

Eel Assessment – Gurruchaga Maree SARL

Assessment against:

Component 1: Generic Requirements

Component 3: Glass eel buyers

Component 7: Traceability

Completed by

Max Goulden

01st April 2014

FINAL

1. Introduction

This document presents the report completed following the audit carried out under the Sustainable Eel Standard (Version 5, 21st June 2013), and Sustainable Eel Methodology (Version 1, 21st June 2013) against Gurruchaga Maree SARL (hereafter, Gurruchaga). This assessment has been completed against Components 1, 3 and 7 of the Standard only.

The assessment is of the elver buyer Gurruchaga. Gurruchaga buy eels from a number of French and Spanish rivers ranging from Normandy in the North to the Basque country in the south. Those that are currently certified against the SEG standard are the Seudre, Gironde, Loire, Adour and Charente. Elvers are purchased and stored in tank facilities for on-ward sale to clients. The company has three holding systems in place. The locations and addresses of these are listed below;

Site Name	Address	Area Covered
Site 1 – Hendaye facility (also the Head Office site)	88, Route de la Corniche Quartier Haicabia 64700 HENDAYE	Adour, Landes rivers
Site 2 - Charron facility	Le Port du Corps de Garde 17230 CHARRON	La Rochelle area
Site 3 – Epargnes facility	Epargnes, Poitou Charentes	Gironde, Seudre and Charente rivers

The audits were completed on two separate dates with the first visit occurring on the 17th December 2013 to Hendaye. A second visit was completed on the 24th to the 26th February 2014 to both the Charron and Hendaye facilities.

Following discussions with the client it has been agreed that only the Hendaye facility can be currently certified against the SEG standard. The Charron site will not deal with SEG eels and so will not be certified. The Epargnes site will deal with SEG eels but will require a visit and assessment prior to being allowed to sell product as SEG certified.

This report therefore considers each principle of Component 3 and 7 for the Hendaye site.

2. The assessment

The assessors were Mr Max Goulden and Mr David Elliott of MacAlister Elliott and Partners Ltd, who visited the Hendaye Facility on the 17th December 2013 and the Charron and Hendaye facilities again on the 24th to the 26th February 2014. Each visit commenced with a tour of the facility. This was followed by the assessment of the paper based records with the majority held at the central office in Hendaye. The audit was overseen by Mr Jerome Gurruchaga (Owner) and Office Manager, Nathalie Immeln.

The audit was followed by a period of discussion and provision of evidence by Gurruchaga regarding the traceability system in place. This resulted in the publication of this version of the report (2753R02B) in April 2014.

3. Client Contact Details

Client Contact Name	Nathalie Immeln
Client Address	88, Route de la Corniche, Quartier Haicabia 64700 HENDAYE
Client Email	gurrumaree@wanadoo.fr
Client Phone Number	+33 559566891

4. Results of the assessment

The outcome of this assessment is as follows;

That Garruchaga has passed Component 1: Commitment to Sustainability and legality

that the Garruchaga, Hendaye site scored **6 green scores** and **4 amber scores** against Component 3 and therefore **should be considered sustainable under the SEG standard, Component 3: Glass Eel Buyers.**

that the Garruchaga, Hendaye facility scored **2 green scores** and **2 amber scores** against Component 7 and therefore **should be considered sustainable under the SEG standard, Component 7: Traceability .**

Recommendations

A number of recommendations were raised by the auditor. These are provided in the table below .

Component 3: Glass Eel Buyers
Documented Bio-Security Procedure: A documented bio-security procedure (including fish health checks, wash down of equipment, personal hygiene etc..) should be completed at the Hendaye facility.
Documented Handling Procedure: A documented handling procedure (including all handling methods for arrival and departure of eels) should be completed for the Hendaye facility. This can form a separate part of the bio-security procedure that is discussed above.
Component 7: Traceability
Provision of records: It is requested that all records are provided to the auditor on the first sale of SEG certified product by Garruchaga.
Maintenance of Records: Going forward, all records must be maintained for three years (minimum)
Separation of SEG and Non-SEG documentation: Going forward, clear separation of all documentation for SEG/non-SEG products must be completed from start to finish at both facilities (as required)
CLOSED OUT – EVIDENCE PROVIDED ON THE 12th MARCH 2014.

PLEASE NOTE: Failure to comply with these recommendations may result in the failure of the client against future audits against the Sustainable Eel Standard.

5. Next Audit

At the completion of the audit the client was assessed against the risk assessment set out in the Methodology. This is set out in the table below.

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

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

		Surveillance	
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	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

As the client has been seen to fall into the Enhanced Surveillance bracket, the next audit will be due on the **01st March 2015** (in 1 years' time) and shall be an on-site audit.

The tables below give the standard and a rationale for the scores given (in line with the discussion already concluded in Section 4 of this report).

