases in the fishery within the last 3 years, eg. EVEX, Eel Herpes virus.</li> </ul>

### Component 3 - Yellow and silver eel fishing

#### Criterion 3.1: Yellow eel fishing is from a responsible fishery

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• Fishing is in an area permitted by the fisheries authority (working to its Eel Management Plan) <u>and</u></li> <li>• The catch quotas and other applicable fishing restrictions are being observed (have been in compliance over the past 4 years)</li> </ul>
<b>Minor Non-conformance</b>	<ul style="list-style-type: none"> <li>• Fishing is in an area permitted by the fisheries authority <u>and</u></li> <li>• The catch quotas and other applicable fishing restrictions are being observed (have been in compliance over the past 2 - 3 years)</li> </ul>
<b>Major non conformance</b>	<ul style="list-style-type: none"> <li>• Fishing is in an area permitted by the fisheries authority <u>and</u></li> <li>• There have been breaches of catch quotas or other applicable fishing restrictions between 1 and 2 years previously)</li> </ul>
<b>Critical non conformance</b>	<ul style="list-style-type: none"> <li>• There have been breaches of catch quotas or other applicable fishing restrictions in the last 12 months</li> </ul>

#### Criterion 3.2: There is good progress with the applicant's responsibilities in the Eel Management Plan for the river or District

<b>Responsible indicators</b>	There is credible progress with at least 75% of the actions relating to the fishery for the implementation of the Eel Management Plan.
<b>Minor Non-conformance</b>	There is credible progress with 50% - 74% of the actions relating to the fishery for the implementation of the Eel Management Plan.
<b>Major non conformance</b>	There is credible progress with at least 25 - 49% of the actions relating to the fishery for the implementation of the Eel Management Plan.
<b>Critical non conformance</b>	There is credible progress with at least 0 – 24% of the actions relating to the fishery for the implementation of the Eel Management Plan.

#### Criterion 3.3: The fishery is well-managed

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• Fishers are licensed and provide catch and effort data via a tele-declaration system.</li> <li>• Data on catch and effort are collected and analysed regularly by the fishery authority (at least annually at the end of the season).</li> </ul>
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	<ul style="list-style-type: none"> <li>• There is a data set for at least the last 5 years that is considered by the fishery authority to be accurate, useful for statistical purposes and provides a comprehensive picture of the glass eel fishery under assessment.</li> <li>• Enforcement is in place throughout the fishing area and there is no evidence of systematic, regular or significant non-compliance.</li> <li>• 95%+ fishers have been in compliance with the requirements of the fishery in the past 12 months</li> <li>• The fishery has a SEG Group Certification procedure and there is high compliance (75% +)</li> </ul>
<b>Minor Non-conformance</b>	<ul style="list-style-type: none"> <li>• Fishers are licensed and provide catch and effort data.</li> <li>• Data on catch and effort are collected and analysed regularly by the fishery authority (at least annually at the end of the season).</li> <li>• There is a data set for at least the last 3 years that is considered by the fishery authority to be accurate and provide enough information on the glass eel fishery under assessment for management and to track annual trends in glass eel arrival.</li> <li>• There is no evidence of systematic, regular or significant non-compliance.</li> <li>• 75 – 94.9% fishers have been in compliance with the requirements of the fishery in the past 12 months</li> </ul>
<b>Major non conformance</b>	<ul style="list-style-type: none"> <li>• 50 – 74% of fishers have been in compliance with the requirements of the fishery in the past 12 months</li> </ul>
<b>Critical non conformance</b>	<ul style="list-style-type: none"> <li>• More than 50% of fishers have been in breach of the requirements of the fishery in the past 12 months</li> </ul>

#### Criterion 3.4: Mortality during fishing is minimised

NB there are good practice guides for fishing and welfare

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• Fishing mortality is 2% or less</li> </ul>
<b>Minor Non-conformance</b>	<ul style="list-style-type: none"> <li>• Fishing mortality is 2.1 – 4%</li> </ul>
<b>Major non conformance</b>	<ul style="list-style-type: none"> <li>• Fishing mortality is 4.1 - 10%</li> </ul>
<b>Critical non conformance</b>	<ul style="list-style-type: none"> <li>• Fishing mortality is greater than 10%</li> </ul>

#### Criterion 3.5: The fishery has negligible impacts on by-catch species

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• The fishery has a negligible impact (less than 1% direct mortality) on by-catch due to fishing, noise or other effects of fishing</li> <li>• By-catch is returned to the water alive as gently and rapidly as possible</li> <li>• Dead by-catch is landed and recorded and utilised appropriately where possible</li> <li>• The fisheries show initiatives to reduce the amount of dead by-catch</li> </ul>
<b>Minor Non-conformance</b>	<ul style="list-style-type: none"> <li>• The fishery has low-level impacts (less than 5 % direct mortality) on by-catch due to fishing, noise or other effects of fishing</li> <li>• By-catch is returned to the water alive as gently and rapidly as possible.</li> </ul>
<b>Major non conformance</b>	<ul style="list-style-type: none"> <li>• The fishery has medium level (5 - 10 % direct mortality) impacts on by-catch due to fishing, noise or other effects of fishing <u>or</u></li> <li>• By-catch is not returned to the water alive as gently and rapidly as possible.</li> </ul>

