

Comments on Draft 1 (consultation period 1 June – 31 July 2017)

Name & Organisation	SEG Standard para ref	Comment/issue	SEG Response
Tony Norman Rivers Lugg and Arrow Fisheries Association tony@theleen.co.uk	N/A	We feel that all fishing for glass eels should be stopped until the European eel is removed from the 'Red List'. The one exception (and only where there is a surplus) would be for stocking in suitable habitat above impassable obstacles.	We understand the desire to stop all fishing given the eel's IUCN listing. Whilst fishing is permitted under the EU Regulations and UK Eel Management Plans, we want to see best practice adopted. This standard is designed for best practice. We also believe that, managed properly according to the standard, eel fishing can actually help the recovery of the eel.
Dai Francis Severn & Wye Smokery Dai.francis@severnandwye.co.uk	N/A	<p>As original supporters of the standard we are pleased that measures are being made to make it relevant and more robust in a market that our customers struggle to understand what the standard stands for.</p> <p>The effectiveness and strength of any standard, accreditation or kite mark is dependent on customers being fully aware of the principal qualifications and beliefs of the standard.</p> <p>By allowing companies (as the standard does at the moment) to trade under the umbrella of the "Sustainable Eel Standard" and at the same time trade in wild and unsustainable eel resource, you are allowing the companies to "greenwash" their products and discourage anyone making the costly decision to trade solely in a sustainable source.</p> <p>In our view processors /wholesalers/ of eel who want to subscribe to the 'SES' should not in any way be involved handling or processing any adult 'wild' eel other than that sourced from a recognized 'SES' approved farm. This should be a principal that requires no debate.</p> <p>Up until now the SEG has done little to promote eel as resource and concentrated its energies on regulation of fisheries, restocking, habitat improvement and unblocking of migratory pathways as the end of the 1st paragraph of SES version 6 says these efforts are "not achievable without a dynamic Eel sector."</p> <p>It is also unacceptable to think that the industry would credit an audit that is every 4 years, every two years should be the absolute minimum requirement.</p>	<p>We have increased effort to communicate clearly what the standard means.</p> <p>These comments are noted and you will see we are moving towards certification being only for those with a majority of traceable supplies of certified eel in a transition towards 100% in the future. Our assessors advise that they can identify where uncertified eels are being passed off as certified, through mass and number balance comparisons. Other standards such as MSC and ASC permit other fish products at the trader's site.</p> <p>Whilst we also see adult eels as potential spawners, fisheries scientists advise that catches can be made from catchments achieving their escapement targets.</p> <p>We wish to see the eel recovering first and foremost, and not promoted until a responsible eel sector is established and recognised by consumers and those outside the sector as being on the road to recovery.</p> <p>Repeat audits are set on a risk basis. Although certificates last for 4 years, repeat audits are required at least every 2 years.</p>

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		Whistleblower action by members is something that should be encouraged otherwise we have no way of properly policing the standard.	The procedures for this are described and an additional line encouraging reports has been included.
Richard Jardine RichardJJardine@hotmail.com	4.5	Would it be useful to mention ideal temperature and oxygen saturation for eel transport?	We are looking to develop transport best practice standards and these would be a helpful addition.
	5.6	Refer back to general section 5 for slaughter methods?	Whilst this is an aspiration for SEG, retailers (especially supermarkets) are tending to move away from having multiple third party logos on their products, preferring to refer their own company reputation. The SEG label will be used for Business to Business (B2B) assurance. Thank you. Corrected
	7	Recommend that retailers use signage for eels certified by SEG (SEG provide)?	
	12 General	Subsections in section 12 numbering is incorrect Marine Conservation Site (MCS) website refers to Eel but should have a reference to the SEG?	We hope the MCS website might make such reference after the Standard has been published, or when ISEAL membership has been achieved.
Christine Absil Good Fish Foundation christine@goodfish.guide Comments on Version 5.2		Comments on Version 5.2: <ul style="list-style-type: none"> - Transparency of certification process is key. Will draft reports be available to the public and stakeholders? - Similar to MSC, stakeholders should be allowed to raise objections to the certification and an objection procedure should be in place. This does not seem to be the case at present. - On P5: "The final decision is taken by the SEG review panel after analysis of the assessor's report". As SEG also contains representatives from the fishing and aquaculture industry this could create, or at least suggests, conflicts of interest. Why isn't the decision of the CB leading? - The standard is mostly based on compliance with the eel management plan. Progress of the EMP's is reported to EU by the member states, but until now this progress is not evaluated further. Therefore we strongly suggest that effectiveness of an approved EMP of the MS is not taken for granted but assessed by a 3rd party as well. - Component issue indicator requirements include many qualitative statements "with reasonable confidence" e.g. component 2.1, 5.1, 5.2, 6.1. E.g. component 5.1 and 5.2 "the restocking is part of a management initiative that should with reasonable confidence lead to the 40% escapement target being achieved in the future." this statement includes several very qualitative assumptions. Namely "should lead with reasonable confidence to the 40% escapement goal". 	We are considering that in the Assurance Code Thank you for this suggestion. Whilst some standards might run like this, it is not an ISEAL requirement. We are considering that in the Assurance Code. The Panel is made up of scientists and conservationists only, with no commercial interests, in order to avoid any conflict of interest. The CB decision has been leading, with the Panel only making decisions when the CB recommendation has been marginal. In future, the Certificate Body will be the Awarding Body and will be even further independent of SEG. All reports and decisions will be published on the SEG website and open to scrutiny. The assessor is required to consider this as a third party – not just to accept the report by the Member state. We have sought to remove such qualitative terms as far as possible.

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		<p>- Restocking should not be the be all end all method. Centuries of eel restocking have learned that there is no clear relationship between percentage escapement and restocking. To quote Willem Dekker (2016a): “As successful as restocking might have been locally, it has not markedly changed the overall trends and distribution patterns or halted the general decline of the stock and fishery.”</p> <p>ISEAL compliance: We think several of the aforementioned issues in the current standard are likely to be raised by ISEAL as well. ISEAL Credibility principle 3 (relevance) requires that standard requirements are objective. The qualitative nature of some of the SEG standard requirements allows a subjective interpretation. The way ISEAL credibility principle 7 (transparency) and 8 (accessibility) are implemented is unclear. How and when stakeholders are asked to provide input during the SEG certification process should be clarified. Other issues:</p> <ul style="list-style-type: none"> - Component 4.2: red score indicator mentions fish waste but the use of e.g. trimmings from salmon farming should be allowed. - Component 4.3: Feed component of the standard should not only include FCR. Fish In Fish Out (FIFO) ratio should be estimated for both fish oil and fish meal according to Jackson (2009). Ideally Forage Fish Dependency Ratio (FFDR) should be estimated similar to how this is done in the ASC standards, e.g. the 2012 salmon standard Appendix IV-1. - Component 4.3: Feed component of the standard should include steps taken to lower the aforementioned FFDR as this ratio is very high compared to other farmed fish species. - Component 4.8: Eel used for restocking should be in good health similar to that of the eels used for consumption (e.g. no selection of eels with lower sale value to be used in restocking) - Component 6.3: Provisions should be made for bycatch of invasive species that is of value to the fishery such as crayfish and Chinese mitten crab. The fishers should be allowed to retain these species if it complies with national regulations - Component 6.4: A clear definition of ETP species (according to which list, IUCN, national red list, other?) should be given here. <p>Component 6.7: A clear definition of humane slaughter methods must be given. In our opinion the only approved methods should be</p>	<p>Agreed – hence regular reference to habitat improvement and improving migratory pathways, progress with eel management plans, meeting escapement targets etc.</p> <p>Thank you. We also have ISEAL accredited consultants guiding us.</p> <p>The standard now refers to a 3rd party accreditation (eg. IFFO) to consider suitability of feed.</p> <p>Feed conversion ratio criteria were provided from expertise within the eel farming sector.</p> <p>This is described in Component 5, and we have added new Criterion 5.8</p> <p>Amended as suggested – see Notes in Component 2.</p> <p>We believe the indicator is sufficient to account and be flexible for a range of protections whose lists are constantly changing.</p> <p>Updated – see Component 5.6</p>

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		electric stunning and percussive stunning.	
<p>Peter Wood UK Glass Eels</p> <p>peterwood@glasseel.com</p> <p>Comments in red</p>	Various	<p>2. In addition, the 40% escapement target has come under increasing challenge. Some make the observations that:</p> <ul style="list-style-type: none"> Measuring eel stocks is notoriously difficult to do accurately. So, many consider that it is impossible to calculate what the stock was before anthropogenic influences, and therefore that the 40% target, whilst a best estimate, is difficult to measure. Other targets might be more appropriate <p>With European waters so degraded (freshwater habitat availability is perhaps 10% what it should be), that seeking a 40% escapement target from a 10% healthy environment for eel is unachievable.</p> <p>Very important to recognize that measuring standing adult eel stocks is extremely difficult. We have yet to catch one eel in Llangorse Lake that can be identified as one of the 100,000 that has been translocated.</p> <p>If you cannot measure it you cannot manage it. Resources now need to be put into developing a methodology to measure stocks of all life stages.</p> <p>The 40% escapement target that has been set before anthropogenic influences is fantasy. There is a price to pay if we want to live in a modern technological society with secure water supplies, no risk of flooding, and low cost food from intensive agriculture; it will be very difficult to go back 30 years yet alone to the era before the industrial age. The 40% concept is flawed. This was obvious from the start. SEG should have the courage to challenge this flawed concept. Unachievable dysfunctional targets that are core to the recovery plan are almost certainly likely to lead to failure.</p> <p>* Future drafts and the final version will include references to the evidence for these assumptions.</p> <p>NB. ICES reports and other reviews have challenged the effectiveness of restocking, which is at the heart of these assumptions. The current consensus is that it is more effective the closer the stocked location is to the source of the eels. Whilst it is a key feature of so many Eel Management Plans, and until the scientific evidence reaches a conclusion, this standard will assume that it is effective.</p>	<p>Agreed. Eel stock assessment is very challenging to do accurately. This is reflected in the text.</p> <p>Agreed. We are lobbying ICES and the EU with similar comments; also seeking funding and promoting projects to gain better information on eel stocks.</p> <p>We recognise this, so are proposing different, 'responsible' targets, as an interim measure towards full recovery and sustainability.</p>

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		<p>Where is the evidence on which to build this consensus or is this the emotional narrative of a post truth world? The eel is a panmixic species that arrives on ocean currents. There is no evidence to suggest that the distribution of the glass eels is anything but random. This idea flies in the face of what SEG is trying to do in collecting glass eels from river basins where there is a surplus and translocating them to areas of undersupply. So for the Severn do we just translocate in the Severn basin???</p> <p>This idea is already distorting the market in France. Ironically we are one of the nearest to the European stocking market what is going to happen to the glass eels sourced from Spain and Southern France . This idea if left unchecked has huge potential to distort the market.</p> <p>10.2 Components</p> <p>The eel sector is composed of many parts, starting with fishing, through transport, holding, and farming to restocking or retail supply to the consumer. This standard is designed for each part of the supply chain to show that is achieving the highest standards and is acting responsibly and sustainably, contributing towards net benefit for the eel.</p> <p>The Standard is divided into the following components:</p> <p>Component 1: Core requirements:</p> <ul style="list-style-type: none"> ○ Commitment to legality and sustainability ○ Trading in sustainably sourced eel ○ Traceability ○ Biosecurity and Welfare <p>Component 2: Glass eel fishing</p> <p>Welfare will continue to play an important part in the management of vertebrates.</p> <p>Illegal trade and unsustainable practices appears to have increased in recent years as supply has diminished with reduced stocks, competition has increased and, whilst export out of the EU has been banned, demand from Asia has encouraged an illegal market (trafficking). We have to be realistic. This is the legislation of unintended consequences. The inability to implement the legislation has created an illegal parallel economy that is much stronger than the legal local economy.</p>	<p>Increasing numbers of scientific papers conclude this, and the review of stocking in 2012 by Mike Pawson made this conclusion.</p> <p>‘More’ effective for closer translocations doesn’t mean ‘ineffective’ for further ones. The standard isn’t saying just translocate into the same catchment, but does recognise when fishermen donate their catch to do just that.</p> <p>Added to Draft 2.</p> <p>The legislation and the standard have been developed with the correct intentions. Implementation is a matter of adequate enforcement. What is suggested as an alternative?</p>

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		<p>SEG is clear that the road map for recovery of the European eel population, as set out in the EU Regulation, cannot be followed unless all commercial activity is carried out in full compliance with the law and in full transparency. The EU regulation does not have sufficient flexibility to alter management objectives in order to respond to the changing political and socio-economic environment</p> <p>SEG also condemns some activities which, while not illegal, are not in the interest of recovery of the European eel population. The assessor should evaluate the full range of activities of the organisation which relate to eels. Activities should be judged on a case-by-case basis, but activities such as involvement with unregulated European eel fisheries outside the geographical scope of the EU Regulation (eg. in North Africa), except for purposes relating to conservation, would be considered by SEG as unsustainable. Does this mean that organisations in North Africa exporting glass eels and farming eels for export to Asia cannot be sustainable?</p> <p>By encouraging a legal and sustainable market via the SEG Standard, illegal and unsustainable practices will be discouraged and phased out. The number of farms wishing to purchase SES glasseels is decreasing not increasing.</p> <ul style="list-style-type: none"> • The illegal trade (measured as the unaccountable reported catch in Europe) reduces by 10% per year over the next 10 years. <p>In 10 years (2027) the level of illegal trade has reduced from 40% of the total catch to less than 5%. At the moment I cannot see that there are any incentives that will reduce the illegal exports. I do not think that SEG has really grasped the pervasive nature of the black market. There is now a strong and well developed network for illegal exports, there is no practical system to monitor the illegal movements or to identify shipments at Border Inspection Posts. Unfortunately too little too late. What is certain is that this illegal trade is extensive and there is an expectation from the fishing sector that the wholesalers should support it. There is an expectation that cash should be paid for unrecorded transactions. This is one of the first questions that is asked when we are negotiating with fishermen. This illegal process generates a significant cash economy which is self-perpetuating. The fishermen justify their actions because in their opinion the regulatory process is not rational and the quotas are too small and</p>	<p>Possibly. The EU is currently reviewing the regulations. This is outside of the scope of the standard. The standard is intended to support the EU Regulation and will be reviewed as the Regulation changes.</p> <p>Whilst export to Asia from the EU under CITES is considered unsuitable, there is no reason why export of the same species from a different should be regarded as suitable.</p> <p>We hope this trend will change as the standard becomes more accepted.</p> <p>SEG is very aware of the extent of the black market and has been heavily involved in influencing the enforcement authorities in Europe and Asia.</p>

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		<p>are not sufficient to support the crews on their boats. The outcome is that 200-300% of quota is fished.</p> <p>While there is demand from Asia the CITES restrictions will continue to create the margin. As the supply is restricted the price increases. As with any market the people involved in it will be compensated with a price that is compatible with the effort and the risk. This is a positive feedback to support the illegal trade. Random spot-checks might be a deterrent for the small operator however for the professional criminal losing 10% of your consignments during the season is not going to make the operation non-profitable. While the illegal trade is financially viable it is unstoppable. Encouraging a sustainable market is not sufficient on its own to combat this illegal trade.</p> <p>The only reason the illegal exports have stopped in the UK is because there is insufficient margin for some to operate. SEG should continue to bear in mind any amount of legislation and regulatory activity will not control illegal exports if there is an economic return the participants. At the moment everyone participating in this trade wins from the fishermen to the end user.</p> <p>To complicate matters further while it is possible to measure the unaccountable reported catch it is not possible to measure the unaccountable unaccounted catch. If you cannot identify or measure this activity how can illegal activity be managed from 40% + to >5%.</p> <p>Target expectations need to be realistic. 10 year programs are impossible to forecast. 2-5 year forecasts would be more practical.</p> <p>Good record keeping that can be audited is essential to be able to provide the evidence that the claims a business makes for its products are genuine. Customers seek the assurance of the SEG standard to show that the product they are buying is what it is claimed to be, i.e. from certified sustainable sources. However, no audit system is criminal-proof and it is open to fraud; hence spot-checks and vigilance by suppliers and customers will be required to maintain the credibility and security of the standard.</p> <p>One of the biggest problems is how do you monitor the glass eel fishing. 20% mortalities are still being recorded by farmers and 80% mortality was reported in Lithuania. So there are still</p>	<p>Agreed. The standard is designed to encourage legal practices and for those who wish to operate responsibly. SEG continues to influence collaboration of enforcement authorities globally.</p> <p>We can identify indicators for this from monitoring activities in Asia itself.</p> <p>This is an aspirational target that we will measure, rather than a forecast.</p> <p>We recognise that monitoring mortality in the glass eel fisheries is challenging, so have presented options for covering this in the standard.</p>

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		<p>major problems with regard to quality within the fishery. This is information from just a few shared clients. There is another tranche much larger that is unreported. The glass eel fishery is unmonitored.</p> <p><i>Separation and Segregation</i></p> <p>Separation can be achieved through physical or temporal separation. However it is done, it must ensure that mixing will not occur. Products cannot contain any non-certified eel (all eel-based ingredients must come from an SES certified source).</p> <p>For the UK all the hand net fishermen need to be certified to include those on the Lune, Ribble and Dee. How are we in the UK going to certify the 10-15 outlier hand net glass eel fishermen in the North of England? Physical and temporal separation of stock for these few fishermen presents practical problems. Do we abandon them and allow them to establish a core of non sustainable stock in the UK for illegal sales to Asia?.</p> <p><i>Record Keeping and Documentation</i></p> <p>The key to traceability is good record-keeping. Organisations will need to be able to produce records that allow for the tracking of product throughout their ownership. They will also be required to produce records that allow an auditor to view the quantity (in weight) of product that has been bought, lost and sold. The auditor will want to be able to ensure that the amount of certified product leaving the Chain of Custody is the same or less than the corresponding amount bought.</p> <p>Note glass eels shrink during storage (they don't feed), so weight change is an important element of rectifying 'eels in' with 'eels out' for a batch. However, for this case there is a trade-off between frequent record-keeping and mortality induced by handling so that good husbandry dictates that handling is minimised – this means weighing only when necessary.</p> <p>We will try and sell by the piece not by the Kilo. The Latvians are buying by the piece.</p> <ul style="list-style-type: none"> • Auditors report a high confidence (90%+) in the quality of records of a high proportion (90%+) of those assessed • All those handling certified eel are using the SES logo to label the product and do so correctly • Reports of transgressions are handled promptly and fairly 	<p>We hope to be able to find an affordable way to certify smaller fisheries and bring them into the recognised responsible supply chain.</p> <p>We are in correspondence about this.</p>

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		<p>The issue of transgressions remains unresolved for UK glass eels. This matter was dealt with in some detail at the annual meeting. It is a subject that needs to be settled and closed from my point of view. The new governance protocol is a significant step forward.</p> <p>Criterion 1.4: Biosecurity – Eel and eel products are provided with minimal risk of diseases, parasites and alien species</p> <p>Matter discussed at some length at the AGM. This will have to be a risk based assessment. Testing samples of glass eels for specific pathogens prior to shipment is not a solution to the problem. This is why Sweden has a quarantine program to support its national approach of high health status for the Agriculture and the Aquaculture sector. Evex can be found of many European countries. <i>Dikerogammarus villosus</i> is alien to some, normal to others. Is it really practical to stop the spread of <i>Anguillicola crassus</i> which in now distributed over most of the UK. The EA or SEG approach to this problem is not consistent. Eg. The Bristol water reservoirs that have been inaccessible to eels for many decades. Rather than surveying the stock to check the incidence of <i>Anguillicola crassus</i> with a view to keeping these areas clean for the development of a pristine population of reproductive stock , migratory pathways are being opened up to allow infected stock to gain access to these areas.</p> <p>All suppliers have high quality, effective, bio-security and welfare plans</p> <p>There are no, or very rare, examples of a disease or alien species associated with a batch of certified eel. This is an unrealistic expectation as a general objective, May be achievable in some limited regions.</p> <p>The fishery conducts good biosecurity measures such as the disinfection and drying of nets between each fishing trip. What about the boats, the tanks, the transport systems. Is it relevant for activities in same river basin? It is all very difficult or impossible to enforce and manage. It involves a huge commitment of every member of staff in the organization. High levels of biosecurity can only be maintained for short times. We only run our critical program for the period we have glass eels in stock for Sweden. No longer.</p> <p>There have been no instances of disease or alien species from the fishery in the past 5 years. OK for the listed diseases with national</p>	<p>Biosecurity aspects are improved in this standard and are likely to continue developing.</p> <p>Updated</p> <p>We don't believe this should be an unrealistic target.</p> <p>Good bio-security is not difficult and is important to demonstrate responsible practices.</p> <p>This is an aspirational target that we will measure.</p>

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		<p>monitoring plan but for the unlisted diseases of non-susceptible species it is not practical to implement.</p> <p>The biosecurity plans should be risk based and developed for specific organisations with specific outcomes.</p> <p>Daily mortality records should be an obligation.</p> <ul style="list-style-type: none"> • All suppliers have high quality, effective, bio-security plans • All customers provide and seek evidence of bio-security before buying • There are no, or very rare, examples of a disease or alien species associated with a batch of certified eel <p>Certain management and husbandry processes can eliminate certain risks. This facilitates the process of moving stock without the burden of further testing and inspection. Restocking with farmed Juveniles will eliminate spread of Dikerogammarus. This hypothesis needs to be tested but with Gammarus pulex they do not survive in the farmed environment.</p> <p>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. Medicine records to be no more onerous than current requirements of the medicine regulations.</p> <p>Water, supplies of eel, and use of equipment are managed such that it is not possible to infect one tank or batch of eels from another. Not quite sure what the expectations are here. If you have recirculated system then water and disease will go from one tanks to the next</p> <p>The facility has the appropriate permissions to operate from the relevant licensing authority and there have been no bio-security issues in the past 5 years.</p> <p>The facility provides health check certificates to show batches being free of disease and alien species. Need to be specific re scope of health checks and range of alien species.</p>	<p>Agreed.</p> <p>Agreed.</p> <p>Is it necessary and will the sector accept SEG introducing higher standards than current regulations?</p> <p>Can the filtration and disinfection system not treat water from separate tanks? ie. the outlet of each tank goes into the filtration system before entering another tank.</p> <p>Biosecurity aspects are improved in this standard and are likely to continue developing.</p> <p>Agreed that the historical evidence is low. However, standards and expectations have increased in the modern age.</p>

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		<p>The risk of restocked eels introducing disease into wild populations has been assessed and is minimal. Restocking from UK has been taking place since 1907. It is low risk activity. The evidence that restocking is spreading disease is difficult to find.</p> <p>Wholesale / Retail / Processing: Hygiene Plans are followed and there are rare examples of infection. This is an incredibly complex area to try and regulate. All these facilities will have EU plant numbers. They are highly regulated by the environmental health department in the UK. Either pass or fail?</p> <p>Traceability – sale to certified buyers</p> <p>There is an obvious temptation to sell to buyers who will offer the best price. That price is determined by the market and the illegal market often commands a higher price. SEG Certified buyers must sell only to legal markets so it follows, that to be sustainable, certified fisheries must only sell to certified buyers. Other mechanisms such as e-Declaration systems are also being used to improve traceability and therefore discourage and also measure the extent of the illegal markets down to the fishery level.</p> <p>Are you saying that we can only sell to SEG certified buyers? There are very limited outlets for SEG glass eels.</p> <p>Survival & eating glass eels</p> <p>It is obviously important to maximise welfare and survival for glass eels to then maximise their net benefit. There will inevitably be some mortalities and those can be kept, frozen and supplied for an albeit diminishing market in earing glass eels. In some places in Europe there are local traditions based on eating glass eels, e.g. it is a Christmas tradition in parts of Spain. However, the reduction in glass eel catches has led to substitutes being developed for these traditions.</p> <p>SEG does not support the capture of glass eels for direct consumption as we believe it is poor use of the stock and does not support net benefit, but we do support the use of the small proportion of glass eels that don't survive fishing, holding and transportation</p> <p>Does this mean a SEG glass eels supplier cannot sell to the consumption market?</p> <p>Does this mean that a Spanish processor cannot become SEG certified?</p>	<p>Yes – it will be compliance with existing legislation – not a new test.</p> <p>That is the longer term aspiration.</p> <p>SEG does not support the capture of glass eels for direct consumption as we believe it is poor use of the stock and does not support a positive contribution. We do support the use of the small proportion of glass eels that don't survive fishing, holding and transportation</p>

