



The Sustainable *Eel* Standard

including:

- **Explanatory Notes and**
- **Methodology**

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

This Standard is the property of the Sustainable Eel Group. It has gone through a consultation process with all interested parties during May 2013. It has had the advice and approval from independent and eel scientists and conservationists, as a sub-group of the Sustainable Eel Group.

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The Purpose of this Standard

The Sustainable Eel Standard has been developed as part of the solution for the sustainable recovery of the European Eel. It has been designed to:

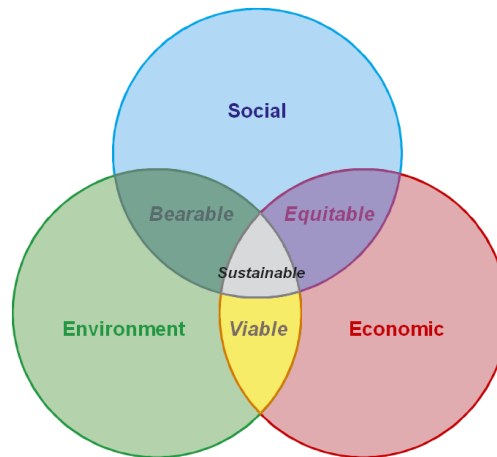
- Enable operators to demonstrate high standards and their commitment to sustainability
- Encourage high and responsible standards through the supply chain, from fishery to market
- Encourage sustainable practices and sustainable markets
- Discourage unsustainable practices and unsustainable markets
- Provide confidence to consumers who wish to buy responsibly

Sustainability and the European Eel

We have developed the Eel Standard in line with the principles of the Brundtland Convention's definition of sustainability ([see Note 2](#)), ie. :-

'development that meets the needs of the present without compromising the ability of future generations to meet their own needs'.

This concept balances the needs of the species, communities and economic growth as represented in the following diagram:



The Sustainable Eel Group (SEG), recognises that the term 'sustainable' cannot be truly applied to the European Eel population (*Anguilla anguilla*) until, over several generations and decades, the recruitment of glass eel is at a level that is considered biologically safe. We believe this recovery of the glass eel recruitment will not be achieved without major interventions, including the regulation of the fisheries, restocking, trap and transport and unblocking of migratory pathways. These interventions at a European scale are not achievable without a dynamic European eel industry. This Standard has been designed to promote and ensure the most responsible methods of fishing, transport and farming, such that the objectives of the EU Eel Recovery Plan and full sustainability will be achieved more quickly.

We have tried to find an objective external definition of sustainability for eel fisheries, and on this basis have turned to the EU Regulation (1100/2007) on stock rebuilding for *Anguilla anguilla*. The regulation requires each Member State with eel stocks to produce eel management plans (EMPs) with the long-term objective of ‘reducing anthropogenic mortalities so as to permit with high probability the escapement to the sea of at least 40 % of the silver eel biomass relative to the best estimate of escapement that would have existed if no anthropogenic influences had impacted the stock’ (Article 2 paragraph 4). The EMPs were subject to approval by the European Commission and an external review body – the International Convention for the Exploration of the Seas (ICES).

Based on this objective, we have developed two possible definitions of a sustainable eel fishery:

1. (a higher level definition) – the fishery removes eels from a catchment where the 40% escapement target is being met with reasonable probability; or
2. (a lower level or interim definition) – the fishery removes eels from a catchment where the EMP is approved and being implemented.

These are the definitions we have used to correspond to our score indicators below. We have taken the same approach with our definition of sustainability (see below). Note that with the review and revision of the EMPs in 2013, this definition of sustainability will be reviewed and changed if necessary.

The Sustainable Eel Group has defined a sustainable eel fishery as one which is:-

‘Managed in line with an approved EU Eel Management Plan’

and defined a sustainable eel product as:-

‘Having been sourced from a sustainable fishery and supply chain, caught in an environmentally sensitive manner and (in the case of aquaculture) has been grown or ranched in conditions that meet European standards for health, bio-security, welfare and the environment’

This document is the fifth version of the Sustainable Eel Standard as approved by the Standard sub-group of the Sustainable Eel Group (SEG). The Standard is subject to continuous improvement and is based on the best available science. It will continue to be reviewed and improved as the scientific knowledge improves and at least every 3 years as Eel Management Plans are reviewed.

How the Standard works

The eel sector is composed of many parts, starting with fishing, through transport, holding, and farming to restocking or retail supply to the consumer. This standard is designed for each part of the supply chain to show that is achieving the highest standards and is acting responsibly and sustainably, contributing towards a sustainable outcome for the eel. It is also designed to help ensure that quotas for restocking are met. This is an important element of the EU Regulation to aid the Eel’s recovery.

The Standard is divided into the following components:

Component 1:	Generic requirements
Component 2:	Glass eel fisheries
Component 3:	Glass eel buying and trading
Component 4:	Eel culture
Component 5:	Restocking
Component 6:	Yellow and silver eel fishing
Component 7:	Traceability

Component 1 must firstly be met by any organisation that wishes to be assessed against any of the other components. This has no exceptions and is mandatory.

After meeting Component 1 an organisation must then achieve a pass under all the other components which apply to them. For example, a company that both trades eels and cultures them would need to pass both Component 3 – Glass Eel Buying & Trading, and Component 4 – Eel Culture.

Finally, for a company to make a claim on the product they sell (ie. to use the Sustainable Eel Standard logo as an eco-label on their packaging or marketing) they must also pass Component 7 - Traceability. Again as an example, if a an eel farm was to pass Component 4 but not Component 7, they would be certified as farming eel to the level of the component but would be unable to make any claim on outgoing product they are selling.

Each component consists of a series of criteria for which there are three scoring indicators: green, amber and red (although a few criteria have only a green and red indicator). Criteria are weighted – the most important counted twice, while other matters of less importance are counted once.

In order to pass overall, the scores should include a majority of greens for that component (eg. 4 out of 7 or 5 out of 8 green; a green score in a key, weighted issue will count as two greens – an amber score will similarly count as two ambers). Any one red score will result in failing an evaluation against the Standard. Where there is an equal number of greens and ambers, the outcome will be decided by a review panel (the Sustainable Eel Standard sub-group of SEG). In such borderline cases, the panel will apply a simple but rigorous test; ie. is it possible for the assessed organisation to achieve any further greens within an appropriate period (defined by the sub-group). In these cases, certification will usually be conditional on improved performance.

Assessments against the standard are carried out by an independent assessor, who must meet the requirements set out in the Methodology. The final decision is taken by the SEG review panel after analysis of the assessor's report. A surveillance audit process is in place to monitor the on-going performance of certified organisations, and any certification under the standard may be suspended or removed from the organisation concerned if the requirements of the standard are breached.

