

Sustainable Eel Standard Consultation

The following is the write-up of flip-charts recorded during the SEG Standard Consultation session at the SEG Conference on 16 June 2017. Our thanks to everyone who contributed.

These will be used to inform the next draft of the Standard which will be published for a further 30 days consultation in September 2017.

Topic	1. Net Benefit (pages 7 – 9)
Facilitator	David Bunt
Aims	<ul style="list-style-type: none">• Review & improve & advise on proposed definitions for Net Benefit• Review and consider the use of 'Responsible' and 'Sustainable' and whether we should also or alternatively use associated colour indicators, eg. 'Silver' and 'Gold'
Process	<ul style="list-style-type: none">- Debate and consider- Present conclusions & recommendations

Records

- The 40% target in the EC regulation is daft. Needs to be rational
- Will have to communicate clearly how could provide Net Benefit
- Need evidence that stocking has benefit over leaving glass eels where they were.
- Stocking effectiveness in recipient catchments should be measured, and the impact at the donor catchment
- Need traceability back to catchments
- 90% survival at the farm is not good if it is only 50% from the fishery
- Assumptions and rationale need to be backed up by science / evidence; e.g. are they really 'surplus'? – what is the effect on the ecosystem?
- Should we be eating a 'critically endangered' species?
- What about the effect on economies & communities?
- Are the catchments healthy to receive the fish – water quality, habitat?
- Restocking fish should be a balanced sample from the farm – not the slow growers
- Definition 1 may not really be 'Net Benefit'?
- Limited progress with EMPs may not be 'sustainable'
- Can the benefit be measured? E.g. is an improvement of 0.1% a 'benefit'?
- Need regulation of non-certified fisheries
- Is there an allowable catch? i.e. can it sustain exploitation?
- Not sure if two levels are appropriate
- Could have a 1 – 5 Star system?
- Responsible / Silver may be very difficult to communicate
- Water Boards should be certified for their impact / benefit to eel

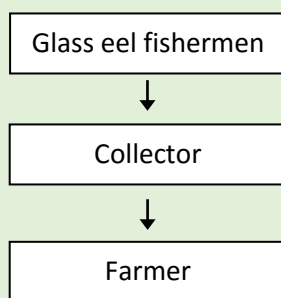
Topic	2. Certification for sustainable supplies only? (pages 11 & 13)
Facilitator	Cy Griffin
Aims	<ul style="list-style-type: none"> Advise on whether certification should be for businesses that have <u>supplies</u> of certified eel
Process	<ul style="list-style-type: none"> Debate the pro's and con's of the proposal that SEG certificates should apply to <u>supplies</u> of certified eel only (focussing on traceability) and not just the <u>ability</u> to Present conclusions & recommendations

Records

- Would it be possible for a company to supply certified and non-certified eel under the changes in the standard?
- Different situations. When to add logo? Which stage in the supply chain?
- Example for Yellow eel:
 - Fisherman → smoke house → retail
 - Farmer → wholesale → smoke house → retail
 All have ability, but may not use standard in the supply chain
OR
- In beginning, due to market demand, not all eel supplies would have passed yet (e.g. farmer needs around 20 tonnes)
- Supply chain traceability
- Who to pay premium for standard?

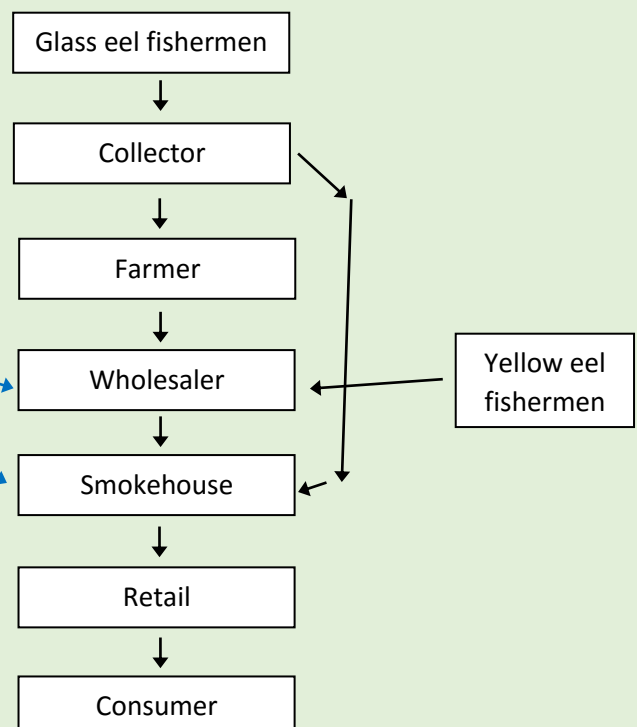
When to add standard logo?

