



Sustainable  
*Eel* Group

# The SEG Standard

## Claims and Labelling Guide

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### Versions Issued

Version No.	Date	Description of Amendment
1.0	4/7/18	Initial
1.1	21/1/20	Amendment for immediate compliance with ISEAL Claims Credibility Good Practice Guide
2.0	1 /12/2022	Amendments after experience since 2020, and in readiness for 2023 standard review
2.1	20/8/2023	Review during ISEAL Code Compliant project, and including proposed SEG Certified logo
2.2	5/12/2023	Minor corrections
2.3	1/11/24	Change to registered address
3.0	12/6/26	Substantial review to complement the revised SEG Standard (V8) and align with the Empowering Consumers for the Green Transition Directive. For consultation

This document is the property of the Sustainable Eel Group. It is effective from the date above.

For further information please see:

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## 1. Purpose and scope

1.1 This document describes the policies, procedures and requirements for claims and labelling under the Sustainable Eel Group (SEG) sustainability standard and associated certification scheme.

**It is a draft proposal, for consultation with that for the revision of the SEG Standard, to Version 8.0.**

The aims of this guide are to ensure that:

- a) Businesses and individuals make the correct claims associated with their SEG Certification,
- b) Businesses and individuals accurately promote the sustainability aspects of their products, practices, or services in relation to trade of SEG Certified eel when developing packaging and marketing materials,
- c) The value and integrity of SEG's logos, trademarks and brand are protected,
- d) Claims and logo use aligns with the [Empowering Consumers for the Green Transition Directive](#),
- e) Those wishing to use SEG Claims and Labelling are provided with communication and marketing guidelines.

1.2 Specifically, this document:

- a) Clarifies and explains what certification under the SEG Standard means,
- b) Defines how businesses may use the **SEG Certified** logo, complementing the SEG Certified Logo User Manual (to be completed and published)
- c) Defines how SEG Certified eel and eel products must be identified or labelled and what claims can be made under what circumstances.

## 2. Applicability and responsibility

2.1 This guide must be used by SEG, certified clients – fishers, traders, eel farms, processors, wholesalers and retailers. It is also to be used by Conformity Assessment Bodies to assess compliance with claims made by clients. It can also be referenced NGOs, consumers and anyone with an interest in the European eel.

2.2 It will be published on our webpage: [SEG Standard System](#).

2.3 Those using and applying it are responsible for ensuring they use the latest version.

## 3. General principles

### 3.1 Truthfulness and accuracy

The allowed claims provided for use in this guide have been carefully reviewed to be clear, relevant and accurate to reflect the SEG Standard and associated sustainability impacts relevant to the European eel.

Specifically, they are consistent with:

- a) The scheme's scope, sustainability impacts (social, environmental and economic) and strategies outlined in our [009 Theory of Change](#),
- b) Achievement of the performance levels set out in the components and criteria in the [SEG Standard](#),
- c) Compliance with the scheme as set out in the [202 Assurance System](#),

- d) Traceability and Chain of Custody criteria as set out in the [SEG Standard](#),
- e) Sustainability performance data collated according to our [302 MEL Plan](#), but not the sustainability impacts of any individual certificate holder,
- f) The [Empowering Consumers for the Green Transition Directive](#).

### 3.2 Transparency

The origins of the allowed claims and rationales are described in more detail in the referenced [009 Theory of Change](#) and [302 MEL Plan](#), to be fully transparent about the basis for their development. They are open to challenge and improvement.

### 3.3 Relevance

The allowed claims are intended to be relevant to:

- The diversity of types of operators likely to seek certification,
- Customers and consumers of eel and eel products,
- Scientists, NGOs and conservation bodies with specialist knowledge of European eel management and conservation,
- Governments and their agencies responsible for eel management and conservation policy and regulation.

### 3.4 Clarity and comprehensibility

The allowed claims are intended to be clear, easy to understand, and open to as little ambiguity and interpretation as possible. Definitions are provided in 4.2 where applicable or deemed necessary. Stakeholder feedback with suggestions for improvements are welcome.

## 4. Allowed claims

### 4.1 What certification under the SEG Standard means

The SEG Standard comprises indicators for a range of components and criteria relevant to the scope of the organisation's operations.

To be awarded a SEG Standard certificate, a client must conform with the Standard, according to the levels described and according to the assessment processes defined in the [202 SEG Assurance System](#).

Achievement of the indicators is assessed by an independent auditor and confirmed and certified by a SEG approved Conformity Assessment Body (CAB).

### 4.2 Allowed Claims

On holding a valid SEG standard certificate, a business or may make one or more of the following Allowed Claims on its website, packaging, invoices, promotional material or publicity.

Where claims are made, they shall be accompanied by a link to the [What SEG Certified Means](#), which provides supporting information accessible to stakeholders to enable their understanding of the claim.

