



The Sustainable *Eel* Group

Standard Development Procedure

Version 1.2, 17 October 2016

Amendments

Version No.	Date	Description of Amendment
1.1	16/9/2016	Various to bring into line with ISEAL
1.2	17/10/16	Minor updates to formatting by SEG Standard Panel Chair

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

Contents

2	SEG Standard Terms of Reference	4
3	Development of the SEG Standard.....	6
4	Availability of the SEG Standard	9
5	Variation of Documented Procedures	10
6	Record Keeping	10
7	Concerns and Complaints.....	111
8	Review and Revision.....	11
9	Urgent Revisions	11
10	Administrative and Non-Substantive Changes	12
11	Clarifications and Interpretations.....	12
12	Regular Review and Revision.....	13
	Annex 1. SEG Standard Panel	14

1 Introduction and Background

1.1 Standard-Setting Procedures

- 1.1.1 This document specifies the Sustainable Eel Group's (SEG) procedures to develop and approve the SEG Standard and to maintain it over time.
- 1.1.2 Responsibility for approving these procedures rests with the SEG Board of Directors ('SEG Board')
- 1.1.3 These procedures and associated Annexes shall be published and be available for download from the SEG web site.
- 1.1.4 Comments or suggestions are welcome, and should be addressed to the SEG Chairperson at andrewkerrseg@gmail.com for consideration.
- 1.1.5 These procedures shall be reviewed and may be revised by the SEG Board, taking account of any stakeholder comments that have been received up to that time, prior to their implementation for any future review or revision of the SEG Standard.

1.2 Preparation for the Development of the Sustainable Eel Group Standard ('SEG Standard')

- 1.2.1 Preparation for the development of the SEG Standard is described in Document 101 SEG Standard Background:
 - a. Prior to the development of the standard the need and justification for the standard was assessed. The existence and design of other comparable initiatives was researched, and organisations responsible for similar programmes were engaged proactively (see Document 101 SEG Standard Background).
 - b. An assessment of risks (e.g. possible unintended negative social, environmental or economic impacts) in implementing the SEG Standard was carried out, and actions to mitigate these risks were identified and documented (see Document 101 SEG Standard Background).
 - c. A stakeholder analysis was carried out (see Document 008 SEG Stakeholder Analysis), key stakeholder groups and representatives were identified (see Document 007 SEG Stakeholder List), and stakeholders were proactively engaged in discussions of the SEG programme.
- 1.2.2 The SEG Board has established a series of partnerships with like-minded European initiatives in order to ensure that the SEG Programme is aligned across the region of its application, as described in Document 101 SEG Standard Background.

2 SEG Standard Terms of Reference

2.1 Objectives

- 2.1.1 The objective of the SEG Standard is to maximise the contribution of eel fishers, ranchers, aquaculturalists, traders and consumers of eel products to the restoration of healthy eel populations, distributed throughout their natural range, fulfilling their role in the aquatic environment and supporting sustainable use for the benefit of communities, local economies and traditions.

- 2.1.2 The requirements specified in the SEG Standard shall be designed to ensure that implementation of the SEG Standard at the level of each individual SEG certificate holder has a positive net impact on eel populations.
- 2.1.3 The requirements specified in the SEG Standard shall support the collection of the long-term data necessary to monitor changes in eel populations over time and to demonstrate the efficacy of the SEG Standard in achieving its objectives.

2.2 Scope of Application

- 2.2.1 The SEG Standard shall be designed to be applicable to eel fishing within European coastal, estuarine and freshwater systems, to eel ranching and aquaculture, and to the trade and transportation of live eels.
- 2.2.2 The SEG Standard shall include provisions for the monitoring of the trade in live eels and for the monitoring of the trade of eel products from source to end consumer.