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		<p>The Spanish market is the corner stone of the sector. Without the Spanish consumption sector the glass eel trade would collapse. Who would purchase the glass eels early in the season?</p> <p>We tried in 2014 not to supply the Spanish Sector when there was a surplus of glass eels. This involved closing the business. As a result the fishermen found other outlets and from that point on we have been wrestling with the illegal trade.</p> <p><i>Unit of fishery</i></p> <p>Fisheries can be assessed at a range of size of ‘units’, from individual fishermen, through groups, co-operatives, to a whole estuary. Smaller units, eg. a single fisherman, brings individual responsibility but greater cost (of assessment). Larger units bring economies of scale, and the whole group of fishermen must trust each other to operate according to the required standards and regulations.</p> <p>Where assessment for individuals is prohibitively expensive, we will seek to facilitate collaboration to bring groups together to conduct multiple single assessments to make it more affordable.</p> <p>How are the individual fishermen across the whole of the Bristol Channel going to be certified? Severn, Avon, Wye, Usk, Tone, Brue, Parrett, Tor, Torridge and all the other little fresh water outlets that run into the Bristol channel.</p> <p>Then we have the few fishermen on the Lune, Ribble, Dee etc in the North,</p> <p>The artisan method of hand fishing in the UK or France is the most environmentally sensitive method of fishing in Europe. This should be recognized. At the moment SEG is producing the illusion that the standard achieved in Spain and France using boats is the same as the hand fishing. For the future it is important to recognize that the quality, the mortality and by catch of hand net fishing is completely different from trawled fish.</p> <p>With exception of the Parrett where traditional fishing has been abandoned it is impossible to kill, injure the glass eels or to have any significant by catch using the traditional hand net as set out in the regulations across the UK.</p> <p>On the Parrett the fishery is active, nets are placed in the tidal river and the glass eels are swept into the net along with the detritus, shrimps and other life forms. The nets need to be cleaned and emptied every few minutes. Everywhere else in the</p>	<p>We hope to be able to find an affordable way to certify smaller fisheries and bring them into the recognised responsible supply chain.</p> <p>The different types of method and the effect on mortality are recognised in the standard.</p>

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		<p>UK the fishing is passive and relies on the glass eels swimming into the net against an ebb tide as they migrate upstream. The glass eels are under no pressure, the nets can be left in the river for an infinite time with no deleterious impact and there is virtually no by catch.</p> <p>The traditional handset is the most environmentally sensitive method of fishing. This method of fishing should be should automatically qualify as a sustainable method. By all means measure a subset of this method of fishing for those people using the float and rope system but for those using the traditional net in the Parrett and elsewhere just measure one other subset. Measuring subsets in another 10 locations in the UK is just not economically viable.</p> <p>Fishery data Good fishery data are important to enable effective fisheries management by local, national and European fishing authorities.</p> <p>Nothing mentioned about sea horse catch in French fishery</p> <p><i>Mortality rates in glass eel fishery and in storage</i> Mortality from fishing can become apparent during the period of glass eel storage, rather than in the fishery itself. Since the glass eel catch over several days tends to be amalgamated in one tank in the holding facility, it is not possible to separate out a time period to allocate this mortality to the fishery vs. the holding facility – eg. by saying that mortality during the first 24 hours is due to the fishery while after that it is due to conditions during holding. Thus, the maximum mortality rate for the fishery covers the whole time period that the glass eels are in the holding facility. The Standard for glass eel buyers (Component 4 of the Standard) also includes a mean mortality requirement, which is lower than the maximum mortality requirement for the fishery, although covering the same time period. This arises because the glass eel fishery component (Component 2) requires a maximum permissible rate for each batch, while the glass eel storage component (Component 4) sets a maximum for the average rate across the whole season. Note that these two rates are not additive – both must be achieved.</p> <p>Note that the setting and calculation of mortality rates has caused difficulties for each clients and assessors. Suggestions for</p>	

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		<p>solutions for this standard are welcomed. It will be most helpful to separate the action of fishing and the action of fish storage.</p> <p>In France it is highly likely that any observed fishing mortality at the point of catch would be discarded or separated at the time of fishing. In the UK with traditional hand nets we do not have fishing mortality and there are no discards. . Any mortality is due to poor transport technique from river bank to collector. Poor technique is inadequate equipment or too long a time to transport the glass eels.. A bucket is OK for small catches when temperatures are low. Trays are the preferred equipment for larger catches and higher temperature. There is no market in the UK for dead glass eels as in Spain. We do not pay for dead glass eels so this is self-regulating problem. There is a powerful incentive to keep the glass eels alive. Trays are not used in France, However temperatures are lower during French season so the plastic skips work. However not ideal for transport and would not work in the UK. For UK mortality is collective mortality with no discards over whole period of storage.</p> <p>There should be no significant mortality as a result of storage in the first two weeks in a well-designed glass eel storage facility. Just a few pieces per million each day. Therefore any mortality is due to fishing.</p> <p>What is the shrinkage data in France? Assume some Mass Balance figures are available. Best practice 5-7% is possible in UK. We know that 15% in France is possible but likely to be much greater.</p> <p><i>Design of net for glass eel fishing</i></p> <p>The crucial element in the design of fishing gear for glass eels is that it does not allow the eels to become trapped in the mesh – this leads to mechanical injuries which eventually leads to mortality even if such injuries are not immediately visible. For the cod end and for hand-held nets, this is generally solved by ensuring that the mesh size is small enough so that no part of the glass eel fits through. For the rest of a towed net, the mesh size can either be small enough as above, or large enough that glass eels can pass through without injury (in practice, most swim away from the mesh, ensuring that they remain in the net). For the cod end, we have been prescriptive about mesh size, but for the remainder of the net, fishermen may find their own solutions, as long as they fulfil the criterion of not causing injury or abrasion.</p>	<p>All noted and accounted for as far as possible in the standard</p> <p>All noted and accounted for as far as possible in the standard</p>

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		<p>For the traditional hand net you need an open mesh because the only way you will catch the glass eels is by having a free flow of water through the net. This attracts the glass eels into the net and holds them in the net. If there is not a free flow then glass eels sense this is an obstruction and swim around the net. Mesh will be at least 2 mm. As the net is on a fixed frame the mesh does not change shape. For a French trawl net you need an even greater open mesh to allow the efficient passage of water and reduce clogging. When stretched the meshes form a narrow diamond shape and change from a free flowing format to just allowing the glass eels to swim through damaged or trapping them as in photos attached. (note the individual glass eels trapped in the mesh).</p> <p><i>By-catch in glass eel fisheries</i></p> <p>In order to evaluate impacts of the fishery on by-catch over a fishing season, the assessor will require evidence which is likely to include:</p> <ul style="list-style-type: none"> - Main species represented in the by-catch - A quantitative or qualitative evaluation of the quantity of each species caught over a given period (eg. per tow or dip, per night) - The measured or likely population status of these species in the area of the fishery (noting that rare, endangered or protected species are dealt with separately) Sea Horses - Protocols or methods for dealing with by-catch - The actual or likely discard survival <p>‘Negligible impacts’ are defined as a low rate of by-catch plus a low rate of discard injury or mortality plus by-catch only from species which are abundant in the area. ‘Low-level’ impacts are where two of these criteria are met. In ‘severe’ impacts, none of the criteria may be met in full. Where only one criterion is met in full, the assessor shall use their judgement in deciding the outcome.</p> <p>Infrequent but large catches of gelatinous zooplankton in glass eel nets during bloom periods may be excluded from these criteria.</p> <p>These are not infrequent. Need pressure washer to disperse through mesh.</p> <p>Parrett fishery has by catch of Gammarus pulex. Could be more than 10%. Traditional hand net fishery minimal or zero by catch and no discards.</p> <p><i>Mortality during first week in culture</i></p>	<p>All noted and accounted for as far as possible in the standard</p>

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		<p>It was agreed between glass eel buyers and eel farmers represented on the stakeholder group that mortality during the first week in the eel culture facility is related to handling during fishing, holding and/or transport, rather than to factors under the eel farmer's control. This period therefore may be left out of calculations for mortality rates during culture.</p> <p>This is generally the case but not in every case. There are still farmers causing unnecessary mortalities due to poor management. Every case of mortality needs investigation. Perhaps SEG should be arbiter of these mortalities that involve members.</p> <p><i>Quotas and Sustainable Yield</i></p> <p>Given the size, range and diversity of the stock of the European Eel, it is not yet possible to properly set quotas or a Maximum Sustainable Yield. We hope that stock and catch</p> <p>More attention needs to be given to stock assessments. There is no work being done to evolve new methods of stock assessments.</p> <p>The Eel Management Plan is approved and there are good data which shows with reasonable confidence that the EU silver eel 40% escapement target is being achieved in the eel management district.</p> <p>This is a target that is sheer fantasy. It is a proposition that is extremely difficult to measure with any accuracy. Fine keep it as an objective to work towards but accept it what it really is. If 40% silver eel escapement is being achieved then the rules regarding exports and sales need to be relaxed.</p> <p>Fishers are licensed and provide catch and effort data AND data on catch and effort are collected and analysed regularly by the fishery authority (at least annually at the end of the season), AND data are considered to be accurate, useful for statistical purposes and provide a comprehensive picture of the glass eel fishery under assessment AND fishermen only use legal gear AND enforcement is in place throughout the fishing area with no evidence of systematic non-compliance.</p> <p>How do you measure effort in a passive fishery using traditional hand nets?</p> <p><i>Restocking requirements under the EU Regulation</i></p> <p>The EU Regulation requires that 60% of glass eels from fisheries should be reserved for restocking in order to improve escapement rates.</p>	<p>We can consider this.</p> <p>We wish to see better monitoring too. eDNA monitoring is a new method that might transform stock assessment in the future.</p> <p>This is recognised and changed in the new standard.</p> <p>It can be measured crudely by the number of fishermen, but better by the no. nets x no. tides fished.</p> <p>We recognise that the market does not yet properly support this target. SEG has conducted a review of the restocking market recently with one aim to increase the restocking market.</p>

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		<p>So far an elusive target as there are not the funds to support this target. The French catching period is not at the correct time of year. Peak production in France is at the end of January when the whole of Northern Europe is still frozen!</p> <p>Mortality rate over the season is less than 2% on average.</p> <p>Mortality rate over the season is less than or equal to 5% on average but greater than or equal to 2%</p> <p>There should be no mortality due to storage in the first 2 weeks so total allowance for mortality from the fishermen is 4+2=6%?. Seems a bit generous to me when we are already achieving 1.6% inclusive of our minimal by-catch.</p> <p>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.</p> <p>Not economically viable and unnecessary to have electronic quality system linked to alarm. Water pressure. Air pressure and levels OK. Glass eel facility is run on air not oxygen so as long as you have necessary air pressure then Oxygen level is OK. Would be different if running a farm with oxygen.</p> <p>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</p> <p>1. No animal shall be transported unless it is fit for the intended journey, and all animals shall be transported in conditions guaranteed not to cause them injury or unnecessary suffering.</p> <p>2. Animals that are injured or that present physiological weaknesses or pathological processes shall not be considered fit for transport and in particular if:</p>	<p>Hence the higher level is regarded as 'responsible' and the lower level 'aspirational'.</p> <p>Reference to alarm has been removed.</p> <p>Added to the notes.</p> <p>Actually achieving the 60% target ('sold') is 'responsible'. Planning to do so ('reserved') is 'aspiring'.</p> <p>Possibly not. This might be regarded as 'aspiring'.</p>

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		<p>The buyer can provide documented evidence that they have sold at least the required target percentage of its glass eels from the latest season for the primary purpose of conservation / escapement.</p> <p>Reserve or sold. Restocking requirements under the EU Regulation</p> <p>The EU Regulation requires that 60% of glass eels from fisheries should be reserved for restocking in order to improve escapement rates. We can reserve but we cannot sell 60%</p> <p>Restocking as per article 7 in 1100/2007 in an official plan or some other plan. I do not think our Llangorse project would qualify.</p> <p>8. Restocking shall be deemed to be a conservation measure for the purposes of Article 38(2) of Regulation (EC) No 1198/2006, provided that:</p> <ul style="list-style-type: none"> — it is part of an Eel Management Plan established in accordance with Article 2, — it concerns eels less than 20 cm in length, and — it contributes to the achievement of the 40 % target level of escapement as referred to in Article 2(4). <p>How will the sales to the Netherlands be treated. The current practice from France is to sell 50:50 restocking: consumption fish to the farms.</p> <p>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.</p> <p>You might find the following links useful</p> <p>http://onlinelibrary.wiley.com/doi/10.2903/j.efsa.2009.1014/epdf http://onlinelibrary.wiley.com/doi/10.2903/j.efsa.2004.44/epdf http://onlinelibrary.wiley.com/doi/10.2903/j.efsa.2008.809/epdf</p> <p>Restocking of eels has been taking place for over 100 years – Glass eels from the Severn in the UK were first stocked into the German Rhine in 1908. It has been an accepted management technique since and has been an integral part of the Eel Management Plans of several EU countries. However, the scientific evidence on its effectiveness is mixed, with as many studies reporting the negative aspects of stocking to those reporting benefits. The current consensus is that stocking is most effective when done as close as possible to where the eels were caught. This has the added benefit of reducing the introduction of disease, parasites and alien species.</p>	<p>If it is 50% then it will achieve the ‘aspiring’ level.</p> <p>Reference used and changes made to reflect.</p> <p>Increasing numbers of scientific papers conclude this, and the review of stocking in 2012 by Mike Pawson made this conclusion.</p>

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		<p>We (SEG and fisheries authorities around Europe), will continue to review the evidence to ensure that Eel Management Plans and this standard are consistent with the latest science.</p> <p>The current consensus is that stocking is most effective when done as close as possible to where the eels were caught. This has the added benefit of reducing the introduction of disease, parasites and alien species. Where is the evidence? Who is propagating this narrative?</p>	
<p>Samuel Stone</p> <p>Marine Conservation Society</p> <p>Samuel.stone@mcsuk.org</p>	<p>Title</p> <p>Page 6</p> <p>Page 8</p>	<p>MCS believes the standard should not be called 'Sustainable' as it is recognised that this is not something achievable for decades for the eel itself.</p> <p>Additionally, with regards to the farmed component, no existing farmed production standards refer to themselves as 'sustainable' due to the inability for 100% of feed to come from certified sustainable fisheries and other difficulties in defining sustainability for fish farming (eg regional carrying capacity).</p> <p>'Eel recovery standard' or 'responsible eel standard' are preferred alternatives.</p> <p>MCS feels these alternatives would better reflect the aim of the standard, '...to promote and ensure the most responsible methods of fishing, transport and farming, such that net benefit can be demonstrated and the objectives of the EU Eel Recovery Plan and full sustainability will be achieved more quickly'</p> <p>MCS believes the lower level definition should only apply if implementation of the approved MP was deemed credible and time bound.</p> <p>Definition 1: Using 'net benefit' is a misleading here as in our opinion, the term implies Definition 2. Otherwise under definition 1, the standard could see 1 less eel caught to essentially be of 'net benefit' compared with non-certified fisheries.</p> <p>Definition 2, assumptions: natural mortality would be very high, so whilst only 400kg may be needed to populate the catchment in the example provided, much more than this would be needed to account for this high natural mortality and migration barriers during their journey and life upstream and this would need to be reflected in the total catch permitted in the area. Of the 400kg of glass eel, what weight or number can be expected to escape once matured?</p>	<p>We have re-named the standard to use the term 'Responsible'</p> <p>We have reduced the narrative in this section. In the Standard itself we use the criterion: <i>There is good progress with at least 75% of the actions for the implementation of the Eel Management Plan for the river or eel management district.</i></p> <p>We have made changes to seek to address this in as simple terms as possible. The narrative below each definition provides more context, and the criteria in the standard describe the differences in more detail.</p> <p>The 400kg includes mortality rates.</p>

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		<p>Definition 2, assumptions: ‘The majority (at least 60%) should go for restocking’. This needs to be much clearer and definitive in order to demonstrate net benefit. ie. ‘A minimum of 60% <u>is</u> used for restocking...’. Ideally this proportion would be higher. As the years and the numbers of glass eels appearing are highly variable, it would be good to see local eel quota assessed on a case by case basis after sampling at the start of the season. Then for each season, the weight of eels that is left for re-stocking (min 60% after allowing for sufficient numbers to migrate upstream) and then for harvest or farming could be calculated.</p> <p>Definition 2 The assumptions provided are very specific ie. To areas where the eel migration is very high and to areas where the upstream migration is completely blocked. Does this then mean that this definition (of a sustainable eel fishery) can only apply in these specific situations?</p> <p>Indicators: Is being a ‘member of SEG’ the same as being certified by SEG?</p> <p>Issues: Does the retailer (and other parts of the supply chain) need Chain of Custody to ensure traceability?</p> <p>Benefits: Does this mean that glass eels are ONLY ‘sustainably’ fished in places where a greater proportion of eels are being restocked than retained for consumption or farming? ie ‘Net benefit’</p> <p>2.1 responsible indicators Implementation of the management plan should have some time-bound elements – otherwise a MS could be doing very little and very slowly, yet still technically implementing some of the eel management plan; and</p> <p>We feel that ‘Eel fishing is in a place accepted by the fishery authority as providing net benefit to the eel stock’ needs further description. Is this to mean that the local authority would need to make an evaluation of the proportion of glass eels for restocking vs consumption + farming?</p>	<p>At present, it is the case that the 60% target is not always met. The EU regulation specifies and required 60% for restocking and so this standard support that target. Where the target is met. Operators can claim to be acting responsibly.</p> <p>We agree that in the future the fisheries authorities will develop We hope this standard and other influences will collectively lead to better eel stock assessment so that responsive local and range-wide quotas can be set.</p> <p>No – these are just examples. Most fisheries are in estuaries with a full range of barriers to upstream from very few to very high.</p> <p>Membership of SEG has been removed from the description</p> <p>Yes – Traceability and Chain of Custody are synonymous here. Hence we also describe: <i>If the client has demonstrated Traceability via another standard, that evidence can be used here.</i></p> <p>Yes, that is the overall objective.</p> <p>We have amended the criterion to say ‘<i>There is good progress with at least 75% of the actions for the implementation of the Eel Management Plan for the river or eel management district.</i>’.</p> <p>This is principally the achievement of the escapement targets (now re-defined) – but other factor can be considered, as in the Arzal example.</p>

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	Page 23	Component 3 - Benefits Regarding 'net benefit' - Any mortality to yellow and silver eels would need (if not already specified) to be included in estimates of total escapement for a region to ensure the 40% escapement targets are fully met.	Agreed
	Page 27	Eel Farming Mortality – the calculation is clear and logical but there is nothing in standard requiring a log of cause of mortality and associated breakdown of figures. This is essential to enable driving improvements, as the major causes can be identified and remediated. Also a figure of 4.4% per year is given, however this reads as a target rather than a cap and I would expect to see a commitment to reduce this number over time particularly if the comment above is acted upon.	Additional descriptors added to Criterion 5.1 In the criteria, the term ' <i>is less than or equal to</i> ' is used, which we believe describes a cap rather than a target.
	Page 28	Feed. It is best practice in standard development not to refer to just one organisation (such as MSC). This is particularly pertinent for two reasons here – MSC is the ONLY standard that certifies a fishery as sustainable and incorporates all of your requirements, no other standard currently does so. IFFO RS is NOT an eco-label and only certifies a Feed Mill as producing responsible feed. If referring to MSC, we suggest you say "fishery must be certified as sustainable using a 3 rd party audited standard that uses a low trophic pathway"	As we are now using the term 'responsible' we have applied the following criterion: ' <i>Fish meal/oil in the feed (including juvenile feeds) is certified by IFFO or shown in some other way to be from responsible or sustainable sources</i> '.
	Page 29	Humane Slaughter See Farm Animal Welfare Committee https://www.gov.uk/government/groups/farm-animal-welfare-committee-fawc#assessment-of-farm-animal-welfare---five-freedoms-and-a-life-worth-living for guidelines and advice here for appropriate method of humane eel slaughter. Criterion 5.1: The total mortality rate during the culture process is low – see comment above Criterion 5.2: The fish meal/oil ingredients in the feed come from a sustainable source – see comment above IFFO RS does NOT certify fisheries and is NOT a sustainability standard. It is B2B certification	Thank you. We have updated and used European Food Standards Agency guidance . As above: Additional descriptors added to Criterion 5.1 As above: As we are now using the term 'responsible' we have applied the following criterion: ' <i>Fish meal/oil in the feed (including juvenile feeds) is</i>

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	Page 30	<p>of a feed mill for RESPONSIBLE production . This criterion has to refer to MSC certified for sustainable and IFFO RS certified for responsible .</p> <p>Criterion 5.6: Grading, slaughter and transportation are carried out with respect to welfare - there is only one acceptable level here</p> <p>5.7. Whilst 10% is a good start, a greater % would be better. If the target is '60% by number of eels from fish farms is provided for restocking', then shouldn't this value be closer to 60%?</p>	<p><i>certified by IFFO or shown in some other way to be from responsible or sustainable sources'.</i></p> <p>For the 'aspiring' level, we have added: '<i>Other, previously acceptable methods of stunning before slaughter are used, eg. chilling, but there are credible plans in place to invest in the latest methods within the next 2 years'.</i></p> <p>The great majority of eels for restocking are from direct supply as glass eels (no 'farming'). A lesser, but significant amount are as juveniles, grown for stocking at a greater size within 12 months. The 10% target is for those farms focussed on the consumption market. It allows for them to show some positive contribution back to the ecosystem.</p> <p>The wording has been changed to reflect the target for responsibility.</p>
	Page 31	<p>6.1 Sustainable & responsible indicators</p> <p>Sustainable - It is felt that 40% escapement should be being achieved and the 'Or' option removed here. ie removal of '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.'. This 'Or' option seems like it would be more appropriate in the 'Responsible' criteria. It also seems the 'responsible' criteria should include some reference to the kind of evidence or targets that would be sufficient, otherwise there is quite a lot of ambiguity here.</p>	
	Page 36	<p>To decide if a 'Sustainable' or 'Responsible' award is made:</p> <p>We believe only 'Organisations only with all Sustainable indicator passes will achieve a Sustainable level certificate award' should receive the highest award, otherwise there is little incentive for organisations with a majority of 'sustainable' passes to make further improvements. Unless the award is based on improvements needing to be made over a specific period of time. Similar to how MSC conditions need to be addressed for a score between 60-80. As noted earlier though, MCS believes an alternative name for the standard (eg. eel recovery or responsible eel standard) would be more appropriate given the Critically Endangered status of the eel and what the standard has set out to achieve.</p>	<p>The wording, targets and rules to achieve a 'majority' of responsible scores has been amended. Certified organisations will need to show 'continuous improvement' between assessments. See section 9. And more specifically, 10.3: <i>Organisations not yet achieving 80% of criteria as Responsible will be required to identify and make improvements to achieve a higher score by their next assessment</i></p> <p>Yes, we have renamed it as suggested by several consultees.</p>
Ingvild Harkes WWF Netherlands	General comments	<p>- The approach is targeted towards sustainable management of the eel stock rather than recovery – there is no acknowledgement of critical status of the stock (IUCN Red List).</p>	<p>We are surprised to have overlooked describing that ourselves! It is now included at 5.1.</p>

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iharkes@wwf.nl	5	<ul style="list-style-type: none"> - The quantified criteria for sustainability are missing – both in terms of the stock as in terms of a ‘sustainable fishery’ and ‘sustainable source’? - It is assumed that sustainable use is feasible at this point and that continued fishery and consumption are required to keep the fisheries sector involved in management – economic considerations rather than biological/ecological arguments underlie the approach. - The approach lacks a scientific basis and approach – key references are missing. - There is no quantification and target stock – current recovery targets as set in the eel regulation are challenged even though they are science based. - The approach lacks a strong quantified evaluation procedure – what are the indicators and methodology to measure the effect of the approach? - The approach is based on, but does not aim to obtain MSC/ASC certification – why not use an existing, widely accepted, sustainability label for fisheries and aquaculture? <p>The objective of the proposed approach is not <i>recovery</i>, based on a general threat analysis and strategies that address all factors that negatively influence the stock (including fishing for consumption), but <i>sustainable management</i>, with a maximised contribution of the sector and consumers. The fact that units can already obtain a sustainability certificate when abiding to certain standards, implies that the stock is already above safe biological limits, which it is not (ICES 2016). The approach focuses merely on a role for the eel fisheries sector and restocking to balance mortality, an approach that may have some positive impact, but will not likely lead to recovery of the stock (Dekker and Beaulaton 2015).</p> <p>The driver for the development of the standard therefore seems merely focused on human needs (economic), rather than recovery of the eel stock (ecological) to pristine levels as these targets set in the European Eel regulation are contested further down the document.</p> <p>ICES advice (2016a) is not taken as the starting point.</p> <p>The vision envisages a healthy stock, but the approach does not present a target for the required size of the stock and at what point this is above safe biological levels so that sustainable use is possible. This is acknowledged in the first paragraph of page 6, but with no</p>	<p>Yes, because those quantities are not properly known, except in a few locations. Note that due to this and because of feedback from several consultees, we have change the terminology from ‘sustainable’ to ‘responsible’ as a step on the journey towards recovery and sustainability.</p> <p>We believe that responsible use is possible as a step towards sustainability. In the new version (section 5.2) we describe the different pressures in a more balanced way.</p> <p>We have applied ICES eel stock indices, targets and references</p> <p>We have applied ICES eel stock indices. Targets are bases on ICES indices for eel spawning escapement for River Basin Districts, or smaller catchments where known.</p> <p>Targets are and measures are proposed to measure the effect of each, and once agreed, we will develop the methodologies to</p> <p>Use of MSC and ASC is described in section 9. Where an operator has existing relevant certification under MSC or ASC, it can be applied here.</p> <p>We very much want to see the Eel regulation targets achieved. To see pristine level targets achieved will require pristine access to pristine habitats. That is a long way off, which is why we don’t currently see that as a realistic target and why we wish to see as much effort to improve the eel’s environment and migration, as we do to create a well regulated, responsibly operating eel sector. The Eel Regulation allows for ‘<i>protection and sustainable use of the stock</i>’, and the standard is designed to be a practical too to help the sector achieve that.</p> <p>The proposed approach is therefore ‘responsibility’, as a first step towards recovery and full sustainability.</p> <p>Targets are described in section 5. and specifically 5.4</p>