1. Component 1 - Commitment to Sustainability & Legality

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.
Discussion	<p>Gurruchaga have professed their desire to align with SEG during the auditors visit and are keen to support the continued assessment of a number of French fisheries.</p> <p>No evidence of illegal trading by Gurruchaga has been provided to MEP and Gurruchaga confirmed verbally that they have not received any prosecutions relating to eel purchase or trading.</p> <p>The auditor has also received proof of documentation showing the company has paid all taxes (TVA etc...) required in France (Attestation de Regularite Fiscale) and that both facilities are fully licensed for operation by the French authorities.</p>

	Since no evidence of illegal trading or breaches of regulation has been provided and all documentation required is in place the auditor must provide a green score indicator for Component 1.
Score	A Green Score Indicator is provided

2. 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 or equal to 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 3%
red score indicator	Mortality rate over the season is greater than 5% on average.
Discussion	Gurruchaga as a whole – Mortality records were provided at the head office in Hendaye. The company has produced (and has in stock) 4,060kg during the year (2012/2013). During the year, mortality figures across the 10 batches were reported to total 78kg (and records were shown to substantiate this during the audit). This represents a total of 1.9% of the total amount purchased and suggests that the company scores a Green indicator.
Score	A Green Score Indicator is provided for both sites
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 or equal to 1.5% 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.
Discussion	Garruchaga as a whole – The buyers Nijvis (Dutch based farmer) and Albe Fischfarm (German based farmer) have been contacted (selected randomly) to provide confirmation of the mortality rates on received batches of purchased eels from Garruchaga. These were confirmed by Nijvis on the 10 th January 2014 who stated that over the past year all batches received from Garruchaga have had a maximum mortality of 1.5%. The last batch received on the 28 th December 2013 had mortality after one week on the farm of 1.35% (including transportation). Albe Fischfarm provided mortality figures on the 7 th January 2023 stating that for batches received between November and December 2013 losses were seen to be between 0.5 and 1.5 % maximum.

	It is clear from the above that Garruchage can be provided with a green score indicator here.
Score	A Green Score Indicator is provided for both sites
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.
Discussion	<p>The Hendaye facility had a new system installed at the end of 2013. This system is a partially closed system with four separate tanks used for the holding of glass eels. The system has a computerised management system which provides tracking of pH, Oxygen and other key parameters. Daily records are also maintained by staff for Ammonia, Nitrate and Nitrite levels. Water quality is considered highly satisfactory and little concern exists with regards to the system in place.</p> <p>At the time of the second visit, a new generator system was being installed but was not yet operational, meaning the system was reliant on mains electricity only. A separate oxygenation system though is in place and will cut in automatically should the electricity fail. Considering that the new generator was seen by the assessor and the oxygen system is in place and working it is considered suitable to provide a Green Score indicator for the Hendaye facility.</p>
Score	A Green Score Indicator is provided for both facilities
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.
Discussion	<p>The Hendaye facility does not currently have a documented bio-security procedure in place and so cannot reach a green score (this is currently being devised by Gurruchaga for completion).</p> <p>Staffs do complete daily checks of eels and are experienced in identifying problems if they arise.</p> <p>No chemicals are currently used at all during the holding process but any use would be approved by a veterinarian first.</p> <p>It is clear that certain hygiene measures were in place at the Hendaye facility such as regular cleaning and personal hygiene precautions. Eels are handles as little as possible with extraction through the outflow pipe directly into containers for packaging.</p>
Score	An Orange Score Indicator is provided for both sites
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.
Discussion	Handling is minimised at both site and packing is well thought out and uses the outflow system form the tanks. Again though, no documented procedures are in place for either facility and so an orange score indicator is provided.
Score	An Orange Score Indicator is provided for both sites
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.									
Discussion	Site 1: Hendaye Facility – Gurruchaga have their own transport which provides fully oxygenated conditions. The packing process for eels was described to the auditors and is seen to be highly efficient (all pump based).									
Score	A Green Score Indicator is provided for both sites									
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>he has 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 nor has no evidence to show that he has made the required target percentage of its glass eels available for restocking in the last year.									
Discussion	<p>Gurruchaga as a whole – Restocking has taken place in quite large quantities through Gurruchaga with the following quantities having been identified during the visit and through correctly labelled paperwork (Repeuplement Allemagne).</p> <table border="1" data-bbox="422 1310 1500 1429"> <thead> <tr> <th>Date</th> <th>Buyer</th> <th>Amount (kgs)</th> </tr> </thead> <tbody> <tr> <td>05th December 2013</td> <td>Albe Fischfarm GMBH & Co.</td> <td>354.000</td> </tr> <tr> <td>28th November 2013</td> <td>Albe Fischfarm GMBH & Co.</td> <td>738.000</td> </tr> </tbody> </table> <p>This represents a total restocking quantity of just over 1 tonne which is equivalent to around 25% of the total amount sold. It appears clear that Gurruchaga have made a large quantity of eels available for re-stocking and have also completed a number of re-stocking activities (if not meeting the 60% requirement). It is expected that an orange indicator would be scored for this principle.</p>	Date	Buyer	Amount (kgs)	05 th December 2013	Albe Fischfarm GMBH & Co.	354.000	28 th November 2013	Albe Fischfarm GMBH & Co.	738.000
Date	Buyer	Amount (kgs)								
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28 th November 2013	Albe Fischfarm GMBH & Co.	738.000								
Score	An Orange Score Indicator is provided for both sites									