2.3 Content and Structure

- 2.3.1 The SEG Standard shall include introductory sections describing its objectives, its scope of application, and providing a general description of the mechanisms for its verification and of the claims that may be made by individuals and businesses that are verified as complying with the standard's requirements.
- 2.3.2 The SEG Standard shall specify:
 - a. The formal status of the document (i.e. whether draft, or approved for use);
 - b. The date on which it was approved, if applicable, and in the case of an updated version any transition period that may apply before the updated version comes into effect;
 - c. SEG's contact information;
 - d. A statement to the effect that the approved English language version of the SEG Standard is the official version, and that in the event of inconsistencies between this and other versions it shall be the approved English language version that shall be deemed definitive;
 - e. The date by when the standard will be reviewed, which shall be no longer than five years after the date of its approval.
- 2.3.3 The SEG Standard may include components that are applicable to specific categories of users, for example to glass eel fishers, glass eel buyers, yellow and silver eel fishers, eel aquaculturalists, eel ranchers, and/or to live eel traders.
- 2.3.4 The SEG Standard may incorporate a scoring or weighting system that provides for differentiation between those users who are achieving the highest levels of performance and those who are achieving lower levels of performance that are nonetheless compatible with the Standard's objectives.
- 2.3.5 The requirements of the SEG Standard:
 - a. Shall be drafted so that conformity can be assessed for any applicant within the scope of the SEG Standard without the need for subsequent modification or adaptation;

- b. Shall be drafted to minimize ambiguity in interpretation;
 - c. May be expressed in terms of process, management or performance requirements;
 - d. Shall not favour any particular technology or patented item.
 - e. Shall include requirements relating to data collection and reporting designed to facilitate the monitoring and evaluation of progress toward achieving the standard's objectives;
- 2.3.6 The SEG Standard shall include or reference a glossary of key terms required to guide its consistent interpretation and implementation.

3 Development of the SEG Standard

3.1 Work Programme

- 3.1.1 The working language for the development of the SEG Standard shall be English.
NOTE: The support of the SEG European Representatives will be sought to ensure that key documents are translated and consultation takes place in other European languages wherever possible.
- 3.1.2 The decision to develop or revise the SEG Standard shall be announced on the SEG website together with a summary of the standard development process that shall include:
- a. A summary of the Terms of Reference for the standard, including the scope, objectives and justification of the need for the standard;
 - b. The steps in the standard-setting process, including the timelines and clearly identified opportunities for contributing; and
 - c. Decision-making procedures, including how decisions are made and who makes them.
- 3.1.3 The work programme and timetable for the development and any subsequent revision of a SEG Standard shall be updated on an ongoing basis on the SEG website.
- 3.1.4 At the outset of the development or revision process the SEG Team shall review and update its stakeholder contact list to ensure that it includes a broad range of stakeholders from all the key stakeholder groups identified through its stakeholder analysis (see Document 101 SEG Standard Background, Section 7), including stakeholders from large as well as small commercial operations, representatives of organisations that have developed similar international standards, and stakeholders from a broad range of countries within the scope of application of the SEG Standard.
- 3.1.5 At the outset of the development or revision process the SEG Team shall inform all stakeholders on its stakeholder contact list of its intention to develop/revise the SEG Standard and:
- a. Inform them of the information that is available on the SEG website;
 - b. Seek their input on the standard's Terms of Reference;
 - c. Encourage their participation in the standard's development.

3.2 Summary of Responsibilities

3.2.1 The Terms of Reference and internal procedures of the SEG entities involved in the development of the standard are defined in Document 004 SEG Governance. Key responsibilities for the development and approval of the SEG Standard are summarised as follows:

a. SEG Board of Directors ('SEG Board')

The SEG Board:

- i. mandates the development of the SEG Standard;
- ii. approves the SEG Standard Development Procedures, including the Terms of Reference for the SEG Standard;
- iii. appoints the SEG Chairperson and the members and Chairs of the SEG Leadership Group and SEG Standards Panel
- iv. approves the finalised SEG Standard (and subsequent substantive revisions) on the basis that the SEG Standard Development procedures have been implemented to the Board's satisfaction and the resulting SEG Standard meets the specified Terms of Reference.

b. SEG Leadership Group

The SEG Leadership Group reviews draft standards prior to their submission to the SEG Board, and advises the SEG Board on their approval.

c. SEG Standards Panel

The SEG Standards Panel drafts the SEG Standard in accordance with the SEG Standard Development Procedure, for approval by the SEG Board taking account of the advice of the SEG Leadership Group.

d. SEG Technical and Operational Team ('SEG Team')

The SEG Technical and Operational Team, led by the SEG Chairperson, is responsible for implementing the SEG Standard Development Procedure.