<b>Critical non conformance</b>	<ul style="list-style-type: none"> <li>The fishery has high-level (more than 10% direct mortality) impacts on by-catch due to fishing, noise or other effects of fishing <u>and</u></li> <li>By-catch is not returned to the water alive as gently and rapidly as possible.</li> </ul>
<b>Criterion 3.6: The fishery has negligible impacts on rare or other protected species</b>	
<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>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.</li> </ul>
<b>Minor Non-conformance</b>	<ul style="list-style-type: none"> <li>Interactions result in up to 1% mortality or injury of species that are considered vulnerable, threatened, endangered, or are protected under national or international law.</li> </ul>
<b>Major non conformance</b>	<ul style="list-style-type: none"> <li>Interactions result in 1 – 5% mortality or injury of species that are considered vulnerable, threatened, endangered, or are protected under national or international law.</li> </ul>
<b>Critical non conformance</b>	<ul style="list-style-type: none"> <li>Interactions result in more than 5% mortality or injury of species that are considered vulnerable, threatened, endangered, or are protected under national or international law.</li> </ul>
<b>Criterion 3.7: The fishery has negligible impacts on habitats</b>	
<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>The fishing operation does not cause any noticeable impact to the habitat – i.e. river bed or margins</li> </ul>
<b>Minor Non-conformance</b>	<ul style="list-style-type: none"> <li>The fishing operation causes slight impact to the habitat – i.e. river bed or margins</li> </ul>
<b>Major non conformance</b>	<ul style="list-style-type: none"> <li>The fishing operation causes noticeable damage to the habitat – i.e. river bed or margins</li> </ul>
<b>Critical non conformance</b>	<ul style="list-style-type: none"> <li>The fishing operation causes extensive damage to the habitat – i.e. river bed or margins</li> </ul>
<b>Criterion 3.8: Transport</b>	
<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>The operator holds the relevant national or EU transport authorisations</li> <li>There is a documented Transport Plan in place to minimise travel time – this meets the Transport requirements for vertebrates</li> <li>Packing is done in a way that minimises handling, time and stress</li> <li>Eels are kept cool and wet with an adequate supply of oxygen</li> </ul>
<b>Minor Non-conformance</b>	<ul style="list-style-type: none"> <li>The operator holds the relevant national or EU transport authorisations</li> <li>There is no documented Transport Plan in place</li> <li>Packing is done in a way that minimises handling, time and stress</li> <li>Eels are kept cool and wet with an adequate supply of oxygen</li> </ul>
<b>Major non conformance</b>	<ul style="list-style-type: none"> <li>The operator doesn't hold the relevant transport authorisations</li> <li>There is no documented Transport Plan in place</li> <li>Packing is not done in a way that minimises handling, time and stress <u>or</u></li> <li>Eels are not kept cool and wet with an adequate supply of oxygen</li> </ul>
<b>Critical non conformance</b>	<ul style="list-style-type: none"> <li>The operator doesn't hold the relevant transport authorisations</li> <li>There is a no documented Transport Plan in place</li> <li>Packing is not done in a way that minimises handling, time and stress <u>and</u></li> <li>Eels are not kept cool and wet with an adequate supply of oxygen</li> </ul>

### Criterion 3.9: Biosecurity

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>Fishers only operate in the same river catchment or lake, with no risk of transferring diseases or alien species between catchments <u>OR</u></li> <li>The fishery conducts good biosecurity measures such as the disinfection and drying of nets and equipment between each fishing in different waters.</li> </ul>
<b>Minor Non-conformance</b>	<ul style="list-style-type: none"> <li>Fishers operate in different river catchments or lakes AND:</li> <li>The fishery conducts good biosecurity measures such as the disinfection and drying of nets and equipment between each fishing in different waters.</li> </ul>
<b>Major non conformance</b>	<ul style="list-style-type: none"> <li>Fishers operate in different river catchments or lakes AND:</li> <li>The fishery does not good biosecurity measures such as the disinfection and drying of nets and equipment between each fishing in different waters.</li> </ul>
<b>Critical non conformance</b>	<ul style="list-style-type: none"> <li>Fishers operate in different river catchments or lakes OR:</li> <li>The fishery does not good biosecurity measures such as the disinfection and drying of nets and equipment between each fishing in different waters.</li> </ul> <p>AND:</p> <ul style="list-style-type: none"> <li>There has been history of serious eel diseases in the fishery within the last 3 years, eg. EVEX, Eel Herpes virus.</li> </ul>

### Component 4 - Eel buying and trading

#### Criterion 4.1: The glass eel holding operation is a legally registered facility

Are there national certifications / registrations to refer to, to reduce the need to audit for any of the following?

