



Sustainable
Eel Group

The SEG Standard Assurance System



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Versions Issued

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1.0	21 June 2013	Creation of Methodology
1.1	29 November 2016	Minor updates and corrections
2.0	4 July 2018	Substantial amendments following review and publication of new standard, 21 June 2018.
2.1	26 September 2018	Minor updates and corrections
2.2	15 January 2019	Minor update to Section 4. to refer to alleged transgressions in advance of certification

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1. Introduction

1.1. Purpose

This document describes the Assurance system for the Sustainable Eel Group ([SEG standard](#)).

The Assurance system defines the procedures by which Compliance Assessment Bodies (CABs) shall conduct SEG audits and by which certificates shall be issued to clients. Additionally, this system describes the procedures to be implemented in instances of issues or concerns are raised to SEG or SEG certification bodies.

1.2. Applicability and responsibility

This system is for SEG use and the use of SEG certification bodies and their auditors. It is published on our website in the page [SEG Standard System](#) on our website: www.sustainableeelgroup.org for transparency. Those using and applying it are responsible for ensuring they use the latest version.

1.3. The Sustainable Eel Group - our purpose

The European eel population has declined significantly and is now classified by the IUCN as ‘critically endangered’. It was once very common and widely spread across its range from North Africa, through Europe and up to Scandinavia, and supported fishing, associated trade and livelihoods.

The reduced population is a risk to the species itself, wildlife and ecosystems and the socio-economics of communities that fish for, trade in and eat eel.

Our primary purpose is for the recovery of the European eel, with multiple concurrent benefits to habitats, communities, traditions and economies that rely on it.

Our work and strategies are designed to support the recovery of the European eel, and the European Commission’s ‘Eel Regulation’ (Council Regulation (EC) No 1100/2007). This primary objective of this Regulation is, as described in Article 1, ‘the protection and sustainable use of the stock of European eel’.

The SEG standard, one of our principal strategies, has been developed and designed as a code of conduct for best practice in the commercial eel sector, to support the recovery of the European eel and the to meet the objectives of the Eel Regulation. This Assurance system describes the rules and procedures to be applied to support the effective working of the SEG standard.

2. Audit procedures

2.1 Initial certification audit

Prior to initiating an audit the client must enter a binding legal agreement with the CAB. The agreement shall include:

- 2.1.1 the scope, timing and cost of the audit;
- 2.1.2 requirements for the client to ensure that there are no outstanding payments relating to certification
- 2.1.3 requirements for the client to provide data and information required by the Monitoring and Evaluation System;

- 2.1.4 commitments by the CAB to treat data confidentially and securely and to adhere to the [SEG Data Security Policy](#);
- 2.1.5 acknowledgement that data and audit outcomes will be shared openly with SEG and that SEG will issue a publicly available report based on the relevant components of Section 2.6., though SEG will adhere to the SEG Data Security Policy; and
- 2.1.6 the CAB shall apply data quality control processes to ensure that audit reports are accurate

An on-site audit will be required for the initial certification of all clients. This will consist of the following:

- 2.1.7 Pre-audit agreement. Prior to audit, the client and CAB will discuss and identify what components of the standard are included in the scope of the audit. The client shall be asked to outline its process from start to end. The client must be made aware that the certification body must have access to all records held by the client in order to be able to verify their findings.
- 2.1.8 Tour of operation. The certification body shall complete a full audit of the client's operation, including tours of farms and/or observing fishing activities, subject to the sampling requirements identified in Section 2.5.
- 2.1.9 Discussion and assessment against standard. The certification body shall assess the client against the standard. The certification body shall collect evidence at every stage. Certification bodies may provide clients with information that would improve their operations, however, this information must be documented in the audit report and it must be clear to the client that the information is not normative and that they can choose the path of improvements that best suits their organisation.
- 2.1.10 Final meeting. Final discussion and initial findings.

Following the completion of an initial certification audit the certification body shall complete a draft report describing the client's performance against each of the requirements for the component(s) against which they have been assessed. The report will make a recommendation on certification (against each of the components that have been assessed). The draft assessment report will first be sent to the client for comment. Should the client not comment within two weeks of the report being sent, the CAB shall produce the final report with no further amendments.

Within 60 days (an extension can be agreed between the CAB and client in extenuating circumstances) of the last day of the on-site portion of the audit, the final report (incorporating any clarifications agreed through the process of review with the client) shall then be sent to the CAB's decision making entity, who has the authority to award the certificate under contract agreement with SEG. Final reports which result in certification shall be forwarded to SEG for publication on their website.

A register of assessed clients will be maintained in the SEG website. Certificates and assessment reports will also be published, linked to that register, to provide full transparency and be open to public scrutiny. Commercially confidential information in assessment reports may be removed or redacted.