3.3 Preliminary Standard Development and Pilot Testing

3.3.1 The SEG Board shall be responsible for overseeing the preliminary development and pilot testing of a first draft SEG Standard prior to public consultation and finalisation.

3.3.2 Preliminary development and pilot testing shall include:

- a. Drafting of a pilot version SEG Standard in consultation with relevant experts and stakeholders
- b. Establishing a pilot assurance programme to verify implementation of the standard by eel fishers, ranching/aquaculture managers and eel product traders, as applicable
- c. Issuing SEG Certificates to eel fishers, ranching/aquaculture managers and eel product traders who are deemed to have met the requirements of the pilot version of the SEG Standard

3.4 Drafting of the SEG Standard

- 3.4.1 The SEG Team shall publish the draft SEG Standard for stakeholder consultation on the SEG website, together with a form for the submission of comments.
- 3.4.2 The SEG Team shall contact all stakeholders on its contact list informing them of the launch of the SEG Standard development process and inviting comments on the current draft standard, with a minimum 60-day period in which comments may be submitted.
- 3.4.3 At the end of the specified comment period the SEG Team shall collate all comments received and prepare a general synopsis.
- 3.4.4 At the end of the specified comment period the SEG Team shall carry out an analysis of the number and variety of stakeholders that have submitted comments, and determine whether comments have been received from stakeholders that are representative of all the key groups identified in SEG's initial stakeholder analysis, including any groups that may be considered disadvantaged.
- 3.4.5 At the end of the specified comment period the SEG Chairperson shall convene a meeting of the SEG Standards Panel to review and revise the draft standard to meet the standard's Terms of Reference, taking account of the stakeholder comments previously received.
- 3.4.6 At the discretion of the SEG Chairperson in consultation with the Chair of the SEG Standards Panel additional experts may be invited to take part in the meeting of the SEG Standards Panel to provide advice on particular issues, or for particular purposes such as ensuring editorial consistency or clarity, or to ensure that the views of disadvantaged stakeholders that have not been expressed through the consultative process may be taken into account.
- 3.4.7 When the SEG Standards Panel has agreed on a revised draft standard the SEG Chairperson shall determine, in consultation with the SEG Standards Panel and SEG Leadership Group what if any further work is required before the draft standard is ready to be submitted to the SEG Board for formal approval.
- a. If the SEG Chairperson determines that insufficient input has been received from any key stakeholder group or that substantive, unresolved issues persist that may be resolved through further consultation, then steps 3.4.2 to 3.4.6 shall be repeated as necessary.
 - b. In the case of a standard that is being developed under these procedures for the first time there shall be at least two rounds of public consultation and review as per steps 3.4.2 to 3.4.6, however the second consultation period may be reduced to 30 days.
- 3.4.8 When the SEG Chairperson determines that the draft standard is ready to be submitted for formal approval the SEG Standards Panel shall be asked to vote on a formal motion recommending that the draft SEG Standard be submitted to the SEG Board for its approval. If the vote is not passed steps 3.4.2 to 3.4.7 shall be repeated as necessary.

3.5 Approval of the SEG Standard

- 3.5.1 When the SEG Standards Panel votes that the SEG Standard is ready to be submitted for SEG Board approval, the SEG Chairperson shall direct the SEG Team to prepare a report that:
- a. summarises the standards development process to date, demonstrating how the approved procedures have been implemented, and including a clear description of