**The core primary claim that we recommend clients to use, is:**

- English: ***Certified, responsibly sourced European eel***
- Dutch: ***Gecertificeerde Europese paling uit verantwoorde bron***
- French: ***Anguille européenne certifiée et issue de sources responsables***
- German: ***Zertifizierter, verantwortungsvoll beschaffter Aal***
- Spanish: ***Anguila europea certificada y de origen responsable***

This can be used on-product (packaging) or off-product (marketing Information, website, invoices).

**Secondary allowed claims are:**

***European eel that is traceable from fisher to final product. Caught, handled and traded by SEG certified organisations in line with best practices to support the recovery of the European eel population.***

or:

**Complies with the best practices for the protection of the European eel, from fishery to customer through a traceable supply chain.**

and:

***Making a contribution to the protection and recovery of the European eel.***

These can be used on-product (packaging) or off-product (marketing Information, website, invoices).

**4.3 Definitions**

Responsible	<i>Goes beyond legal requirements, meeting best practices for fishing, trade and handling of the European eel.</i>
Responsibly sourced	<i>European eel that is traceable from fisher to final product. Caught, handled and traded by SEG certified organisations in line with best practices to support the recovery of the European eel population.</i> Or: <i>Complies with best practices for the protection of the European eel, from fishery to customer through a traceable supply chain.</i>

**4.4 SEG claims alongside other claims**

Clients may wish to include a reference to SEG certification in marketing material or annual reports alongside other sustainability claims. In such cases, clients shall ensure that their material does not associate SEG certification with other brands or logos.

In such marketing material or annual reports, only the above claims can be used.

#### 4.5 *SEG Certified* logo

Certified clients are eligible to use this **SEG Certified** logo on packaging and other materials, alongside or instead of the Allowed Claims, subject to a **SEG Claims & Labelling User Agreement**.



### 5. Substantiation of claims

Prerequisites to support determination of whether a client may use Allowed Claims are:

- 5.1 The client has been certified as meeting the SEG Standard and associated sustainability performance, as determined by audit by an independent CAB, applying the SEG Assurance System.
- 5.2 Written agreement with SEG on the claim(s) to be used and, where appropriate, for use of the **SEG Certified** logo.

### 6. Supporting information for claims

- 6.1 Supporting information to inform users of the claims associated with SEG Certified is in this Guide.
- 6.2 Summary information targeted at consumers **will be** at the SEG web-page: [What SEG Certified Means](https://www.sustainableeelgroup.org/what-seg-certified-means). Consumers shall be directed to this page by the URL short code 'eel.group' that is on the **SEG Certified** logo. Users may also use the QR code near the **SEG Certified** logo on products:

URL: <https://www.sustainableeelgroup.org/what-seg-certified-means/>

Short URL [eel.group](https://eel.group)

QR Code:



### 7. Claims Approval Process

Requests for claims shall be applied for and approved as follows:

#### 7.1 Application Procedures

- a) Contact SEG at: [standard@sustainableeelgroup.org](mailto:standard@sustainableeelgroup.org)
- b) Make a request for the Claim(s) sought to be used, and whether / how to use the **SEG Certified** logo:

- c) Specify, using the SEG Certified Logo User Manual (to be completed and published)
  - i. The Claim(s) you wish to make
  - ii. What product(s) / packaging / invoicing / marketing materials (including website) you wish to place it on
  - iii. How you want it to appear (send examples), to include the **SEG Certified** logo.

## 7.2 Review and Verification

- a) The SEG System Manager will review the application for compatibility with the requirements in this Guide,
- b) verify the applicant’s eligibility by checking with the CAB on the status of their SEG certification and relevant performance criteria recorded in audit reports.

## 7.3 Approval Criteria

- a) When deemed to meet the requirements the SEG System Manager will develop and issue a **SEG Claims & Labelling User Agreement** to the applicant.
- b) Supporting information: The Agreement will include the requirement to provide a link or a QR code to the SEG web page: [What SEG Certified Means](#) [page not available yet] which provides supporting information accessible to stakeholders to enable their understanding of the claim.
- c) The SEG System Manager will record the approval decision, including the details listed in 7.1.

## 7.4 Timelines and Validity

- a) These are the normal and maximum timelines for application and approval. Times may be extended if time is protracted to gain agreement between SEG and the applicant. All times are ‘working days’.

Phase	Normal timescale	Maximum timescale
Acknowledgement of application	3 days	10 days
Review and verification	3 days	10 days
Approval	3 days	10 days
Reply to applicant	3 days	10 days

- b) Claims will be valid for as long as a Client’s SEG Standard certification is valid.

## 8. Traceability and Chain of Custody

- 8.1 The [SEG Standard](#) specifies performance criteria for Traceability and Chain of Custody, requesting that the full supply chain is SEG certified and that there is no mixing of certified and non-certified eel.
- 8.2 SEG certification is provided only when those criteria have been met, following thorough assessment by the independent CAB. So: any SEG certified client will have met these performance criteria.
- 8.3 The risk of fraud is reduced by:
  - a) Rigorous assessment and analysis of records during audit,

- b) The possibility of unannounced visits (the CAB is required to conduct unannounced audits of 10% of clients per year).
- 8.4 These criteria are also provided from the SEG web page [Chain of Custody](#) with a summary of how the SEG Standard's chain of custody model works and what controls it has in place to manage their integrity.

