

Eel Assessment – Severn and Wye Smokery

Assessment against:

Component 1: Generic Requirements

Component 7: Traceability

Completed by

Thomas Bourner

4th August 2015

FINAL REPORT

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 the Severn and Wye Smokery. This assessment has been completed against components 1 & 7 of the standard only.

This report is a recertification audit after the decision to not continue was taken last year. It has since been decided they would like to restart certification.

The assessment is of a smoker in Chaxhill, Gloucestershire, England. Primarily producing smoked salmon, the smokery only uses traditional production techniques with most grading, filleting, curing and cutting being done by hand. By chipping all their own wood their products contain a distinctive taste. They smoker are active supporters and members of the Sustainable Eel Group and have piloted an ‘eels in school’ campaign to increase awareness of the use of sustainable eels. Frozen eels are purchased from a certified supplier, they are then defrosted and smoked.

2. The assessment

The assessor was Thomas Bourner of MacAlister Elliott and Partners Ltd, who visited the Severn and Wye Smokery on the 4th August 2015. The visit included a tour of the factory/smoker, storage areas and the office.

3. Client Contact Details

Client Contact Name	Mark Romans
Client Address	Chaxhill Westbury-on-Severn Gloucestershire GL14 1QW
Client Email	mark.romans@severnandwye.co.uk
Client Phone Number	01452 760190

4. Results of the assessment

The outcome of this assessment is as follows;

The Severn and Wye Smokery has **passed** Component 1: Commitment to Sustainability and legality

The Severn and Wye Smokery scored **4 green scores** and **0 amber scores** against Component 7 and therefore **should be considered sustainable under the SEG standard, Component 7: Traceability.**

Three recommendations were raised by the auditor;

RECCOMENDATION 1: Although all eel products handled will be SEG certified it is advised that they use a distinct label to identify the product as SEG.

RECCOMENDATION 2: They are currently not handling SEG products. Once operations commence they must conduct SEG training and send example copies of training records. In addition to this they must also send an 'Approved Supplier List' to the CAB.

RECCOMENDATION 3: An SEG non-conforming product policy must be written into the SEG operating procedure.

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 Surveillance	Go to Q5

	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 Standard Surveillance bracket, the next audit will be due on the 4th August 2017 (in 2 years' time) and shall be an on-site audit.

The tables below gives the standard and a rationale for the score given. The score is highlighted in the appropriate colour.

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.

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.

Discussion	The Severn and Wye Smokery currently purchase all SEG eels from Royal Danish and these are the only eels that will be used. As a company they are passionate about sustainability and were have a ‘eels in schools’ scheme running to help promote sustainable eels. There is no evidence of any illegal trading in eels.
Score	The client is very committed to the sustainability of eels. A green score is justified.

2. 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.
Discussion	All the eels purchased are from one certified supplier, Royal Danish. Once they begin purchasing them as certified they will operate an approved supplier list. The accreditation will be checked as part of this approval and only suppliers listed will be able to be bought from. Once they have been ordered as certified they will be listed on a GRN which is passed to goods in. They then know to expect a certified product only and would reject if this was not was delivered.
Score	The system in place only allows certified eels to be purchased from a certified supplier so green score is appropriate.
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	When products are delivered they will have an SEG label placed on the pallets. This ensures that all pallets are checked for their certification upon arrival and are clearly labelled during storage. All eels will be certified and there is therefore no risk of substitution.
Score	The process in place means that the products will be clearly labelled at all stages and a green score is therefore appropriate.
3. – Outgoing Product (See Note 22)	
green score	The organisation only labels certified products with the ‘SES’ ecolabel once

indicator	<p>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 O 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>The company procedure states that codes specific to SEG products will be in use and can only be used for SEG products. They will produce labels that include SEG in the product description and all other information as required by the SEG.</p>
Score	<p>Aware of the requirements and will implement as necessary when selling products as certified.</p>
<p>4. – Record keeping and documentation (See Note 23)</p>	
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	<p>The above requirements are met except that records have been maintained for less than three (3) years</p>
red score	<p>The organisation’s tracking and tracing system shows evidence that certified</p>

indicator	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.
Discussion	Records are all kept for a minimum of three years and longer in practise due to UK requirements. Records are sufficient to allow traceability of each batch of eels purchased and sold. A traceability test was completed as part of the audit and clearly shows the eels throughout the whole process. A reconciliation can be completed demonstrating this over a given period. All eels used are certified so there is no evidence of mixing with non-certified products.
Score	A traceability test was successfully completed to demonstrate that records are kept to allow reconciliation of products. Green score appropriate.