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>The Glass eel holding facility is a registered Aquaculture Production Business and/or meets all the legal requirements for the country.</li> <li>In France, if the organisation handles more than 20 tonnes per year, it is registered for ICPE (Classified Installations Environmental Protection)</li> </ul>
<b>Minor Non-conformance</b>	<ul style="list-style-type: none"> <li>The facility is registered and has had some minor non-compliances that it is actively rectifying</li> </ul>
<b>Major non conformance</b>	<ul style="list-style-type: none"> <li>The facility is registered and has had at least one major non-compliances that it is actively rectifying <u>or</u></li> <li>The facility is not a registered Aquaculture Production Business or meeting all the legal requirements but has credible plans to register within the next 12 months.</li> </ul>
<b>Critical non conformance</b>	<ul style="list-style-type: none"> <li>The facility is not registered for this purpose and has no plans to register in the next 12 months</li> </ul>

#### Criterion 4.2: Mortality in storage facility

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>Mortality rates, after the first week (after fishing), are less than 2% on average.</li> </ul>
<b>Aspiring indicators</b>	<ul style="list-style-type: none"> <li>Mortality rate after the first week (after fishing), is less than or equal to 4% on average but greater than or equal to 2%</li> </ul>
<b>Major non conformance</b>	<ul style="list-style-type: none"> <li>Mortality rate after the first week (after fishing), is 4% - 10 %</li> </ul>
<b>Critical non conformance</b>	<ul style="list-style-type: none"> <li>Mortality rate after the first week (after fishing), is more than 10 %</li> </ul>

### Criterion 4.3: Mortality during transport and initial holding if transported to farm

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>Mortality during transport and for the first week at the destination is less than 2% on average</li> </ul>
<b>Minor Non-conformance</b>	<ul style="list-style-type: none"> <li>Mortality during transport and for the first week at the destination is less than or equal to 4% on average but greater than or equal to 2% on average.</li> </ul>
<b>Major non conformance</b>	<ul style="list-style-type: none"> <li>Mortality during transport and for the first week at the destination is 4 – 10%</li> </ul>
<b>Critical non conformance</b>	<ul style="list-style-type: none"> <li>Mortality during transport and for the first week at the destination is more than 10%</li> </ul>

### Criterion 4.4: Water quality

Are there national registrations / consents that can be referred to here?

Can we simplify / remove anything?

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>A system is in place that is expected to keep key water quality parameters within suitable tolerances for healthy eel survival (e.g. Ammonia, Suspended Solids, pH, O<sub>2</sub>)</li> <li>Water quality management procedures are in place including regular monitoring of relevant parameters which shows that water quality is always high and stable</li> <li>The facility operates a back-up system to ensure that water quality will not adversely affect survival rates in the case of an equipment failure</li> </ul>
<b>Minor Non-conformance</b>	<ul style="list-style-type: none"> <li>A system is in place that is expected to keep key water quality parameters within suitable tolerances for healthy eel survival (e.g. Ammonia, Suspended Solids, pH, O<sub>2</sub>)</li> <li>The facility has a minimum of a back-up generator and oxygen supply</li> </ul>
<b>Major non conformance</b>	<ul style="list-style-type: none"> <li>The facility has inadequate facilities to maintain the required water quality <u>or</u></li> <li>The facility has failed permitted water quality requirements in the last 12 months <u>or</u></li> <li>There is no back up generator or oxygen supply</li> </ul>
<b>Critical non conformance</b>	<p>Any two of the following:</p> <ul style="list-style-type: none"> <li>The facility has inadequate facilities to maintain the required water quality,</li> <li>The facility has failed permitted water quality requirements in the last 12 months,</li> <li>There is no back up generator or oxygen supply</li> </ul>

### Criterion 4.5: Handling and welfare

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>Systems are in place and the facility is designed to keep handling to a minimum</li> <li>Documented procedures are in place for handling, and handling is careful</li> <li>The infrastructure is designed to avoid injuries, and so that the use of nets is rarely necessary. When used, nets are small-mesh (1mm maximum)</li> <li>Eels are moved without being allowed to dry out.</li> </ul>
<b>Minor Non-conformance</b>	<ul style="list-style-type: none"> <li>The facility may not be optimally designed, but systems are in place to avoid handling as much as possible within the constraints of the facility</li> <li>Handling, where necessary, is carefully planned and executed</li> <li>The infrastructure has been optimised as far as possible to avoid injuries</li> <li>Nets are small-mesh (1mm maximum)</li> <li>Eels are moved without being allowed to dry out.</li> </ul>
<b>Major non conformance</b>	<ul style="list-style-type: none"> <li>There are no documented handling procedures <u>or</u></li> <li>There is no evidence that handling is carefully planned and executed <u>or</u></li> <li>There no evidence that infrastructure has been optimised as far as possible to avoid injuries <u>or</u></li> </ul>

	<ul style="list-style-type: none"> <li>• Nets have mesh greater than 1mm <u>or</u></li> <li>• There is evidence that eels have been moved and allowed to dry out.</li> </ul>
<b>Critical non conformance</b>	<p>Any two or more of the following:</p> <ul style="list-style-type: none"> <li>• There are no documented handling procedures <u>or</u></li> <li>• There is no evidence that handling is carefully planned and executed <u>or</u></li> <li>• There no evidence that infrastructure has been optimised as far as possible to avoid injuries <u>or</u></li> <li>• Nets have mesh greater than 1mm <u>or</u></li> <li>• There is evidence that eels have been moved and allowed to dry out.</li> </ul>