## 9. Percentage based and partial claims

- 9.1 In the majority of cases, where operators deal in certified and no-certified eel, they shall be clearly separated and labelled accordingly.
- 9.2 The only exception to this is on eel farms, which may have insufficient tanks to keep them separated, as well as grading different batches. In these circumstances the eel farm may 'mix' up to 33% of non-certified eels. However, in such cases (a) the operator will record a minor non-conformance at assessment audit and (b) they must, through an auditable mass-balance calculation, show that they have not sold more certified eel than they purchased.
- 9.3 So, whilst some mixing may be permitted, certified eels sold will either be (a) 100% traceable to a certified fishery or (b) mixed to a maximum of 33% in eel farms, but not more certified eels sold than purchased.

## 10. Use of logos and trademarks

- 10.1 Clients wishing to use the SEG Certified logo must follow the SEG Certified Logo User Manual which contains the criteria and specifications for licensing the use of the **SEG Certified** logo alongside allowed claims.
- 10.2 The SEG Certified Logo User Manual contains further communication and marketing guidelines. The client will specify how they wish to communicate and market their SEG Certification, from within that framework, for agreement with SEG.
- 10.3 Before use of the **SEG Certified** logo, or use of allowed claims marketing and communication, clients will be required to enter into a written agreement with SEG for that use. That will be part of the **SEG Claims & Labelling User Agreement**.

## 11. Monitoring and Compliance

SEG will apply the following procedures to monitor the use of claims and mitigate their misuse.

### 11.1 Monitoring

- a) SEG will develop a system for clients to report information relating to their claims in order to: (i) Verify that the volume of certified product carrying the label does not exceed the amount of certified raw material purchased; (ii) Calculate or reconcile licensing fees and (iii) Ensure traceability and integrity of the certified supply chain.
- b) Two months after and on the annual anniversary of each SEG Claims & Labelling User Agreement with a certified client, SEG will conduct a review of the client's website to monitor compliance of claims made on the website against the agreement and will enquire with the client whether

there have been any changes to its business that might impact its ability to make SEG related claims.

- c) SEG will investigate any reports it receives in relation to potentially mislabelled products or inaccurate claims, including misuse by organisations that do not participate in the SEG scheme. Reports can be made to SEG at: [standard@sustainableeelgroup.org](mailto:standard@sustainableeelgroup.org).
- d) On re-assessment (usually every two years), the CAB shall undertake a review of records, invoices and marketing material as part of the planned audit, to review documentation against the client's SEG Claims & Labelling User Agreement.

## 11.2 Corrective actions

SEG will apply the following actions where there is a reported or suspected misuse of claims or labelling:

- a) Write to the client to identify the alleged misuse and ask them to explain and/or take corrective action within 10 working days. This may take the form, for example, of requesting packaging to be corrected and reprinted. It is expected that this will resolve any issues in 95% of cases.
- b) If there is no corrective action within 10 days, SEG may take the following progressive action:
  - i. Write to provide a reminder and that if there is no corrective action within a further 10 days, their SEG certificate will be suspended, and legal action might ensue. This will be part of the SEG Claims & Labelling User Agreement.
  - ii. If there is no corrective action after that 10 days, the CAB will suspend the SEG certificate. It will then consider full withdrawal of certification.
- c) SEG may draw on the resources and expertise of CABs in carrying out investigations to identify the extent of misuse of claims or labelling.
- d) Wherever an incorrect claim or label use is identified the client must notify the onward supply chain that has received products or material with incorrect branding. This is especially important where claims or labelling may have been applied to non-certified products.

## 11.3 Appeals and Dispute Resolution

In the event of a dispute between SEG and the client on Claims and Labelling, SEG will seek to resolve it by discussion and negotiation.

If that is not possible or has been exhausted, the client may use the [SEG Complaints Procedure](#).

## 12. Public information on claims

12.1 This guide is published on our website as 205 SEG Standard Claims and Labelling Guide in the [SEG Standard System](#) and summary information is also available from the web page: [SEG-Standard-Claims-and-Labelling](#).

## 13. Approved users

13.1 SEG will maintain a list of all approved users of claims (e.g. licensees/certificate holders/clients).

13.2 SEG will publish a list of approved users, subject to Data Protection legislation, on its website, linked from the web page: [SEG-Standard-Claims-and-Labelling](#).

#### **14. Monitoring, evaluation, learning and review**

14.1 This is a substantially updated Claims and Labelling Guide, reviewed to coincide with the launch of the **SEG Certified** logo.

14.2 As a new system document, with a range of procedures and standards, it will be included in our annual management system review to identify if any improvements can be made.

14.3 It will also therefore be incorporated into our MEL (Monitoring, Evaluation and Learning) Plan for regular review and as a potential topic for an external outcome evaluation.

14.4 It will also be reviewed each time the SEG Standard is reviewed, during which we will consult with stakeholders, to include supporting materials such as this guide.