

Eel Assessment – Scandinavian Silver Eel

Assessment against:

Component 1: Generic Requirements
Component 4: Culture Eel
Component 5: Restocking
Component 7: Traceability

Completed by
Alex Senechal

24th May 2017

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 Scandinavian Silver Eel AB. This assessment has been completed against Components 1, 4, 5 and 7 of the Standard only.

The assessment is of the Scandinavian Silver Eel AB (SSE) farm facility in Helsingborg, Sweden. SSE buy SES certified glass eels for on growing, sale and restocking. Frozen and Smoked SES eels are also sold by SSE to the local market. Glass eels are transported by small aircraft directly from the UK to SSE.

All eels go into a quarantine system maintained at the SSE facility in a separate building to the main growing systems. Glass eels remain in the quarantine for a period of 70-100 days until approved by the appointed veterinary professional for the facility. During their time in the quarantine, a sample number of eels are tested for viruses while the rest remain in tanks with ‘sentinel’ rainbow trout which are removed after 50 days for further testing to ensure that they are also free of any viruses, most notably IHN, VHS and IPN. This is to prevent the introduction of any such viruses to populations of Swedish eel, trout and salmon from eel released for restocking. Additional trout are kept in the tanks in case any sentinel fish are lost prior to fish being sent off for testing. It is also during this time that eels are marked with strontium.

Eels which are not sold on after quarantine for restocking are grown on to ~1g before being moved to the 2x2m diameter tanks in the main growing building. Grading is done every 6-8 weeks to limit competition and cannibalism in tanks. Once eels reach ~25 grams, they are moved to D-ended tanks which are 3x11m for the rest of their growing. Eels at the facility may take up

to 4 years to reach a size of up to 1.5kg before they are slaughtered and sent to be smoked for the domestic market. A large volume of the production is sent live to Dil for processing at ~150 grams for the Dutch and European market.

The quarantine, circular and D-ended units each use a separate circulation systems, where after leaving the tanks water is first mechanically cleaned using a drum filter, then biologically cleaned and finally oxygenated before being pumped back to the fish tanks. The sludge, faeces and any feed waste collected during mechanical filtration is stored to be removed from the facility by contractors.

This audit looks at the Chain of Custody from the purchase of said eels from the UK to the point of sale for restocking and smoking and the purchase of certified smoked eels (originally from SSE) from Dil Import-Export BV in The Netherlands and Kåseberga Fisk AB, for sale to the local market.

2. The assessment

The assessor was Alex Senechal of MacAlister Elliott and Partners Ltd, who visited Richard Forham of Scandinavian Silver Eel on the 2nd and 3rd May 2017. The visit included a tour of the facility to view operations and an assessment of paper based records assisted by an explanation of procedures at the facility from Mr Fordham.

3. Client Contact Details

Client Contact Name	Richard Fordham
Client Address	Box 902, 25109, Helsingborg, Sweden
Client Email	richard@silvereel.se
Client Phone Number	+46-42 14 24 33

4. Results of the assessment

The outcome of this assessment is as follows;

Scandinavian Silver Eel AB has passed Component 1: Commitment to Sustainability and legality

that Scandinavian Silver Eel AB scored **7 green scores** and **3 amber scores** against Component 4 and therefore **should be considered sustainable under the SEG standard, Component 4: Culture Eel**

that Scandinavian Silver Eel AB scored **3 green scores** and **1 amber scores** against Component 5 and therefore **should be considered sustainable under the SEG standard, Component 5: Restocking**

that Scandinavian Silver Eel AB scored **4 green scores** against Component 7 and therefore **should be considered sustainable under the SEG standard, Component 7: Traceability**

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 2nd May 2019 (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	The organisation or a member of the organisation has been arrested on suspicion of

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.