The Standard

Each component of the standard is set out in this section. Explanatory notes are provided where supplementary explanation or clarification may be required.

Component 1 – Generic requirements

The requirement in this component of the Standard must be met by any organisation wishing to be certified against any other part of this standard, regardless of the specific nature of its activity.

1. Commitment to sustainability & legality (See Note 1)	
green score indicator	All trading and commercial relationships are aligned with SEG goals AND the organisation has declared to the assessor any historic conflicts of interest with regard to eel sustainability AND there is no evidence of illegal trading and/or of circumventing the EU Eel Regulation AND any evidence of illegality by commercial partners or other organisations is immediately reported to the appropriate authorities.
red score indicator	The organisation or a member of the organisation has been arrested on suspicion of illegal buying, holding, selling or trading of eels in the last 12 months, AND/OR for failure to declare eel fishing or trading activities appropriately to the authorities, AND/OR for other serious breaches of national or international eel regulations; AND/OR credible sources suggest that the organisation has been involved in serious breaches of national or international eel regulations in the last 12 months (the above applies to close business partners of the organisation, which members of the organisation must reasonably have known about, without the organisation informing the appropriate authorities) AND/OR the organisation is involved in activities which put in serious question their commitment to sustainability.

Component 2 - Glass eel fisheries

1. The management target (40% escapement or otherwise) is being achieved (See Note 2)	
Weighting: 2	
green score indicator	The Eel Management Plan is approved and there are good data which shows with reasonable confidence that the EU silver eel escapement target is being achieved in the eel management district.
amber score indicator	The Eel Management Plan is approved and there is evidence that it is being implemented.
red score indicator	The Eel Management Plan is not approved AND/OR there is little evidence of it being implemented AND/OR key parts of it are not being implemented AND/OR there is strong evidence of widespread non-compliance which is undermining implementation.
2. The fishery is well-managed (See Note 3)	
Weighting: 2	
green score indicator	Fishers are licensed and provide logbook data AND data on catch and effort are collected and analysed regularly by the management agency (at least annually at the end of the

	season), AND data are made available to the management agency at any time if required AND data are considered to be accurate, useful for statistical purposes and provide a comprehensive picture of the glass eel fishery under assessment AND fishermen only use legal gear AND enforcement is in place throughout the fishing area with no evidence of systematic non-compliance.
amber score indicator	Fishers are licensed AND data on catch and effort are collected and analysed regularly by the management agency (at least annually at the end of the season) AND data are considered 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 AND fishermen only use legal gear AND there is no evidence of systematic non-compliance.
red score indicator	There is evidence of illegal fishing that may adversely affect the fishery AND/OR data are not collected on catch and effort AND/OR data are too inaccurate or partial to provide enough information for management AND/OR there is evidence of systematic non-compliance in the fishery (eg. widespread use of illegal gear, misreporting of catches, failure to respect quotas, closed periods or other management regulations, or other).
3. Mortality during fishing is minimised (See Notes 4 & 5)	
Weighting: 2	
green score indicator	Fishing is by hand-held nets OR fishing from vessels meets the following criteria: i) fishing is at slow speed (anchored in current or speed of no more than 1 knot relative to water); ii) haul duration is on average no longer than 20 minutes, with the maximum duration not more than 30 minutes; (iii) mesh size of cod end no greater than 1mm; (iv) rest of the net designed such that glass eels do not become trapped or abraded; v) vivier tank on board and in use; AND fishermen can demonstrate that the mortality rate of the catch over the duration of holding in the storage facility is <4% for each batch captured.
amber score indicator	Fishing from vessels meets the following criteria: i) fishing is at slow speed (no more than 1.5 knots relative to water); ii) maximum haul duration no longer than 30 minutes; iii) mesh size of cod end no greater than 1mm; iv) rest of the net designed such that glass eels do not become trapped or abraded; v) vivier tank on board and in use; AND fishermen can demonstrate that the mortality rate of the catch over the duration of holding in the storage facility is <8% for each batch captured.
red score indicator	The fishing technique does not meet the amber requirements, AND/OR mortality rate in the storage facility exceeded 8% for one or more batches in the last 12 months.
4. The fishery has negligible impacts on by catch species (See Note 8)	
Weighting: 1	
green score indicator	The fishery has a negligible impact on by-catch AND by-catch is returned to the water alive as gently and rapidly as possible.
amber score indicator	The fishery has low-level impacts on by-catch AND by-catch is returned to the water alive as gently and rapidly as possible.
red score indicator	The fishery has a severe impact on by-catch AND/OR by-catch is discarded dead
5. The fishery has negligible impacts on rare or other protected species	
Weighting: 1	

green score indicator	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.
amber score indicator	Interactions, resulting in mortality or injury, with other species that are considered vulnerable, threatened, endangered, or are protected under national or international law, are rare and have no overall measurable impact on the population.
red score indicator	The fishery has interactions resulting in mortality or injuries, with species that are considered vulnerable, threatened, endangered or are protected under national or international law, which may have an impact at the population level.
6. The fishery has negligible impacts on habitats	
Weighting: 1	
green score indicator	The fishing gear does not cause any damage to the bottom.
amber score indicator	Damage to the bottom by gear is limited or minimal.
red score indicator	Damage to the bottom by gear is frequent or widespread.

Component 3 - Glass eel buyers

1. Mortality in storage facility (See Note 5)	
Weighting: 2	
green score indicator	Mortality rate over the season is less than 2% on average.
amber score indicator	Mortality rate over the season is less than or equal to 5% on average but greater than or equal to %
red score indicator	Mortality rate over the season is greater than 5% on average.
2. Mortality during transport and initial holding if transported to farm (See Note 9)	
Weighting: 2	
green score indicator	Mortality during transport and for the first week at the farm is less than 2% on average.
amber score indicator	Mortality during transport and for the first week at the farm is less than or equal to 3% on average but greater than or equal to 2% on average.
red score indicator	Mortality during transport and for the first week at the farm is more than 3% on average.
3. Water quality	
Weighting: 1	
green score indicator	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) AND