Not meeting Standard (yet)



Meeting Standard

(example for ESF – but also SEG standard. What costs?)



In beginning until more to supply

Topic	3. Biosecurity & Welfare (pages 15 – 17)
Facilitator	Miran Aprahamian
Aims	<ul style="list-style-type: none"> Advise how the Standard should include processes to improve assurance the biosecurity of the transfer of live eels, so that purchasers of certified eel have greater confidence that it is provided disease and alien species free. Examples are Viruses – eg. EVEX; parasites eg. A. Crassus; alien species eg. Invasive Shrimp. Note, we are not expecting to be able to be able to eradicate such outbreaks, but we do expect responsible traders to have good biosecurity procedures and to reduce rather than increase the risk of spreading infection.
Process	<ul style="list-style-type: none"> - Debate - Present recommendations

Records

The topic should include Welfare becoming “Biosecurity and Welfare”

Biosecurity Issues which need to be addressed in the Standard:

- Need to:
 - Set out a detailed Risk Assessment plan
 - Determine how each risk is to be mitigated
 - Plan must be auditable & enforced
- Regulation: Aquatic Health Regulation (<http://extwprlegs1.fao.org/docs/pdf/uk102228.pdf>) – such a plan should already be in place
- Notes:
 - The assessment will be different for each site
 - The plans will evolve as the sector (Biosecurity) develops
 - Plan must be endorsed / signed off
 - Need to record:
 - Mortalities each day
 - Medicines used
- Other issues to be considered:
 - Juvenile eel in the glass eel catch – risk of transmission
 - Transport issues: water / driver / general status of vehicle
 - Water supply
 - Farm issues: mixed species / adult eel
 - Time: transport / time in captivity
 - Transport boxes: New boxes / disinfect & wash old boxes

Welfare Issues which need to be address in the Standard:

- European Food Standards – EFSA (<https://www.food.gov.uk/sites/default/files/multimedia/pdfs/fsa1782002guidance.pdf>)
- Need to include slaughter (see also section 4 **Technical – esp mortality**)
- E.g. no sharp objects – reducing bruising
- Back-up system if power fails
- No high heads – fish dropping to the floor

Eel fishing - specific suggestions in relation to Welfare & Biosecurity:

- Nets disinfected after each trip when moving between rivers – cost issues
- Transmitted via the fishing process
- Identify risk & process of mitigation
- Do we need to disinfect?
- What disinfection should be used?

- These would be different for each site
- Must be auditable
- Need to realise that it will evolve as sector develops
- Juvenile eel in the glass eel catch – risk of transmission

Welfare in the Netherlands

- The industry agreed together with the Ministry of economics that eels must be electrocuted before slaughter. A special machine has been developed with the help from Wageningen university for that. So there is a system available - technical specs are free available for the whole of Europe.
- This can be brought into the standard.