- any departure from the approved procedure together with the justification for any such departure;
- b. explains the main issues and concerns raised during the process, and explains how these have been responded to;
 - c. includes a summary of all comments received during the last period of consultation and an explanation of how these comments have been responded to in the final draft of the standard;
 - d. includes as an Annex the final version of the standard that is being submitted for approval.
- 3.5.2 The SEG Chairperson shall submit the report to the SEG Leadership Group together with the recommendation of the Standards Panel that the standard be submitted to the SEG Board for approval.
- 3.5.3 The SEG Leadership Group shall review the SEG Standard and the report on the process for its development to determine whether the approved SEG Standard Development Procedure has been followed, and whether the SEG Standard meets the defined Terms of Reference.
- 3.5.4 If the SEG Leadership Group determines that the procedures for SEG Standard development have not been fully implemented or that the standard does not meet the defined Terms of Reference it shall document its concerns and specify what actions it considers necessary to address these concerns. The SEG Chairperson shall then be responsible for ensuring that such actions as have been specified by the SEG Leadership Group are implemented.
- 3.5.5 If revisions to the standard are required then such revisions shall be reviewed and shall be approved by the SEG Standards Panel before the revised standard is re-submitted to the SEG Leadership Group for its review.
- 3.5.6 When the SEG Leadership Group is satisfied that the procedures for SEG Standard development have been fully implemented and that the SEG Standard meets its Terms of Reference it shall document its decision and submit the standard to the SEG Board together with its recommendation that the SEG Board should approve the standard.
- 3.5.7 The decision to approve the SEG Standard shall be made by the SEG Board, in accordance with its usual decision-making procedures.
- 3.5.8 If the SEG Board does not approve the SEG Standard, the SEG Leadership Group shall determine what further action to take prior to re-submission.

4 Availability of the SEG Standard

- 4.1 The approved SEG Standard shall be published on the SEG website within four weeks of its approval by the SEG Board, and all current SEG certificate holders and certification bodies shall be informed of such.
- 4.2 Any associated guidance or explanations relating to the SEG Standard shall be published on the SEG website.
- 4.3 The SEG Standard and any associated documentation shall be available for download from the SEG website free of charge.

- 4.4 SEG encourages its European Representatives to develop translations of all SEG documents including the SEG Standard into languages other than English. However, SEG does not authorise any such translations as being ‘official’ translations. In case of doubt the official English language version of the SEG Standard shall be deemed definitive.

5 Variation of Documented Procedures

- 5.1 Departures from these procedures may be approved by the SEG Leadership Group in exceptional circumstances, when compliance is not possible for reasons beyond the control of the SEG Chairperson or SEG Standards Panel, or when the SEG Leadership Group determines that an alternative process would better achieve the SEG programme’s objectives.
- 5.2 The SEG Leadership Group shall document any such departures in writing and include a description and explanation in the report submitted when SEG Board approval for the final standard is sought.

6 Record Keeping

- 6.1 The SEG Chairperson shall ensure that the following records are kept for at least five years and for each standards development process, and are accessible for review on request:
- a. Copies of drafts of the SEG Standard circulated for public review, and of the final approved version of the SEG Standard;
 - b. Names and affiliations of organizations, groups and/or individuals invited to comment on the SEG Standard during each stage of its development or revision;
 - c. Names and affiliations of the members of the SEG Standards Panel and invited experts who participated in the review and revision of each draft of the standard.
 - d. Copies of all comments received on drafts of the SEG Standard circulated for formal review;
 - e. A synopsis of the comments received in response to each draft of the SEG Standard circulated for formal review, together with an explanation of how the comments were subsequently taken into account;
 - f. A copy of the policies and procedures that guided the standard development activity at the time;
 - g. A description of and explanation for any departures from the published procedures for SEG standards development;
 - h. The final report on the implementation of the standard development procedure considered by the SEG Leadership Group and SEG Board showing how the procedure was implemented.
 - i. All formal decisions of the SEG Standards Panel, the SEG Leadership Group and the SEG Board in relation to the development and approval of the SEG Standard.

7 Concerns and Complaints

- 7.1 Any stakeholder has the right to raise their concerns or submit a complaint about the implementation of the SEG Standard Development Procedure or about the content of the SEG Standard.
- 7.2 Concerns or complaints should be submitted in writing to the SEG Chairperson who shall ensure that the complaint is conveyed to the appropriate body or individual for response.
- 7.3 Concerns or complaints related to procedural issues shall be responded to initially by the SEG Chairperson. If the complainant is not satisfied with the explanation, the concern or complaint shall be forwarded to the SEG Leadership Group to be discussed and responded to in accordance with its procedures. The response of the SEG Leadership Group shall be final.
- 7.4 Concerns or complaints related to content of a draft or approved SEG Standard shall be responded to initially by the Chair of the SEG Standards Panel who shall provide an explanation for the current wording of the SEG Standard and information on how the stakeholder can participate in a future revision of the standard.
- 7.5 No further appeal or complaint in relation to content shall be considered but all comments shall be documented and maintained in the standards comment file for future reference when the standard is next reviewed.