	water quality management procedures are in place including regular monitoring of relevant parameters which shows that water quality is always high and stable AND water quality monitoring is linked to an alarm-based system in the event of a sudden drop in water quality AND 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.
amber score indicator	A system is in place that is expected to keep key water quality parameters within suitable tolerances (e.g. Ammonia, Suspended Solids, pH, Oxygen) AND 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.
red score indicator	No water quality monitoring occurs AND/OR water quality is not held regularly at levels which are considered suitable for healthy eel survival.
4. Biosecurity is present and disease is treated rapidly and appropriately	
Weighting: 1	
green score indicator	An effective and documented biosecurity plan (including the washing and disinfection of equipment) is in place AND records are available showing regular monitoring of health and possible signs of stress (including the completion of periodic microscope parasite checks) AND records are maintained in relation to the name, administrator, amount, dates and reason for use of any medicines and/or chemicals used in the facility AND the use of chemicals follows legal requirements of the appropriate EU regulations and of the country concerned.
amber score indicator	The facility follows bio-security measures (including the washing and disinfection of equipment) although this is not documented AND eels are regularly monitored for health and possible signs of stress (although this might not be documented) AND records are maintained in relation to the name, administrator, amount, dates and reason for use of any medicines and/or chemicals used in the facility AND the use of chemicals follows legal requirements of the appropriate EU regulations and of the country concerned.
red score indicator	The facility operates no bio-security measures (including the washing and disinfection of equipment) AND/OR there is no checking of the eels for health and possible signs of stress AND/OR records are not maintained with regards to the use of medicines and/or chemicals AND/OR legal requirements of the appropriate EU regulations and country concerned are not met for the use of medicines or chemicals.
5. Handling and welfare (see notes 10 and 11)	
Weighting: 1	
green score indicator	Systems are in place and the facility is designed to keep handling to an absolute minimum AND documented procedures are in place for handling, and handling, where necessary, is careful AND 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) AND eels are moved without being allowed to dry out.
amber score indicator	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 AND handling, where necessary, is carefully planned and executed AND the infrastructure has been optimised as far as possible to avoid injuries AND nets are small-mesh (1mm maximum) AND eels are moved without being allowed to dry out.
red score indicator	Excess, poorly planned or careless handling is likely to result in additional mortality.
6. Transport (See note 12)	

Weighting: 1	
green score indicator	Transport is carefully planned to minimise travel time AND packing is done in a way that minimises handling, time and stress AND eels are kept cool and wet with an adequate supply of oxygen.
red score indicator	The above criteria are not met.
7. The required percentage of glass eels from the fishery is being used for restocking (See Note 13)	
Weighting: 2	
green score indicator	The buyer can provide documented evidence that <u>they have sold</u> at least the required target percentage of its glass eels from the latest season for the primary purpose of conservation / escapement.
amber score indicator	The buyer can provide documented evidence that the <u>has made</u> at least the required target percentage of its glass eels from the latest season available for the primary purpose of conservation / escapement, OR 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 OR that the buyer can provide credible evidence that re-stocking will occur in the forthcoming season.
red score indicator	The buyer does not make or has no evidence to show that he has made the required target percentage of its glass eels available for restocking in the last year.

Component 4 - Cultured eel

1. The total mortality rate during the culture process is low (See note 14 and note 9)	
Weighting: 2	
green score indicator	The Percentage Mortality Rate (See note 14 for formula) 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 (See note 9 regarding first week mortality)
amber score indicator	The Percentage Mortality Rate (See note 14 for formula) 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. (See note 9 regarding first week mortality)
red score indicator	The Percentage Mortality Rate (See note 14 for formula) of eels in culture is greater than or equal to 15% on average in the current and previous year OR as an average of the previous five years. (See note 9 regarding first week mortality)
2. The fish meal/oil ingredients in the feed come from a sustainable source (See Note 15 and 16)	
Weighting: 1	
green score indicator	Fish meal/oil in the feed (including juvenile feeds) comes from a fishery where the stock is at or above a target or precautionary reference point (for example is certified by a standard which is aligned with the FAO Code of Conduct for Responsible Fishing).
amber score indicator	Fish meal/oil in the feed (including juvenile feeds) <u>does not</u> come from a fishery where the stock is at or above a target or precautionary reference point (for example is certified by a standard which is aligned with the FAO Code of Conduct for Responsible Fishing)

	but the product <u>does come</u> from fish waste from processing that would otherwise be discarded.
red score indicator	One or more of the sources of fish meal/oil in the feed (including juvenile feeds) is from a depleted stock with no rebuilding plan in place AND/OR the product comes from fish waste from processing that would otherwise be discarded.
3. Feed is used as efficiently as possible (See note 17)	
Weighting: 1	
green score indicator	The average feed conversion ratios in the farm are as follows: glass eel to fingerlings: 1.1 or less fingerlings to 200g: 1.6 or less large eels: 2.0 or less
amber score indicator	The average feed conversion ratios in the farm are as follows: glass eel to fingerlings: 1.3 or less fingerlings to 200g: 1.8 or less large eels: 2.2 or less
red score indicator	The average feed conversion ratios in the farm are as follows: glass eel to fingerlings: greater than 1.3 fingerlings to 200g: greater than 1.8 large eels: greater than 2.2
4. Water quality	
Weighting: 1	
green score indicator	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) AND water quality management procedures are in place including regular monitoring of relevant parameters which shows that water quality is always high and stable AND water quality monitoring is linked to an alarm-based system in the event of a sudden drop in water quality AND 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.
amber score indicator	A system is in place that is expected to keep key water quality parameters within suitable tolerances (e.g. Ammonia, Suspended Solids, pH, Oxygen) AND 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.
red score indicator	No water quality monitoring occurs AND/OR water quality is not held regularly at levels which are considered suitable for healthy eel survival.
5. There are no ecological impacts from effluent discharge	
Weighting: 1	
green score indicator	Effluent discharge is regularly tested by the farm AND Effluent discharge complies with all local and national requirements AND has not been found to be non-compliant in the past 5 years.
amber score indicator	Effluent discharge is regularly tested by the farm AND/OR has been found to be non-compliant on 1 occasion in the past 5 years.
red score indicator	Effluent discharge is regularly tested by the farm AND/OR effluent discharge does not comply with all local and national requirements AND/OR has been found to be non-compliant on 2 or more occasions in the past 5 years.