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		<p>references and with a role for the eel sector and ongoing fishery, which, from a scientific or conservation point of view is not necessarily a starting point as the eel fishery is still a main factor to eel mortality.</p> <p>A net benefit can be anything above the current exploitation rate and mortality, and is not in line with the recovery target set in the EU Eel Regulation. Collection of data is positive.</p> <p>The design is targeted towards sustainable use and operations, however, the stock is critically endangered (IUCN Red List) which requires restoration, before sustainable use can be designed. The current status of the stock is not acknowledged in the standard, nor is the minimal effect of the current management efforts (ICES 2016b). There is no scientific basis presented to support the approach presented in the document.</p> <p>To base the approach on a broad and generic definition focused on sustainable resource use by Brundtland, is foregoing all the detailed and available science on eel biology and advice to reach recovery that is present. The Brundtland quote underlies the Convention on Biodiversity which also supports the precautionary approach, which, particularly in the case of a critically endangered stock, should be the point of departure.</p>	<p>The status of the stock and the scientific basis is set out in section 5.</p> <p>The base of the approach is now linked more firmly to ICES targets, but the principles and relevance of Brundtland are still described.</p>
	6	<p>The definition of a sustainable eel fishery on a EU level is 40% escapement overall, not only in particular catchment areas. The areas that can support an escapement of 40% or more need to be managed carefully as to compensate for areas with a (much) lower escapement. Management of eel should be looked at on the level of the overall stock, not regionally.</p>	<p>We agree in principle, but we must see each part of the sector from individual fisheries, buyers farms etc. as building blocks to manage properly, one by one, to achieve that whole in the future. Each one must play its part and show if and how it is doing so.</p>
	7	<p>Restocking, data collection and the opening up of migration routes are positive measures that would help towards recovery of the eel stock. To limit other anthropogenic influences (fishing, consumption) may also be required for stock recovery – could these options be considered?</p> <p>Challenging the escapement target will not help the process of recovery, particularly as there is no scientific backing of these statements.</p>	<p>Yes, these are actively considered in the standard.</p> <p>The ‘challenge’ has been removed, and we have proposed using more realistic but scientifically valid targets for the goals of responsibility.</p>

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	8	A net benefit is not defined and could include any number/quantity over the current exploitation rate and mortality.	We now use the term 'positive contribution' which is define in section 6.
	10	Why not make use of existing certification schemes (MSC, ASC) if the SEG feels that eel fishing can be sustainable?	Use of MSC and ASC is described in section 9. Where an operator has existing relevant certification under MSC or ASC, it can be applied here.
	11	The methodology lacks criteria, quantifications and an evaluation process.	We believe this is better described now in draft 2
	12 – 33	The standard and criteria have no overall, quantifiable objectives. Presented are merely principles (a code of conduct).	There are quantifiable targets and measures for each component, and for the standard overall (Section 13.)
	34 – 40	The rules and procedures do not include a possibility for stakeholder input or objections. The standards are all set by the SEG and the parties it represents.	The Panel is independent of SEG and has no commercial sector interests that could be regarded as a conflict of interest. In future, the Certificate Body will be the Awarding Body and will be even further independent of SEG. All reports and decisions will be published on the SEG website and open to scrutiny.
	41	What is the definition of a healthy aquatic ecosystem?	The most appropriate generic definition is 'Good ecological status' under the Water Framework Directive. Where we can be more specific with factors for good eel habitat and migration, we will. This has been added. Our 'Theory of Change' document defines Healthy Aquatic Ecosystems as <i>'functionally intact water flow to support habitat for fish and vegetation, water quality, and ecosystem health, where natural residence of elvers, natural escapement of silver eels as well as free migration between the waters themselves is possible'</i>
	42	<p>WWF and partners have invested in the development of an independent sustainability label (MSC, ASC) that has been tried and tested for 20 years now and has international acclaim. Whilst it may not be perfect, it is the best available. If the sector and SEG believe that eel fishing can be sustainable, why not use the existing standards?</p> <p>References</p> <ul style="list-style-type: none"> Dekker, W. and Beaulaton, L. (2015). Climbing back up what slippery slope? Dynamics of the European eel stock and its management in historical perspective. ICES Journal of Marine Science, August 2015: 1-9. 	In 2010 we approached the MSC to apply their standard to eel fisheries. It was concluded that the MSC standard could not be applied for a number of reasons – mostly because of the size, diversity and extensive range of the stock and the fisheries, the extensive impact of human impacts across the range and because there are limited controls on impacts on the eel it its range outside of the EU. MSC certified fisheries are more finite, easier to define, assess and understand their stock dynamics. The European Eel is one panmictic stock, extending from the western Atlantic Ocean to the Mediterranean and Baltic Seas, and the estuaries, rivers and lakes of Europe, Scandinavia and North Africa. There are many fisheries catching at all life stages between glass eels and silver eels. In summary, it was too complex for MSC to apply it. So, SEG developed its first eel standard in

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		<ul style="list-style-type: none"> ICES (2016a) ICES Advice on fishing opportunities, catch, and effort, Northeast Atlantic. Published 28 October 2016. ICES (2016b) Report of the Joint EIFAAC/ICES/GFCM Working Group on Eel (WGEEL), 24 November–2 December 2015, Antalya, Turkey. ICES CM 2015/ACOM:18. 130 pp. 	2010, but basing it wherever possible on MSC principles and experience. For example, the Traceability component is heavily based on the MSC Chain of Custody requirements.
Richard Fordham Scandinavian Silver Eel richard@silvereel.se	p6 line 6	Surely the level of survival in glass eel fisheries is much lower than 5-10% - e.g Brian Knights figure of less than 1% in the Severn?	It is very low in some fisheries, but higher. It has been much higher than this in some irresponsibly operating fisheries.
	P9 L17	“the current consensus...” The restocking programme in Sweden is a vital part of the Eel Management Plan. The results show that the restocked eels grow and survive as well as the naturally recruited eels, and both the naturally recruited and restocked silver eels begin their migration using the same route into the Atlantic. Figures show that around 90% of all eels in freshwater come from restocking. The consensus here is that they acclimatise extremely well and are a vital part of the Eel Management Plan.	The effectiveness of restocking does seem to give variable results. That in Sweden is amongst the most effective with results implying that the restocking is vital to the viability of the eel population.
	p11 line 24	I would choose a level with a majority of Sustainable indicator passes.	We intend to continue with this model, which was used in previous versions of the standard
	p15 1.3.3	We grade our stock on average every 6-8 weeks into 12 different sizes and we normally hold about 4 different year classes (0,3g to 2kg). It is impossible to be able to keep all the four years separate throughout the farming cycle. The only way is if the eel farm is running below full capacity and therefore able to spread the eels out, but is this uneconomic. It is possible for us to keep our intakes separate until about 10g. Normally we have one import a year but this problem would be exacerbated if we had several intakes of glass eels a year. I think it would be possible for us to keep certified and non-certified eels apart if that became necessary.	
	p17 line 4, 15	Eel farms are normally recirculated and therefore impossible to guarantee that one batch will (certainly not one tank) not infect another throughout the farming cycle.	It should be possible to arrange plumbing so that a minimum number of batched (tanks) are in series and a maximum are in parallel and the tanks' effluent is filtered and disinfected before being recirculated.
	p23 Component 3	Might include criteria for restocking, trap and transport, maintaining traditions and fishing techniques.	Bonus score at criterion 3.7 added for donating or transporting yellow or silver eels to aid downstream migration and escapement
	p27	What is the total stock? In our farm the stock fluctuates month by	A calculation for total stock is provided to account for the changes in stock

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	Component 5	month depending on glass eel intakes, restocking, mortality, grading and sales of consumption eels. Is it the average stock during the year?	on a fish farm over the year.
	p27 line 37	No problem with the statement “that the source is sustainable” for the dry feeds. A very small proportion of the feed is locally sourced uncertified high-quality cod roe which has created no disease problems. Therefore, we are reluctant to change to a certified source. Is this a problem?	Can the cod roe be from disease-free certified sources?
	p28	“eels used for restocking are not graded out” This has been possible when providing small eels (<1g) for restocking. But it is not possible when supplying larger restocking eels. Grading is necessary for larger eels to satisfy customers wishes, prevent cannibalism and maintain feed conversions.	They can be graded, as long as similar proportions are used for restocking and the slower growers aren’t favourably chosen for restocking.
	p30 L24	“the current consensus....” Same comments as above	As above: The effectiveness of restocking does seem to give variable results. That in Sweden is amongst the most effective with results implying that the restocking is vital to the viability of the eel population.
	p36 L20	I would choose “Organisations with majority of Sustainable indicator passes”	This is the model we are continuing with.
Peter Neusinger Eeline Aquatrading	Component 4.	Glass eel holding facilities should be registered Aquaculture Production Businesses (APBs) 4.4 Back-up systems (generator/oxygen) essential. 4.5 5 yearly transport authorisations (re animal welfare in transport) should be required by traders. CEFAS require transport Logs be carried in vehicles.	This has been added as a new criterion. 4.4 adapted to reflect this. 4.6 adapted to reflect this
	Component 8	7 years since the eel export ban took effect. 7 years of good work and progress by SEG, DUPAN, companies in the sector and science and ‘positive’ conservationists. For those companies outside the sector: some alternative measures have been funded and put in place. BUT 7 years during which entrainment has continued virtually unchecked at many locations, further damaging the already depleted numbers of returning stock. This stock is the minute percentage of elvers that have survived to make the return journey. 7 years when, if nothing else, companies should have been monitoring losses, these the potential brood stock and consequently the spawning potential. At present we can only	Agreed, hence a new addition to the standard to encourage companies to undertake more eel conservation work.

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		<p>estimate the loss by extrapolating the data from the few sites that have been logged.</p> <p>The EMPs and sustainable certification measures anticipate tangible/gradual eel recovery presently expected of measures taken by the industry. If this happens then NDFs may be forthcoming. Beyond the sector's control is the loss of a huge chunk of brood stock caused by thousands of points of entrainment which could have a huge bearing on the rate of recovery and the perceived effect of the sector's measures. Ideally the two would go hand in hand, but one without the other...? Perhaps the day will come when power companies will want to certify environmentally friendly sites.</p>	<p>Agreed, hence a new addition to the standard to encourage companies to undertake more eel conservation work.</p>
Björn Kullmann University of Hamburg bjoern.kullmann@uni-hamburg.de	8	<p>'For example, in the Parrett in Somerset, UK, the glass eel run is estimated to have been 1 – 5 tonnes (3M – 15M glass eels) per year in recent years. Fisheries scientists have calculated the amount required to populate the Parrett catchment to be 400kg (1.2M glass eels).'</p> <p>Please provide the reference. I can't find it in 'peer-reviewed' literature. Ecosystem modelling is often highly imprecise and predicted/modelled numbers should be taken with caution since basic assumptions might be wrong or inaccurate.</p>	<p>This was provided by the English Environment Agency by the fisheries scientists who provide the data to ICES. This is only one example though, and the data for each fishery or will need to be assessed against the standard.</p> <p>ICES scientists and members states have information on the carrying capacity of catchments and river basins, but we agree that more and better data and information, particularly on stock size in rivers is needed before we can understand and set eg. sustainable yields and quotas. In the mean time we will work with the best scientific data available.</p> <p>No, we want to ensure that, if and where it is happening, it is justifiable to do so, and that best practice is being followed to make maximum positive contribution to eel stocks as a whole.</p>
	9	<p>'Overall, the use of surplus glass eels enhances and provides net benefit [...]' pretends that someone knows what that means. In fact, there is hardly any information about the carrying capacity of river catchments. (What is enough?) The SEG should argue carefully and provide a lot of references here since these surplus eels are one of the (fairly weak) standing legs of the eel management.</p>	
	9	<p>'Whilst it is a key feature of so many Eel Management Plans, and until the scientific evidence reaches a conclusion, <u>this standard will assume that it is effective.</u>'</p> <p>Why is it necessary to assume effectiveness if there is no evidence for that? I agree that stocking is a key feature of most management plans. So indeed, the SEG standard must define criteria for a</p>	

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	15	<p>certification for suppliers of stocking material. But it appears that SEG wants to establish a standard to keep a business alive rather than contributing to the recovery.</p> <p>‘Issues’.</p> <p>The very important example of the anguillid herpesvirus 1 (<i>Herpesvirus anguillae</i>) is missing here as it is of outstanding importance in eel aquaculture. Farmers often deliberately infect the young eels to prevent an uncontrolled outbreak in later stages. This strongly affects stocking measures (see Kullmann et al., 2017 in J Fish diseases doi:10.1111/jfd.12637).</p> <p>Certified eel farmers/traders should not be allowed to buy and resell infected eels. This, from my point of view, has been disregarded in the past but MUST be part of a credible SEG standard. A certified eel trader must be responsible for the health status of the eels sold for stocking purposes</p>	<p>There is evidence for significant effectiveness in some places – eg. Sweden, and against it in others, so we look to apply best practice to ensure it is most effective.</p> <p>This example has been included.</p> <p>This statement has been included.</p>
	17	<p>Delete ‘[...] 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).’</p> <p>This provides a ‘gap’ to stock diseased eels because most eel diseases are widespread (I assume because biosecurity hasn’t been a subject of interest; see comment above). In Germany, I regularly hear the argument that stocking of diseased eels (with viruses and/or parasites) is even beneficial because those eels are more robust. Sustainability <i>ad absurdum</i> but common practice.</p>	Deleted.
	P2. ‘Sustainable’	<p>We are not wholly convinced that there can ever be a fishery that can be guaranteed sustainable in the near future, such are the complexities of the threats, and dearth of data relating to key metrics that would be required to prove sustainability. Further, information on these needs to be collected at the level of the river each fishery is occurring on to be able to prove sustainability and until that happens, it seems impossible to claim any eel product is sustainable. We think SEG has done an excellent job in relation to improving traceability and welfare standards within the industry but until some of these data gaps relation to stock metrics and the impact of threats are filled on a fishery by fishery case, the idea of a sustainable eel product does not seem possible.</p>	<p>We agree, so are now focussing on ‘responsibility’ and good practices, as a step in the journey towards sustainability and recovery.</p>
Zoological Society of London	P4	<p>Nowhere in this document, the ToRs or the ToC is this term defined,</p>	<p>Terms and definitions are expanded in Section 5.</p>

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	'sustainable recovery'	making it meaningless. It needs defining or the wording changed.	
	P4. ' <u>maximise</u> the contribution...	By having a two tier system in place, this is not the correct wording. <u>Increase</u> ?	As a much considered objective, we are happy with this definition of our vision. Certificates will only be awarded when operators achieve the higher tier.
	P5 Encourage high and responsible standards	'Discourage' and 'Encourage' seem quite passive words. If the standard is to be viewed as robust, should it not be non-negotiable?	The indicators within the standard are non-negotiable. But we can only encourage and not force operators to take up the standard.
	P5. Ranching	Ranching is not defined in the context of the standard – I would suggest it is.	Thank you. It is included in the glossary.
	P5 Aquaculture	Aquaculture, and presumably ranching of eel (see above regarding a definition), is exclusively fishing from the wild to grow on, so although there should be minimum welfare standards applied to 'aquaculture' facilities and transportation. In terms of sustainability, it's about how wild stock s are managed and the impact of fishing on them. Have SEG considered whether two separate standards are needed? One for 'working towards sustainability' another for 'good ethical and welfare practices'. Both could be underpinned by traceability	The new version is positioned as 'Responsibility' which is both as working towards sustainability and good ethical and welfare practices.
	P5 Definition Sustainability	This is not their definition of sustainability, but sustainable development - it'd be good to be clear on this.	Amended to reflect this.
	P6 Sustainability diagram	Is this from the Bruntland report? If so, it should be referenced, if not, it should be made clear that this is SEG's interpretation of the Bruntland definition of sustainability.	Referenced.
	'We recognise that that the term 'sustainable' cannot be truly applied to the European Eel	This should be an opening statement not slipped in on page six. SEG can then give its definition of sustainability within the context of the standard. It should it be made clear that the standard is being given to those that are 'working towards sustainability' rather than providing a 'sustainable' product. If one of the aims of the standard is to 'provide confidence to retailers and consumers who wish to buy responsibly' there needs to be consistency.	The point is noted, however we feel the preceeding chapters are important precursors. The standard is now positioned towards responsibility as suggested by a number of consultees.

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	until ...	Also, what is being done to ensure that consumers/restaurants are being done to be made aware of this; having quizzed a few restaurants that are selling eel, they are under the impression it is 'sustainable'.	An education / awareness campaign is needed.
	'We believe this recovery ...'	However, we could do none or all of these things and still see complete population loss or recovery driven by oceanic/climate driven factors.	True
	'Most importantly...'	What evidence is there that this is the most important intervention? If this is SEG's opinion, it should be made clear that this is the case.	The relative importance is removed.
	'These interventions at a European scale ...'	Again, it should be made clear that this is SEG's opinion. Further, it should be worth considering that statements like this without support could continue to result in SEG continuing to be framed as an organization primarily supporting commercial fishing interest to safeguard and promote there industry rather than the science based conservation organization with species conservation as its focus.	The paragraph is significantly changed now.
	Net Benefit	For eel stocks?	Yes.
	EU Eel Recovery Plan	Better call it the regulation?	We try to consistently use the term EU Eel Regulation
	'Full' sustainability	It is quite confusing for the reader talking about sustainability and full sustainability, and this makes it sound like partial sustainability is possible. Maybe 'sustainability across the species range.'?	We now talk about 'responsibility' as part of the journey towards sustainability
	EMPs were introduced	Not all were approved in this year.	Reference to years now removed in a significantly changed chapter.
	Two definitions	But above you have a single definition for sustainability, so how can there be shades of this? It means that definition two is inappropriate and should be removed if the goal is to achieve sustainable eel populations as quickly as possible, which is referred to as a SEG principle above. If we go back to the Regulation, the 40% figure is a spawner stock output to be met in order not to be failing and further measures required. The 40% is not merely a long-term aspirational objective. If the escapement target is being achieved there is a case for fishing in a sustainable ethical manner. If not, fishing is an anthropogenic impact which should be eliminated until the target can be achieved. We recognise that there are also other anthropogenic pressures	We now have definitions for sustainability and responsibility, and a lesser standard of 'aspiring' to indicate that an organisation is nearing the high standards if responsibility.

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		that are impacting escapement but the spirit of the regulation is that any anthropogenic activity which prevents the 40% escapement being achieved should be reduced to a level so that this figure is met.	
	EMP is approved	Just by having an EMP in place does not mean that the eel fishery is sustainable. In addition to the above, what if the EMP identifies fishing as the biggest pressure on eel stock - would a fishery working within it be awarded the standard?	Agreed. The delivery of the EMP AND achievement of escapement targets must be achieved.
	Water Framework Directive	This is the first mention of this legislation – would be good to put it in the context of the eel. Also, there needs to be some support for the statement relating to progress being poor, ideally references and data.	Reworded and referenced.
	Financial Crisis	How do we know this? Please reference.	Removed
	P7: Challenge to 40% target	By whom? To be credible, any statements like this need to be supported by evidence.	Removed / reworded
	Some make the observations ...	Who? If it's just an opinion that happens to support SEG's mandate then it looks like you are cherry-picking – again, these statements need support. Further, it totally undermines the assertion that a fishery can be defined as sustainable with any certainty.	Removed / reworded
	10% of what it should be	Who has defined what 'it should be'? And where are these figures from? This does not align with any of the large-scale barrier or habitat assessments in the literature. Is this referring to loss of wetland habitat from a historic baseline? If so, when, or does it consider loss of habitat from barriers, or both? Again, statements like this need support/evidence, or it has to be made clear it's SEG's opinion.	Removed / reworded
	However, it makes sense in this circumstance ...	This is speculation. How do you know they will die? And even if they do, they will potentially provide food for other species providing a net benefit for the system as a whole. In your ToC it highlights the importance of 'Healthy Water Habitat/Aquatic Ecosystems', and so is there evidence that fishing them out is a net benefit compared to leaving them in there? Further, we know European eel can spend	Section re-worded and local references obtained.

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		some or all of their growth life phase in saline water so is there some evidence that can be referred to that inaccessibility to freshwater habitat will result in lower survival?	
	Managed in line with an EMP	The approval of an EMP is not confirmation of a sustainable fishery – noted above, what if fisheries are the greatest impediment to achieving the 40% escapement?	Agreed. The delivery of the EMP AND achievement of escapement targets must be achieved.
	‘Having been sourced from a sustainable fishery’	Above it is stated that sustainability is not achievable for decades. There has to be consistency and transparency about what sustainable means for the consumer to be clear about what they are buying.	Terminology has been reviewed throughout to be consistent
	P8: Affiliated with ‘sustainable’	Again, recalling the statement made above, we can’t see how the word sustainable can be used here.	Amended as described above.
	Common Sense	These are hugely subjective terms – whose common sense and whose knowledge?	This term removed. We are using best available science and information
	Parrett example	This would need to be referenced and show that inter-annual variation in environmental factors have also been taken in to account. Further, this is only one example and it is a stretch to apply this to every exploited river in the species’ range.	Referenced, and yes – it is an example only and not meant to be inferred that it can be extrapolated to all catchments. We will use best available stock data from ICES or local fisheries authorities to determine individual cases (hence the indicators in the standard).
	Excess would die through density dependent....	There is no evidence for this. Undoubtedly this happens to a proportion, but where is evidence that this will be the fate of all the calculated excess?	Density dependent mortality is factored into mortality models by authorities’ fisheries scientists and by ICES.
	Predation	This doesn’t make sense. If you remove the ‘excess’ that would supposedly be predated upon will the predators not simply turn to the individuals referred to as required to optimally populate the catchment?	Yes, to some extent, and the 400kg includes fisheries scientists’ measures for mortality. But at those lower densities all mortalities, including from predation, are proportionately less (‘density dependent’ mortality)
	Arzal example	As before, we know that glass eels can populate marine and coastal waters so there is no evidence that they will all simply die. The comment on predation needs referenced or needs to be indicated that it is anecdotal.	Reworded and reference provided
	Restocking		Yes, agreed in principle. The principle that restocking is generally better

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		<p>Restocking elsewhere is not necessarily better use – the science is not conclusive on this. Also ‘restocking’ can mean many things. I would say that if fish were taken directly from a fishery, stocked above a barrier where there is a good habitat and downstream access, this would be significantly better than stocking yellow eels that had been on-grown for months and graded out.</p> <p>As such, ‘restocking’ needs to be teased apart delineating between 1) restocking for ‘pure conservation purposes’ in water bodies that won’t be fished commercially for eels; 2) water bodies that are fished commercially (e.g. Lough Neagh), but that are meeting escapement targets; 3) water bodies that will be are fished, but not meeting escapement targets; 4) long-distance restocking (from UK to other parts of Europe); 5) restocking/translocation nearby but to a different catchment/water body; 6) translocation within same catchment (e.g. from downstream to upstream of an obstruction); 7) restocking with eels that have stayed in a farm or buyer's holding facility for any length of time vs. direct transfer.</p> <p>Restocking also needs to be a consideration when assessing a fishery, buyer or farm for the standard. For example, if 60% of what the fishers catch is going for restocking in a water body where there will be no commercial fishing, is that more sustainable than if their 60% is going to Lough Neagh? Or if their catches are lower, but going entirely for consumption? It could be argued that the ultimate destination of the eels caught is just as important in assessing the sustainability of a fishery as the fishing methods used.</p>	<p>the closer to the source of the fish as possible is discussed, referencing the Pawson review of stocking.</p> <p>These increased levels of granularity are areas we would like to include in a future version of the standard as it matures and understanding of stocking effectiveness improves.</p>
	P9		
	Surplus glass eels	Again, viewing a natural resource as having ‘surplus’ is contradictory to the ecosystem approach the SEG ToC document proposes.	Disagree that is is contradictory to the ToC which describes and seeks to balance <i>‘the aquatic environment and supporting sustainable use for the benefit of communities, local economies and traditions’</i>
	60% for restocking	According to who – needs to be referenced; and if this is the regulation figure, there is no biological/scientific support for it.	That is the requirement of the Regulation
	5 – 10% survival	Reference – can this really be claimed across the range?	Yes – ICES WGEEL models of mortality lead to those levels of mortality from glass eel to silver eel
	High growth rates	There will be natural variability in growth rates; is it not the case the slow growers are often weeded out for restocking?	Growth rates in farms systems are consistently higher than in the natural environment at the same temperature. The standard has been reviewed to seek to stop the practice of using slow growers for restocking.
	Farmed eels less		This statement removed as not seen as relevant.