#### Criterion 4.6: Transport

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• There is a documented Transport Plan in place to minimise travel time – this meets the Transport requirements for vertebrates</li> <li>• Packing is done in a way that minimises handling, time and stress</li> <li>• Eels are kept cool and wet with an adequate supply of oxygen</li> <li>• The operator is trained and holds the relevant transport authorisations for its country(s) of operation</li> </ul>
<b>Minor Non-conformance</b>	<ul style="list-style-type: none"> <li>• There is no documented Transport Plan in place</li> <li>• Packing is done in a way that minimises handling, time and stress</li> <li>• Eels are kept cool and wet with an adequate supply of oxygen</li> <li>• The operator holds the relevant transport authorisations for its country(s) of operation</li> </ul>
<b>Major non conformance</b>	<ul style="list-style-type: none"> <li>• There is no documented Transport Plan in place</li> <li>• Packing is done in a way that minimises handling, time and stress</li> <li>• Eels are kept cool and wet with an adequate supply of oxygen</li> <li>• The operator doesn't hold the relevant transport authorisations for its country(s) of operation</li> </ul>
<b>Critical non conformance</b>	<p>Any 3 of the following:</p> <ul style="list-style-type: none"> <li>• There is no documented Transport Plan in place</li> <li>• Packing is done in a way that doesn't minimise handling, time and stress</li> <li>• Eels are not kept cool and wet with an adequate supply of oxygen</li> <li>• The operator doesn't hold the relevant transport authorisations for its country(s) of operation</li> </ul>

#### Criterion 4.7: The target percentage of glass eels is being used for restocking

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• <b>In France:</b> Glass eels are sold according to their earmarked quota – glass eels for restocking are sold only for restocking</li> <li>• <b>Outside of France:</b> The buyer can provide documented evidence that <u>they have sold</u> at least 60% for restocking the required target percentage of its glass eels from the last season for the primary purpose of conservation / escapement.</li> </ul>
<b>Minor Non-conformance</b>	<ul style="list-style-type: none"> <li>• <b>In France:</b> No indicator (nothing less than meeting the requirements of the quota is suitable or even legal)</li> </ul> <p><b>Outside of France</b></p> <ul style="list-style-type: none"> <li>• The buyer can provide documented evidence that they <u>have reserved or made available at least 60%</u> of the required target percentage of its glass eels from the latest season available for the primary purpose of conservation / escapement, <u>OR:</u></li> </ul>

	<ul style="list-style-type: none"> <li>The buyer can provide documented evidence that it has made available glass eels to the maximum level possible within the constraints of the implementation of the EMP in that country</li> </ul>
<b>Major non conformance</b>	<ul style="list-style-type: none"> <li><b>In France:</b> No indicator (nothing less than meeting the requirements of the quota is suitable or even legal)</li> </ul> <p><b>Outside of France</b></p> <ul style="list-style-type: none"> <li>The buyer can provide documented evidence that they <u>have reserved or made available 40 - 59%</u> of the required target percentage of its glass eels from the latest season available for the primary purpose of conservation / escapement, <u>OR</u>:</li> <li>The buyer can provide documented evidence that it has made available glass eels to at least 50% of the level possible within the constraints of the implementation of the EMP in that country</li> </ul>
<b>Critical non conformance</b>	<ul style="list-style-type: none"> <li><b>In France:</b> No indicator (nothing less than meeting the requirements of the quota is suitable or even legal)</li> </ul> <p><b>Outside of France</b></p> <ul style="list-style-type: none"> <li>The buyer can provide documented evidence that they <u>have reserved or made available less than 40%</u> of the required target percentage of its glass eels from the latest season available for the primary purpose of conservation / escapement, <u>OR</u>:</li> <li>The buyer can provide documented evidence that it has made available glass eels to less than 50% of the level possible within the constraints of the implementation of the EMP in that country</li> </ul>
<p><b>Criterion 4.8: Biosecurity is present and disease is treated rapidly and appropriately</b></p> <p><b>Are there national registrations / consents that can be referred to here?</b></p> <p><b>Can we simplify / remove anything?</b></p>	
<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>The use of chemicals follows legal requirements of the appropriate EU regulations or of the country concerned.</li> <li>The facility has the appropriate permissions to operate from the relevant licensing authority</li> <li>An effective and documented biosecurity plan is in place and there is evidence that it is being followed.</li> <li>Records are available showing regular monitoring of health and possible signs of stress according to the facility's plan (including the completion of microscope parasite checks) and daily mortality is recorded.</li> <li>Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility.</li> </ul>
<b>Minor Non-conformance</b>	<ul style="list-style-type: none"> <li>The use of chemicals follows legal requirements of the appropriate EU regulations or of the country concerned.</li> <li>The facility has the appropriate permissions to operate from the relevant authority</li> <li>An effective and documented biosecurity plan is in place and there is evidence that it is being followed.</li> <li>Eels are regularly monitored for health and possible signs of stress (although this might not be documented) and daily mortality is recorded.</li> <li>Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility.</li> </ul>