6. Biosecurity is present and disease is treated rapidly and appropriately	
Weighting: 1	
green score indicator	The farm operates an effective and documented biosecurity plan for the prevention and protection of fish AND daily records are available showing regular monitoring of fish health and signs of stress AND records are maintained in relation to the name, administrator, amount, dates and reason for use of any medicines and/or chemicals used in the facility AND the use of chemicals follows legal requirements of the EU and of the country concerned.
amber score indicator	The farm follows bio-security measures (although this may not be documented) AND eels are regularly inspected for disease (although this may not be documented) AND records are maintained in relation to the name, administrator, amount, dates and reason for use of any medicines and/or chemicals used in the facility AND the use of chemicals follows legal requirements of the EU and of the country concerned.
red score indicator	The farm has no bio-security measures in place AND/OR eels are not inspected regularly for disease AND/OR no records are maintained with regards to the use of medicines and/or chemicals AND/OR legal requirements of the EU and country concerned are not met for the use of medicines or chemicals.
7. Grading, slaughter and transportation are carried out with respect to welfare (See note 18)	
Weighting: 1	
green score indicator	Grading is completed in an efficient manner AND slaughter is completed by a method that provides an instant death or renders them insensible to pain AND procedures are in place to ensure transportation provides suitable conditions for fish welfare.
red score indicator	Grading is not seen to be completed in an efficient manner AND/OR slaughter is completed by a method other than one that provides an instant death or renders them insensible to pain instantaneously AND/OR transportation does not provide suitable conditions for fish welfare.
8. The farm provides eel for restocking (See note 19)	
Weighting: 2	
green score indicator	The farm can provide documented evidence that 10% or more of the farms (See Note 19 for calculation) annual eel production (by piece) <u>has been released</u> for restocking for the purpose of conservation / escapement.
amber score indicator	The farm can provide documented evidence that it makes 10 % of their annual eel production (by piece) <u>available</u> for restocking for the primary purpose of conservation / escapement AND/OR for new clients, the farm can demonstrate that they have bookings for re-stocking in the following year at more than 10% of the predicted annual eel production (by piece) for the purpose of conservation / escapement.
red score indicator	The farm does not make or has no evidence to show that it has made any eels available for restocking in the last year.

Component 5 - Restocking

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
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Weighting: 1	
Green score indicator	The eel management plan is approved and there are good data which show with reasonable confidence that the EU silver eel escapement target is being achieved in the eel management district OR the restocking is part of a management initiative that should with reasonable confidence lead to the 40% escapement target being achieved in the future. Fishing of restocked eels does not have any measurable impact on escapement.
Amber score indicator	The management plan is approved and there is evidence that it is being implemented. The restocking is a part of the management plan. Fishing on restocked eels may have measurable impacts on escapement, but only if escapement is above the 40% target.
Red score indicator	There is no approved management plan OR the plan is not being implemented OR restocking is not part of the plan or contributing to the plan OR fishing on restocked eels has a significant impact on escapement which is below the 40% target level.
2. Survival and growth rates of restocked eels, and escapement from the system, can be estimated	
Weighting: 1	
green score indicator	A formal monitoring programme estimates 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. There is active research on means of improving the restocking programme or restocking techniques.
amber score indicator	A monitoring programme estimates survival, growth and escapement. The existing evidence suggests that restocking is significantly enhancing eel biomass and contributing to escapement.
Red score indicator	There is no monitoring of restocked eels OR monitoring suggests that restocking is making no measurable contribution to biomass or escapement.
3. The restocked area is suitable for eel growth, survival and escapement	
Weighting: 1	
green score indicator	Ecological information suggests that the system into which eels are restocked is suitable eel habitat (eg. type of water body, productivity, former presence of eels). 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 (eg. effective passes trap and transport).
amber score indicator	It is reasonable to assume by analogy with other systems the system into which eels are restocked is good eel habitat. 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.
Red score indicator	The system into which eels are restocked is unsuitable habitat (eg. excessive levels of pollution or disease) OR migration pathways from the system to the sea are blocked and there is no plan for opening or circumventing these blockages within a reasonable timeframe OR the restocked system connects to the sea in an area which is not part of the natural geographic distribution of European eel.
4. The risk of restocked eels introducing disease into wild populations has been assessed and is minimal	
Weighting: 1	

green score indicator	Eels are tested before restocking and found to be free of disease AND/OR eels are from a known source which is tested on a regular basis and known to be free of disease.
amber score indicator	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 OR eels are from a known source where available evidence is sufficient to confidently suggest that disease levels are low (although it may not be tested regularly) OR eels from an area where a disease is endemic in the wild population are being restocked into an area with similar prevalence of the same disease(s).
Red score indicator	Restocking poses a significant risk of introducing disease into areas where it does not exist or is not prevalent, OR there has been no consideration of disease risk before restocking.

Component 6 - Yellow and silver eel fishing

1. The management target (40% escapement or otherwise) is being achieved (see note 2)	
Weighting: 2	
green score indicator	The management plan is approved and there are good data (see note 3) which show with reasonable confidence that the EU silver eel escapement target is being achieved in the eel management district.
amber score indicator	The management plan is approved and there is evidence that it is being implemented. The fishery is complying with the requirements of the EMP. If the best estimate is that escapement is below the 40% target, then the fishery has no significant impact on escapement.
Red score indicator	The management plan is not approved OR there is little evidence of it being implemented OR the fishing is having a negative impact on escapement which is below the 40% target.
2. The fishery is well-managed	
Weighting: 2	
green score indicator	Fishers are licensed and provide logbook data in accordance with the requirements of the regulatory authority AND data on catch and effort are collected and analysed regularly by the management agency (at least annually at the end of the season), AND data is made available to the management agency at any time if required AND data is considered to be accurate, useful for statistical purposes and provide a comprehensive picture of the glass eel fishery under assessment AND fishermen only use legal gear AND enforcement is in place throughout the fishing area with no evidence of systematic non-compliance AND catch records make a distinction between glass eel, yellow eel, male silver eel and female silver eel
amber score indicator	Fishers are licensed AND Data on catch and effort are collected and analysed regularly by the management agency (at least annually at the end of the season) AND Data are considered 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 and silver eel escapement AND fishermen only use legal gear AND there is no evidence of systematic non-compliance.
Red score indicator	All or some fishers are not licensed AND/OR data are not collected on catch and effort AND/OR data are too inaccurate or partial to provide enough information for

	management AND/OR there is evidence of systematic non-compliance in the fishery (eg. widespread use of illegal gear, misreporting of catches, failure to respect quotas, closed periods or other management regulations, or other).
3. The fishery has negligible impacts on by-catch species	
Weighting: 1	
green score indicator	The fishery has a negligible impact on by-catch AND by-catch is returned to the water alive as gently and rapidly as possible AND dead by-catch is landed and recorded AND the fisheries show initiatives to reduce the amount of dead by-catch
amber score indicator	The fishery has low-level impacts on by-catch AND by-catch is returned to the water alive as gently and rapidly as possible.
Red score indicator	The fishery has a severe impact on by-catch AND/OR by-catch is discarded dead
4. The fishery has negligible impacts on rare or other protected species	
Weighting: 1	
green score indicator	The fishery has no direct interactions resulting in mortality or injury with other species that are considered vulnerable, threatened, endangered or are protected under national or international law.
amber score indicator	Interactions, resulting in mortality or injury, with other species that are considered vulnerable, threatened, endangered or are protected under national or international law, are rare and have no overall measurable impact on the population.
Red score indicator	The fishery has interactions resulting in mortality AND/OR injury, with species that are considered vulnerable AND/OR threatened AND/OR endangered AND/OR are protected under national AND/OR international law, which may have an impact at the population level.
5. The fishery has negligible impacts on habitats	
Weighting: 1	
green score indicator	The fishing gear does not cause any damage to the bottom.
amber score indicator	Damage to the bottom by gear is limited or unusual.
Red score indicator	Damage to the bottom by gear is frequent or widespread.