indicator	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>SSE continue to show good interest and a strong will to be aligned with the SEG requirements during the auditors visit and have indicated a desire for SEG to be promoted further to help improved public opinion of eel as a sustainable food source. SSE see SES certification as an important tool in doing this and increasing wild populations through restocking.</p> <p>No evidence of illegal trading by SSE has been provided to MEP and SSE confirmed verbally that they have not received any prosecutions relating to eel purchase or trading and that the facility abides by all biological, environmental and retail regulations in Sweden with regard to the growing and sale of eels.</p> <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.</p>
Score	A Green score indicator is awarded

2. 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)
Discussion	Evidence was gathered for the mortality rates at the facility dating back to 2001 for the quarantine and back to 2011 for the main growing facility. However, paper records of daily mortality numbers from each tank are kept for many more years. It should be noted that due to the way in which grading and separation is done at the facility it is not possible for batches of fish to remain separate as fish may be present at the facility for up to 4 years to reach commercial size. Mortality is

	recorded as individuals and not as weight from glass eel size through to final sale weight of ~ 1.5 kg. All fish that enter the facility are quarantined first for 70-100 days. The percentage of mortality during this period is also kept for analysis and was not higher than 5.1% for the past 5 years. This averages out at 3.85% between 2001 and 2016.
Score	A Green Score indicator is awarded
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) <u>but</u> 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.
Discussion	<p>Two types of feed are used at the facility, cod roe and pelleted feed of different size grades depending on the size of the eels. When eels first arrive at the quarantine facility, they are fed cod roe. This is sourced from a local supplier and is not from an MSC certified stock at present.</p> <p>Cod roe is only used for a limited amount of time before eels are weaned onto dried feed, which is purchased from Skretting and Biomar. The sustainability of feeds from these suppliers has been verified separately to this assessment by the assessor and confirmed as using sustainability sourced ingredients to form the eel specific feeds used by SSE.</p> <p>Scoring - For cod roe, suggest amber – roe would otherwise mainly be discarded but stock status of North Sea and Northern Baltic cod and the fishing method preclude a green score. For dried feed, sustainability of the feed ingredient sources have been verified with the manufacturers and therefore suggest a green score. Overall however advise an Amber is awarded</p>
Score	An Amber score is awarded
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	The average feed conversion ratios in the farm are as follows:

indicator	<p>glass eel to fingerlings: greater than 1.3 fingerlings to 200g: greater than 1.8 large eels: greater than 2.2</p>
Discussion	<p>The feed conversion rate is of 0.8-0.9 in quarantine as an average where eels are only glass eel size. Detailed records of feed given to each tank in at the facility are kept rates are kept by graded weight of eels and have been summarised for the audit. These were provided for 2011-2016 as feed conversion rates for all eels at the facility in the given years.</p> <p>2011-12 1.59 2012-13 1.55 2013-14 1.82 2014-15 1.84 2015-16 1.75</p> <p>Eels which are larger have worse conversion rates however, as an average of the whole farm SSE average 1.71. The figures provided for the scoring above indicate that the average FCR for the SSE facility is at an Amber level (1.77 or less).</p> <p>Feed is provided to each tank via a computer controlled system with the rate of feed being monitored manually and adjusted on the system according to feeding habits of the eels. This is monitored daily by the expert team of staff at the facility.</p>
Score	An Amber score is awarded
5. 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	Water temp, dissolved oxygen and pH are continuously monitored with security systems that are alarmed and can communicate to nominated persons to respond should the readings fall outside of the desired parameters. Emergency oxygen feeds in by computer when levels are below 55% and is kept at an optimal value of 81%. When there is a power outage, there is free flow of oxygen into each system while generators start up. The generators at the facility can provide sufficient power for the pumps and to reboot the computers to monitor the systems. The generator starts within 1-2 minutes meaning that there is insufficient time for changes to water and