<b>Major non conformance</b>	<ul style="list-style-type: none"> <li>• The facility doesn't have the appropriate permissions to operate from the relevant authority <u>or</u></li> <li>• There is no documented biosecurity plan is in place or no evidence that it is being followed <u>or</u></li> <li>• There is no evidence that eels are regularly monitored for health and possible signs of stress or daily mortality is recorded, <u>or</u></li> <li>• Records are not maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility.</li> </ul>
<b>Critical non conformance</b>	<p>Two or more of the following:</p> <ul style="list-style-type: none"> <li>• The facility doesn't have the appropriate permissions to operate from the relevant authority,</li> <li>• There is no documented biosecurity plan is in place or no evidence that it is being followed,</li> <li>• There is no evidence that eels are regularly monitored for health and possible signs of stress or daily mortality is recorded,</li> <li>• Records are not maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility.</li> </ul>

## Component 5 – Eel farming

**Are there national registrations / consents that can be referred to here?**

**Can we simplify / remove anything?**

### Criterion 5.1: The total mortality rate during the culture process is low

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• The Percentage Mortality Rate of eels in culture is less than or equal to 10% on average in the current and previous year OR as an average of the previous five years</li> <li>• An accurate daily log is maintained of the number and causes of mortality</li> </ul>
<b>Minor Non-conformance</b>	<ul style="list-style-type: none"> <li>• The Percentage Mortality Rate of eels in culture is between 10 and 15% on average in the current and previous years OR as an average of the previous five years.</li> <li>• An accurate daily log is maintained of the number of mortalities</li> </ul>
<b>Major non conformance</b>	<ul style="list-style-type: none"> <li>• The Percentage Mortality Rate of eels in culture is between 15 and 25% on average in the current and previous years OR as an average of the previous five years</li> </ul>
<b>Critical non conformance</b>	<ul style="list-style-type: none"> <li>• The Percentage Mortality Rate of eels in culture is more than 25% on average in the current and previous years OR as an average of the previous five years <u>or</u></li> <li>• There is no accurate log of the number of mortalities</li> </ul>

### Criterion 5.2: The fish meal/oil ingredients in the feed come from a sustainable or responsible source

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• Fish as 'FMFO' in the feed (including juvenile feed) comes from either an MSC certified fishery or a Marin Trust certified factory, or the feed is sourced from an ASC certified feed mill.</li> </ul>
<b>Minor Non-conformance</b>	<ul style="list-style-type: none"> <li>• Fish meal/oil in the feed (including juvenile feeds) is not from one of these certified sources, but there are credible plans to move to such a supplier within 12 months.</li> </ul>
<b>Major non conformance</b>	<ul style="list-style-type: none"> <li>• Fish meal/oil in the feed (including juvenile feeds) is not from one of these certified sources, and there are no plans to move to such a supplier within 12 months.</li> </ul>
<b>Critical non conformance</b>	<ul style="list-style-type: none"> <li>• Fish meal/oil in the feed (including juvenile feeds) is not from one of these certified sources, and there are no plans to move to such a supplier.</li> </ul>

### Criterion 5.3: Feed is used as efficiently as possible

#### Do these need to be adjusted to reflect that modern feeds have more plant based ingredients?

<b>Responsible indicators</b>	The average feed conversion ratios in the farm are, overall less than 1.6
<b>Minor Non-conformance</b>	The average feed conversion ratios in the farm are, overall between 1.6 and 2.0
<b>Major non conformance</b>	The average feed conversion ratios in the farm are, overall between 2.1 and 2.5.
<b>Critical non conformance</b>	The average feed conversion ratios in the farm are, overall greater than 2.5.

### Criterion 5.4: Water quality

#### Are there national registrations / consents that can be referred to here?

#### Can we simplify / remove anything?

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• A system is in place that is expected to keep key water quality parameters within suitable tolerances for healthy eel survival (e.g. Ammonia, Suspended Solids, pH, Oxygen)</li> <li>• Water quality management procedures are in place including regular monitoring of relevant parameters which shows that water quality is always high and stable</li> <li>• Water quality monitoring is linked to an alarm-based system in the event of a sudden drop in water quality</li> <li>• The facility operates a back-up system to ensure that water quality will not adversely affect survival rates in the case of a power supply failure.</li> </ul>
<b>Minor Non-conformance</b>	<ul style="list-style-type: none"> <li>• A system is in place that is expected to keep key water quality parameters within suitable tolerances (e.g. Ammonia, Suspended Solids, pH, Oxygen)</li> <li>• Water quality management procedures are in place and there is regular monitoring of relevant parameters which shows that water quality is always high and stable.</li> </ul>
<b>Major non conformance</b>	<ul style="list-style-type: none"> <li>• The facility has inadequate facilities to maintain the required water quality <u>or</u></li> <li>• The facility has failed permitted water quality requirements in the last 12 months <u>or</u></li> <li>• There is no back up generator or oxygen supply</li> </ul>
<b>Critical non conformance</b>	<p>Any two of the following:</p> <ul style="list-style-type: none"> <li>• The facility has inadequate facilities to maintain the required water quality,</li> <li>• The facility has failed permitted water quality requirements in the last 12 months,</li> <li>• There is no back up generator or oxygen supply</li> </ul>