Component 7 – Traceability

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

1. Incoming product (See Note 20)	
green score indicator	The organisation/fishery operates a system which allows incoming eel products to be traced back to a certified source.

red score indicator	The organisation/fishery is unable to demonstrate that product can be traced back to a certified source.
2. Separation and segregation of product (See Note 21)	
green score indicator	The organisation operates a system which ensures that the product remains separated at all stages from arrival to dispatch from non-certified eel products AND the organisation ensures that any products wishing to make a claim as certified do not contain any non-certified eel-based ingredients.
red score indicator	The organisation has no system in place to ensure that certified and non-certified product remains separate at all stages OR non-certified and certified products have become mixed OR certified products (or products wishing to be certified) contain or could contain non-certified eel-based ingredients
3. Outgoing product (See Note 22)	
green score indicator	The organisation only labels certified products with the 'SES' eco-label once it has been approved to do so through the signing of an 'SES' eco-label licence agreement. All product to be sold as certified by an organisation meets the following criteria: <ul style="list-style-type: none"> • Any product labelling shall be accompanied by the 'SES' logo. • Products shall be accompanied by an invoice which: <ul style="list-style-type: none"> - Includes the relevant 'SES' batch code in the product description; - Includes a record of the volume/quantity of product and to whom it was sold; - Includes the SES batch code on the invoice • The SES batch code must be clearly related to the certified product only
amber score indicator	The above requirements are met except that: <ul style="list-style-type: none"> • Products have not been correctly labelled through the invoice
red indicator	Products or product invoices have been labelled as SES with the words SES or the SES Eco-label despite not being completely derived from a certified source.
4. Record keeping and documentation (See Note 23)	
green score indicator	<ul style="list-style-type: none"> • The organisation operates a system that allows the tracking and tracing of all eel from purchase to sale and including any steps in between. In the case of live eels this should include the ability to track each eel in each batch delivered to a buyer to be connected back to a water, a time period (maximum duration one month) and specific fisherman/vessel. • The organisation operates a system that also allows for the completion of a batch reconciliation of eel product by weight over a given period. • The organisation maintains records for a minimum of three (3) years.
orange score indicator	The above requirements are met except that records have been maintained for less than three (3) years
red score indicator	The organisation's tracking and tracing system shows evidence that certified and non-certified product have become mixed AND/OR batch reconciliation records are unable to confirm that outgoing quantities are in line with incoming quantities.

Explanatory Notes

Note 1: Sustainability and Legality

In the past, eel fishing and trading in much of the EU has been dogged by illegal and unreported activity. SEG is clear that the road map for recovery of the European eel population, as set out in the EU Regulation, cannot be followed unless all commercial activity is carried out in full respect of the law and in full transparency.

SEG also condemns some activities which, while not illegal, are not in the interest of recovery of the European eel population. The assessor should evaluate the full range of activities of the organisation which relate to eels. Activities should be judged on a case-by-case basis, but activities such as involvement with unregulated European eel fisheries outside the geographical scope of the EU Regulation (eg. in North Africa), except for purposes relating to conservation, would be considered by SEG as unsustainable.

The red score indicator addresses 'serious' breaches of regulations. In this context, 'serious' should be interpreted as involving breaches of regulations that cannot reasonably be considered to have occurred by accident or carelessness (such as errors in paperwork or failures to meet administrative deadlines).

The red score indicator considers illegal or inappropriate activities which occurred or were suspected to occur within the last 12 months. This time period is specified in order to give organisations the opportunity to 'repent' and join the standard, even after a history of illegal or inappropriate activities. However, the methodology specifies that in the event of evidence of further such activities coming to light, such organisations will have their certification immediately suspended.

Note 2: Definition of a sustainable eel fishery

This note applies to both glass eel fisheries and fisheries for yellow and silver eels. Sustainability is a general concept which can be defined and addressed in different ways.

In 1987 the Brundtland Commission (a commission set up by the United Nations to unite countries to pursue [sustainable development](#) together defined 'sustainable development' as:

'Development that meets the needs of the present generation without compromising the ability of future generations to meet their own needs'.

In 1995 the Food & Agriculture Organisation (FAO) published a Code of Conduct for Responsible Fisheries which states that:

'The right to catch fish carries with it the obligation to do so in a responsible manner so as to ensure effective conservation and management of the living aquatic resource'

and

'The best scientific advice available must be taken into account in order to evaluate the current state of the fisheries resource and the possible impact of the proposed measures on the resource'.

In assessing progress of an eel management plan, the assessor will seek evidence from the relevant agencies to identify whether there is credible progress with the majority of management actions.

Note also that for countries where the EU Regulation does not apply, a similar standard that is at least the equivalent of that set out in the EU regulation and is based on the implementation of an eel management plan approved by an international scientific committee.

Note 3: Good data

Good data are defined as data that can be used for statistical analysis with reasonable power.

Note 4: Mortality rates during fishing for glass eels

It would be more straightforward to have only a direct statement about the mortality rate, but stakeholders were concerned that: i) the mortality rate is variable eg. over the season; ii) the mortality rate is difficult to measure because eels may look fine but have invisible injuries that subsequently cause mortality outside the specified timeframe and iii) it would be relatively easy for fishermen to 'put on a good show' for inspectors in this regard (for example, poor physical condition can be masked by raising salinity of the tank water with salt to between 10 and 16 ppt). Therefore, we have chosen to include a series of criteria about the fishing method, such that the Standard requires fishermen to use techniques that are known by the industry to result in low mortality rates. These are in line with the French 'good practice guide' for glass eel fishing for the purposes of restocking – available at http://www.comite-peches.fr/site/maj/_files/upload/pv_ccr/GPG_Glasseel_Restocking.pdf.

Note 5: Mortality rates in glass eel fishery and in storage

Mortality from fishing can become apparent during the period of glass eel storage, rather than in the fishery itself. Since the glass eel catch over several days tends to be amalgamated in one tank in the holding facility, it is not possible to separate out a time period to allocate this mortality to the fishery vs. the holding facility – eg. by saying that mortality during the first 24 hours is due to the fishery while after that it is due to conditions during holding. Thus, the maximum mortality rate for the fishery covers the whole time period that the glass eels are in the holding facility. The Standard for glass eel buyers (Component 3 of the Standard) also includes a mean mortality requirement, which is lower than the maximum mortality requirement for the fishery, although covering the same time period. This arises because the glass eel fishery component (Component 2) requires a maximum permissible rate for each batch, while the glass eel storage component (Component 3) sets a maximum for the average rate across the whole season. Note that these two rates are not additive – both must be achieved.