	oxygen parameters to occur. Generator maintenance is undertaken each month to verify that it is in good working order. Temperatures are kept at ~24 degrees C and are monitored with pH by the computer system. The pH is kept at between 6.3-6.4. The system is kept balanced by monitoring of oxygen levels and mortality of the fish. Ammonia levels are not regularly checked in the systems. The small tanks have, if necessary, both aerated and oxygenated water whereas the D-ended tanks are always aerated and oxygenated.
Score	A Green score is awarded
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.
Discussion	Biofilters are backwashed every day or every other day. Any valves that are not used tend to be released every other day to eliminate any risk of build-up. Sludge is kept in a specific tank at the facility and then pumped away as hazardous waste and disposed of by local authorities. This has been the case since 2015/16 when sludge was no longer allowed to be used as fertiliser on local agricultural land. There is no source of escapement into any other waterways from the facility to be noted and the facility has not been found to be non-compliant with any regulations pertaining to effluent discharge in the last 5 years.
Score	A Green score is awarded
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.
Discussion	Quarantine -

	<p>There is a very strict regime by which persons entering the quarantine area have to change clothing and ensure they do not enter then main facility after being in the quarantine area. All water coming out of the quarantine area has its pH raised to above 11 for in excess of 6 hours to ensure anything harmful to other fish at the facility or beyond is destroyed.</p> <p>Written records of water pH, oxygen and temp are kept daily for both water in the tanks with and of the high pH of water going out. Biosecurity is maintained throughout the quarantine process to keep the rest of the facility safe from diseases and viruses. Procedures are maintained by workers and any outside persons entering the quarantine area including veterinary staff who follow additional set procedures when checking fish. The vet is present every 2nd-3rd week.</p> <p>Strontium is used to create rings on the otoliths of the eels. Even four rings has been successfully tested in the past, but is not very practical.</p> <p>No documented procedures were presented for the above.</p> <p>Main facility –</p> <p>If persons have been to other facilities, they are given disposable footwear when in the main fish farm building.</p> <p>All fish that enter the system have been quarantined beforehand and signed off by a vet once the checks for viruses and other diseases have been completed and passed.</p> <p>No Antibiotics have been used in over 20 years. Occasional parasite outbreaks are treated with formalin, salt or pH manipulation. No veterinary medicines are used. A full record is kept including quantity added to which tanks and by which member of staff.</p> <p>Bicarbonate and sodium hydroxide is used to buffer the system to prevent the pH from dropping.</p> <p>Vet inspections are carried out every other year for the main facility.</p> <p>Every time fish are graded, the tanks are physically cleaned with water from the system but not disinfected. This process is not written but is a routine procedure which is competed every time to ensure cleanliness of the tanks.</p> <p>All eels in both facilities are visually inspected at least twice each day, and there is also close monitoring and record keeping of feeding rate (loss of appetite being a key early indicator of a problem). Feeding is computer controlled but is checked at least once a day.</p> <p>No documented biosecurity procedure was presented to the auditor; however it is obvious that clear procedures are adhered to by all staff and visitors to the main</p>
--	---

	facility to ensure there is no introduction of diseases or viruses to these systems.
Score	An Amber score is awarded
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.
Discussion	<p>Grading of smaller fish is done through pumping from tanks to the grading machine. The grading machine can separate fish into 3-4 sizes which are sent into tanks to then be forklifted above permanent tanks and emptied back in so that there is minimal handling. Larger fish are netted from the D-ended tanks and then graded using the same machine before returning to tanks. Feeding of smaller fish can usually restart within 24 hours of grading. Larger fish may take 1 or 2 days to start feeding properly. Larger fish (>500g) tend to be more affected/ stressed by the grading process.</p> <p>Slaughter – Pithing followed by bubbling nitrogen is used for all larger eels slaughtered at the facility by the staff. Once dead, they are frozen down for desliming before being sent to Kåseberga Fisk AB Eel Smokers. Smaller eels for the Dutch market are shipped out alive to Dil in the Netherlands where they slaughter and smoke the eels.</p> <p>Transportation – consumption eels are starved and cooled over 6 days prior to transport, and this is done by Dil in tanks with aerated water. Restocking eels are starved and cooled for a minimum of 4 days prior to transport, and this is done in the same boxes they are sent in from Peter Wood, with a small quantity of ice and a bit of water. Transport time is kept to less than 12 hours.</p>
Score	A Green score is awarded
8. The farm provides eels 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.
Discussion	Details were provided on the quantity of glass eels sold on for restocking with figures ranging from 33.2% to 98.8% from 2001 – 2016. The average quantity of glass eels sent each year for restocking over this period is 71.5%. Restocking with eels from SSE is done in Sweden and other EU countries with eels being sold to government departments, commercial businesses and private waterway owners.
Score	A Green score is awarded