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	contaminated	Reference.	
	Overall, the use of surplus	We are not convinced of this as there are far too many assumptions at present – needs to be supported with evidence.	References have been provided and we think there is sufficient evidence to support the principle – particularly as the Regulation supports it and this standard is designed to support the Regulation. WE intend to refine this further as scientific knowledge improves to improve both the Regulation and this standard.
	Consensus	Who created the consensus?	This view is supported by increasing numbers of studies, was concluded by Pawson and is also supported in your comments above.
	... this standard will assume it [restocking] is effective	We disagree with this. At present, the document frequently switches between advocating a scientific evidence-based approach and supporting actions based on unsupported assumptions. SEG need to establish a robust approach for the standard to have a value. There would be great merit in this document highlighting where knowledge gaps are and assuming the precautionary approach while simultaneously encouraging/funding research to fill these gaps. There are many examples of stocking producing a negative net outcome to populations.	A more thorough discussion of restocking is provided in the new draft.
	9 Continuous Improvement	It'd be helpful to indicate what changes have taken place in this iteration in response to new science.	Agree this would be helpful. The current version provides many more references than previously, so we hope that is helpful
	Raise the bar	This is a very vague statement; would be good to be more specific, such that they are measurable.	This term removed and the statements changed.
	Those certified to demonstrate continuous improvement	This may require some rewording. Presumably certification is also granted to maintain high standards – don't actually need to demonstrate improvement each year i.e. if they have complied to best practice and science has not driven refinements between successive assessments, how do they demonstrate improvement?	Reworded. Elsewhere in the standard we describe that those not meeting 80% compliance of Responsible scores must show an improvement by their next assessment.
	10.2 Components	It would be good if animal welfare could be considered as a core requirement.	Biosecurity & welfare are now combined and are core requirements
	10.3 a traceable supply	We think this is ultimately what the standard is delivering – no small achievement and to be applauded – but drawing from the text in	Thank you, and the text and terminology ('Responsibility' have been changed to be clearer.

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	<p>P11. Some criteria weighted</p> <p>Surveillance audit in place 1.1</p> <p>Illegal trade increased</p> <p>Demand from Asia</p> <p>SEG condemns some activities which, while not illegal, are not in the interest of recovery of the European eel population</p> <p>Unaccounted catch</p> <p>Illegal trade at 40%</p> <p>SEG member for 3 years</p>	<p>the document so far, it is misleading to the consumer to state that these products are sustainable.</p> <p>This weighting should be explained and how the decision was reached.</p> <p>This is great and I think should be highlighted as a strength earlier, as it's essential for the standard's credibility.</p> <p>This statement needs support.</p> <p>In relation to illegal trade, consumer demand needs to be addressed. The point could be made that the whole supply chain should be aiming to only meet the reasonable level of legal demand, e.g. what we know the European consumption to be, rather than exploiting at a level that exceeds legal consumer demand. The emphasis would be on creating a responsive legal market that fluctuates with stock levels and demand, rather than surplus dumping or illegal exports of catches in excess of legal demand.</p> <p>This is very euphemistic and ultimately a bit peculiar. If you state the law is the guide above but then say some legal things are bad, it completely undermines your credibility. In reality, it'd be fair to say many people disagree with elements of the Regulation and have called for it to be updated, so by the same argument couldn't it be said that just because it is legal it doesn't mean it is good. I'm pretty sure some smugglers think what they are doing is 'good' as it provides income and meets a food demand, even though it is illegal. It is undermining to SEG to cherry-pick when you agree and disagree with the law if the standard is to be consistent.</p> <p>This isn't necessarily illegal, could just be sloppy paperwork at the governmental level.</p> <p>Where does this number come from? Is it a long-term average?</p>	<p>Will do this in the final published version</p> <p>This seems an appropriate time to introduce this.</p> <p>A link / reference is provided to the Trafficking section of the SEG website which provides plenty of supporting information</p> <p>Good point. Included.</p> <p>The text has been significantly changed to reflect this.</p> <p>We now have a number of sources of information to get a more confident indicator of the level of Trafficking</p> <p>The range in recent years is 30 – 50% which is now quoted and referenced.</p> <p>Requirement for membership had been removed.</p>

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	No prosecutions	If a new initiative can fulfill or exceed all of the requirements of the standard, why do they need to have to wait three years?	Quite possibly, but we have to deal with fact rather than suspicion.
	P13 Greater demand for sustainable supplies	This doesn't mean they are legal, simply clever...	Yes, we know it to be approx. 30t of glass eels.
	Target – number of businesses	Has there been an economic analysis of what the demand is, what proportion of the market needs to be sustainable to achieve this and by association, how much fishing there needs to be? If there is more fishing than demand within the EU – be it for consumption or stocking - then is this not unsustainable and/or potentially fueling illegal trade?	Yes, we agree and have been lobbying individual countries where quotas have been set higher than the demand.
	Non certified eel	Should it not be done by proportion of market share? If you don't have the big guns then surely the problems will continue?	We talk about the proportion of the market too, so the two should go hand-in-hand
	1.3 customers seek assurance	How is non-certified sustainable eel defined?	Term sustainable has been removed. Batches of eels that are not certified
	Spot checks	Has a customer survey been carried out to indicate that this is the case? I think it'd be important to do so if not.	No a survey as such, and agree this would be helpful at some point. This comes from feedback from supermarkets in particular and the supply chains to them.
	They don't feed	How is this to be implemented? This is essential.	This is described further in the Governance section (12) and will be described further still in the Assurance Code, under development.
	Reduction in uncertified eel	They don't feed or are not fed?	They aren't fed during storage. Wording amended.
	Minority likely to abuse the system	Just because it is uncertified it doesn't mean it is not produced in a way that is equal or better than what the standard demands. This is indicating that SEG has a monopoly, which is dangerous.	Possibly. No other standard has been produced to help suppliers demonstrate this. Suppliers have the choice of assessment under the standard. We are not seeking a monopoly and make no money from the standard – it is not even self-funding. We only wish to raise standards to achieve and demonstrate responsible practices on the road to sustainability.
	1.3.1 silver	It would be good to indicate how many have been certified and how many have had it revoked to support this.	Figures are available and have been reported in SEG meetings and can in future in annual standard performance reports, but we don't think it appropriate to report those in the standard.
			Yes – that is what we are seeking to move towards and the two indicators reflect those differences

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	1.4 Benefits	In the spirit of improvement which is listed as a tenet of the standard, will it be expected of the holder to ultimately only trade in certified eel?	Agree. Word 'reasonably' has been removed
	1.4 Targets. All customers	The word 'reasonably' would not fill us with confidence as a consumer...	Within the supply chain.
	Very rare	Is this end-consumers or within the supply chain?	We will develop that further as we develop the 'Impacts Code' (the full targets and measures document that will define how SEG's and the standard's success will be measured.
	Alien species	Who decides within SEG what constitutes "very rare"? Even if you don't publish this in the guidance I think you need some structure to this otherwise it is not much of a deterrent And is there a contingency plan to deal with these instances?	At present no. The standard doesn't guarantee absolute freedom from disease or invasives.
	Regular monitoring of health	There are legal requirements in the UK for notifiable pathogens and invasives not referred to here. Presumably many countries have similar systems; should SEG highlight their duty to escalate positive detection of such species to relevant regulator in each country. Feel the biosecurity section needs to be more robust to provide a strong deterrent.	The bio-security section has been improved in this standard and it likely to require further development for future editions
	Periodic	Define or it is open to abuse. Any use of the word regular/frequent/periodic should be avoided. At least suggest a minimum.	Thank you. Amended to reflect compliance with plans.
	Permissions to operate	Define	Removed. As per the plan.
	P17. Restocking: Sustainable definition	This should be top of the list as it is a legislative requirement.	Agree – moved.
	P18. Fishing in a small number of estuaries	This is assuming that the river being stocked doesn't have these already – most rivers in the UK likely have <i>A. crassus</i> and so stocking with infected fish is probably not making the situation worse.	Agree, but wording changed following other comments.
	Fishing rarely catches 50%	Estuaries or RBDs? If it is this few, if SEG could support long-term research into some or all of recruitment/escapement/carrying capacity/density dependent mortality it would result in huge strides towards understanding what sustainability really looks like.	Agree. We have information from some estuaries already to provide greater detail than the RBD and we aim to expand that. It is likely that local fisheries authorities have some of this before it is aggregated up into RBDs.
	Acceptable	Reference.	Sentence removed.
			Sustainable, responsible and acceptable are defined – hopefully with

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	fishery		greater clarity now?
	e-Declaration systems	Responsible?	They exist already, but we are championing them, including via the standard, as they aid traceability.
	Fishery data	Is this a SEG initiative? Needs to be clearly defined.	The explicitness is in the indicators.
	Direct consumption of glass eels	Agreed, but how does this relate to the standard? If this is expected of those that hold the standard, then it should be explicitly stated. But if the glass eels is ultimately being farmed for consumption then it is irrelevant.	Yes, we agree that 'a dead eel is a dead eel' and therefore worthless to the ecosystem. However, a 100g meal portion of glass eels is 300 dead eels whilst that of a smoked eel is a quarter to a half of dead eel – ie. it provides much more 'value'.
	Unit of fishery – helping small units	This could be elaborated on using some examples.	Thank you. Early examples are developing and might be included in the final published version.
	P19 Eel management district	River Basin District? Eel Management Unit?	As described, this is the smallest catchment for which data are available. Most often it is at RBD level, but the assessor will seek and use more detailed local data wherever possible
	GPG Glass Eel Restocking		It is now referenced. It was produced by the French National Comite de Peches
	P20 Design of net for glass eel fishing	There should be a link/reference to the document – also who produced this? Is it recognized as credible? This is too vague. Being the point of capture, it's among the most important parts of the standard and a stronger position regarding the different styles of hand-netting is needed (e.g. incoming, outgoing tides, locations). Also, how then fishermen store and transport the glass eels to the buyers (e.g. trays, buckets, temperature, stored for how long in their garden shed tank, etc.) It doesn't have that much meaning if it's just about the mesh size.	This has been tightened up, particularly in the indicators, but is also one of the more challenging areas to get right
	Mesh size is small enough		Welfare of the glass eels takes priority here. It also means that any by-catch is caught safely and can be returned unharmed.
	By-catch	This will mean the increased chance of by-catch and brings us back to the 'ecosystem approach'.	The assessor is present at the time of fishing. They also seek other records from the fishery and refer to any local scientific studies.

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	Main species	At what stage, does the assessor look at these bits of evidence? When the fishers are catching, when they sell them, once the buyers have them? Unless the assessor is on the bank or in the boat, a lot of that information won't be reliable.	Wording has been amended
	Evaluation of quantity	By just listing the main species (main by no. of individuals?) it may miss those rare and endangered species. All species should be listed.	We believe this is sufficient
	Definition of negligible	This need clarification. This is another example of where the standard becomes vague. What is a low rate? Defined on what basis? SEG needs to seek expert advice on these and define acceptable thresholds with justification. If there is lack of data to do this then these are areas where SEG should be funding/facilitating the studies required to give the standard validity	At present this has to be, by necessity, open to interpretation by the assessor (who are qualified fisheries scientists and assessors). At present there are too many species and too many variable to be able to definitively define what is negligible for each species in every circumstance. As information develops, eg. with local scientific studies, then we will include this in future. A priority example that we might be able to include sooner is for sea horses.
	Reasonable power		Has been changed to ' <i>within accepted scientific limits</i> '
	Quotas	A very vague statement.	The authorities have set what they believe to be acceptable quotas for each fishery
	P21. Glass eels are fished from a place only where they can provide net benefit	Is this suggesting that French quotas are not robust? In which case, how can a French fishery be sustainable? Is this the SEG definition of 'Net benefit'?	No, it is an example for Glass eel fishing only. The term Positive Contribution is now used.
	Continuous improvement in survival		We don't know current overall mortality rates, but have taken your suggestion to provide an overall aspirational target of 98%.
	Increasing confidence in fishery data	This needs to be clearer – are targets set in line with what is happening or what is aspirational?	Agree. CPUE has been added to the description.
	2.5 Threatened, vulnerable ...	There's no mention of effort in the above. The glass eel fishery has the power to provide enormously valuable data in the form of CPUE but to date there seems little progress on this front. If SEG could instigate that, it would be massive.	We have deliberately allowed all such designations to be considered, lest it be implied that we are giving priority to one designation over another.

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	Component 3 Yellow & silver eel fishing	How are these terms defined? They have specific/varying meanings within IUCN and national legislation –indicate how SEG defines these.	Agree in principle, however we haven't developed that level of knowledge and expertise here yet. We hope to develop that for a later 'continuously improved' version. Thank you for the pointers so far which are a good basis from which to start developing that information.
	Yellow and silver eels are adult	There is a lot that can be said here about the relative sustainability of different kinds of yellow and silver eel fishing. It would be reasonable for SEG to have a position on 1) catch methods (fyke nets, including mesh and ring shape and size, draft nets, long lines, including which baits, traps, bobs, etc.); 2) how long those methods are used for (e.g. how many days a fyke net can be left for); 3) locations for fishing; 5) bycatch; 6) survival of rejected/returned eels (those that are too small for sale); 7) storage of eels before sale; 8) survival rates during processing and transport; 9) end markets (legal vs. illegal, bait vs. consumption, etc.)	Good point. Term 'adult' removed.
	Fished only from where they can provide net benefit	Yellow eels, are 'growth stage' eels and silver eels 'maturing eels' – the term adult is not appropriate here.	Agree. This phrase removed.
	3.3. Sustainable 'Landed and recorded...'	This makes the justification of exploiting growing and/or seaward-migrating spawner life phases very difficult.	Added to the new draft.
	3.5 Damage to the bottom	And utilised where possible?	Added to the new draft.
	Component 4 Sufficient for Competition	Perhaps better using 'benthos'?	Yes, these are perhaps value judgements, but we are comfortable with them, from our knowledge and experience. Has been amended to mention monopolies too
	Careful handling 'Tipping'	But there are examples across Europe where there are monopolies; this too much of an sweeping opinion statement without a real economic definition of 'competition'.	Clarified: No tipping from any height.
	4.3 water quality	What is this?	Agree. We will develop these for a set of 'Transport Principles'

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	parameters		
	4.6 For the purpose of conservation	Acceptable levels for high standards of welfare need to be defined so that SEG inspectors are able to spot check facilities and husbandry to determine if passing or failing.	This is to support the EU Eel Regulation targets for restocking
	Component 5. High survival in fish farms	We assume this means restocking, and would refute it is a conservation measure, there is not enough evidence to support this.	Agree. This refers to the higher survival of getting to the elver stage, past first feeding, to 'adult' fish for consumption, and that glass eels can be held temporarily with high survival rates before being transported for restocking.
	The farm should be contributing to restocking to play its part in achieving net benefit	The little available evidence indicates the less time they are in farms the better – this was stated in the SEG -sponsored review of restocking.	Amended.
	Restocking of cultured eels	At present this is not proven; it should be indicated this is SEG's view.	Agree.
	Eels for restocking not graded out	Again, restocking is a catch-all term within which are a range of practices, some potentially more effective than others. Also as is previously stated in the document, there is a huge amount of uncertainty related to stocking and where possible, the sector should support research in to its effectiveness e.g. marking any eels that are restocked so they can be monitored.	
	5.2 IFFO	Excellent to see this in here. Is there anything about stocking density as this can potentially skew sex ratios. This should be a criteria in section 6 and non-negotiable	IFFO is now referenced.
	5.3 Food conversion ratios	First use of this abbreviation.	
	5.4 water quality parameters	Reference for why these are the gold standard.	This would be a worthwhile addition to a future version.
		How fish farms are regulated varies massively across countries SEG is concerned with. Why don't SEG define evidence-based levels of	

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	5.5 Ecological impacts	key water quality parameters that SEG demands as a condition of receiving certification. Defaulting to local or national requirements is passing the buck and likely to mean varying levels of environmental impact caused by members that achieve the same level of “sustainable” certification	This would be a worthwhile addition to a future version.
	Component 6 Accepted. Management technique – in several EU countries’ EMP	See above.	Accepted by the EU as it is in the Regulation. Stocking is discussed in greater detail now in Section 6.2, including a brief mention of other EMP techniques.
	Close to where eels were caught	Accepted by whom? But is this because it is an effective action or an easy/feasible one? The UK has not gone down this path and it’s important to offer a balanced view as to why – i.e. it was seen as being more effective to put resources elsewhere because the jury was out on stocking.	This discussion largely removed and moved to Section 6.2.
	SEG & fisheries authorities	And as quickly as possible after catch; and without grading; and at a density that does not skew sex ratio unnaturally. And to date there has been little study of how restocking affects the ecosystem as whole – see section 8.	Removed, however, seeking to work in collaboration with local, national and Europe wide fisheries authorities to gain better scientific evidence.
	Over-abundance	Can SEG talk on behalf of fisheries authorities and what bodies does this term represent?	The Parrett and Arzal examples are provided in an earlier section.
	Rationale	There is no evidence to support the breadth of this statement – hugely misleading.	There is very good evidence in some places that re-stocking is effective. Eg: https://academic.oup.com/icesjms/article/73/1/91/2458715 This is included in the text in 6.2.
	Silver eel escapement measured confidently	Can a river that presently does this be given as an example?	Stocking density is added to 6.3
	6.1 Restocking to improve escapement	There should be some reference to it being as natural or ecologically sensitive as possible. There’s nothing about density of stocking below.	There have been some studies. Fisheries authorities measure escapement in a number of ways through monitoring of yellow and silver eels.
	Fishing of restocked eels	Does this mean of yellow or silver eels? How can this be discerned? There are no before/after stocking studies to our knowledge.	Many are already strontium marked. But as stock indicators are often measured through monitoring numbers, relative comparisons can be made rather than having to take a sub-sample to kill for otolith analysis.

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	6.2 Sustainable Indicators 6.3 suitable eel habitat	This is great to see - is it worth considering specifically stating that they have to be marked? This going to be the best way to identify stocked eels and also allows those outside of the stocked area to identify them e.g. movement through the Baltic, or transboundary rivers.	We would expect responsible fisheries authorities to have properly considered the receiving environment before permitting a restocking programme and to have some monitoring methods in place.
	Component 7. Issues	Who assesses this and based on what criteria? What actually happens is that someone looks to see if there is record of eel being there previously and, at best, if eels are at lower densities than historic (which they inevitably tend to be). There is no meaningful assessment of the available food productivity in relation to numbers stocked.	Some are more aware than others. As the standard and a certified supply chain becomes more established, we will embark on an education and awareness campaign to help wholesalers and retailers become more aware and be able to make a choice in what they purchase.
	Component 8. Health Aquatic Ecosystems	To what extent are wholesalers and retailers aware of the status and biology of the species they may be selling? To what extent does the consumer know, and as previously stated, how is the term sustainable understood by them as SEG defines it?	Hopefully they have been addressed above.
	Effective eel conservation & education	We have raised a number of points relating to this above.	Agree. We now give clearer definitions about what the standard means in section 5.5.
	Companies able to be recognised	We have seen missives from certain people within the sector that are misleading; if SEG is giving someone a standard they need to be communicating in a truthful and credible way.	No – by achieving these criteria in the standard
	8.2 Significant contribution	Does this just mean getting in the media? Some media reports on eels are not credible.	Criteria are now provided
	P34. SEG Standard	A definition of this should be included; we have a better understanding of costs, methods and timescales for many interventions and there needs to be more clarity here e.g. % of turnover; x man hours.	We have adopted this term throughout, based on feedback from yiu and others.
	P39. Balance of probability	This term is much more appropriate than 'Sustainable Eel Standard' considering the uncertainties raised above	This will be defined with greater clarity in the Assurance Code document which is under development.
	P40. No 7	This has to be defined.	This has been added

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	<p>Target 11 – increase in eel conservation projects</p> <p>Overall Standard. 10% increase</p> <p>NGOs</p>	<p>Should there not be some reference to the legal situation? If they are breaking the law, does SEG have a responsibility to report them?</p> <p>Where are these numbers from? Are they just the EU? And is this ALL conservation projects, as we'd assume this should be due to the eel sector rather than through other sources.</p> <p>Increasing number of projects doesn't indicate an increase in benefit – no sense of scale or effectiveness.</p> <p>This needs clarification – is this 10% in monetary value?</p> <p>This end comment should be removed. The Eel Standard should be able to stand on its own and be robust enough/fit for purpose not to need external validation by any named sector.</p> <p>Further, mentioning organisations by name is unhelpful – it creates 'us v them'. Also, considering the complexities of the eel situation, this end point would not be down to SEG alone.</p>	<p>This is just for companies seeking to invest in the eel as part of their corporate responsibility programmes.</p> <p>Agree these are crude measures. A more 'effective' measure added.</p> <p>Yes – this is a repeat of the measure in 11.</p> <p>Agree. Removed</p>
<p>Christine Absil</p> <p>Good Fish Foundation</p> <p>christine@goodfish.guide</p> <p>Comments on Version 6 draft 1</p>		<p><u>GENERAL</u></p> <p>We very much appreciate the initiative SEG has taken to improve the SEG standard in a way that it is in line with ISEAL guidelines. Eventually, this is the only credible way to apply a standard. This is essential if an eel industry tries to demonstrate that it has a right to continue exploiting a resource which according to many, cannot endure any commercial exploitation, as this slows down or even undermines any recovery efforts. Since through its '<i>theory of change</i>' the SEG is convinced that it can demonstrate that a commercial sector is essential in the recovery of European eel, we are very keen to see this worked out in practice. This refers in particular to the demonstration of the '<i>net benefit on eel populations</i>'.</p> <p>In the ideal situation, when '<i>net benefit</i>' indeed can be demonstrated, and when SEG certified products are fully traceable, we do see the potential of substantially improving consumer awareness on the plight of the eel, by <i>jointly</i> communicating on the need to source only certified eel. However, if certification would remain more or less a marketing tool, with a limited number of</p>	<p>Thank you, we agree.</p> <p>Due to the term 'net benefit' having other definitions, we are now using the term 'positive contribution'.</p> <p>Agreed, and a joint approach will be welcome.</p> <p>Agreed. We wish to move towards the majority of the sector adopting the</p>

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		<p>uptake by producers, the value of the certification effort is useless. After all, it just provides a license to continue exploiting, and the added value of better data availability, monitoring, and recovery schemes supported by producers, remains limited. In that case, a complete ban on commercial & recreational harvesting would make much more sense, since everyone would know that any eel on the market would be illegal. Enforcement of a complete ban would arguably be much easier than enforcement of restricted harvesting.</p> <p>So, it is up to the industry to demonstrate that responsible harvesting is possible, enforceable, and has a net benefit on eel populations.</p> <p>At the same time, we do recognise the limitations and drawbacks the use of a certification scheme brings along: thorough traceability is essential; higher costs, and extra administrative burden are involved.</p> <p>At all times, SEG will have to make sure that these issues will be prohibitive for certain producers. We suggest for example to introduce a fund, maintained mainly by the more financially viable producers such as aquaculture companies.</p> <p>Also, as part of the SEG standard, we would like to see an overview of the socio-economic relevance of the eel sector. How many FTE's are involved, and in which part of the sector? What is the economic relevance per sector? That would allow the measures to be put more in context.</p> <p>2. The sustainable eel group – our purpose</p> <p>Page 4, <i>Vision</i>:</p> <p>This vision regarding the benefit of communities, local economies, and traditions is an often used argument, but in reality difficult to defend. In general, it will be very difficult to demonstrate that local communities and local economies are benefitting from eel production and/or consumption. Sometimes, restocking efforts are even costlier than the fishery would earn (Sweden). Also, the aquaculture industry would not qualify under this vision, as it is a relatively recent industry with hardly any historical/cultural value. The only argument that holds, is the tradition of eel consumption, which can be maintained by aquaculture. Specific fisheries expertise can also be maintained by involving fishermen e.g. in trap-and-transport activities.</p>	<p>standard. It is of no value to the eel or the sector if just a limited few adopt it.</p> <p>Agreed.</p> <p>We already have Eel Stewardship Funds (see http://www.esf.international/), and through the standard (amended to reflect this – see Components 1.2 and 8) we hope to increase contributions to help eel conservation projects and to fund the administration of the standard.</p> <p>An economic overview is included in section 5.2.</p> <p>Noted, and you have rightly noted how a new industry (aquaculture) is helping to maintain traditional eating methods (eg. smoked eel and jellied eel).</p> <p>Some traditions – eg. eating glass eels have diminished die to lack of supply and associated cost.</p> <p>Most traditional fishing methods have been superceded by more modern ones (albeit similar but more efficient).</p>

3 The purpose of this standard

Page 5:

The standard is designed to provide confidence to retailers and consumers who wish to buy responsibly.

This is a very sound objective. However, why then talking about **sustainable** eel in the standard?