Note 6: Design of net for glass eel fishing

The crucial element in the design of fishing gear for glass eels is that it does not allow the eels to become trapped in the mesh – this leads to mechanical injuries which eventually leads to mortality even if such injuries are not immediately visible. For the cod end and for hand-held

nets, this is generally solved by ensuring that the mesh size is small enough so that no part of the glass eel fits through. For the rest of a towed net, the mesh size can either be small enough as above, or large enough that glass eels can pass through without injury (in practice, most swim away from the mesh, ensuring that they remain in the net). For the cod end, we have been prescriptive about mesh size, but for the remainder of the net, fishermen may find their own solutions, as long as they fulfil the criterion of not causing injury or abrasion.

Note 7: Vivier tank

This is a tank for holding live fish with systems to replenish water, and monitor and maintain water quality standards appropriate to the fish species and life stage.

Note 8: By-catch in glass eel fisheries

In order to evaluate impacts of the fishery on by-catch over a fishing season, the assessor will require evidence which is likely to include:

- Main species represented in the by-catch
- A quantitative or qualitative evaluation of the quantity of each species caught over a given period (eg. per tow or dip, per night)
- The measured or likely population status of these species in the area of the fishery (noting that rare, endangered or protected species are dealt with separately)
- Protocols or methods for dealing with by-catch
- The actual or likely discard survival

‘Negligible impacts’ are defined as a low rate of by-catch plus a low rate of discard injury or mortality plus by-catch only from species which are abundant in the area. ‘Low-level’ impacts are where two of these criteria are met. In ‘severe’ impacts, none of the criteria may be met in full. Where only one criterion is met in full, the assessor shall use their judgement in making a recommendation to SEG.

Infrequent but large catches of gelatinous zooplankton in glass eel nets during bloom periods may be excluded from these criteria.

Note 9: Mortality during first week in culture

It was agreed between glass eel buyers and eel farmers represented on the stakeholder group that mortality during the first week in the eel culture facility is related to handling during fishing, holding and/or transport, rather than to factors under the eel farmer’s control. This period therefore may be left out of calculations for mortality rates during culture.

Note 10: Careful handling

Careful handling will involve, amongst other things, no dropping or tipping, no drying out, minimal contact with sharp edges or corners, nothing in which the tail could be caught, moving the eels with water rather than nets where possible, and the procedure to be planned in advance and completed as quickly as possible.

Note 11: Design of glass eel holding facilities

In order to be ideal for glass eel holding, there should be, for example, no sharp corners or edges, no excessive flow rates and no abrupt changes in flow rate. Some buyers may use facilities that

have been adapted rather than specially designed, and thus may not be ideal. The standard has been designed so that these facilities can still have an 'amber' score if they are used as well as possible, but a green score can only be obtained by facilities with a completely appropriate design.

Note 12: Transport – no 'amber' score possible

We were not able to design an 'amber' score criterion for transport – it appears that anything less than the optimum standard is not acceptable. There is therefore only one scoring criterion here – either pass (green) or fail (red).

Note 13: Restocking requirements under the EU Regulation

The EU Regulation requires that by 31 July 2013, 60% of glass eels from fisheries should be reserved for restocking in order to improve escapement rates. Intermediate targets are 35% in the first year of implementation of the EMP, rising by 5% per year, or more if necessary to meet the 2013 deadline. National targets may differ somewhat from these, even in approved EMPs: for example, France proposed a target of 40% in the 2010-11 seasons, rising by 5% each year such that the 60% target will be met in the 2014-15 season. The assessor should take the restocking requirement that is appropriate to the situation – usually this will be the target set out in the national or local EMP, as long as it is approved, but different targets may be used if appropriately justified. EU restocking targets will be reviewed as part of the review of the EU Regulation, proposed for 2013.

Note 14: Mortality rate during culture

Unlike for the fishery, traceability at the farm level should ensure that mortality can be measured directly and evaluated reliably by the assessors. In practice, calculating mortality can be a difficult task and finding a single method to fit all farms is problematic. It has been decided that a direct approach is the most feasible for use across the culture industry. The following methodology should therefore be used;

1. (Total Mortality (by piece) in the year / Total Stock (by piece) in the year) X 100
2. This then needs to be multiplied by the average time that an eel will spend in the system.
3. This should be completed on a yearly basis by the farm

An example:

A farm has recorded a total stock for the year of 1.8 Million eels (Calculated using an average weight). During the year it records a total mortality of 100,000 eels (Calculated using an average weight).

This provides the following calculation;

$$(100,000/1,800,000) \times 100 = \underline{4.4\%}$$

On average, an eel will spend a maximum of two years in the facility meaning this mortality rate needs to be doubled, giving a total mortality percentage of 8.8%. The farm would therefore score a Green Indicator for this.

It must be emphasised that the farm manager will be asked to provide the calculation directly. The workings, including evidence of how the figures have been achieved, will need to be provided to the assessor.

Note 15: Feed

For feed products other than pelleted feed (eg. cod roe), it is the responsibility of the organisation under assessment to show that the source is sustainable.

In relation to pelleted feed, it is recognised that feed companies may be unwilling to provide the sources and breakdown of ingredients, such that information may be difficult to obtain. SEG will contact feed companies (known to supply the eel industry) directly on a yearly basis. This will lead to the yearly agreement on what feed products can be considered to meet the green and amber indicators and this will be made available to all the companies involved. The idea of this is to negate the requirement for each farm to contact the feed company individually. If a farm uses a product that is not on this 'approved list' it will be his responsibility to prove it meets the requirements set out in the standard.

Note 16: Sustainable fisheries

In this statement we follow MSC and other eco-labels in considering i) the impact of the fishery on the stock of the target species, and ii) the impact of the fishery on other species and marine ecosystems more generally.

Note 17: Feed conversion ratios

A good Feed Conversion Ratio (FCR) is key to ensuring that the farm is operating efficiently and using its feed in an effective manner. The FCR will vary depending on the size of the fish and so three separate FCRs are given. FCR figures should be verified whenever possible by the assessor to ensure they have been calculated correctly.

Note that these figures are from eel farmers – no national or international standards appear to exist for eel farming.

Note 18: Humane Slaughter Methods

Although the EU does not currently provide a list of acceptable humane methods of slaughtering fish it is generally agreed that the best methods are those that;

'provide an instant death or render them insensible to pain'

For the purposes of this standard the methods that are considered to meet this statement are defined as, electrical shock, be-heading, pithing or chilling. Other methods may be considered by the assessor if evidence can be given to support this overriding statement is valid.