3. 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	
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.
Discussion	Restocking of SEG certified eels brought from the UK and sold by SSE to a number of government, private companies and individuals for the purpose of restocking occurs each year. This is completed in accordance with the eel management plans of the countries to which the eels are sold. The Swedish restocking is part of a management initiative that should with reasonable confidence lead to the 40% escapement target being achieved in the future. Each year Sweden on average restocks more than the recommended number of glass eels.
Score	A Green score is awarded
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.
Discussion	Evidence is present that there is around 21-22% survival 15 years after restocking and that 9/10 eels in fresh water in Sweden have come through the quarantine system of SSE up until 2016 since 2000. Most of the waterbodies are selected by the government for reduced fishing and a reduced number of water turbines. Restocking is not normally done above the third turbine with government funds.
Score	A Green Score is awarded
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 (e.g. 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 (e.g. 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 (e.g. 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.
Discussion	This is specified by the client or the government. The government restock a significant quantity of fish at sea in brackish water. Attempts are also made to restock lower than the 3 rd water turbine on any waterway selected. Restocking is done post permission being granted by local (regional) fisheries department in all circumstances. Improvements in the number of eel friendly passes and mechanisms are being made slowly and this is why restocking is not usually done above the 3 rd turbine.
Score	An Amber score is awarded
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.
Discussion	All glass eels sold on for restocking from SSE have gone through the full quarantine process and that this is overseen by veterinary professionals which have to report back and sign off before use for restocking into the wild. All eels are marked with Strontium so that researchers can identify restocked eels. There is therefore very limited risk of any introduction of a harmful disease to wild populations.
Score	A Green score is awarded

4. 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 fish is sent directly from UK Glass eels with certificates of traceability included. These are cross checked by the Vet on their inspections to ensure that eels are from the source they are meant to be. No other product has been brought into the facility from other sources since 2011.
Score	A Green score is awarded
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	This does not apply as all product at the facility is from SEG certified fisheries in the UK. Should non SEG certified eels be introduced to the facility, these would be kept separate at all stages of retention to ensure no mixing of product is possible. Product which is sent to Dil in The Netherlands is kept separate by the processor as are all large eels sent to Kåseberga Fisk AB throughout the entire smoking process before being sent

	back to SSE
Score	A Green score is awarded
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>Evidence was provided to demonstrate that the SES ecolabel is used on product. Invoices are labelled with SES number and on order forms. However, batch numbers are of batches sent out by SSE and not of batches received from the original fishery. This is because the fish are graded by size and kept in tanks according to size and weight and therefore may contain multiple batches of eels all of which grow at differing speeds. Therefore, eels from difference batches cannot be kept segregated throughout the growing process. All product sold by SSE is labelled if sold on by them. Product sold on by third parties is not eco-labelled and therefore not sold on as SES certified product.</p> <p>As all fish at the facility are from certified fisheries is it suggested that a Green score is awarded</p>
Score	A Green score is awarded
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

	<p>specific fisherman/vessel.</p> <ul style="list-style-type: none"> ▪ 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.
Discussion	<p>SSE has very comprehensive documentation and record keeping and every movement has been clearly documented.</p> <p>There is an issue however of trackability down to batch number from a fishery discussed above. Eels from one batch will grow at totally different rates from others, some of which after a year will be the same as the previous year's eels. Space considerations dictate that these eels must be mixed. To keep batches separated throughout the growing process would be commercially unviable.</p> <p>Based on how comprehensive the records of SSE are and the efforts made to ensure accurate records are maintained at all times of activities at the facility it is advised that a Green score should be awarded</p>
Score	A Green score is awarded