### Criterion 5.5: There are minimal ecological impacts from effluent discharge

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• The system is closed-circuit and has no discharge OR</li> <li>• Effluent discharge is regularly tested by the operator AND</li> <li>• Effluent discharge complies with all local and national requirements AND</li> <li>• Has not been found to be non-compliant in the past 5 years.</li> </ul>
<b>Aspiring indicators</b>	<ul style="list-style-type: none"> <li>• Effluent discharge is regularly (monthly) tested by the operator AND/OR</li> <li>• Has been found to be non-compliant on no more than 1 occasion in the past 5 years.</li> </ul>
<b>Major non conformance</b>	<ul style="list-style-type: none"> <li>• Effluent discharge is tested less than monthly by the operator OR</li> <li>• Has been found to be non-compliant on more than 1 occasion in the past 5 years.</li> </ul>
<b>Critical non conformance</b>	<ul style="list-style-type: none"> <li>• Effluent discharge is tested less than monthly by the operator AND</li> <li>• Has been found to be non-compliant on more than 2 occasions in the past 5 years.</li> </ul>

### Criterion 5.6: Grading, slaughter and transportation are carried out with respect to welfare

Responsible indicators	<ul style="list-style-type: none"> <li>Grading is completed in an efficient manner (can we define?)</li> <li>Slaughter is completed by a method that provides an instant death or renders them insensible to pain, i.e. electric stunning or percussive stunning.</li> <li>Procedures are in place to ensure transportation provides suitable conditions for fish welfare.</li> </ul>
Minor Non-conformance	<ul style="list-style-type: none"> <li>Grading is completed in a less efficient manner (can we define levels of efficiency!?)</li> <li>Other, previously acceptable methods of stunning before slaughter are used, e.g. chilling, but there are credible plans in place to invest in the latest methods within the next 12 months</li> </ul>
Major non conformance	<ul style="list-style-type: none"> <li>Grading is even less efficient (levels / definition) <u>or</u></li> <li>Other, previously acceptable methods of stunning before slaughter are used, e.g. chilling, but there are credible plans in place to invest in the latest methods within the next 12 months (difference with above?)</li> </ul>
Critical non conformance	<ul style="list-style-type: none"> <li>Grading is poor (levels / definition?)</li> <li>Other, previously acceptable methods of stunning before slaughter are used, e.g. chilling, and there are no credible plans in place to invest in the latest methods within the next 12 months .</li> </ul>

### Criterion 5.7: The organisation provides eel for restocking

Responsible indicators	<ul style="list-style-type: none"> <li>The organisation can provide documented evidence that 10% or more of its annual eel production (by piece) <u>has been provided</u> for restocking for the purpose of conservation / silver eel escapement and that</li> <li>All eels purchased from the restocking quota have been used for restocking</li> </ul>
Minor Non-conformance	<ul style="list-style-type: none"> <li>The organisation can provide documented evidence that 5 - 10% of its annual eel production (by piece) <u>has been provided</u> for restocking for the purpose of conservation / silver eel escapement, and</li> <li>All eels purchased from the restocking quota have been used for restocking</li> </ul>
Major non conformance	<ul style="list-style-type: none"> <li>The organisation can provide documented evidence that 1 - 5% of its annual eel production (by piece) <u>has been provided</u> for restocking for the purpose of conservation / silver eel escapement, <u>or</u></li> <li>Some eels (1 – 5%) purchased from the restocking quota have been used for restocking (this would be illegal?)</li> </ul>
Critical non conformance	<ul style="list-style-type: none"> <li>Less than 1% of its annual eel production (by piece) <u>has been provided</u> for restocking for the purpose of conservation / silver eel escapement, <u>or</u></li> <li>More than 5% of eels purchased from the restocking quota have been used for restocking (this would be illegal?)</li> </ul>

### Criterion 5.8: Eels for restocking are not graded out slow-growers

Responsible indicators	The age of eels used for restocking are no more than 12 months older than from the date of the glass eel intake
Minor Non-conformance	The age of eels used for restocking are between 12 and 18 months older than from the date of the glass eel intake
Major non conformance	The age of eels used for restocking are between 18 months and 24 months older than from the date of the glass eel intake
Critical non conformance	The age of eels used for restocking are more than 24 months older than from the date of the glass eel intake