Topic	4. Technical – esp mortality (pages 19 & 27)
Facilitator	Alex Koelewijn
Aims	<ul style="list-style-type: none"> ● Advise on any flaws and improvements to the technical elements of each Standard component.
Process	<ul style="list-style-type: none"> - Review the technical details for each of the Components of the Standard, eg. (2) Glass Eel Fishing, (5) Eel Farming etc - NB. Particular challenges in the past have been: <ul style="list-style-type: none"> (1) achieving the 40% escapement target / progress with eel management plans (P 21) and (2) measuring mortality during fishing, in holding / transport by buyers and on supply to fish farms (P 19) - Identify any flaws, recommend any improvements

Records

- Problems with the nets – blocked by recreational fisherman
- Get clear best practices for storage:
 - Salinity 3g/l : 2 stage → freshwater
- Get clear best practices for duration of fishing: max 15 minutes
- Get clear what is 'total stock'
 - Standing stock (in numbers), record month by month
 - Certified and Non-certified to be physically separated?
 - What is of great importance is the mass balance - a farm can never sell more certified eels than it has taken into the system. So, probably an administrative procedure that is very tight and where the mass balance (as in MSC) proves the number of certified eels in a farm and in its sales.
- Nothing 'Humane' in slaughter – consider rewording

Topic	5. Commitment to Legality / Governance & dealing with transgressions
Facilitator	Matthew Wenban-Smith
Aims	<ul style="list-style-type: none"> • Advise on the criteria for assessing commitment to sustainability and legality • Advise on the most suitable procedures for dealing with reports of illegal activity
Process	<ul style="list-style-type: none"> - Review the criteria (P12). Are they fair and reasonable? What flaws do you see? What improvements do you recommend? - Review the procedures (P39). Are they fair and reasonable? What flaws do you see? What improvements do you recommend? - Present recommendations

Records

A

- SEG governance needs to be tightened up. SEG's role: Neutral v Campaigning?
- Proposed procedures are an improvement
- Need to be fleshed out in a lot more detail
- Extremely important for SEG's credibility, and also a business risk: SEG can't be seen to be supporting bad certificates; but can't risk damaging businesses of legitimate certificate holders on basis of potentially unjustified allegations.
- Also a business risk for SEG: risk of litigation.
- Too dependent on Chair / 2 people → risk if it discredits legitimate certificate holders
- Need to protect those making allegations (and the accused) – risk if it doesn't properly
- SEG regular review of the process to identify improvements over time
- Transparency vs commercial confidentiality – volume, value
- Findings must be available to accused and those making allegations – feedback to parties
- Timelines – establish expectations
- Timeliness – need to respond quickly
- Cost? Logistical considerations. Cost should come from SEG membership fees
- Appeal process needed
- NB: look for other examples of complaints procedures – this is not a new thing, many other initiatives and organisations have to address equivalent issues and concerns

Improvements:

- Is allegation credible? }
- Seeking view of accused } Investigation
- Evidence based }
- Convening scientifically credible panel }
- Make use of other systems, e.g. Teachers accused of child abuse – Look at existing models

Legality

- There will be illegal that is not picked up due to the limitations of enforcement
- The test for SEG should be conviction rather than investigation:
 - provides clarity & 'innocent until, proven guilty'

Topic	6. Performance Measures (pages 4 & 42)
Facilitator	Aimee Russillo
Aims	<ul style="list-style-type: none"> • Advise, reviewing the proposed targets & measures: <ol style="list-style-type: none"> 1. how net benefit to the eel stock overall can be objectively measured 2. how net benefit at the level of each certificate holder can be objectively measured
Process	<ul style="list-style-type: none"> - Consider the proposed targets and measures - Many are objectives of SEG as a whole and at landscape level. It isn't appropriate to include these in the standard – they aren't applicable at a certificate holder level and also not possible to hold the certificate holder accountable for the outcomes - Are they realistic, achievable? - Those that are at the certificate level - What measurement mechanisms already exist, what will have to be developed? - SEG will need to consider how to measure organizational objectives that are at sector level - SEG will need to understand how it will collect, manage, analyse and report on the certificate holder level - Present recommendations

Records

- Need to be outcome based to support transparency aspirations
 - Improved understanding
 - Data poor species - stocks, lifecycles- this will be a benefit
 - Underpin transparency

Bottom Line

- Focus on a few Key Performance Indicators (KPIs) that a Certificate Holder can control directly through their activities
- Clear rationale! – these KPIs need to be feasible and have high usability – for SEG and the certified entity
- Communication! – Transparent outcome data