Note 19: Restocking of Cultured Eels

The requirement for restocking eels during culture distinguishes between the actual provision of eels for restocking and eels being 'made available' for re-stocking (ie. a willingness on the part of the eel growers to provide eels for restocking as and when there is a market, even if the market is less lucrative than the market for eel product). Whichever is used, the farm must be able to provide evidence to support this and to show that the eels are going for the purposes of restocking (documentation for the purchasers stating this intended purpose would act as sufficient evidence here). Restocking in this context refers to restocking for the primary purpose of enhancing escapement, rather than for fisheries.

Restocking percentages should be calculated by piece, although an average weight may be used to calculate this. The calculation to be used would be:

$$((\text{Year Restocking Total (by piece)} / \text{Year Production (by piece)}) \times 100 = \% \text{ Restocked per year})$$

Note 20: Incoming Product

The client will need to have access to the certificates of all certified suppliers with whom they deal, to prove to the auditor that they are certified. These will need to be backed up by incoming invoices from these suppliers showing the purchase of SEG Certified product.

Note 21: Separation and Segregation

Separation can be achieved through physical or temporal separation. However it is done, it must ensure that mixing will not occur. Products cannot contain any non-certified eel (all eel-based ingredients must come from an SES certified source).

Note 22: Outgoing Product

It is a requirement that all products that wish to be labelled as meeting the Sustainable Eel Standard (SES) also carry the relevant logo. The use of the logo will also need to be approved through the signing of an SES logo licence agreement prior to its use. Organisations will need to use the 'SES' prefix to identify products as certified on labels and invoices. Invoices will also need to have the quantity of certified product and show the SES batch code. This code needs to link clearly to the certified product (so if non-certified product is also included on the invoice, it is clear that this product is not included).

eg. SES001/01. This code refers to products showing the 'SES' prefix and states that the eel product has been certified as sustainable against the Sustainable Eel Standard.

It is not required that end-consumers are provided with an invoice meeting these requirements but they should receive documentation (receipt and product packaging) showing that the product is SES certified. Records will still need to be kept regarding the quantities sold to end consumers. A separate document explaining batch coding is available from the SEG website.

Note 23: Record Keeping and Documentation

The key to traceability is good record-keeping. Organisations will need to be able to produce records that allow for the tracking of product throughout their ownership. They will also be required to produce records that allow an auditor to view the quantity (in weight) of product that has been bought, lost and sold. The auditor will want to be able to ensure that the amount of certified product leaving the Chain of Custody is the same or less than the corresponding amount bought.

It is noted that glass eels shrink during storage (they don't feed), so weight change is an important element of rectifying 'eels in' with 'eels out' for a batch. However, for this case there is a trade-off between frequent record-keeping and mortality induced by handling so that good husbandry dictates that handling is minimised – this means weighing only when necessary.

Methodology

Introduction

This has been created as an accompaniment to the Sustainable Eel Standard (Version 5, 21st June 2013). It is designed to provide an operational methodology for Certification Bodies (CBs) undertaking audits against the Sustainable Eel Standard.

General Terms

Certification Body (CB): A Certification Body is anybody that has been approved by SEG to complete audits against the Sustainable Eel Standard and will be included in a list on the SEG website.

Sustainable Eel Group (SEG): The Sustainable Eel Group (SEG) was formed to take action to support the recovery of the European Eel. It aims to act as a respected partnership that enable and promotes the joined up conservation and management of the eel in the UK and Europe. SEG are responsible for the creation and maintenance of the Sustainable Eel Standard.

Sustainable Eel Standard: The standard against which all audits shall be carried. The standard is divided into 7 separate components against which clients may be assessed.

Sustainable Eel Standard Panel: This is the Panel which is responsible for the development of the Eel Standard and also the approval and issuance of new certificates under the Sustainable Eel Standard.

The Methodology

Certification Body (CB) Eligibility

Audits against the Sustainable Eel Standard can only be completed by a registered Certification Body (CB) as approved by the Sustainable Eel Standard Sub-Group. Registration shall require the applicant CB to:

1. Provide evidence to SEG of other suitable certification standards for which the applicant is accredited;
2. Show the completion of relevant training of auditors against the Sustainable Eel Standard;
3. Have completed one shadowed audit (shadowed by a member of the SES sub-group) for each part of the standard to be assessed by the applicant.

Upon successful completion of these tasks the 'applicant CB' will be approved by the Sustainable Eel Standard Sub-Group as a 'registered CB' and included in the approved list that will made available on the SEG website.

Auditing against the Sustainable Eel Standard

The Sustainable Eel Standard has been designed on a Component basis with each component relating to a separate area of the industry. The components are listed below:

Component 1:	Generic requirements
Component 2:	Glass eel fisheries
Component 3:	Glass eel buyers
Component 4:	Cultured eel
Component 5:	Restocking
Component 6:	Yellow and silver eel fishing
Component 7:	Traceability

Organisations looking to become certified against the Sustainable Eel Standard must firstly be assessed against Component 1. There are no exceptions to this requirement. It is mandatory and must be completed prior to any site visit being implemented. Should the client not meet the requirements for Component 1 then certification will not be approved until such time as this component is met.

On compliance with Component 1 an organisation must then achieve a pass under all the other components which apply to them. For example, a company/organisation that both fishes for glass eels and cultures them would need to pass both Component 2 – Glass Eel Fisheries and Component 4 – Cultured Eel. The CB should assess the organisation against each required component individually.

Finally, for a company to make a claim on the product they sell (ie. to use the SES logo to label product as meeting the Sustainable Eel Standard) they must also pass Component 7 – Traceability (and enter into a licence agreement with SEG for use of the SEG eco labels (See Use of the Eco-label). For example, if a an eel farm was to pass Component 4 but not Component 7, they would be certified as farming eel to the level of the component but would be unable to make any claim on outgoing product they are selling and would not be permitted to use the SEG eco labels on any of their products.

The CBs are required to prepare a Certification Report at the end of the audit process which clearly sets out the performance of the client against each separate component (although this may be completed in a single report).

Application for Certification

A client wishing to be assessed against the Sustainable Eel Standard shall initially contact a relevant Certification Body. At this point the Certification Body shall send the client the following;

- The Sustainable Eel Standard (current version)
- The Sustainable Eel Standard Methodology (current version)
- An Application Form which shall specify:
 - The client's name and address

- Whether they have been certified against any part of the standard previously
- A brief description of the client's business
- The Components against which they wish to be certified
- What evidence is required to be sent pertaining to Component 1 of the Standard

Upon receipt of a completed application form the Certification Body (CB) shall determine whether the client is suitable for certification against the Sustainable Eel Standard. Should the initial application assessment be positive the Client shall be sent a contract determining the cost of the audit and setting out the terms and conditions for completion of the audit. This contract should also clearly state the Components against which the client shall be audited.

Only upon receipt of a signed contract shall the CB complete the audit of the client.