If *sustainable* cannot truly be applied to European eel (which is acknowledged by SEG), it is very confusing, and we would even argue, misleading, to use the word *sustainable* when referring to the standard. Consumers and the general public simply won't understand this, and it definitely will provoke serious criticism with NGOs, but probably also members of ISEAL, who are keen to maintain the credibility of their standards. The objective of our organisation is to promote 'Good Fish', i.e. responsibly produced fish. However, we would not support an ecolabel with the word sustainable, when in fact it is not yet sustainable, but merely responsible.

Therefore, we suggest to describe the 2 standards (silver and gold) in a different way: gold as 'responsible' and silver as 'aspiring' or 'candidate' or something equivalent, making it very clear that the product hasn't reached a level yet, but is on the way. In other fisheries terminology, this would be described as a fishery in a 'Fisheries Improvement Program' (FIP). A fishery in a FIP is not yet recognisable in the market. One could argue that this should be the case as well for eel, implying that only the 'gold' level would carry a label.

A serious problem with a 'lower' standard which is still recognisable in the market is that there is insufficient drive¹ to move to the top level, since there is already market recognition. And after all, that is where most producers are after.

If sticking to one level wouldn't be possible, it could be argued to differentiate between the different sectors to determine whether 2 levels are necessary.

5. Sustainability and the European eel

(p.6)

Progress with EMPs has been very mixed [...] With European waters so degraded [...] seeking 40% escapement from a 10% healthy environment for eel is unachievable.

This problem has been acknowledged by ICES, and therefore it has been calculated what the possible escapement is with the current habitat availability. Since this standard cannot influence habitat availability, unless it would somehow be incorporated in the 'net benefit' criteria, it would make sense to refer to B_{best} as an alternative objective for the standard. This is the highest silver eel

Along with feedback from others we have re-phrased and re-positioned the standard around the concept of sustainability and good practice, recognising that true sustainability is not yet achievable.

We agree and have taken your recommendation. We have 2 levels, and there is a scoring system to decide the outcome. Certificates will only be awarded for those that reach the higher level and those achieving the lower level hopefully have the incentive to work towards the higher.

It is helpful to see that others recognise this and we appreciate the pragmatic suggestion. So, we have adopted this, recognising that achieving these targets are a step on the h=journey towards the longer term sustainable targets of 40% of B0.

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		<p>escapement possible with the current habitat availability and zero anthropogenic mortality. (p.7) <i>Definition of a sustainable eel fishery:</i> <i>“managed in line with an approved EU Eel Management Plan”</i> It is not clear what <i>managed</i> means. It would be more clear if reference was made to B_{best}.</p> <hr/> <p>6. Net benefit (p.8) Definition 1. Affiliated with a ‘Responsible’ level of compliance: <i>certified practices are more beneficial or less damaging to eel populations than non-certified practices.</i> It is impossible to determine whether certified practices are ‘more beneficial’ or ‘less damaging’ to eel populations than non-certified practices. Therefore it should be left out. It can be misleading, and will be prone to misuse. Only Definition 2 should be used. <i>Assumptions:</i> it is key that a ‘surplus’ is defined properly, which implies proper monitoring and data collection. <i>Farmed eels have proven to be less contaminated with dioxins and PCBs than eels from the wild.</i> What is the relevance of this in terms of eel management? Food value? Not clear.</p> <hr/> <p>10. How the standard works Here again, we argue that having a gold and a silver level is creating a lot of confusion. Moreover, incentives to move to gold may be lacking, if a label using the word ‘sustainable’ can already be used at the silver level.</p> <hr/> <p>11. The standard (p. 13) Criterion 1.2 Responsible indicator: if a facility can trade in both certified and non-certified eel, this is recipe for greenwashing, or even mislabelling, if traceability is not 100% guaranteed.</p> <hr/> <p><i>Component 2 – glass eel fishing</i> <i>Survival & eating glass eels</i></p>	<p>Our definitions have been considerably revised in the light of the fundamental changes made and hope that they are now clearer and more consistent.</p> <p>We disagree and will give a simple example. In non-certified glass eel fisheries, mortality can be as high as 50%. The cap for aspiring fisheries (lower standard definition) is 8% which is clearly more beneficial and less damaging. Furthermore, the definition has also been revised, i.e. ‘<i>SEG Standard-compliant activities, eg. fishing, have a positive contribution to eel populations compared to non standard-compliant activities, and are close to being classified as Responsible</i>’.</p> <p>A definition is provided now.</p> <p>The reference has been removed, but it was intended to indicate that eels reared in aquaculture will not be subject to the accumulation of pollutants from many natural environments and thence safer for human consumption.</p> <p>Noted and the structure and definitions amended accordingly as already described above.</p> <p>These comments are noted and you will see we are moving towards certification being only for those with a majority of traceable supplies of certified eel in a transition towards 100% in the future. Our assessors advise that they can identify where uncertified eels are being passed off as certified, through mass and number balance comparisons. Other standards such as MSC and ASC permit other fish products at the trader’s site.</p> <p>It can be monitored through a combination of checking records (catches, sales) on-site audits, spot-checks and intelligence. Prices for dead glass</p>

1. Gabriel S. Sampson, James N. Sanchirico, Cathy A. Roheim, Simon R. Bush, J. Edward Taylor, Edward H. Allison, James L. Anderson, Natalie C. Ban, Rod Fujita, Stacy Jupiter, Jono R. Wilson (2015) Secure Sustainable Seafood from Developing Countries. *Science* 348 (6234): 504-506. DOI: [10.1126/science.aaa4639](https://doi.org/10.1126/science.aaa4639)

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		<p>How can the use of ‘<i>the small proportion of glass eels that don’t survive fishing, holding and transportation</i>’ be monitored? This exemption looks like a potential loophole to continue use of glass eels for direct consumption.</p> <p><i>Component 3 – Yellow and silver eel fishing</i> (p. 24) As yellow and silver eels have the greatest opportunity to survive and migrate to the Sargasso sea to spawn, it will very difficult to define the net benefit these fisheries. So, the ‘responsible’ indicator would need more detail. At the same time, these fisheries argue that they have an important cultural relevance.</p> <p>(p. 25) <i>Criterion 3.4: the fishery has negligible impacts on rare or other protected species</i> Silver eel fishing often takes places in coastal areas which is also the habitat of several protected migrating species such as the twait shad, trout and salmon. It will be very difficult to assess the impact of silver eel fishing on these species.</p> <p><i>Component 5 – eel farming</i> <i>Criterion 5.7 The farm provides eel for restocking</i></p> <ul style="list-style-type: none"> • What is the necessity of having this criterion? • Has the benefit of this been demonstrated? • How to avoid grading (slow growers) for restocking? <p><i>Component 6 – Restocking</i> It is not clear who has the responsibility for the activities.</p> <ul style="list-style-type: none"> • Who is responsible for financing? (It is often financially supported by the Member state). • Who sets up and carries out the monitoring program? • Who determines suitability of the area for restocking? <p><i>13.2 Compliance</i> It is unclear where stakeholders are involved in the certification process. There is no possibility to comment on the draft final report. With certification schemes as MSC and ASC, public input can be given at various stages of the certification process.</p> <ul style="list-style-type: none"> • It is also unclear who is the standard holder. Is it the SEG? How independent is this? • How is correct implementation of the Standard being monitored? E.g. who checks correct use of the label, and who would follow up on complaints of misuse? 	<p>eels are lower, so there is a financial incentive to maximise survival.</p> <p>Agreed. So here we have specified that it is compulsory (not an optional bonus score) to donate proportions of the catch to provide a positive contribution.</p> <p>Sometimes they do – especially if they are using traditional methods such as wicker baskets</p> <p>If those species are caught then it shouldn’t be difficult to form a view of the impact on them.</p> <p>It is to show some level of positive contribution, although we now have an alternative, at 1.2, to make financial contributions to eel conservation projects. The benefit has been demonstrated no more or less than for other restocking methods. We have dealt with grading slow growers for restocking at 5.8</p> <p>This depends on the country. Usually it is undertaken by the Government or its agency, sometimes it is contracted out to private companies. It is not clear yet if any organisation will wish or need to be certified for its restocking practices, but we have set the criteria for doing so to best practice.</p> <p>The current plan, unless there are compelling reasons to do otherwise, is for the independent, contracted-out, Certification Body to make the decision, but without consultation as this adds unnecessary delay to the certification process. Whilst MSC and ASC might do this, it is not an ISEAL requirement. Reports will be published for public scrutiny and transparency.</p> <p>SEG ‘owns’ the standard and the process. The SEG Standard Panel, which is independent of the SEG Board (and has conservation and science representation only – no commercial interests) oversees the application of the standard and, in future, will oversee and monitor the contracted-out Certification Body. The SEG Standard Panel will ensure correct implementation of the</p>

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		<p>Comments on key issues in the previous version:</p> <ul style="list-style-type: none"> - Transparency of certification process is key. Will draft reports be available to the public and stakeholders? <i>This has not been answered yet in this version.</i> - Similar to MSC, stakeholders should be allowed to raise objections to the certification and an objection procedure should be in place. This does not seem to be the case at present. <i>Still not the case.</i> - On P5: “The final decision is taken by the SEG review panel after analysis of the assessor’s report”. As SEG also contains representatives from the fishing and aquaculture industry this could create, or at least suggests, conflicts of interest. Why isn’t the decision of the CB leading? <i>The text now suggests that the CB has the final word, but that is not clear. As said above, in this procedure, a stakeholder comments period should be in place, and also an objection possibility.</i> - The standard is mostly based on compliance with the eel management plan. Progress of the EMP’s is reported to EU by the member states, but until now this progress is not evaluated further. Therefore we strongly suggest that effectiveness of an approved EMP of the MS is not taken for granted but assessed by a 3rd party as well. <i>ICES may provide more quantitative insight into effectiveness of EMPs.</i> - Component issue indicator requirements include many qualitative statements “with reasonable confidence” e.g. component 2.1, 5.1, 5.2, 6.1. E.g. component 5.1 and 5.2 “the restocking is part of a management initiative that should with reasonable confidence lead to the 40% escapement target being achieved in the future.” this statement includes several very qualitative assumptions. Namely “should lead with reasonable confidence to the 40% escapement goal”. <i>There are still a number of qualitative assumptions.</i> 	<p>standard. This will be described in more detail in the SEG Standard Assurance Code, and is now clarified in section 12.</p> <p>Answers transcribed from above: We are considering that in the Assurance Code</p> <p>Thank you for this suggestion. Whilst some standards might run like this, it is not an ISEAL requirement. We are considering that in the Assurance Code.</p> <p>The Panel is made up of scientists and conservationists only, with no commercial interests, in order to avoid any conflict of interest. The CB decision has been leading, with the Panel only making decisions when the CB recommendation has been marginal. In future, the Certificate Body will be the Awarding Body and will be even further independent of SEG. All reports and decisions will be published on the SEG website and open to scrutiny.</p> <p>The assessor is required to consider this as a third party – not just to accept the report by the Member state.</p> <p>We have sought to remove such qualitative terms as far as possible.</p> <p>Agreed – hence regular reference to habitat improvement and improving migratory pathways, progress with eel management plans, meeting</p>

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		<p>- Restocking should not be the be all end all method. Centuries of eel restocking have learned that there is no clear relationship between percentage escapement and restocking. To quote Willem Dekker (2016a): “As successful as restocking might have been locally, it has not markedly changed the overall trends and distribution patterns or halted the general decline of the stock and fishery.”.</p> <p>ISEAL compliance: We think several of the aforementioned issues in the current standard are likely to be raised by ISEAL as well. ISEAL Credibility principle 3 (relevance) requires that standard requirements are objective. The qualitative nature of some of the SEG standard requirements allows a subjective interpretation. The way ISEAL credibility principle 7 (transparency) and 8 (accessibility) are implemented is unclear. How and when stakeholders are asked to provide input during the SEG certification process should be clarified.</p> <p>Other issues (<i>these have not been updated since our comments on V 5.2</i>):</p> <ul style="list-style-type: none"> - Component 4.2: red score indicator mentions fish waste but the use of e.g. trimmings from salmon farming should be allowed. - Component 4.3: Feed component of the standard should not only include FCR. Fish In Fish Out (FIFO) ratio should be estimated for both fish oil and fish meal according to Jackson (2009). Ideally Forage Fish Dependency Ratio (FFDR) should be estimated similar to how this is done in the ASC standards, e.g. the 2012 salmon standard Appendix IV-1. - Component 4.3: Feed component of the standard should include steps taken to lower the aforementioned FFDR as this ratio is very high compared to other farmed fish species. - Component 6.3: Provisions should be made for bycatch of invasive species that is of value to the fishery such as crayfish and Chinese mitten crab. The fishers should be allowed to retain these species if it complies with national regulations - Criterion 2.5: A clear definition of ETP species (according to which list, IUCN, national red list, other?) should be given here. 	<p>escapement targets etc.</p> <p>Thank you. We also have ISEAL accredited consultants guiding us.</p> <p>The standard now refers to a 3rd party accreditation (eg. IFFO) to consider suitability of feed.</p> <p>Feed conversion ratio criteria were provided from expertise within the eel farming sector.</p> <p>Amended as suggested – see Notes in Component 2.</p> <p>We believe the indicator is sufficient to account and be flexible for a range of protections whose lists are constantly changing.</p> <p>Updated – see Component 5.6</p>

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		<p>- Component 6.7: A clear definition of humane slaughter methods must be given. In our opinion the only approved methods should be electric stunning and percussive stunning.</p> <p>References: Dekker, W., & Beaulaton, L. (2016a). Faire mieux que la nature? The History of Eel Restocking in Europe. <i>Environment and History</i>, 22(2), 255-300. Dekker, W., & Beaulaton, L. (2016b). Climbing back up what slippery slope? Dynamics of the European eel stock and its management in historical perspective. <i>ICES Journal of Marine Science: Journal du Conseil</i>, 73(1), 5-13. Jackson, A. (2009), Fish In – Fish Out ratios explained. <i>Aquaculture Europe</i> 34, 5 – 10.</p>	
Anonymous 1. Asked for comments not to be published	<p>Pages 8-9</p> <p>Page 15: 1.4:</p>	<p>In general, I like the document regarding its systematic approach. I am an <u>independent reader and eel disease scientist</u>, and do not look to political issues, but more to the technical part.</p> <p>I think in general you did a good job already. I do have some remarks, questions and some suggestions.</p> <p>Questions/remarks/suggestions: Who will be in charge of the certification connected to this Standard, and which education is needed to be authorized to certify? For instance on “health”, my subject?</p> <p>For the assumptions indeed references are needed. It would have added to see these already.</p> <p>Benefits: Giving security on “safety” to buy eels to “customers” : what do you mean by <u>safety and security</u>? There is 1) fish diseases (viruses, <i>A.crassus</i> are not zoonotic (i.e. not pathogenic to humans), some bacteria might be harmful, like <i>Vibrio vulnificus</i> in scarce cases); there is 2) food safety: contamination with bacteria like <i>E.coli</i>, <i>Listeria</i> etc., or with toxic compounds? To define better. Who are the “customers”? The consumers? The eel processors?</p>	<p>The standard is owned by SEG, but the administration of the standard is delegated to the independent SEG Standard Panel. Assessments against the standard are undertaken by trained assessors, who are independent from the SEG Standard Panel, and from SEG, but wil operate under an assurance scheme</p> <p>Most are now referenced</p> <p>We mean ‘security’.</p> <p>The customers are (1) eel farms who don’t want to have their stock infected and (2) countries / river basin authorities who wish to avoid infesting their waters with diseases or alien species</p>

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	Page 16:	<ul style="list-style-type: none"> o Sustainable indicators: EU-regulations: There are gaps in this: some countries, like NL have no official registered drugs for fish. o “There have been no bio-security issues in the last 5 years”: This is vague, and therefore impossible. Or you define what kind of issues, or you leave it out/adapt. o Who signs the health certificates, and are these provided for with glass eel transports? As this is wild caught it may carry viruses without any clinical sign, so, a signature does not say they eels are pathogen free. o Responsible indicators: idem, to a less extent. o Eel Farming: I suggest you add the use of a logbook, in which all actions at the farm are obligatorily recorded. 	<p>The biosecurity aspects of this standard have been improved, but we will use these and further information to improve it further for future editions. Thank you for these comments.</p>
	Page 17	<p>see my remarks on page 16.</p> <ul style="list-style-type: none"> o Responsible indicators: “similar prevalence of the same disease(s)”: this makes sense! o Wholesale/retail/processing: “no instances of infection”: infection with what? There is no notification of eel diseases, so, what would be notified/reported at all, except from what is in the logbook? 	
	Page 20	<ul style="list-style-type: none"> · “Mortality during the first week in culture”: From stories of eel farmers I know, glass eels are transported up and down the French and Portuguese coast to get the highest price, so, not <i>linea recta</i> to the target address. This hampers the glass eel health extremely, and glass eels might die due to infection by f.i. the bacterium <i>Pseudomonas anguilliseptica</i> upon arrival at the eel farm. 	<p>The biosecurity aspects of this standard have been improved, but we will use these and further information to improve it further for future editions. Thank you for these comments.</p>
	Page 21	<ul style="list-style-type: none"> · Targets & measures: I would advise to add: Transport from source directly to eel farm/target address. · transport: to add: Transport from source directly to eel farm/target address at the right water temperature. Will the tracking system “TRACES” be used? Then please add here also. 	
	Page 26: Criterion 4.5	<p>Useful info: The OIE has a chapter on TRADE MEASURES, IMPORTATION/EXPORTATION PROCEDURES AND HEALTH</p>	<p>Yes, these are poor practices that we’d like to see ended,</p>

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	<p>Page 28</p> <p>Page 30: Criterion 5.6:</p>	<p>CERTIFICATION, please see http://www.oie.int/international-standard-setting/aquatic-code/access-online/</p> <ul style="list-style-type: none"> o Humane slaughter methods: “Although the EU.....”: The OIE has a chapter on best slaughter methods for fish: please see: Chapter 7.2. Welfare of farmed fish during transport; Chapter 7.3. Welfare aspects of stunning and killing of farmed fish for human consumption : http://www.oie.int/international-standard-setting/aquatic-code/access-online/ and Lambooi et al.,2002: https://www.deepdyve.com/lp/wiley/a-feasible-method-for-humane-slaughter-of-eel-anguilla-anguilla-l-hVFQLAqfpK • Benefits: “Survival is maximised”: how to measure? · see OIE guidelines given above, and Lambooi et al.,2002: https://www.deepdyve.com/lp/wiley/a-feasible-method-for-humane-slaughter-of-eel-anguilla-anguilla-l-hVFQLAqfpK · Page 31: Criterion 6.1, 6.2: Sustainable indicators: How? Do you give guidelines how to do this? It is vague, and difficult, I know. <p>Good luck with further developing the Standard.</p>	<p>Thank you. We will be developing best practice for transport of eels and will ensure that these measures are referred to.</p> <p>Thank you. More recent guidelines have been identified and adopted.</p> <p>Thank you. More recent guidelines have been identified and adopted.</p>

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<p>Tony Norman The Lugg and Arrow Fisheries Association tony@theleen.co.uk</p>		<p>The SEG have finally recognised that the European Eel is classified by the IUCN as CRITICALLY ENDANGERED. As such we continue to believe that all exploitation of the species should cease. The licensing system merely enables the illegal trade to exist. Instead we believe that resources should be put to improving access, habitat, water quality and policing of hydro power and illegal trading.</p>	<p>We have always recognised the IUCN classification, but overlooked to mention this obvious status in the last draft. This is corrected now.</p> <p>We agree that resources should be put into the areas you describe and are also applying pressure to do so (the current revision to the EU Regulation now requires a more balanced approach - requiring more environmental improvements and has restricted yellow and silver eel fishing further). We believe that proper, well regulated fishing can still exist and the standard sets higher requirements on those who wish to be certified than the legal requirements alone. This standard defines high standards of practice that many licensed fisheries would not currently achieve.</p> <p>IUCN itself states: ‘Well regulated trade can contribute positively to</p>

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			<i>the conservation of some threatened species, and may be essential for human livelihoods'. We agree that illegal trade is a serious problem too and we are vigorously working with various agencies to tackle that.</i>
Ian McCulloch The Golden Valley Fish and Wildlife Soc. Goldenvalleyfishandwildlife@hotmail.co.uk		<p>We are totally opposed to any Europe-wide standard for eel exploitation that allows the capture and export of the European Eel (<i>Anguilla anguilla</i>) at its juvenile stage. The catch-and-export trade is, we believe, largely responsible for the near-total collapse in our eel stocks. Any "sustainable" standard, while this is allowed to continue, is none other than meaningless window-dressing at best, and facilitating extinction at worst."</p>	<p>We respect and recognise your views on this matter. The eel is classified as critically endangered, stocks in many rivers are a fraction of what they were and it seems obvious to call for a ban on all fishing. But the causes are many and varied, with fishing playing but one part. Fishing is an easy target to control further. We are seeking a more balanced approach that puts pressure to improve the environment and remove barriers, and allows a limited, well regulated, higher standard of fishing.</p> <p>We also firmly believe that without a commercial sector, the eel would suffer more. For example, glass eels restocked to Sweden from areas of abundance have been proven to enhance eel populations there; and in Holland, fishermen have caught and hauled many tons of eels 'over the dyke' in the last 5 years, to allow them to migrate to sea without going through the massive pumps. The standard is designed such that those certified, can demonstrate a positive contribution to eel stocks, rather than damaging them.</p> <p>The EU Regulation seeks 'sustainable use [i.e. fishing] of the stock' and so we (1) respect that and (2) provide a standard that is at a higher level than the EU and EA and NRW require. If all fishing practices in Europe followed the SEG standard, about 50% of the 60 tonnes of glass eels caught in Europe would be saved. Some fisheries would not achieve the standard. It is quite possible that, if it sought SEG certification, your local fishery might not achieve the Standard due to low population target levels. We understand that only about 25 fishermen are fishing the Wye now, and returns last year were about 25kg.</p>
Nick Longman Monnow Rivers Association mrnick922@gmail.com		<p>There should be a total ban on ALL fishing for or use of eels in the UK (except possibly for limited translocation within the country for conservation purposes)</p>	<p>We understand the thinking behind this view. In the recent review (November 2017) of the EU Eel Regulation the Environment Agency restricted yellow and silver eel fishing further. It is the EA and NRW's role to decide when, where and how fishing should be restricted.</p> <p>The policy in the UK (EA and NRW) has been to focus on investment to open up barriers to improve migration, rather than restocking. They control fishing levels. We support it with a standard that aims to promote best practice and with higher</p>

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			<p>standards than what is merely legal.</p> <p>We support local translocations schemes and in recent years the Severn and Parrett fishermen, thanks to improved awareness, have become increasingly willing to donate surplus catches to local stocking schemes.</p> <p>As described above, we believe that restricted, well regulated, higher standards of elver fishing in areas of high abundance can provide a positive contribution to eel stocks, combined with environmental improvements, and still provide some socio-economic benefit.</p>
Dr Fatima Wariaghli Faculté des Sciences Rabat, Université Mohammed V Agdal, Morocco Wariaghli_fatima@yahoo.fr	Composant1/ Conditions générales	<p>Les autorités des pays doivent signer cet état d'engagement et appliquer une nouvelle loi et la mettre en vigueur pour sanctionner toutes les compagnies qui pratiquant la pêche illégale des civelles et qui ne respectent pas la tranche importante de l'engagement qui est la pratique du repeuplement.</p> <p>The authorities of the countries must sign this state of commitment and apply a new law and put it into force to sanction all the companies that practice the illegal fishing of glass eels and which do not respect the important part of the commitment which is the practice of the restocking.</p>	<p>Nous sommes d'accord. Les autorités de toute l'Europe renforcent les mesures d'exécution pour s'attaquer à ce problème. Il y avait 48 arrestations en 2017.</p> <p>We agree. There is increased enforcement by authorities across Europe – to tackle this problem. There were 48 arrests in 2017.</p>
	Composant2/ Pêcherie de civelles	<p>La pêche des civelles doit être limitée voir interdite dans la zone de PGA, il faut réglementer seulement la pêche des anguilles argentées et jaunes.</p> <p>Fishing glass eels should be limited or prohibited in the PGA area, only the fishing of silver and yellow eels should be regulated.</p>	<p>Nous sommes d'avis, comme le précise la norme, que la pêche de l'anguille de verre ne devrait provenir que de zones à forte abondance et / ou de bassins versants qui répondent à leurs objectifs de population d'anguilles. Nous croyons que chaque anguille de verre, chaque anguille jaune et chaque anguille argentée devraient être soigneusement réglementées à des niveaux que nous décrivons comme «responsables» dans un voyage vers la durabilité.</p> <p>It is our view, as specified in the standard, that glass eel fishing should only be from areas with high abundance and/or from catchments that meet their eel population targets. We believe that each glass eel, yellow eel and silver eel fishery should be carefully regulated at what we describe as 'responsible' levels in a journey towards sustainability.</p>
	Composant5/ Repeuplement	<p>Le repeuplement doit être exigeable surtout, dans les zones à barrage entravant la migration de l'anguille.</p>	<p>Nous sommes d'accord que le repeuplement devrait avoir lieu dans les zones inaccessibles, afin de faire bon usage de cet habitat jusqu'à ce que des solutions techniques telles que les passes d'anguilles et les criblages permettent une migration sécuritaire.</p>