8 Review and Revision

- 8.1 SEG shall make a formal comment form publicly available on its website at all times inviting any stakeholder to submit comments on the SEG Standard and/or proposals for revisions or clarifications.
- 8.2 The SEG Chairperson shall keep a file of all comments, including those made by members of the SEG Team, that are received on the SEG Standard after its approval.
- 8.3 The SEG Standards Panel shall review all received comments on an ongoing basis with a view to providing guidance on interpretation of the SEG Standard by certification applicants, certificate holders, certification bodies and other stakeholders, and/or proposals for revisions in accordance with Sections 9 – 12 below, as required.

9 Urgent Revisions

- 9.1 The SEG Standards Panel may determine that there is a need for an urgent revision to the SEG Standard.
- 9.2 Conditions under which an urgent revision can be triggered may include, but are not limited to:
- Formal complaints raised by stakeholders that are deemed to have merit as per the SEG complaints procedure;
 - Problems of implementation which affect multiple organisations;
 - Perceived threats to SEG's credibility; or
 - Changes in legislation or international obligations that affect the implementation of the SEG Standard.

- 9.3 If the SEG Standards Panel believes that there is a need for an urgent revision of the SEG Standard it shall direct the SEG Team to prepare a paper outlining the reasons for the proposed urgent revision and shall submit this to the SEG Board for consideration. The Board shall then make a decision whether to proceed with an urgent revision.
- 9.3.1 If the SEG Board determines that there is a need for an urgent revision it shall direct the SEG Panel, in consultation with the SEG Chairperson, to draft a proposed change and submit it to the SEG Board for approval.
- 9.3.2 If the SEG Board determines that an urgent revision is not required it shall provide reasons for the decision and shall direct the SEG Panel as to alternative measures that it considers to be appropriate.
- 9.4 Urgent revisions shall not be required to undergo a public consultation process. However, any approved urgent revisions shall be included in the subsequent regular SEG Standard revision and consultation process.
- 9.5 Upon Board approval of an urgent revision, a new version number of the SEG Standard shall be created along with an effective date, and this SEG Standard shall be published on the SEG website and announced to SEG stakeholders.

10 Administrative and Non-Substantive Changes

- 10.1 The SEG Standards Panel may determine that there is a need for an administrative or non-substantive change to the SEG Standard.
- 10.2 Administrative and non-substantive changes to the SEG Standard may be made at any time at the discretion of the SEG Standards Panel. These do not require a formal revision process though any changes that are made shall be noted to stakeholders in the subsequent revision process and published in a list of changes on the SEG website. Administrative and non-substantive changes do not affect the regular review and revision cycle but shall require a new version number of the SEG Standard, to be issued and published on the SEG website.

11 Clarifications and Interpretations

- 11.1 The SEG Standards Panel may determine that there is a need for a clarification or interpretation of the SEG Standard:
- a. A clarification is an *informative* explanation of the intent of a requirement of the SEG Standard. Clarifications may be provided without the need for stakeholder consultation.
 - b. An interpretation is a *normative* explanation of the intent or application of a requirement based on stakeholder consultation, where the interpretation has implications for how compliance is assessed and where existing requirements and guidance are ambiguous or lacking. Interpretations require stakeholder consultation prior to finalisation.
- Clarifications:**
- 11.2 Where a clarification is required, the SEG Standards Panel shall provide a written explanation.

11.3 The clarification shall be provided to the individual who requested it, circulated to all SEG certificate holders and certification bodies and be posted on the SEG website.

Interpretations:

11.4 Where an interpretation is required, the SEG Standards Panel shall oversee the development of the interpretation by the SEG Team.

11.5 The SEG Team shall prepare a consultation paper which includes at least the following:

- a. Scope of the issue for interpretation;
- b. Considerations;
- c. A draft proposal for review;
- d. Consultation process, including timeline and opportunities for stakeholders to contribute; and
- e. Decision-making process – including how decisions are made and by whom.

11.6 Interpretations shall be subject to a minimum consultation of 60 days. The SEG Team shall inform SEG members, certification bodies and certificate holders of the draft proposal and shall make it publicly available on the SEG website.