Initial Certification Audit

An on-site audit shall be required for the certification of all clients. The initial on-site certification audit shall consist of the following parts:

1. **Initial Meeting.** During this the client shall be informed of what will be audited and the scope for the rest of the audit. The client shall be asked to outline its process from start to end. During this initial meeting the client must be made aware that the CB must have access to all records held by the Company in order to be able to verify their findings.
2. **Tour of Site.** The CB shall complete a full audit of the client's operation
3. **Discussion and Assessment against Standard.** The CB shall assess the client against the standard. The CB shall collect evidence at every stage.
4. **Final Meeting.** Final discussion and initial findings.

Following the completion of an initial certification audit the CB shall complete a report setting out the client's performance against each of the requirements for the component(s) against which they have been assessed.

The report shall make a recommendation on certification (against each of the Components that have been assessed). The client must achieve a majority of green indicators in order to be approved against any particular component. However the client will fail the audit:

- Should the client receive a single red indicator
- Should the client receive more amber than green indicators
- Should the client receive the same amount of amber and green indicators the final decision shall be made by the Sustainable Eel Standard sub-group

A recommendation shall be made by the CB separately for each component assessed.

The draft report shall first be sent to the client for comment. The final report (incorporating any clarifications agreed through the client's comments) shall then be sent to the SEG Sub-Group who shall make the final decision on certification. Should the client not comment within two weeks of the report being sent the CB shall send the final report with no further amendments.

Issuing Certificates

Certificates will only be issued by the SEG sub-group and shall include the following details:

- The Clients name and address
- The components that the client is certified against
- The Certification Code (SEG Certificate Number)
- The Issue Date
- The Expiry Date (usually four years after the issue date)
- A statement declaring that the certificate does not provide evidence that the client may sell product as SEG certified (a logo licence being required for this)

The certificate shall last for a maximum of four years but may be withdrawn at any time by the SEG sub-group should evidence become available to demonstrate the client is no longer meeting the Sustainable Eel Standard.

The SEG sub-group will send the client will be sent a copy of the Certificate, conditions for its use, and improvements expected by the next audit. SEG will maintain and publish a register of all certified clients at: <http://www.sustainableeelgroup.com/the-sustainable-eel-standard/assessed-organisations/>

Transferability of Certificates

Certificates are not transferable between companies. So, a when a certified company merges with, acquires or is acquired by another company, the Certificate cannot be transferred to the new company(ies).

Surveillance Audits

A certified client shall be required to follow a set surveillance audit program as determined by a risk assessment process completed by the CB at the completion of each audit. This risk assessment shall be implemented by the completion of the following scoring table (which should be included in the audit report):

Question	Performance of Client at Audit	Yes	No
1	Has the client been part of any external investigation which may be of concern to SEG AND/OR been suspended from any other certification standard?	Enhanced Surveillance	Go to Q2
2	Has the client received a borderline pass ¹ for a Component in its previous audit?	Enhanced Surveillance	Go to Q3

¹ A borderline pass is considered a pass that occurs when one less amber indicator is received then would be required to fail (ie. 5 green indicators and 4 amber indicators) or when a company is certified with equal number of amber and green indicators.

3	Does the client only buy and sell product (does not physically handle it?)	Minimum Surveillance	Go to Q4
4	All other scenarios	Standard Surveillance	Go to Q5

The relevant audit frequencies are provided in the Table below:

	Certification Audit	Year 1	Year 2	Year 3	Year 4 Recertification Audit
Minimum Surveillance	On-Site Audit	Remote Audit	Remote Audit	Remote Audit	On-Site Audit
Standard Surveillance	On-Site Audit	No Audit	On-Site Audit	No Audit	On-Site Audit
Enhanced Surveillance	On-Site Audit	On-Site Audit	On-Site Audit	On-Site Audit	On-Site Audit

Remote Audit

A remote audit shall consist of a desk based study. The client shall be asked to provide documentation showing the system in place. Should the documentation provided not be satisfactory then an on-site audit may be required.

Certified companies will be sent a reminder that a surveillance audit is due two (2) months before the anniversary date of the audit. It is then the certified organisation's responsibility to book and organise the audit. All audits must be completed up to a maximum of three (3) months after the anniversary date. Should this not occur, SEG shall cancel the certificate of the organisation, unless the organisation can demonstrate to SEG extenuating circumstances and also provide a suitable time-frame for the completion of the audit.

Un-scheduled Audits

Should it be felt necessary, SEG may request a CB to complete an un-scheduled audit against any component(s) of the SEG Standard.

The un-scheduled audits may take either the form of an on-site or remote audit (This shall be specified by SEG directly). The costs of the un-scheduled audit shall be covered by SEG.

Should the CB find no major² changes to the client's certification then the CB shall create a summary report only to be sent to the client and SEG sub-group.

Should major changes to the client's certification be noted during the un-scheduled audit, a complete report shall be drafted and sent to the client and SEG sub-group. In this case the costs

² A major change is defined as one that results in a client's certification status being revoked.

of the audit shall be re-funded by the client to SEG. Should the client refuse to refund SEG then certification shall be suspended until such time as the outstanding money is reimbursed to SEG.

Use of the Eco label

The provision of a SEG certificate does not provide a client with permission to use the logo on its products. In order to gain permission to use the logo the following process is required:

1. The client must have been audited and have been approved against Component 7 – Traceability, of the Standard.
2. The client must have signed a written licence agreement with SEG for use of the Sustainable Eel Product logo (contact David Bunt at: davidbuntseg@gmail.com)
3. Proposed packaging/labelling shall have been approved by SEG prior to use

Further details on the conditions of the use of the Certificate and eco-label are available on the SEG website: www.sustainableeelgroup.org

Failures and Transgressions of the Standard

Should the client fail an initial audit, the certificate will not be awarded, however, the client will be provided with a full report detailing the reasons for the failure and the measures that need to be undertaken in order to satisfy the criteria for awarding the certificate. In the case of a re-audit the certificate will be suspended until such time as the failure has been rectified.

Should information or suspicion come to light that the client is not achieving a component of the Standard between audits, the SEG sub-group will investigate the facts. Depending on the seriousness of the alleged breach, it may be deemed necessary to suspend the Certificate whilst the investigation is carried out. Investigation may include requiring the CB to undertake an unscheduled audit.

The client may be required to provide evidence to answer questions posed in an investigation. If the client is unable to provide proof of their case in support of their re-assessment, the SEG sub-group will apply the 'balance of probability' test in forming their view.

If the suspension has been raised due to a failure that is believed to have intentionally occurred then the suspension shall last for a minimum of six months. Depending on the severity of the failure or transgression, this suspension may be increased indefinitely by the SEG sub-group.

For further information please see: www.sustainableeelgroup.org

Or contact us at: info@sustainableeelgroup.org