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		The repopulation must be required especially in the dam zones hindering the migration of the eel.	<i>Cela dépend de la volonté politique et du financement, dans le cadre des plans de gestion de l'anguille pour y parvenir.</i> We agree that restocking should occur in those areas that cannot be accessed, to make good use of that habitat until engineering solutions such as eel passes and screens enable safe migration. It depends on political will and funding, as part of eel management plans to make these happen.
Jérémie Souben CNPMEM/ CONAPPED jsouben@comite-peches.fr	General comment 1 + p2	It is good to have a final translation in French by a professional. It could be indicate that the English and French versions are equally important and both are official version.	We recognise the importance of having a translation for French colleagues. The previous version was translated by a professional – it is in this SEG web-page dedicated to the French: http://www.sustainableeelgroup.org/seg-standard-en-francais/ The versions for this review have been using Google translate, which is why they have not been good, but we will get a full and proper translation for the final published version. The French can be an official version if the translation is accurate – SEG will appoint a translator and CNPMEM will review and provide assurance of accuracy. In the absence of agreement on translation, the English version must remain the original official version. The English version is required by ISEAL.
	General comment 2	As evoked by the SEG, the escapement target (40% of the pristine biomass) is difficult to assess and other objectives may be more appropriate. The habitats of the eel are so degraded that the 40% target seems illusory as long as the non-fishing mortality factors are not reduced. This approach must take into account the means implemented and envisaged by the RCE 1100/2007 to achieve the final exhaust objective and not only the escapement target. In this approach, it is possible to quote the reduction of the commercial fishery foreseen by the RCE 1100/2007. The French fisheries has achieved its objective and has significantly reduced its fleet to reduce its fishing effort by more than 60%. A criterion on the reduction of national commercial activity since 2007 must be included in the standards.	We would like to understand other targets better that might be suitable to use in the standard. Agreed – made changes to 2.1 and 2.3 to help better reflect achievable targets applicable to fishermen. 2.1 includes the more realistic Bbest targets; 2.3 added to measure fishers' contribution to EMP.
	General comment 3	In this version of the standards it is implied, for some criteria, that the prerequisites are the use of the legal framework. This approach calls for not stigmatizing non-certified stakeholder as poachers. Certification for all fisheries must remain voluntary.	We are not implying that non-certified stakeholders are poachers, however some are, and certification aims to give assurance to the customer that they are buying from a responsible source. There is high demand from customers such as the retailers in Holland, Germany, Sweden and Denmark that the fish they sell are sustainable. So, this demand is filtering through the supply chain. As that demand reaches buyers and fishermen, it is their choice, therefore voluntary, whether they wish to sell to that market. The

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			<p>direction of sales of natural products is that this demand will continue to increase. All suppliers have the choice to move with that demand or not.</p> <p>Legal practices are described in the standard to make it clear to the assessor and the assessed that they are required. We don't want to accidentally certify illegal practices.</p>
	General comment 4	<p>Overall, to justify sustainability, the social and economic pillars must not be neglected.</p> <p>e.g.</p> <p>Reflect the economic fluctuations in the price for restocking</p> <p><u>Donations</u>: means losing money (economic & social). Remove bonus scores / donations</p>	<p>We do not neglect them – they are recognized. Some say we consider them too strongly. At present, though, catches have not been reduced and the eel is not recovering. There is plenty of pressure on the EU to ban eel fishing completely, and unless the sector can demonstrate that it is acting responsibly, there is increasing chance that future call to ban eel fishing will be successful.</p> <p>Added. Applies to all states. (reflected in Article 7, Clause 6 of the regulation).</p> <p>Retained, as this is a way of showing a positive contribution. It is a voluntary, bonus score</p>
	General comment 5	<p>For glass eels fishing, the objective is not to increase the overall market but (i) to increase the market share of certified eels and (ii) to reduce the market share of non-certified eels. This objective of reducing the "uncertified" market raises the question for the French representatives and the place of professionals without certification. Certification is voluntary</p>	<p>Yes, as above, certification is voluntary. We wish to see an increase in the proportion being certified to (1) satisfy customer demand and (2) improve practices and (3) help the eel to recover through this journey towards sustainability</p> <p>The phrase 'reduce uncertified market' removed.</p> <p>We have developed a standard, a certification process, since we consider that one can do better than just follow the law. Certified is better than legal. The inevitable consequence is: uncertified is worse than certified, even though it might still be legal.</p> <p>The objective of the standard is to provide the number of fully traceable eel products for the markets that demand that.</p>
	General comment 6	<p>For the yellow eel and silver eel fisheries, the SEG considers that individuals are part of the reproductive potential and that fishing can be sustainable only when the escape objective is reached. Some of fisheries need to fish yellow/silver eels to maintain livelihoods.</p>	<p>Yes, all fishing supports livelihoods, but if not done responsibly (1) eel stocks won't recover so livelihoods will be lost and (2) the EU could ban fishing completely. The standard allows for yellow and silver eel fishing at responsible levels.</p> <p>Wording amended and EMP actions for fishermen are now applied here.</p>
	General comment 7	<p>Given the cost of certification and the commitments made by those involved in the sector, it is difficult to see to whom the components of the standards "restocking" and "contribution to a healthy aquatic environment" are intended.</p>	<p>Restocking is aimed at Govts. and agencies (eg. ARA) who arrange and conduct the stocking. However, we recognize there may be limited demand to become certified. 'Contribution to healthy envmt' is aimed at energy and water companies who have a big impact on the environment and may wish to reduce that impact</p>

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		Restocking: 6.1 and 6.3 are legal requirements in the regulation, only 6.2 goes beyond. So, 6.1 and 6.3 not needed?	through conservation projects or donations to Eel Stewardship Funds. If the Standard supports the regulation it is good to have parts of the regulation repeated to clarify and show how it is being supported, so 6.1 and 6.3 are retained.
	General comment 8	Examples to justify sustainability are based on Parrett and Arzal. Particular attention must be paid to the fact that the most degraded estuaries will be classified as sustainable fisheries. We should not have a message in favor of environmental degradation. With current definition, some fishermen in a healthy open estuary could not have a sustainable fishery...	We agree, which is why we describe that there must be other measures to reduce the impact – eg. progress with the eel management plan, donations by fishermen for restocking etc. e.g. if the eel pass at the Arzal was working well and/or there was translocation of glass eels, meaning that the Arzal was meeting its escapement target, there could be no argument that glass eel fishing is responsible / sustainable. We would welcome other definitions to identify whether or not different estuaries can be assessed for their sustainability. Local fishery committees will need to be able to show if/how different estuary fisheries can show a positive contribution if they wish to achieve certification.
	General comment 9	On restocking, the criteria chosen for certification are the definition of restocking in RCE 1100/2007 The French stakeholders does not conceive of any other approach for restocking than that described by the EU n ° 1100/2007. The resumption of its fundamentals in a certification challenges the realization of other actions of restocking.	60% restocking wording considered already and now amended in the standard.
	General comment 10	On restocking, it seems important to recall that RCE 1100/2007 makes it possible to revise the percentage of glass eel for restocking (60%) in the event of a fall in the market price of restocking compared to that of consumption. This emphasizes that sustainability must take into account social and economic aspects and not just environmental criteria. RCE 1100/2007 (paragraph 2): “In the event of a significant decline in average market prices for eels less than 12 cm in length used for restocking in eel river basins as defined by Member States, compared to the price of eels less than 12 cm in length used for other purposes, the Commission should be authorised to take appropriate measures which may include a temporary reduction in the percentage of eels less than 12 cm in length to be reserved for restocking”	We understand this clause exists. However, the EU has considered this only once, in 2013, and did not enact it. It has therefore never been applied. Here is a historical misunderstanding. The price for “consumption” refers to the Spanish market, direct glass eel consumption. Not for aquaculture, producing ongrown eel for a consumption market. 60% restocking wording considered already and amended.
	Cover	Good to see all these pictures	Thank you. We wanted to present a balance of a range of photos from across different parts of the sector, from fishing to restocking to retail.

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	P 5 (cf general comment 3)	« Diminish practices and markets that don't meet responsible standards ” The certification must be a voluntary process. If you are not certified you will be eliminated?	As described above, it is voluntary, to meet consumer demands. Non-certification does not stop anyone from fishing or trading, but as demand for certification increases, it provides more outlets and choice for the fisher /supplier/customer. Certified operations are better than non-certified. Banning non-certified is beyond our powers, but we will do all we can to promote certified fishing. The objective of the standard is to increase the number of fully traceable eel products for the markets that demand that. Wording reviewed to not give the impression we are trying to eliminate anyone acting legally.
	P 9	“sustainable yield for the total stock cannot be set until the species is in recovery” This is the French system validated by Europe since the validation of the EMP. Do you want no quota in France? It could be better to have also a quota for others glass eel fisheries in Europe	We agree that quotas are better where they can be set scientifically. The EC accepts the French system from their ICES scientists. Only France has a quota and applying that good practice. Wording amended.
	P 10 (cf general comment 2)	You use BBest mathematical models to justify sustainability. It s better to focus on the means implemented and not only on escapement and mathematical models.	We are adopting measures that (1) support the EU regulation, (2) are recognized by ICES WGEEL scientists and (3) will be acceptable to stakeholders that are likely to accept the SEG Standard independent accreditation through ISEAL (thereby meeting consumer demand in Northern Europe). We will be pleased to consider adopting other measures / targets that meet these criteria. Amendments made to the EMP criteria as discussed.
	P 12 (cf general comment 8)	Responsible definition could be used only for closed, degraded or little estuaries. A fishery on healthy and open estuary can't be responsible?	It is possible – the eel biology and fishery science parameters need to be considered in each case.
	P 13 (cf general comment 10)	You need add : Provided there is no price difference between the consumption market and the restocking market 60% should go for restocking RCE 1100/2007 makes it possible to revise the percentage of glass eel for restocking (60%) in the event of a fall in the market price of restocking compared to that of consumption. This emphasizes that sustainability must take into account social and economic aspects and not just environmental criteria.	Amended as it applies to all states (reflected in Article 7, Clause 6 of the regulation), though it has never been enacted.
	P14	“Use of farmed eels for consumption reduces the pressure on wild yellow and silver eels from fisheries where the eels are destined to become the spawning escapement. “ Glass eels fishermen could also be yellow eel fishermen. You can not have opposition between glass eel and yellow/silver eels fishers.	Yes they could be the same people. We are not looking to have opposition between fishers, but all to recognise the relative impact that each fishery has on the spawning stock. Wording amended to remove confusion that implies that this form of fishing is not preferred, then provide a standard to allow it.

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		These fisheries are often the only ones applying pressure locally to reduce pollution and remove barriers.	
	P14 (cf general comment 8)	<p>“Overall, the use of surplus glass eels provides a positive contribution to recruitment and population locally and elsewhere in Europe, whilst also providing a market for high quality and high value food for humans. “</p> <p>The key point of justification is based on the effectiveness of restocking and mortality dependent density. There is a better use of glass eels arriving in the watershed compared to natural colonization. Fishermen share this vision of restocking. However, other estuaries (especially large catchments) will not be able to use this justification. On large catchments such as the Loire or the Gironde, how can we justify the fact that natural recruitment is too abundant compared to the capacity of the environment? It lacks an approach on the qualitative aspects of the receiving environment (growth, mortality factor ...). In this part, which speaks of sustainability, the social and economic aspects have been completely lost and the focus is solely on the resource.</p> <p>Larger estuaries with less visible anthropogenic mortality factors can hardly justify their sustainability with the use of the above definitions.</p>	These fisheries will need data on recruitment, escapement, catches, social and economic factors to make their individual cases against the standard.
	P18 issues	The quota is not define by the demand. Such as all the fisheries with a quota the EU rules to define TAC et quota are used (scientist + socio economic advice)	Quotas are discussed and resolved above.
	P18 (cf general comment 3 and 5)	<p>« • Discourages and reduce illegal practices and trading • Discourages and reduce unsustainable practices »</p> <p>The SEG targets illegal trade and unsustainable practices. What the definition of unsustainable practice? with no certification?</p>	Yes – we are trying to reduce poor practices that, for example, have high mortalities, or that encourage illegal exports. Have given some examples of unsustainable practices – e.g. high fishing mortality.
	P18	<p>“The illegal trade (measured as the unaccountable reported catch in Europe) reduces by 10% per year over the next 10 years. “</p> <p>How to have a target figures on illegal market? It’s illegal so you don’t have figures</p> <p>How can the legal chain have quantified targets on reducing illegal traffic?</p>	We can get a reasonable indicator of illegal trade through our own and others (eg Traffick) studies, eg:

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Name & Organisation	SEG Standard para ref	Comment/issue	SEG Response																																										
			<p>Trade data and market studies suggest: 30-50% of annually reported European glass eel catches are trafficked to Asia!</p> <table border="1"><thead><tr><th>Year</th><th>Total European catch (t)</th><th>Asian imports (%)</th><th>WGEEL (%)</th><th>SEG studies (%)</th><th>Trafficking evidence (%)</th></tr></thead><tbody><tr><td>11/12</td><td>45.4t</td><td>23%</td><td>19%</td><td></td><td></td></tr><tr><td>12/13</td><td>51.6t</td><td>43%</td><td>14%</td><td></td><td></td></tr><tr><td>13/14</td><td>61t</td><td>33%</td><td>11%</td><td></td><td></td></tr><tr><td>14/15</td><td>51.6t</td><td>39%</td><td>14%</td><td></td><td></td></tr><tr><td>15/16</td><td>59.3t</td><td>30%</td><td>37%</td><td>56%</td><td>16%</td></tr><tr><td>16/17</td><td>66.5t</td><td></td><td></td><td>50%</td><td></td></tr></tbody></table> <p>Sources: ICES WGEEL reports (2012, 2013, 2016); Unagi Net, Nihon Yoshoku Shimbun, SEG, SEPRONA</p> <p>https://i1.wp.com/www.sustainableeelgroup.org/wp-content/uploads/2017/04/SEG_2017_single_slide.png</p>	Year	Total European catch (t)	Asian imports (%)	WGEEL (%)	SEG studies (%)	Trafficking evidence (%)	11/12	45.4t	23%	19%			12/13	51.6t	43%	14%			13/14	61t	33%	11%			14/15	51.6t	39%	14%			15/16	59.3t	30%	37%	56%	16%	16/17	66.5t			50%	
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	P19	“Improved financial viability of NGOs to undertake eel conservation work “ need to be change by “Improved financial viability of stakeholders to undertake eel conservation work” Which NGO? NGO which want only ban fisheries won’t save the eel. There is not only NGO involved in conservation work (eg restocking)	This isn’t aimed at any particular NGO, it is aimed at those conservation organisations that wish to spend money on e.g. eel passes, restocking, habitat improvement. Changed to stakeholders That line removed and one above changed.																																										
	P 20 cf general comment 3 and 5)	« decreased market share for uncertified eel” It shouldn’t be a target to decrease the uncertified market.	These are targets to help measure the success of the standard. There is currently little pressure on the uncertified market to improve practices. So this is a measure to show that the eel sector is improving its record for sustainability. Wording amended.																																										
	P 23	Examples include the parasites such as the swim-bladder nematode, <i>Anguillicola crassus</i> , viruses such as EVEX (Eel Virus European X) and alien species such as the invasive shrimp, <i>Dikerogammarus villosus</i> . It is necessary first to know the impact of these diseases and to know their cartography	These are only examples. The point is that bio-security must be good to avoid the spread of diseases and alien species. Agreed examples only, no change needed.																																										
	P23	The fishery conducts good biosecurity measures such as the disinfection and drying of nets between each fishing trip. Impossible to implement and the interest is limited	Disinfecting between different rivers is more important, and this may not apply in France, except for any hand-net fisheries? Applies for hand net fisheries only.																																										
	P23	“The use of chemicals follows legal requirements of the EU and of the country concerned “	No. We are just pointing out that responsible operations must follow legal practices, and what those practices are. There are																																										

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		Using a legal framework to be certified. Are you considered illegal if you are not certified?	plenty who are not following legal practices who, in that event, would not gain certification. Wording retained to clarify what the legal requirements are, and so that it would not be possible to inadvertently certify someone who was not following legal practices.
	P25 (general comment 2)	You shouldn't have a Bbest target but a target on the meaning implement to reach this aim	This target and others mentioned above discussed. Targets & measures already covered. We are using both as advised by ICES WGEEL scientists.
	P25	<i>"There is an obvious temptation to sell to buyers who will offer the best price. That price is determined by the market and the illegal market often offers a higher price "</i> Obviously, the purchase must be legal. In the absence of certification the fisherman would be seen as having an illegal activity? <i>"Certified buyers must sell only to legal markets so it follows, that to be responsible, certified fisheries must only sell to certified buyers"</i> Today, you only have one glass eel buyer certified. It is important to allow to sell not only for glass eel buyers certifies	No, we are not suggesting that all uncertified activity is illegal, but to be certified you must operate legally – we are just making that clear. As of March 2018 there are two eel buyers in France are certified out of nine. We wish to see more certified and all acting responsibly. Ideally all of them. Wording & language amended.
	P26 (general comment 4)	<i>"SEG does not support the capture of glass eels for direct consumption as we believe it is poor use of the stock and does not support a positive contribution"</i> Impossible to stop the glass eels market consumption (historic market). How explain for ecological reason why it is better to eat farmed eel than glass eels? The social and economic pillars are clearly forget here. If you want to reach the sustainability, you have to consider economic and social approach	We recognise that this is an important Christmas tradition in Spain. As long as this is from the consumption quota we do not object to it, even though we see it as poor use of the stock. Wording revised.
	P26 (general comment 2)	<i>"progress with EMP"</i> To reach the EMP target you need to reduce all humans mortality and not only professional fisheries. So the fisheries are not responsible if the target is not reach (pollution, dam...). You need to have an approach on the meaning used.	This is to reflect that each river / eel district should have an EMP and there should be progress with it to help the eel populations in that catchment. Fishery EMP actions added and whole EMP actions removed.
	P27 (general comment 8)	The table of good practice guide is good. you need to consider it to define the responsibility (open/not open estuary for example) (cf general comment 8)	We will be pleased to consider any suggestions on how the GPG can be used further to support the standard.
	P28	Rather than using the calculation of the mortality rate in the glass eel buyer it is possible to use the indigo carmine test to see the injuries after fishing. We use this test in french restocking action to assess the glass eel quality.	We have since developed the Carmin Indigo test with a protocol to apply for the standard.

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	P29	<i>"Given the size, range and diversity of the stock of the European Eel, it is not yet possible to properly set Total Allowable Catch, Sustainable Yield or Catch Quotas."</i> The French scientist use this method.	Quotas discussed above. Reference to French added.
	P29	"There are good data which show to the satisfaction of the fisheries authority that the EU silver eel 40% escapement target (40% B0) is being achieved for the river or in the eel management district. " Cf general comment 2. We can't use B0 but the meaning use to reach this target	There is an internationally accepted protocol. ICES advice is based on part of that. WGEEL advice is based on it. MSY is. But we have made the allowance for some 'means' too, as we have discussed.
	P29	"There is good progress with the Eel Management Plan " To reach the EMP target you need to reduce all humans mortality and not only professional fisheries. So the fisheries are not responsible if the target is not reach (pollution, dam...). You need to have an approach on the meaning used.	Agreed. See comment on EMPs above. References to EMPs amended.
	P30	<i>"Fishermen only use legal gear [...] There is no evidence of systematic non-compliance."</i> This is an obligation to use of a legal gear and to send the catch data. Certification should not be misleading by pointing out that uncertified fisheries are illegal... The use of legality is obvious.	Again, we are not implying that uncertified fisheries are illegal. Use of legality is obvious, but it must also be specified in a standard. Wording has been amended. It may be obvious, but we are providing clarity of what is legal and needed for certification. This is not to imply that uncertified = illegal.
	P30	In the mortality during fishing, you can use the carmin indigo test to assess the glass eel quality rather than the mortality in the tank of glass eel buyers	The Carmin Indigo test has since been developed and added to standard.
	P31	"Fishermen have donated an average of at least 5% of their catch in the past 2 years to local stocking programmes," change by Fishermen have sold an average of at least 60% of their catch in the past 2 years to local stocking programmes, Addition of criterion: In order to guarantee a non-revision of the percentage of 60% reserved for restocking as foreseen by the RCE 1100/2007, the buyers undertakes to offer a restocking price equivalent to that of consumption and which ensures the profitability of companies to justify sustainability Where are social and economic pillars to reach the sustainability?	Restocking wording revised. Donations retained – this provides a voluntary opportunity for the fishermen to make their own personal positive contribution to local eel populations Not possible to put this requirement on buyers as prices are set by a tender process in contracts. We need a shift from those setting the contracts to help maintain a fair price for restocking.
	P32 (yellow and silver eel fisheries)	As glass eel fisheries (3.1 and 3.2) it's better to use the meaning implemented rather than B0 or BBest. Also you can't have a target which involve all mortality factors. The escapement target involve a reduction of all kind of mortality	B0 and Bbest do consider all types of mortality Targets & measures covered. changes made as for Glass eel fisheries.
	P33	Fishermen have sold an average of at least...	As above.

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		Where are social and economic pillars to reach the sustainability?	
	P35	<p>“The EU Regulation requires that 60% of glass eels from fisheries should be made available for restocking.”</p> <p>You can add:</p> <p>In order to guarantee a non-revision of the percentage of 60% reserved for restocking as foreseen by the RCE 1100/2007, the buyers undertakes to offer a restocking price equivalent to that of consumption and which ensures the profitability of companies to justify sustainability</p>	<p>As above.</p> <p>Restocking wording revised.</p> <p>Donations retained – this provides a voluntary opportunity for the fish make their own personal positive contribution to local eel populations</p> <p>Not possible to put this requirement on buyers as prices are set by a tender process in contracts. We need a shift from those setting the contracts to help maintain a decent price for restocking.</p>
	P40	It is good to have the 5.8 criterion	Good – thank you.
Richard J Fordham Scandinavian Silver Eel richard@silvereel.se	<u>1.4.3:</u> <u>Traceability –</u> <u>Record Keeping</u> <u>and</u> <u>Documentation</u> <u>p.22</u>	<p>“The organisation operates a system that allows the tracking and tracing of all eel from purchase to sale.....and specific fisherman/vessel.”</p> <p>Not sure if this is meant for an eel farm. We normally receive eels once a year, have eels in 12 distinct size classes and keep the eels for up to 4 years (1kg plus). The eels are wild and grow at different rates which means regular grading to ensure similar sized eels are kept together to maintain good husbandry conditions. In the worst case we would need 48 tanks to keep years and sizes separate. Normally we limit the number of year classes but keep the size classes. A farm buying in at regular intervals during a season would need considerably more tanks to be able to keep deliveries with a gap of more than a month separate.</p>	<p>Yes, the intention is that your batches of eels can be traced to the buyer’s batches. And through the buyer, they can be traced back to the fishery.</p>
	<u>Criterion 3.7 –</u> <u>Fishermen</u> <u>donate a</u> <u>proportion of</u> <u>their catch for</u> <u>a positive</u> <u>contribution.</u> <u>p.33</u>	<p>“Fishermen have donated at least 10% of their catch for in the past 2 years to local restocking programmesmigration and escapement”</p> <p>10% seems a very high figure to donate for silver eels if eel farms are being asked to provide 10% for restocking of small eels.</p>	<p>10% is at least consistent. Any differences would lead to accusations of treating each differently.</p> <p>This is though a voluntary and bonus score.</p>
	<u>Component 5 –</u> <u>Eel farming</u> <u>p.37</u>	<p><u>Mortality Rate During Culture.</u></p> <p>I have looked at the explanation on p.37 and I am still not clear about what is meant by “total stock” on the farm. Is it the average stock (by number) on the farm for the year?</p>	<p>Yes.</p>
	<u>Component 5 –</u> <u>Eel farming</u> <u>p.37</u> <u>Feed</u>	<p>The cod roe we use is not from an MSC accredited fishery, but due to the very close scrutiny in the quarantine we are reluctant to change to supplier for fear of infecting the glass eels with a virus from a new</p>	<p>Is it IFFO approved? We understand your biosecurity concerns. Is it possible to find and transition to a MSC or IFFO approved one over time? This might mean an Aspiring score for this criterion in the mean time.</p>