## Criterion 5.9: Biosecurity is present and disease is treated rapidly and appropriately

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• The facility has the appropriate permissions to operate from the relevant authority.</li> <li>• The use of chemicals follows legal requirements of the EU or of the country concerned</li> <li>• An effective, documented biosecurity plan is in place and is being followed.</li> <li>• Daily records are available showing monitoring of fish health and signs of stress and daily mortality is recorded</li> <li>• Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility</li> <li>• Ultra Violet light is used at an appropriate level to control diseases</li> </ul>
<b>Minor Non-conformance</b>	<ul style="list-style-type: none"> <li>• The facility has the appropriate permissions to operate from the relevant licensing authority</li> <li>• The use of chemicals follows legal requirements of the EU or of the country concerned.</li> <li>• An effective and documented biosecurity plan is in place and there is evidence that it is being followed.</li> <li>• Eels are regularly inspected for disease (although this may not be documented) and daily mortality is recorded</li> <li>• Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility.</li> </ul>
<b>Major non conformance</b>	<ul style="list-style-type: none"> <li>• The facility doesn't have the appropriate permissions to operate from the relevant authority <u>or</u></li> <li>• There is no documented biosecurity plan is in place or no evidence that it is being followed <u>or</u></li> <li>• There is no evidence that eels are regularly monitored for health and possible signs of stress or daily mortality is recorded, <u>or</u></li> <li>• Records are not maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility.</li> </ul>
<b>Critical non conformance</b>	<p>Two or more of the following:</p> <ul style="list-style-type: none"> <li>• The facility doesn't have the appropriate permissions to operate from the relevant authority,</li> <li>• There is no documented biosecurity plan is in place or no evidence that it is being followed,</li> <li>• There is no evidence that eels are regularly monitored for health and possible signs of stress or daily mortality is recorded,</li> <li>• Records are not maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility.</li> </ul>

## Component 6 – Restocking

Should we remove this as there seems little interest in restocking commissioners being certifies to this?

Or keep it to show best practice about it and it remains available?

It is aimed at those who organize / commission restocking contracts.

3 options:

- Remove
- make simpler – to generate demand
- Non mandatory

Could be used to influence better EMPs

### Criterion 6.1: Restocking is carried out in accordance with an approved EMP, in order to improve escapement to or above the 40% target and is approved by the relevant agency

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• The eel management plan is approved and the restocking is part of the agreed programme that should with reasonable confidence lead to the 40% escapement target being achieved in the future.</li> <li>• Fishing in the restocked area is at a level such that the 40% survival target is exceeded.</li> </ul>
<b>Minor Non-conformance</b>	<ul style="list-style-type: none"> <li>• The management plan is approved and there is evidence that it is being implemented. The restocking is a part of the management plan.</li> <li>• Fishing in the restocked area is at a level such that 30 – 40% survival is achieved.</li> </ul>
<b>Major non conformance</b>	<ul style="list-style-type: none"> <li>• The restocking plan is not part of an approved EMP <u>or</u></li> <li>• Fishing in the restocked area is at a level that causes less than 30% survival</li> </ul>
<b>Critical non conformance</b>	<ul style="list-style-type: none"> <li>• The restocking plan is not part of an approved EMP <u>and</u></li> <li>• Fishing in the restocked area is at a level that causes less than 30% survival</li> </ul>

### Criterion 6.2: Survival and growth rates of restocked eels, and escapement from the system, can be estimated

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• A monitoring programme calculates survival rates and growth rates of restocked eels such that there is good evidence that restocking is significantly enhancing eel biomass and contributing to escapement.</li> <li>• There is active research on means of improving the restocking programme or restocking techniques.</li> </ul>
<b>Minor Non-conformance</b>	<ul style="list-style-type: none"> <li>• A monitoring programme estimates survival, growth and escapement. The existing evidence suggests that restocking is enhancing eel biomass and contributing to escapement.</li> </ul>
<b>Major non conformance</b>	<ul style="list-style-type: none"> <li>• There is no monitoring programme but anecdotal / informal evidence suggests there is some improvement in eel biomass</li> </ul>
<b>Critical non conformance</b>	<ul style="list-style-type: none"> <li>• There is no monitoring programme and there is no indication of any improvement in eel biomass.</li> </ul>

### Criterion 6.3: The restocked area is suitable for eel growth, survival and escapement

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• Ecological information suggests that the system into which eels are restocked is suitable eel habitat (e.g. type of water body, productivity, with former presence of eels).</li> </ul>
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	<ul style="list-style-type: none"> <li>• There are no significant barriers to escapement of silver eels from the system OR systems are in place which demonstrably allows a significant proportion of silver eels to circumvent these barriers (e.g. effective passes or trap and transport).</li> <li>• Stocking is carried out at densities appropriate to the capacity of the environment (productivity, temperature).</li> </ul>
<b>Minor Non-conformance</b>	<ul style="list-style-type: none"> <li>• It is reasonable to assume by analogy with other systems the system into which eels are restocked is good eel habitat.</li> <li>• If there are barriers to escapement of silver eels, plans are being put in place to allow a reasonable level of escapement which will be implemented in time to allow this restocking cohort to contribute to escapement.</li> <li>• Stocking is carried out at densities appropriate to the capacity of the environment (productivity, temperature).</li> </ul>
<b>Major non conformance</b>	<ul style="list-style-type: none"> <li>• There has been no assessment that the habitat is suitable for eels <u>or</u></li> <li>• There are barriers to the escapement of silver eels and there are no credible plans for their mitigation before this cohort are likely to migrate, <u>or</u></li> <li>• Stocking is not carried out at densities appropriate to the capacity of the environment (productivity, temperature).</li> </ul>
<b>Critical non conformance</b>	<p>Any two or more of the following:</p> <ul style="list-style-type: none"> <li>• There has been no assessment that the habitat is suitable for eels,</li> <li>• There are barriers to the escapement of silver eels and there are no credible plans for their mitigation before this cohort are likely to migrate,</li> <li>• Stocking is not carried out at densities appropriate to the capacity of the environment (productivity, temperature).</li> </ul>