3. 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)
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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.
Discussion	<p>On purchase, all glass eels must be accompanied by a ‘Journal de Peche De Union European’. This is a legal document which displays who has provided the eels, there licence number, the place that they were caught and by what method. This allows all certified product to be traced back to a river basin directly.</p> <p>Currently though eels are purchased from numerous river basins, some of which are certified and some of which are not. At Hendaye, all eels are currently coming from a certified source in the form of the Adour River. At</p> <p>In essence though the incoming traceability system is not a problem as fish are definitely traceable to a specific water body. Issues regarding the purchase and storage of SEG and non-SEG fish are considered under Principle 2 below (Separation and Segregation).</p>
Score	A green score is provided for both sites.
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
Discussion	<p>At the time of audit Hendaye did not operate a segregation system in the facility. Currently eels are bought as delivered and placed into a single Lot which is then sold as one.</p> <p>For Hendaye, this is not a problem currently as all eels are purchased from a certified source. As such, separation is not currently required. It must be noted through that should the Hendaye facility purchase any eels from non-certified sources in the future that these must be kept separate from all SEG eels at all times. This will be the responsibility of Garruchaga staff and failure to complete this would lead to the suspension of this certificate.</p> <p>For the</p>
Score	A Green Score Indicator is provided for the Hendaye facility
3. – Outgoing Product (See Note 22)	
green score indicator	<p>The organisation only labels certified products with the ‘SES’ ecolabel once it has been approved to do so through the signing of an ‘SES’ ecolabel licence agreement.</p> <p>All product to be sold as certified by an organisation meets the following criteria:</p>

	<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 prefix 'SES' in the product description; Includes a record of the volume/quantity of product and to whom it was sold; Includes the certificate code on the invoice The certificate code must be clearly related to the certified product only
amber score indicator	<p>The above requirements are met except that:</p> <ul style="list-style-type: none"> Products have not been correctly labelled through the invoice
red indicator	<p>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.</p>
Discussion	<p>Currently no product is labelled as certified since it has not passed assessment. The system for labelling product was discussed with Garruchaga and a dummy invoice prepared.</p> <p>It is recommended that Garruchaga provide copies of all invoice documentation to the auditor on first sale of produce as SES certified.</p>
Score	Orange Indicator provide for both sites.
4. – Record keeping and documentation (See Note 23)	
green score indicator	<p>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 water, a time period (maximum duration one month) and specific fisherman/vessel.</p> <p>The organisation operates a system that also allows for the completion of a batch reconciliation of eel product by weight over a given period.</p> <p>The organisation maintains records for a minimum of three (3) years.</p>
orange score indicator	<p>The above requirements are met except that records have been maintained for less than three (3) years</p>
red score indicator	<p>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.</p>

Discussion	<p>The traceability system seen at Gurruchaga was seen to be very proficient and all documentation in order. Gurruchaga operates a batch based system which allows all products from a single batch purchase to be traced through to sale. This starts with the collection of all incoming ‘Journal de Pace De Union Europeene’ documents which are then collated into spread sheet format for each batch individually. This allows a record of all incoming product for that batch to be traced in terms of licence documentation and the amounts pertaining to each purchase. From here the tanks that each batch is added to are recorded and sales then taken against the batch and recorded through the sales invoices.</p> <p>While on-site a complete mass balance was completed. This showed;</p> <p>Purchased during year - 4,060 kg Sold during year – 3,631 kg Mortality during year – 78 kg Standing stock - 168 kg</p> <p>Difference – 183kg more purchased than sold.</p> <p>This difference is well within tolerances for weight loss experienced in glass eel batches.</p> <p>All paperwork is currently kept for one year under French law. <u>Going forward this will be increased to three years.</u> An Orange indicator was provided for this reason.</p> <p>It is also recommended that going forward records are maintained separately for any SEG or non –SEG product that may be held at the Hendaye facility (should it become required). This will need to provide complete confidence that product is tracked and maintained separately at all times.</p>
Score	An Orange Score Indicator was provided for both sites