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		area. Even if the cod roe is frozen it is possible for a virus to survive (IPN).	
	12.3 Use of Batch Codes and the SEG Label p.47	<p>It is a backward step not to show the SEG logo to the consumer. How is a customer to know if the product follows the Sustainable Eel Standard? We have had only 100% Sustainable Eel Standard eels since the start of the Standard, both for consumption and restocking. The benefit to the eel is obvious across the whole supply chain where we and our suppliers are scrutinised at each step. This has a double cost because we pay a charge directly to SEG for our consumption eels (same as Stewardship funds) and incur extra costs all along the chain for complying with the SEG standard. This has put us at an economic disadvantage, but we have been able to show the SEG logo and believe that it has provided more protection for the eel and has been vital in maintaining our production of eel for consumption. Without being able to show the logo there is no economic incentive to change to the Standard compared to paying into a stewardship fund and not incurring any extra costs.</p> <p>People have said that supermarkets do not want any more logos. But a visit to the local supermarket shows how important they are for people to make an informed choice. The MSC, ASC and stewardship funds all use logos to the end consumer - so why not the Sustainable Eel Standard logo? The other argument is that the standard is expensive to manage but this is a cost being born by the company being assessed. The income levied on the end consumer would be paid directly to SEG and provide some form of stable income to help ensure its survival and help to avoid the chronic lack of funding.</p>	<p>Thanks for this feedback and we understand your viewpoint. Having a label on the end product is a desired goal for all to show transparency through the system and to help the customer make an informed choice.</p> <p>At present, the SEG label is only being used in Sweden and the UK. The rest of the market (the vast majority) in Holland & Germany is using the ESF label. Whilst this doesn't yet mean that the product is SEG certified eel (because there isn't sufficient supply yet), the market is preparing to use a new version of the ESF label that will signify SEG certified eels. The consensus decision is that we wish to transition towards using the new ESF label by the end of 2019, and for current SEG label users to transition to that by the same deadline.</p> <p>The ESF label will then: (1) signify SEG certified eels, (2) be consistently used and recognised across Europe (3) be a consistent customer facing label and (4) being part of the ESF scheme, provide some income back to SEG to administer the certification scheme, removing 'double charging' some operators, such as SSE. The SEG label will be a business to business assurance scheme – not a public facing certification brand.</p>
Christine Absil and Irene Kranendonk Good Fish Foundation christine@goodfish.guide irene@goodfish.guide	General	<p>This new version of the standard has greatly improved over the previous one. We particularly appreciate the revision of the categories 'sustainable' to 'responsible' and 'aspiring'. This does reflect the status of a certificate much better.</p> <p>We were only wondering: is the SEG also going to adjust its name to REG? We assume that that would be quite far-reaching.... However, it should be made clear in all communication relating to the standard that it concerns 'responsible' rather than 'sustainable'. Potential misleading communication such as '<i>the certificate from the Sustainable Eel Group</i>' should be avoided at all times.</p>	<p>Thank you for the suggestion we understand the sentiment and also understand the potential for some confusion in messaging. We are here for the long term sustainability of the eel. It is our aim, purpose and brand and don't want to dilute that, so will not be changing our name.</p> <p>We will though, apply great care in messaging and associated documentation so that a SEG Certificate is not perceived to imply supply of sustainable eels. Hence we have also re-named the standard the SEG Standard from the Sustainable Eel Standard and clarified what certification means.</p>
	General	<p><i>EU Eel regulation</i>: what if evaluation in 2018 demonstrates non-effectiveness of certain measures that are fulfilled in this standard? Is the standard going to be adjusted?</p>	<p>We seek to support and, in some cases exceed the standards in the EU Eel Regulation. When the Eel Regulation changes we will review the standard and make further changes as necessary to reflect it.</p>

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	p. 8, sustainable development goals diagram/table	<p><i>Environment:</i> water quality (PCBs, dioxines) is a major issue affecting eel populations.</p> <p><i>Economic:</i> what is the economic value/issue of 'navigation'?</p> <p>Hydropower and energy production are one in case of the eel.</p> <p>Eel culturists can be considered as economic player.</p>	<p>Agreed - adjusted to reflect this.</p> <p>In navigation, there are weirs and locks on major rivers such as the Rhine, Danube, Rhone, Seine. These are barriers to migration – particularly upstream.</p> <p>Hydropower is energy production, but also, for traditional power stations, water is abstracted for cooling.</p> <p>Yes, eel culturists and all involved in the commercial supply chain can be seen as socio-economic players. Amended to reflect this.</p>
	p. 8, economic value of eel fisheries	<p><i>Whilst official figures are difficult to analyse, we estimate that the current economic value of the whole eel sector is €550M pa and employs about 10,000 people across Europe.</i></p> <p>What is the basis of this estimate? The figure shown only includes glass eel purchases in Holland which is not an indication of the entire eel sector.</p> <p><i>This covers from eel fishing to farming, restocking, consumption, plus research, administration, conservation projects and mitigation measures.</i></p> <p>Why are conservation projects included? These would not be necessary in case of a healthy eel stock.</p>	<p>These are the best figures we have from our knowledge of the sector, without commissioning an expensive study.</p> <p>This slide was presented as it is one that we have compiled previously. As the slide is not fully representative, we have removed it.</p> <p>Conservation projects are included because, with so much interest in the eel over the past 10 years, a lot more investment is going into studies and environmental improvements to help to create a healthy eel stock. We are reflecting the position as it currently is.</p>
	p. 8	<p><i>Given the poor status of the eel and its habitat, we can consider that the environmental aspects of the above diagram are diminished and under pressure, and that to restore the balance, a reduction in other pressures should be applied. The decline in catches and reduction in fishing has had an impact on the economics of the commercial eel sector.</i></p> <p>The decline in economic value of the eel sector is a direct consequence of the decline in eel catches and regulations, however the balance is not restored and the eel stock is still not showing signs of recovery. An active reduction in mortality and thus the commercial eel sector (the economic pressure) will be one of the necessary measures to restore the balance and to allow the eel stock to recover.</p>	<p>The commercial sector has already declined by approx. 50% over the past 10 years, and in most cases (e.g reduction in fishing) met its EMP targets. The environment is at 10 – 25% of its previous carrying capacity and whilst there has been much investment in recent years, it has not made a 50% improvement like the commercial / fishing sector. To date there has been a greater focus by the EU on fisheries – it is easier and cheaper to close fisheries and the supply chain.</p> <p>We would prefer to see a more equal balance across all impacts. And, for the fishing sector that is left, the standard requires high standards to show that it is doing it as responsibly as possible.</p>
	p. 8, figure impact on eel sector in Europe	<p>-Please clarify why these figures are used to identify the value of the sector. Are other countries not relevant in terms of economic value? Also, the time frame is arbitrary. What was the the economic value of the eel sector in the last century (before the major decline)? In 2005, the status of the eel stock was already as dramatic as in 2015. The only apparent difference is the fact that no management measures had been taken then.</p>	<p>We don't yet have a complete picture and all the same information across all states.</p> <p>As the slide is not fully representative, we have removed it.</p>

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		<p>- Please provide the same information and timetable for the Netherlands and Denmark. The number of production units (Denmark) is not an indication of eel production. The eel aquaculture production units in 2000 in Denmark: 25 (not 40 as in figure), with a production of 2674 tonnes. Highest number of production units in Denmark was 47 in 1990, with a production of 586 tonnes. So even though the number of production units has decreased considerably during those years, production has increased more than 4 fold! Number of production units in Denmark was 3 in 2016 with a production of 1072 ton. Using the same timeframe as the Netherlands in the same figure, you would end up with: 9 production units in Denmark in 2005, with a production of 1700 tonnes. And for 2016: 3 units, with a production of 1072 ton. This gives a slightly different but correct estimate of the developments in the eel sector. (references: page 47 in: http://ices.dk/sites/pub/Publication%20Reports/Expert%20Group%20Report/acom/2017/WGEEL/wgeel_2017.pdf And table 3.4 in: http://ices.dk/sites/pub/Publication%20Reports/Expert%20Group%20Report/acom/2015/WGEEL/WGEEL_CountryReports_2015.pdf) Text above estimates the value of the eel sector at €550M, in figure (below) €500M. Figure should show production and catch data instead of number of licences and number of farms. Include more countries instead of only the Netherlands to indicate the value of the eel sector and its development.</p>	
	p. 5, section 3	<p><i>The standard will support the collection and availability of the data necessary to monitor the efficacy of the standard in achieving its objectives.</i></p> <p>Will the data collection also expand beyond what is necessary for the SEG standard? This will benefit eel management in general.</p>	<p>We will collect data to primarily support understanding of the sector and the standard in particular. Where it is easy (no extra cost) or where funding is provided to gather and supply other data that supports understanding of eel populations and the eel sector, we will gladly do so.</p> <p>We will use data from other sources, such as ICES for the status of the eel stock.</p>
	p.10, section 5.4	<p><i>1. Until habitats are improved back to their 'pristine state' and 40% of B0 then becomes a realistic target, we consider that achieving a high proportion (70%+) of Bbest is a more suitable interim target, that reflects a responsible level of fishing and stewardship.</i></p> <p>Achieving this would be meeting this standard's 'Responsible' level.</p> <p>Bbest is in most Member States lower than 25% of the pristine state. So meeting 70% of Bbest is for some Member States only 17.5% of Bo. This should not be considered responsible.</p>	<p>We believe we need to set targets a what are realistic and achievable. If they are not, very few will feel it is worthwhile seeking SEG certification, and so the majority of the sector will turn away from it and revert to previous or irresponsible practices, which will be much more damaging. We need to open the door and let people in, then gradually increase standards and targets over time, having convinced them that a responsible start and sustainable future are possible.</p>

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		<p>2. River catchments that are achieving a slower, but acceptable rate of recovery, 40 – 74.9% of Bbest, will be considered to be meeting this standard's 'Aspiring' level.</p> <p>See previous comment. 40-74.9% of Bbest comes down to 10-17.5% (or lower) of Bo for most member states. This is very low and most likely not leading to a recovery in the eel stock (only when ΣA is very low) (see figure p.11) and should therefore not be called 'Aspiring' level.</p> <p>2. but acceptable rate of recovery, 40 – 74.9% of Bbest</p> <p>Rate of recovery would mean that there is an <u>increasing</u> trend in the eel biomass. How will this be monitored? What if eel biomass is declining in an EMU?</p> <p>1. Until habitats / 2. River catchments</p> <p>These should both refer to the eel management units (EMU) of the EMP.</p>	<p>It was GFF's suggestion to adopt Bbest, so we have suggested reasonably high proportions of Bbest.</p> <p>Across Europe, some catchments will achieve these targets and some won't.</p> <p>These targets may or may not be adopted by ICES / EU over time as they consider new targets. We'll be very happy to adopt those new targets once agreed. At present we believe our thinking to be more advanced than just 40% of B0.</p> <p>We will use EMUs as a default, unless there are good data for smaller catchments.</p>
	p.10, section 5.4	<p>It helps to indicate that lower levels of control (eg. 70% Bbest), can assist <u>recovery</u>, albeit at lower rates.</p> <p>Recovery will only take place if ΣA is low enough (<0.8).</p>	<p>We have sought to apply targets that are (1) achievable but challenging and (2) enable recovery. ICES WGEEL will be reviewing their advice on targets in 2018 and the SEG standard will be adjusted to reflect that when published.</p>
	P. 11, section 5.4	<p>Note that as freshwater habitat and migratory pathways are improved, Bbest will gradually increase and develop towards 40% of B0.</p> <p>Bbest will only increase if the eel population directly benefits from the increased or improved habitats, e.g. without increased fishing pressure or catches.</p> <ul style="list-style-type: none"> - If this is the case, and Bbest corresponds to 40% of Bo, will an 'Aspiring level' still be granted to an EMU with only 40-74.9% of Bbest? 	<p>Yes. The SEG standard isn't intended to increase fishing pressure. The standard is designed to make any fishing pressure more efficient & less damaging; also it will identify areas where fishing shouldn't take place. Together these will reduce fishing pressure.</p> <p>On advise from W. Dekker: Bbest varies with recruitment strength, nothing else, so that previous statement has been removed.</p>
	p. 11, section 5.5	<p>Further, it refers to 'Eel that is traceable as caught from <u>a fishery that is achieving its interim target silver eel escapement targets</u>, is well managed.</p> <p>A fishery itself does not have a target silver eel escapement. This is defined on the EMU level. So this would imply that a fishery can only be certified at the EMU level.</p>	<p>Yes, usually, though in some states there are reliable data from smaller EMU districts – even down to river catchments. If there is good, credible, reliable local data we should use it.</p> <p>We are referring to the SEG Standard 'Responsible' targets, not the EU 40% of B0 target.</p>

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		<i>Further, it refers to 'Eel that is traceable as caught from a fishery that is achieving its interim target silver eel escapement targets, <u>is well managed</u>.</i> Which management does this refer to? Having an EMP or achieving the targets set in the Eel Regulation?	The standard has been reworded to clarify
	p. 12, section 5.6	<i>They will be invited to implement an improvement plan to achieve Responsibility at their <u>next assessment</u>.</i> When will the next assessment take place? - What if an 'Aspiring' organisation is not improving, for how long can it stay 'Aspiring'? How many attempts to improve can be made before the 'aspiring' status is withdrawn?	It can take place as soon as they can manage it - whether weeks or years. We see no reason to put a limit on it – certification is voluntary and it is in their interest to achieve it as soon as possible. If they are still 'Aspiring' and with no real status, we see no reason to limit the number of attempts. It is in their interest to achieve the higher standard. This has been clarified in the standard.
	p.12, section 6.1	Definitions of positive contribution: to what area to these definitions apply? Does 'there being no eel sector' (definition 1) for example refer to the EMU, the EMP, the MS or Europe? Same accounts for definition 2.	We mean the eel sector across Europe. But the building blocks can be down to individual river level, where there is reliable data to assess or demonstrate it. This has been clarified in the standard.
	General	Producers, processors and others can attain a certification whilst the targets in the EU eel regulation are not being met.	The certification is for the individual components playing their part in helping to achieve the regulation. There are other players such as state governments who might have a much bigger role in achieving (or not) the regulation.
	p.12, section 6.1	<i>Certified suppliers will have to demonstrate, <u>through independent assessment</u>, how they play their part in providing this positive contribution in the supply chain.</i> Who will be responsible for doing the independent assessments? This should be a third party reporting, independent of the SEG.	The assessments are undertaken by independent, 3 rd party assessors. This will be explained in more detail in the Assurance code, which is being prepared as part of ISEAL requirements.
	p.12, section 6.1	<i>SEG standard-compliant activities, e.g. fishing, make a positive contribution to eel populations compared to non standard-compliant activities, and <u>are close to being classified as Responsible</u>.</i> - How will this definition work when there are only standard-compliant fisheries in the area considered? Would this mean definition 1 must apply? Define 'close to being classified as Responsible'. Will an implementation of an improvement plan be sufficient for this definition?	Not quite sure what you mean by this. If they meet the criteria for Responsibility, they will achieve that, if they meet the criteria for Aspiring, then that will be designated. The definition is a general one, intended to 'position' what the two indicators mean. The definitions have been amended to seek to clarify further. It means they have met the Aspiring indicators for that criterion, which just fall short of the full Responsible criteria. An improvement plan will be needed if they don't meet 80% Responsible indicators.
	p.13, section 6.1	• <i>In some west coast estuaries, the geography is such that more glass eels are concentrated than are needed to populate the catchment.</i> The example provided here is indeed a good example of a catchment where more glass eels are concentrated than needed. However, we	These are just existing examples – we are not intending to write the justification for all other fisheries in Europe.

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		have a serious concern for demonstrating this for other catchments, in the UK and other western estuaries. Mainly in Portugal, Spain and France, there is a serious lack of data quantity and quality on fisheries statistics, habitat quality and glass eel recruitment.	It will be down to the local fishery and fishery authority to provide the evidence and the assessor to consider it. If there is not the data, information or evidence, to demonstrate the indicator then the criteria will not be achieved.
	p. 13, section 6.1	<i>Fishermen have sometimes recently provided juveniles for stocking locally – over barriers and into under-populated wetlands. This provides a positive contribution too and should be recognised.</i> This positive contribution is not yet proven. This relocation is possibly into another catchment, over which scale is the positive contribution measured?	The evidence on restocking suggested that <u>local</u> translocation over barriers and into areas of under-population is the most effective. Donations of fishermen should be recognised where they take place.
	p.13, section 6.1	<ul style="list-style-type: none"> <i>In some other west coast estuaries, there are barriers to migration such as hydropower, water supply and flood management dams.</i> This is an example of a negative impact on the eel stock because of blocked migration ways rather than a positive contribution of a fishery. 	Yes. We comment that we would wish to see these opened up. In the mean time we would wish to see the ‘trapped’ glass eels make a positive contribution by being caught and translocated over those barriers and, if surplus, to other catchments. We are assessing the fishery for its contribution, the local or national contribution to the EMP is considered elsewhere.
	p.13, section 6.1	<ul style="list-style-type: none"> <i>Fishing for these surplus glass eels and making good use of them in the supply chain in the sector is the basic premise for the commercial eel sector being able to provide a positive contribution to eel populations.</i> <p>The examples mentioned are only 2 examples of cases where the contribution could be positive. Considering the lack of data and the wide area where eel occurs, these are exceptional circumstances. We have serious concerns on how to demonstrate ‘surplus eels’ and thus a positive contribution to the eel stock.</p>	Each fishery and example will need to be considered on its own merits. It will be down to the local fishery and fishery authority to provide the evidence and the assessor to consider it. If there is not the data, information or evidence, to demonstrate the criteria then the indicator will not be achieved
	p.13, section 6.1	<ul style="list-style-type: none"> <i>The majority (at least 60%) should go for restocking, under the terms of the EU Eel Regulation.</i> <p>How are individual eels selected for restocking?</p>	There should be no selection (and we specify as a standard indicator that ‘slow growers’ must not be selected). They should be representative of the stock at the holding facility.
	p.14, section 6.1	<ul style="list-style-type: none"> <i>Use of farmed eels for consumption reduces the pressure on wild yellow and silver eels from fisheries where the eels are destined to become the spawning escapement.</i> <p>The glass eels used in eel farms are also destined to become the spawning escapement.</p>	Yes, but survival is 80%+ instead of 5 – 30% in the wild, and the removal of the glass eels for aquaculture and consumption is balanced by the positive contribution by restocking.
	p.14, section 6.2	<i>There have been numerous studies to review the effectiveness of stocking, with as many concluding that stocking is effective, as those challenging that view.</i> The examples mentioned here are all restocking practices done to supply eel fisheries, not to contribute to the spawning population.	The review by Pawson considered restocking for all purposes – to support fisheries and to support the spawning population.

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	p.15, section 7	<i>In 2010 the Sustainable Eel Group approached the MSC to apply their standard to eel fisheries.</i> MSC should be involved to provide comments on the standard since there is overlap with the MSC standard.	We will have approached MSC for comment. Their comments are published below.
	p.15, section 9	<i>In addition, the standard is designed to <u>require</u> those certified to a lower level to demonstrate improvement in their practices between successive assessments.</i> Where is this requirement specified and what are the consequences of non-compliance?	This is described in 10.3 Methodology and has been re-worded to clarify.
	p.17, section 10.3	<ul style="list-style-type: none"> <i>Organisations with a 50% or greater Responsibility score will achieve a Responsible level certificate award.</i> <i>Organisations not yet achieving a 80% Responsibility score will be required to identify and make improvements to achieve a higher score by their next assessment.</i> Are there any consequences involved when a higher score is not achieved? Is this documented anywhere? Not improving up to the minimum requirements before the next assessment in the MSC certification process will lead to a full withdrawn of the assessment.	If required to achieve a higher score, then by definition, they will drop to Aspiring, and an improvement plan will then be required. The Methodology has been reworded.
	p.18, criterion 1.1	<i>Criterion 1.1 Commitment to legality & sustainability</i> The description of this criterion only concerns legality, no sustainability issues are addressed.	Yes, we removed sustainability clauses as there were difficult to define and they are embedded as individual indicators. We have re-named this component.
	p.19, criterion 1.3	<i>We believe that any such practices can be detected through mass-balance calculations during assessment for traceability. Other standards such as MSC and ASC permit other fish products at the trader's site.</i> Recent inspections have shown that also for ASC and MSC, this is a very difficult topic and hard to control. This can also be the case for the SEG, even with the best intentions. This can easily be avoided having operators to process only certified eel if they wish to have the label. This is a great opportunity for the SEG to ensure that truly only responsibly sourced eel carry the label.	We want to transition towards there being 100% and no separate stock on site but we need to give operators time (4 years) to adjust and for an assured supply of certified responsible eels to enter the supply chain. Reworded to clarify.
	p. 20, criterion 1.4	<i>Separation can be achieved through physical or temporal separation. However it is done, it must ensure that mixing will not occur. Certified products cannot contain any non-certified eel.</i> As recognised by SEG itself, this is prone to fraud. Only allowing operators to process certified eel would overcome this.	This the ideal situation that we wish to transition to – hopefully by the time of the next review of the standard in 4 years. Reworded to clarify.
	General	It is assumed that an increase in certified eel products will lead to a decrease in non-certified eel products and that the share of certified	SEG and certified suppliers will be marketing and educating customers and consumers over the next two years.

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		eel products will increase. This does not necessarily have to be the case, certainly when producers can trade in certified and non-certified eel at the same time and when fishing is not banned. How will the SEG actively promote their label, engage producers and selling points? It would be helpful (for sustainability and trafficking reasons) if only certified products can be sold on the markets, this will demand a strong lobby on the policy level.	As they are educated we anticipate greater demand for certified product and reduced demand for uncertified.
	p. 21, criterion 1.4.1	<i>Certified eel products can be clearly and easily traced back to a certified source.</i> This can be specified to 'all eel products' (both in the responsible and aspiring level). Pressuring producers and processors that are allowed to also handle non-certified eel to at least also ensure the traceability of their non-certified products.	Amended as suggested
	Criterion 1.4 general	A producer that is both trading in certified and non-certified products can now ensure the traceability of the certified products. However, what about the traceability of non-certified products? If a producer is trading irresponsible (or even illegal) with the non-certified part of its products, will it still be allowed to carry the SEG label?	If a supplier can't show the product is traceable responsible, they won't pass that criterion. If proven to be trading in illegal product then they will be reported and any certification withdrawn. Reworded to clarify
	p. 23, criterion 1.5	<i>There are no, or very rare, examples of a disease or alien species associated with a batch of certified eel.</i> Quantify very rare.	This is defined as <1%
	p. 23, criterion 1.5	<i>Certified eel farmers and traders should not buy and resell infected eels.</i> Does this also account for the non-certified part of the eel products of a producer?	Yes, no traders should buy/sell infected eels. Re-worded to clarify.
	p. 29, criterion 2.1	<i>Weighting: 2</i> See previous comments on the level of Bo and Bbest.	
	p. 29, criterion 2.2	<i>Weighting: 2</i> As noted in the standard before, the Eel Management Plans are not having the anticipated positive effect. Implementation of (a part of) the measures in the Eel Management Plan is therefore not an indication of improvement in the eel stock status! This should not be a criterion of good practice for glass eel fisheries.	After much consideration we have decided to remove this criterion. This is because (1) most plans were poor or (2) they were poorly implemented. In addition, whilst it was principally the responsibility of the government of the member state to implement, it was considered unreasonable on the fishery if their government had not implemented the plan. So, we have removed this, but added/amended it to reflect if/where the fishery itself has undertaken its responsibilities in the Eel Management Plan.
	p. 31, criterion 2.5 and p. 35, component 4	<i>Fishermen have donated an average of at least 5% of their catch in the past 2 years to local stocking programmes, e.g.</i>	

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		<p><i>translocating over barriers to aid upstream migration and recruitment in the catchment</i> (in criterion 2.8, p. 31)</p> <p><i>The EU Regulation requires that 60% of glass eels from fisheries should be made available for restocking.</i> (in component 4, p. 35)</p> <p>Is the donation of 5% of the glass eel catch for restocking programmes part of the 60% glass eel restocking? If this is the case, a bonus score will be given for a required practice.</p>	No, this would be in addition to the 60%. We have clarified.
	p. 33, criterion 3.1	<p><i>“is being achieved for the river or in the eel management district.”</i></p> <p>What is the unit of certification with the SEG standard?</p> <p>The targets in the eel management plans are all set based on eel management units that vary in size and area in and between member states. Eel management units/districts should be the scope on which of the escapement levels are measured that are applied in the standard.</p>	The EMU/D will be the default unit, unless there are reliable data and information that can be applied at a smaller, e.g. catchment level. We have clarified the definition.
	p. 33, criterion 3.7	<p><i>“Fishermen donate a proportion of their catch for a positive contribution”</i></p> <p>Rules or a protocol on how to select the proportion of the catch that will be restocked should be set up to prevent selection of the smaller or weaker individuals for restocking.</p>	We have stated that the eels used for restocking must be representative of the catch.
	p. 33, criterion 3.7	<p><i>“Fishermen donate a proportion of their catch for a positive contribution”</i></p> <p>The proportion used for restocking of the yellow and silver eel catches should be higher. The proportion of the glass eel catch to be used for restocking is 60% whilst the level for silver and yellow eel fisheries is set here at only 10% even though the standard acknowledges the importance of the contribution of yellow and silver eels to the spawning stock. See also the comments on Criteria and components scoring.</p>	We have sought consistency between the two types of fishermen. If one was required to donate 10% and the other 60%, we’d never get agreement. 10% is a consistent and reasonable amount for both to donate as a bonus score.
	p. 33, criterion 3.2	<p><i>“There is good progress with the Eel Management Plan for the river or District”</i></p> <p>Good progress with the Eel management plan is not an indication of good progress in the eel stock. Unfortunately, eel management plans that have been fully implemented do not show the anticipated effect.</p>	As described above, we have removed overall progress with an EMP.
	p. 35, criterion 4.3	<p><i>“Buyers source at least 90% of their eels from certified suppliers”</i></p> <p>Why is this criterion included or not set at 100%? This enables certified buyers to have non-certified eel.</p>	As described above, we are seeking a transition towards 100%.