**Criterion 6.4: Biosecurity: The risk of restocked eels introducing disease into wild populations has been assessed and is minimal**

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• Eels are tested before restocking and found to be free of disease AND/OR eels are from a known source which is tested on at least an annual basis and known to be free of disease.</li> </ul>
<b>Minor Non-conformance</b>	<ul style="list-style-type: none"> <li>• Eels are tested before restocking when first sourced from a new area, and periodically (at least annually) thereafter to ensure they are free from disease.</li> </ul>
<b>Major non conformance</b>	<ul style="list-style-type: none"> <li>• Eels are not tested for disease before stocking</li> </ul>
<b>Critical non conformance</b>	<ul style="list-style-type: none"> <li>• Eels stocked are from a source with known previous disease issues</li> </ul>

## Component 7 – Processing, wholesale and retail supplies

### Criterion 7.1: Biosecurity and food hygiene

Is this an area where there is duplication? Just need to refer to food producer registration / certification?

Responsible indicators	<ul style="list-style-type: none"> <li>• The operator has a valid food producer registration according to relevant legislation</li> <li>• Food processing hygiene plans are followed</li> <li>• The operator has not been found by national authorities to be in non-compliance for hygiene in the last three years</li> </ul>
Minor Non-conformance	<ul style="list-style-type: none"> <li>• The operator has a valid food producer registration according to relevant legislation</li> <li>• Food processing hygiene plans are followed</li> <li>• The operator has been found in non-compliance by national authorities for hygiene within the last 12 months – 3 years</li> </ul>
Major non conformance	<ul style="list-style-type: none"> <li>• The operator has no valid food producer registration according to relevant legislation <u>or</u></li> <li>• Food processing hygiene plans are not followed <u>or</u></li> <li>• The operator has been found in non-compliance by national authorities for hygiene within the last 12 months</li> </ul>
Critical non conformance	<p>Any two of the following:</p> <ul style="list-style-type: none"> <li>• The operator has no valid food producer registration according to relevant legislation,</li> <li>• Food processing hygiene plans are not followed,</li> <li>• The operator has been found in non-compliance by national authorities for hygiene within the last 12 months</li> </ul>

### Criterion 7.2: Animal welfare

Responsible indicators	<ul style="list-style-type: none"> <li>• Procedures are in place to ensure transportation and storage in holding tanks provides suitable conditions for fish welfare according to national or EU standards.</li> <li>• Slaughter is completed by a method that provides an instant death or renders them insensible to pain, i.e. electric stunning or percussive stunning.</li> </ul>
Minor Non-conformance	<ul style="list-style-type: none"> <li>• Procedures are in place to ensure transportation and storage in holding tanks provides suitable conditions for fish welfare according to national or EU standards.</li> <li>• Other, previously acceptable methods of stunning before slaughter are used, e.g. chilling, but there are credible plans in place to invest in the latest methods within the next 12 months .</li> </ul>
Major non conformance	<ul style="list-style-type: none"> <li>• There are no procedures in place to ensure transportation and storage in holding tanks provides suitable conditions for fish welfare that meet national or EU standards. <u>or</u></li> <li>• Other, previously acceptable methods of stunning before slaughter are used, e.g. chilling, but there are credible plans in place to invest in the latest methods within the next 12 months .</li> </ul>
Critical non conformance	<ul style="list-style-type: none"> <li>• There are no procedures in place to ensure transportation and storage in holding tanks provides suitable conditions for fish welfare <u>and</u></li> <li>• Other, previously acceptable methods of stunning before slaughter are used, e.g. chilling, and there are no credible plans in place to invest in the latest methods within the next 12 months .</li> </ul>

## 8. Assurance

The procedures and rules by which the SEG Standard is assessed, applied and certification is provided is defined in our [202 Assurance System](#).

## 9. Measuring impact

It is important to know if and how our system is working and making an impact on protection and recovery for the eel and developing a responsible eel sector. This is described in our [301 MEL System](#), with a summary in [103b SEG Standard Rationale](#).

## 10. Review and improvement

SEG makes significant reviews to the Standard at least every five years, with minor changes, as necessary, in between. The aim is to continually improve the standard and how it is applied – to improve protection and recovery for the eel, to facilitate responsible use, and to enable certification services to be independent, simple, clear and robust. The next substantive review is due in 2031.

We are always keen to receive any comments from any stakeholders at any time that aim to improve the SEG Standard and its application (assurance). To provide feedback please contact: [standard@sustainableeelgroup.org](mailto:standard@sustainableeelgroup.org).

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For further information please see:

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