11.7 The SEG Team shall prepare a summary of input received and revised draft interpretation for a decision by the SEG Standards Panel. Where an interpretation is approved, it shall come into immediate effect and shall be communicated to SEG members, certification bodies and certificate holders and announced on the SEG website.

11.8 Where appropriate, interpretations shall be incorporated into the SEG Standard during its next revision.

12 Regular Review and Revision

12.1 Within a maximum of five years of the date of approval of the SEG Standard the SEG Team shall carry out a formal consultation with SEG Members, approved certification bodies and SEG certificate holders to evaluate the SEG Standard's continuing relevance and effectiveness in meeting its objectives, and to determine whether the SEG Standard needs to be revised, and report its findings to the SEG Standards Panel.

12.2 If the SEG Standards Panel determines that a revision is desirable the SEG Board and SEG Standards Panel shall review the SEG Standards Development Procedure and the Terms of Reference for the SEG Standard in consultation with the SEG Team, and propose any revisions for approval by the SEG Board.

12.3 The procedures specified in Sections 3 and 4 above subject to any revisions that have been approved by the SEG Board shall then be followed, with the exception of Section 3.3 that shall not apply.

ANNEX 1: SEG Standard Panel

The SEG Standard Panel is responsible for drafting the SEG Standard in accordance with the approved SEG Standard Development Procedure, for approval by the SEG Board of Directors, on the recommendation of the SEG Leadership Group.

The roles and responsibilities of the SEG Standards Panel are as follows:

- To draft the SEG Standard under the direction of the SEG Chairperson and in accordance with the approved SEG Standard development procedure,
- To provide formal guidance on the interpretation of the SEG Standard as required, on an ongoing basis, in order to facilitate its implementation.

SEG Standard Panel members shall be appointed by the SEG Board. The SEG Board shall appoint one of the Panel's members to chair the Panel.

The SEG Standard Panel shall consist of a minimum of three (3) and maximum of ten (10) people comprising:

- a. One member of the SEG Board representing each of the three SEG membership categories
- b. A maximum of seven (7) additional experts appointed by the SEG Board

The SEG Board shall aim to ensure that the SEG Standard Panel's membership includes members with experience and expertise in:

- **Science:** eel ecology, eel population studies, water quality, etc
- **Conservation:** wetland management, eel conservation, etc
- **Commercial and Recreational Use:** commercial fishing of juvenile and adult eels, recreational angling, eel ranching and/or aquaculture, trade in eel products, etc.

The SEG Board shall aim to ensure that the SEG Standard Panel's membership includes members from a broad range of countries affected by the implementation of the SEG Standard, and in particular seeks to include individuals from France, Spain, Germany and the Netherlands, as these countries are considered key to the restoration of sustainable eel populations and trade.

The Panel may invite additional individuals to attend meetings to assist the Panel with its work at its discretion, subject to the approval of the Panel's Chairperson.

The current SEG Standard Panel membership is given in Doc 006 SEG Membership List.

SEG Standard Panel members may participate in and act at any panel meeting through the use of conference telephone or other method through which all persons participating in the meeting can communicate with each other, such as but not limited to webex, e-mail, skype, or other electronic means. Participation in a meeting by such means shall constitute attendance and presence in person at the meeting.

A minimum of 67% of the total number of eligible group members shall be present in person at a meeting in order for the meeting to achieve quorum.

Additional invitees attending SEG Standard Panel meetings but who are not listed as members of the group shall not count towards quorum and shall not vote.

Decision-making:

The SEG Standard Panel shall aim to take all decisions relating to the drafting of the SEG Standard by consensus (see glossary), but if consensus cannot be achieved a decision may be taken by the affirmative vote of at least 67% of the members present at a meeting at which quorum is achieved.

Illustration of voting:

Total number of cttee/ group members	Quorum (at least 67%)	Number of cttee/group members present at meeting	Minimum number of affirmative votes to take decision (67%)
10	7	10	7
9	7	9	7
8	6	8	6
7	5	7	5
6	5	6	5
5	4	5	4
4	3	4	3
3	3	3	3

NOTE: For group membership of ten, the minimum number of affirmative votes for a decision would therefore be five, as at least seven would be required to achieve quorum, and then at least five would need to be in favour of a decision. For group membership of three (the minimum allowed) the number of affirmative votes for a decision would be three – i.e. a decision would have to be unanimous.