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	p. 36, criterion 4.7	<i>"The required percentage of glass eels is being used for restocking"</i> Rules or a protocol should be set up to avoid selection of slow growers and/or weaker individuals used for restocking.	We specify this elsewhere, but have included here, too, that the fish for restocking should be representative of those held.
	Criteria and components scoring	<i>Organisations not achieving a 50% Responsibility score will be recorded as achieving an Aspiring level</i> The MSC standard requires a minimum score of 80 on all criteria to be able to have the MSC label. A score between 60-80 requires improvement for the next assessment (in 5 years). If this is not achieved, the assessment will be withdrawn. Only when a score of 80 or higher is attained a fishery gets certified and is allowed to have the MSC label on their products. Even though MSC is a different standard, it can very well be used to compare the two standards. The SEG 50% responsibility score is much lower compared to MSC requirements. Only meeting 50% means that half of the criteria must be attained at a responsible level to be able to be certified as responsible. The standard would be greatly improved if the aspiring level would be attained at 60-80% and a score of 80% would lead to a responsible level and thus certification. This would increase the credibility of the standard and the positive impact it might have on the eel stock. Apart from the 'core' criteria it is also unclear how the remaining criteria contribute to the 50%, particularly under Component 3 - Yellow and silver eel fishing. As far as we understand, a fishery organisation who does not receive a 'responsible' because it is far from the escapement target, or well implemented management plan, would still be able to get a certificate, because the fishers are licensed and the fishery doesn't have impact on the benthos. Or because they donate 10% of the catch to a restocking program. That would be a far too easy way to get a 'responsible' certificate. E.g. where a fishery is far from the Bbest target, contributing 10% to restocking would not really be a demonstration of <i>'positive contribution'</i> . Also, the benthos-indicator is quite obvious for a demersal fishery, but does not apply to eel fishery. It would only make sense to award a certificate if the core requirement relating to that sector is fulfilled, i.e. for fisheries there should be a link to the escapement target and management effectiveness. The remaining criteria are supplemental.	<p>The SEG standard is relatively new and immature compared to MSC, and much of the eel sector – especially fishing, has not developed or adapted yet to higher standards. To encourage those into the certification system, to be recognised as responsible, we must set it at a level that is high, but achievable. Otherwise, many will see it as impossible and will turn their back on responsibility and certification – having the opposite effect to the aim of the standard.</p> <p>We will keep the scoring system under constant review – the intention is to increase standards over time.</p> <p>MSC sets its standards at a higher 'Sustainable' level.</p> <p>We will review and clarify these. We don't believe it will be 'easy' to achieve certification (as it currently isn't), because in those other indicators, they would still need to achieve relatively high standards, compared to c</p>
	Criteria and components	<i>Not achieving the responsible level would rate the assessed party as aspiring until the responsible level is achieved.</i>	It will remain as 'aspiring'. We will make it clear that this category has no status. As such, it doesn't matter how long or how many

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	scoring	Will in this case the party be classified as 'in assessment' or is the assessment withdrawn? How will this be communicated to the public and how many times will re-assessments take place until the responsible level is achieved? As it is set up now, every party seeking for certification will reach the aspiring level and a party cannot 'fail' to meet the standard and will be in assessment.	times the they are 'in assessment' because there is no certificate and it has no status.
	General comment	As we understand now, having a 'sustainable', 'responsible' or 'aspiring' escapement level in a catchment or eel management unit is not a criterion or core component in the standard for a producer to be able to have a responsible or aspiring level of certification. This means that if a producer is meeting the requirements for a responsible level, he/she will get certified even though he/she might be fishing in an area where the escapement level is defined 'aspiring' by SEG or even lower. This producer should not be able to get certified. The eel stock in that area is not recovering nor at a sustainable level. See also Criteria and components scoring.	This has been weighted to reflect the importance of this criterion. The 'Aspiring' level is still relatively high and a number of existing fisheries are unlikely to achieve it.
	General comment	The ICES advice for the eel stock of reducing anthropogenic mortality to as close to zero as possible is not followed by this standard. Anthropogenic mortality of eels will even be increased in some areas by certifying fisheries where there were no fisheries before or when fishing would be banned (definition 1 of positive contribution).	We do consider that advice – a positive contribution to the stock is to reverse the effect of anthropogenic mortality – whether through the commercial sector or via corporate mitigation & conservation projects. We don't believe there will be any new fisheries - all possible fisheries have previously been exploited, and as demand for certified sources increases (1) practices will improve (with less mortality and wastage) and (2) we believe that fishing in uncertified (poorly performing) fisheries will become uneconomic and naturally decline.
	General comment	Who will be responsible for monitoring the fisheries on their positive contribution to the eel stock in a certain area? Data on fisheries statistics and stock status etc are not available for most areas. Including the impact of barriers and hydropower stations. Indicating that activities from certified producers will have a positive contribution is a difficult task. What will happen when a producer is meeting all the criteria from the standard but the positive contribution cannot be showed? Will the certification be withdrawn?	The data will be used, where available from the local fishery authority, the EMP competent authority and ICES reports. If the criteria are met, then the certificate will be issued as a 'positive contribution' will be assumed.
Peter Wood UK Glass Eels peterwood@glasseel.com		I see some of the revisions coming though in the last iteration of the standard. I would like you to consider if anonymous contributions should make any contribution to the standard. The process starts to lack transparency and accountability.	The anonymous comments were from a known person, a Professor in his field – he just didn't want to be named publicly. Given his background and the quality of comments provided, we were happy to use them, and to be transparent about publishing the comments.

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		<p>There are still some areas that require further work and rather spend 6 hours on a further document may be best to discuss.</p> <ol style="list-style-type: none"> 1) If you exclude Spanish processors from the standard it conflicts with the ideas of Brundtland, this market is not going to go away. It is an important part of the market. It is an outlet for low cost black economy fish to be placed on the market to make it impossible for responsible processors to trade. Responsible traders should have the same opportunities to supply glass eels as processed eels. 2) The understanding of disease control and what and how it can be done is still a long way from development. 3) Welfare. While contributors were talking about the 5 freedoms European Food standard Agency has already published a paper on the welfare of farmed eels. 4) Though SEG now recognises there are exacting standards for the transport of live vertebrates I do not think the message has sunk in that exacting standards do not permit an allowance for injured glass eels in a contract. Transport distances, tachograph limits and working time directives are being broken as a matter of routine for long transports. 5) Understanding of medicine regulations and recording. 6) Though some persons seemed to have some knowledge on slaughter of farmed animals nobody seemed to be aware of Species-specific welfare aspects of the main systems of stunning and killing of farmed Eels (<i>Anguilla Anguilla</i>) [1] published by European Food Standards Agency. 	<p>Spanish Processors are not excluded. We just make the sensible point that it is not good use of the stock. Processors can be assessed under Component 7 – Wholesale & Retail Supplies.</p> <p>At our meeting on 4 January we discussed a number of improvements to develop this area further. After our meeting you provided helpful links that we are considering. We have already included EFSA guidelines on slaughter (see below)</p> <p>(1) We will be developing a 'Transport Standard' and (2) when published, we would expect Responsible participants (and especially holders of the Standard) to write contracts that are compliant with the law and the Standard.</p> <p>Our meeting and follow-up has helped to resolve this.</p> <p>We have included the following in the standard: 'Slaughter Methods: The European Food Standards Agency describes that eels should be stunned using electric or pervasive stunning before killing. That best advice and practice is applied here'.</p>
<p>Ingvild Harkes WWF Netherlands iharkes@wwf.nl</p>	General	<p>At this stage, WNF does not support commercial eel fisheries nor eel culture and therefore WNF does not support the SEG standard. Reason for this is the fact that a sustainable fishing level can only be achieved when the stock has recovered, which is not the case for the European eel. The approaches of the SEG standard are based on the economic considerations (eel exploitation) rather than biological/ecological arguments. The ICES advice to reduce anthropogenic mortality as close to zero as possible is not the starting point of the SEG standard.</p> <p>We do welcome the adapted terminology: Sustainably fishery now defined as a 'responsible' fishery provided it has a net benefit to the eel stock. However, considering the further details we are still not convinced that a certificate holder demonstrates 'responsibility'. A producer (e.g. fisheries) can be certified as 'responsible' if only 50% of</p>	<p>Your position is noted. We acknowledge and respect your views on this complex and controversial matter, and hope that we each feel at least better informed and respectful of each other's views. We recognise that it is a very challenging concept to consider that commercial exploitation of a species classified by IUCN as 'critically endangered' is justifiable. However, even IUCN states that '<i>Well regulated trade can contribute positively to the conservation of some threatened species, and may be essential for human livelihoods</i>'. We are seeking to provide the best standards for a well regulated trade.</p> <p>ICES advice is to reduce anthropogenic to as close to zero as possible, but in giving this advice, ICES has not made use of best available information, and did not consider the efforts made under the European Eel Regulation. That is: ICES advice to protect but</p>

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		the indicators reach the level of 'responsible'. The essential indicators that refer to stock recovery (Bo and Bbest) should at least be at the 'responsible' level if a producer should be allowed a certificate.	does not consider the effect of protective action. The EU, the recipient of ICES advice, doesn't interpret the advice as stopping all eel fishing. So, the SEG Standard seeks to support the EU Regulation by supporting only well regulated, high standards of fishing and trading. And indeed, we believe it is possible for the sector to have a positive contribution to the eel stock – and have a positive rather than negative anthropogenic impact.
	General	The approach lacks a strong quantified evaluation procedure – what are the indicators and methodology to measure the effect of the approach? Comment on the previous version, still not included in the current version.	We identify measures for each stage of the process in Section 13 – these will be attained by the independent assessor and via measures collected by SEG, ICES, Traffick and others. The ultimate outcome – stock size, will also be measured as reported by ICES.
	General	<p>'Net Benefit' has now been formulated as 'positive contribution'. However, the way 'positive contribution' is described is not convincing:</p> <p>Definition 1: Associated with a 'Responsible' Level of compliance. <i>SEG standard compliant activities, e.g. fishing, make a positive contribution to eel populations compared to there being no eel sector – e.g. to there being no legal fishing.</i></p> <p>This is rather confusing. Does this mean that as long as the fishing is legal, it is regarded a 'positive contribution'? This is also suggested in the indicators under</p> <p><i>Criterion 3.3: The fishery is well-managed</i></p> <ul style="list-style-type: none"> <i>Fishers are licensed. At least 90% provide catch and effort data</i> <i>Data on catch and effort are collected and analysed regularly by the fishery authority (at least annually at the end of the season)</i> <p>Being a licensed fishery where data and effort are collected is not exactly equivalent to a 'positive contribution'. We realise that eel fishery management can improve substantially with regard to registration and data collection. However, this is merely a pre-requisite for recovery measures. They cannot be considered as recovery measures in itself.</p>	<p>We have clarified the definition further, so thank you for the feedback.</p> <p>We are saying that a SEG standard certified sector makes a positive contribution to the stock overall – i.e. without a well regulated commercial sector, operating to best practice, eel populations would be worse off overall.</p> <p>For example, in 2017, the commercial sector in the Netherlands helped to translocate 7480 kg of silver eels 'Over the Dyke' to the sea to migrate.</p> <p>Agreed, but we seek and set a series of tests of whether the fishery is operating responsibly or not.</p> <p>We would be pleased to receive other suggestions on how to test this.</p>
	General	To base the approach on a broad and generic definition focused on sustainable resource use by Brundtland, is foregoing all the detailed and available science on eel biology and advice to reach recovery that is present. The Brundtland quote underlies the Convention on Biodiversity which also supports the precautionary approach, which, particularly in the case of a critically endangered stock, should be the point of departure.	The approach isn't just based on Brundtland, it is primarily based on the EU Eel Regulation. But regarding Brundtland, different organisations will have different views on the importance and balance of the 3 Brundtland principles. A purist conservation organisation will naturally desire the environmental principles to take priority and is likely to consider the socio-economic arguments are favoured, whilst a fisherman, seeking to make a living, will wish to see the policy in favour of his socio-economics,

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			and be less aware of the environmental aspects. In formulating this standard we are seeking a balance between those opposed views and seeking a balance between the anthropogenic factors that are affecting the eel. Just closing all fisheries would not be effective as other mortalities and poor access to habitat would remain.
	7	<p>Escapement targets are now related to ICES (Bbest and B0). However, challenging the escapement target will not help the process of recovery, particularly as there is no scientific backing of these statements. The adapted targets for the goals of responsibility are more realistic for the party looking for certification, however they are even further away from a sustainable level since Bbest is in many member states only a fraction of B0. Therefore the 'aspiring level' as described is far away from a sustainable level/40% of B0.</p> <p>Further, we notice that eel fishing is not acknowledged as a main factor to eel mortality.</p>	<p>We are not challenging the current 40% B0 targets, but adapting them to meet 'responsible' levels on the route to sustainability. We believe we need to set targets that are realistic and achievable. If they are not, few will feel it is worthwhile seeking SEG certification, and so most of the sector will turn away from it and revert to previous and irresponsible practices, which will be much more damaging. We need to open the door and let people in, then gradually increase standards and targets over time, having convinced them that a responsible start and sustainable future are possible.</p> <p>It was GFF's suggestion to adopt Bbest, so we have suggested reasonably high proportions of Bbest as reasonable targets. Across Europe, some catchments will achieve these targets and some won't.</p> <p>These targets may or may not be adopted by ICES / EU over time as they consider new targets. We'll be very happy to adopt those new targets once agreed. At present we believe our thinking to be more advanced than just 40% of B0, and are interim, as a stepwise approach to 40% of B0.</p> <p>We list all forms of anthropogenic impacts in section 5.1 to include 'overexploitation'. That whole paragraph is replicated from the ICES WGEEL report 2017.</p>
	8	The measurement area is not defined in the standard. It is for example not defined on which scale a fishery must have a positive contribution to the eel stock to be able to have a 'responsible' level of compliance. It is still very unclear which part of the standard refers to the impact on the entire eel stock and where it refers to the eel stock in a catchment area.	<p>The measurement area is the smallest fishery or catchment area where there are reliable data, otherwise the default is the EU 'Eel Management Unit'. In some states, though there is good information at a more local level, and we (or rather the assessor) will apply that where it is available. For example, in France, the EMU is the whole of France – though data is available for many catchment areas. Also in the UK, EMUs can be large catchments or a series of smaller catchments – yet there may be good data for some smaller catchments.</p> <p>This is helpful feedback and we have clarified it under 'Unit of Fishery' In component 2 in the standard.</p>

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	40	The rules and procedures do not include a protocol to actively include stakeholder to provide input or objections.	We have not included this because (1) it would slow down decision making, (2) it is not a requirement of the ISEAL process, (3) assessments and decision making will be independent of SEG or anyone with any commercial interest and (4) all reports will be published and open to public scrutiny – we have nothing to hide. The procedure will be for the independent Certification Body to award or decline certificates based on assessment. Where outcomes are marginal, they will be referred to the independent Standard Panel for review. We will keep this under review for future revisions of the standard.
Zoological Society of London via Matthew.Gollock@zsl.org		<p>Just a quick note to say that unfortunately we're not going to be able to engage further in the consultation – the timing of the window so close to Xmas and other commitments meant that we can't meaningfully address the responses to our input or review the updated standard.</p> <p>That said, I have been asked to make two over-arching comments on behalf of ZSL:</p> <ul style="list-style-type: none"> • We have concerns that changing 'sustainable' to 'responsible' doesn't fully address the problem – it is replacing one term open to interpretation with another. At the very least, we think the definition under section 5.5 could be improved – throughout the document the term 'responsibility' is used, but here it is 'responsibly sourced', which isn't the same thing. 'Well managed' and 'handled' are also incredibly vague. The definition seems overly focused on fisheries, even though the standard applies equally to eel farms and retailers. Given that this is the text that will be referred to as how SEG define 'responsible', we feel it needs more work. • Further, and relating to the point above, the uneven focus on certain elements of the supply chain – as we highlighted in a number of our comments on the previous draft – means that in our opinion the standard is not fully fit for purpose. The ethos must be embedded from source to sale – the consumer needs to be able to buy, if they wish, fully informed of what a product with the standard attached means, and at present, we don't feel the mechanisms to ensure this are in place. Our previous comments in relation to this are responded to, acknowledging that this needs addressed, but with no firm action to remedy the issue. 	<p>We adopted this term after feedback from you and others that the term Sustainable was not suitable. We have aimed to make the term 'Responsible' as clear (scientifically) and as plain English as possible, however, with your feedback, we have reviewed and sought to clarify further.</p> <p>Some of these terms – e.g. well handled, are used to describe practices in general, plain English, and we then go on to define in detail what is meant by 'well handled' in the more technically worded criteria. We have, though, sought to clarify these terms further as far as we can.</p> <p>We believe the criteria are well and equally developed from fishing to retailer, with traceability the key all the way through to help give assurance to the consumer. We often describe e.g. fishing in preference to say eel buying or traceability in examples, as they are activities that the reader can more easily visualise and understand. We have, though, tried to redress the balance where possible.</p> <p>I have reviewed your previous comments and our response and can't pinpoint what you are referring to here. We have aimed to respond positively to as much as possible. Could you please advise so that we might be able to address it? Thank you.</p>

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		<p>We'll follow the progress of the standard review from other stakeholders in the new year.</p> <p>ZSL, 13/2/18:</p> <p>The previous comments we refer to relate to the fact that the focus of the standard is uneven.</p> <p>I've included a few of the previous comments (not exhaustive) that relate to where we felt there were important gaps – especially around the market and communication to sellers and customers - needed filling below:</p> <ul style="list-style-type: none"> • It should it be made clear that the standard is being given to those that are 'working towards sustainability' rather than providing a 'sustainable' product. If one of the aims of the standard is to 'provide confidence to retailers and consumers who wish to buy responsibly' there needs to be consistency. • Also, what is being done to ensure that consumers/restaurants are being done to be made aware of this; having quizzed a few restaurants that are selling eel, they are under the impression it is 'sustainable'. • Has there been an economic analysis of what the demand is, what proportion of the market needs to be sustainable to achieve this and by association, how much fishing there needs to be? If there is more fishing than demand within the EU – be it for consumption or stocking - then is this not unsustainable and/or potentially fueling illegal trade? • Has a customer survey been carried out to indicate that this is the case? I think it'd be important to do so if not. 	<p>We have provided the following definition which we believe clarifies this. The final phrase 'working towards sustainability' has been added:-</p> <p>'Responsibly sourced' means that those involved with the supply of eel have complied with the Code of Conduct for a Responsible Eel Sector. Further, it refers to 'Eel that is traceable as caught from a responsible fishery, is well managed and has been caught, handled and traded using the current best and most responsible practices, by organisations that are working towards sustainability.</p> <p>Marketing and awareness will start after this standard has been published.</p> <p>We have quite a good idea of the demand, for consumption and restocking in the EU, and the demand for certified product is likely to increase as awareness of its availability increases. We believe that this will lead to a corresponding decline in demand for uncertified product.</p> <p>There is already more fishing than demand in the EU as a result of the demand from Asia, and we are vigorously working with enforcement agencies and raising awareness of that.</p> <p>Not yet, as a whole, but those in the sector do understand their customers' requirements. This will be done as part of the marketing and awareness campaign after the new standard is published.</p>
Marine Stewardship Council		<ul style="list-style-type: none"> • Current indicator is that the stock is at 40% of B0. However, it is stated on page 9 that B0 is only in relation to silver eel. Technically, this would make it 40% SSB as glass and yellow are not considered in the biomass. (Consistency in terminology) 	<ul style="list-style-type: none"> • The stock is not at 40% of B0 – that is the EU Regulation target • SEG is focused on the international stock status – in parallel with the EU Eel Regulation, CITES, and others. A silver eel escapement of at least 40% is considered a necessary condition for an unimpaired next generation. To achieve that silver eel escapement, intermediate targets (e.g. in yellow eel abundance, but more importantly in anthropogenic mortalities) will need to be set. However, circumstances varying from area to area, there is no

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		<ul style="list-style-type: none"> • As 40% escapement is noted to be difficult to meet in different catchments, in the interim, achieving a high proportion (70%+) of Bbest is noted to be 'responsible', with Bbest being similar to B0 but based on recent recruitment. There will be considerable spatial heterogeneity, not to mention it is not clear whether there will be any scaling or comparison to B0 to help ensure that this is an appropriate target and is applied comparatively. • Indirect fishery impacts are not covered i.e. trophic considerations etc. • The terms 'low level' and 'negligible' are not defined and it is not explained how they differ from each other. The glossary section only has two definitions, so it would be nice to see this flushed out to a greater degree. • The bycatch and ETP requirements are vague. This relates to the comment on 'low level' versus 'negligible' and what these mean in the context of this standard. • Some of the identified targets and measures seem vague and/or weak. E.g. pg 20: The outcomes of those contributions will be monitored and measured so that a tangible impact on eel populations can be identified and best value from financial contributions achieved. E.g. pg 33: The amount (weight) and proportion (%) of yellow and silver eels caught from each certified and non-certified fisheries will be monitored. The proportion from certified fisheries increases from 0 % to 50% over the next 10 years. --- so 0% IMO isn't much of a target and doesn't seem very strategic if you will. • The components overlap to a degree, sometimes there is very little distinguishing performance between the indicator levels, and some requirements are asked multiple times, creating quite a bit of redundancy. May be worth restructuring the components to consolidate and make it more efficient to get to their aims. • The standard talks about restocking efforts, aquaculture and wild harvest. However, genetic implications do not seem to be discussed or 	<p>one-size-fits-all solution, and hence, no uniform internal indicators exist – it is only the recruitment intake, and silver eel output, that link local management to the common spawning process in the ocean.</p> <ul style="list-style-type: none"> • Yes, there will be differences in each country. Comparisons will be made over time and with help and input from ICES Eel scientists to help refine and improve the targets and measurements over time. Additionally, SEG will initiate a critical review of existing and potential indicators and consider results in a future review of the Standard. • We will consider this in a future review of the standard. However, noting the many habitat types occupied by eel, and the variation in climate (northern Scandinavia down to Mediterranean). Again, no one-size-fits-all solution will exist. • These are defined on P29 as follows: 'Negligible impacts' are defined as a low rate of by-catch plus a low rate of discard injury or mortality plus by-catch only from species which are abundant in the area. 'Low-level' impacts are where two of these criteria are met. In 'severe' impacts, none of the criteria may be met in full. • Noting your comments, these have been added to the glossary as well • See above • Yes, some of these are currently unknown, so we are unable to set a target, but we are saying that they will be monitored so that we understand them and can set targets in the future • This might have been lost in translation. Currently there are no yellow eel fisheries certified (0%). That is baseline, not a target. For 50% of all yellow eel fisheries to be certified in 10 years is very ambitious • Thank you for this feedback. Different components apply to different parts of the supply chain, so it is unlikely that a supplier will be asked the same question twice.

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		<p>covered in light of some of these activities. I think this is partly due to SEG considering this to be a panmictic stock but there are still concerns if hatcheries, aquaculture or even restocking can augment selection and behaviours.</p> <ul style="list-style-type: none"> • It is concerning that it is noted that this is a IUCN critically endangered species and that there is fishing of glass eels as this is an important life stage. <p>• The layout is quite difficult to follow especially as some components have more than the two primary indicators (aspiring and responsible) i.e. a few times there is a 'sustainable indicator'. A table at the beginning outlining the components and the levels at which they are assessed may help with clarity.</p> <ul style="list-style-type: none"> • We understand that SEG wants to include context for the issue, rationale and benefits in the standard but the format of this does make the standard feel clunky to read through in its current format. • Being that the reference points, "...are not yet matured or fully developed we will apply them as best available science and start testing their application." – It is not clear if this standard is it or if they plan to do a review every certain number of years, how they would handle changes in the requirements etc. 	<ul style="list-style-type: none"> • You are correct, which is why, e.g. Criterion 5.8 states that eels for restocking should not be selected from graded out slow growers – as this could have a genetic impact. <p>• We are following IUCN guidance which says 'Well regulated trade can contribute positively to the conservation of some threatened species and may be essential for human livelihoods'.</p> <ul style="list-style-type: none"> • The Eel Regulation allows for "the protection and sustainable use" of the eel stock. The SEG standard seeks to support that but in a responsible and well regulated way, to a higher standard than what is just legal. <ul style="list-style-type: none"> • Thank you for this valuable feedback which is the first we've had of this type, out of 30 replies. We will consider this in a future review • Thank you for this feedback which is the first we've had of this type, out of 30 replies. We will consider this in a future review <p>• If a significant change in legislation or target were to occur, we would review the standard immediately (we are sufficiently well informed to know ahead when these are coming). Otherwise we will review at least every 5 years. We have clarified this in Section 9, Continuous Improvement.</p>