2.2 Surveillance audit

A certified client shall be required to follow a set surveillance audit program as determined by a risk assessment process completed by the certification body at the completion of each audit. This risk assessment shall be implemented by the completion of the following scoring table:

Question	Performance of Client at Audit	Yes	No
1	Has the client been part of any external investigation which may be of concern to SEG AND/OR been suspended from any other certification standard?	Enhanced Surveillance	Go to Q2
2	Has the client received a borderline pass ¹ for a Component in its previous audit?	Enhanced Surveillance	Go to Q3
3	Does the client only buy and sell product (does not physically handle it?)	Minimum Surveillance	Go to Q4
4	All other scenarios	Standard Surveillance	

The relevant audit frequencies are provided in the table below:

	Certification Audit	Year 1	Year 2	Year 3	Year 4 Recertification Audit
Minimum Surveillance	On-Site Audit	No audit	Remote Audit	No audit	On-Site Audit
Standard Surveillance	On-Site Audit	No Audit	On-Site Audit	No Audit	On-Site Audit
Enhanced Surveillance	On-Site Audit	On-Site Audit	On-Site Audit	On-Site Audit	On-Site Audit

Certified clients will be sent a reminder that a surveillance audit is due a minimum of two (2) months before the anniversary date of the audit. It is then the certified client's responsibility to book and organise the audit. Audits can be advanced or delayed by up to 3 months of the anniversary date. Should this not occur, the certificate of the organisation will be cancelled, unless the organisation can demonstrate extenuating circumstances and also provide a suitable time-frame for the completion of the audit.

A remote audit shall consist of a desk-based study. The client shall be asked to provide documentation showing the system in place. Should the documentation provided not be satisfactory then an on-site audit may be required. Audit reports for remote audits are due within 60 days of the date that documentation is due to be delivered to the certification body.

¹ A borderline pass, under versions 1.0 to 5.0 of the standard, was considered a pass when one less amber indicator is received then would be required to fail (i.e. 5 green indicators and 4 amber indicators) or when a client is certified with equal number of amber and green indicators.

The procedures for an on-site surveillance audit are the same as for the initial certification audit.

2.3 Audit intensity

The duration of the audit will be determined by the CAB and will be a minimum of one day (total time including report writing) and is not likely to be more than five days. Audit intensity will be based on an evaluation of:

- the type of business,
- the size of business,
- the number of facilities or fishermen to be sampled, if applicable,
- audit type (initial audits will likely have a higher level of intensity versus surveillance audits); and
- whether the audit is on-site versus remote; and
- in a surveillance or re-certification audit, the outcomes of the previous audit(s).

2.4 Audit scope

Organisations seeking to become certified against the standard must be assessed against component 1 of the SEG Standard. There are no exceptions to this requirement. Should the client not achieve a score of at least 50% for component 1 then certification will not be approved until such time as this component is met.

As documented within the SEG standard, additional components will be included in the audit scope dependent on the client's business activities. For example, a client that both fishes for glass eels and cultures them would need to pass both component 2 – Glass Eel Fishing and component 5 – Eel Farming.

2.5 Audit sampling

In instances where the client seeking certification is a consortium of fishermen then the auditor shall select a random sample according to the table below. In surveillance audits, the auditor shall first select fishermen who were not sampled in previous audits.

Audit sample size

Number of Fishermen	Minimum Number of Fishermen observed during audit
1	1
2-4	2
5-9	3
10-16	4
15-25	5
26-36	6
37-49	7
50+	Square root rounded up

The auditor shall increase the sample size in situations where there is a high degree of inconsistency in the sample of fishermen observed.

2.6 Report content and publication

Audit reports shall be written using the SEG template and must contain the following information:

1. unit of certification (geographic location, fishing method, life-stage, eligible fishers)
2. list of fishermen assessed;
3. audit methodology;
4. audit schedule;
5. audit intensity and rationale;
6. audit scope;
7. objective evidence used to verify a client's performance for each of the criteria for the component(s) against which they have been assessed;
8. client's performance against each of the criteria for the component(s) against which they have been assessed;
9. auditor's finding for each of the criteria for the component against which they have been assessed;
10. the percentage responsibility score and recommendation on certification (against each of the components that have been assessed); and
11. risk assessment and surveillance audit schedule.

The report findings for the client's performance should contain content of sufficient quantity and quality of information that an outside reader can verify that the client's performance is in conformance with the SEG standard.

All current audit reports of SEG certificate holders will be published on the SEG website (and for up to a year after expiry of the certificate). Commercial or sensitive information may be removed or redacted after agreement between SEG and the client.

2.7 Scoring

Clients will be evaluated in a two part process.

Firstly, auditors will evaluate each criteria for the component(s) within the audit scope. For each criteria where a Responsible Indicator and an Aspiring Indicator is given, the auditor will assign a finding of 'Responsible', 'Aspiring', or 'Not in conformance'. For each criteria where just a Responsible Indicator is given, the auditor will assign a finding of 'Responsible' or 'Not in conformance'.

Secondly, the score of each criteria will be tallied according to the finding and the weighting to provide a Percentage Responsibility Score for each component. A Percentage Responsibility Score must be tallied for each component within the audit scope.

Calculation of the Percentage Responsibility Score is summarized in the table below.

Sample percentage responsibility score calculation.

Criterion ²	Auditor's Finding	Weighting	Total Score
2.1	Responsible	2	2
2.2	Aspiring	2	0
2.3	Responsible	1	1
2.4	Responsible	2	2
2.5	Responsible	1	1
2.6	Responsible	1	1
2.7	Aspiring	1	0
2.8	Responsible	1	1
2.9	Responsible	1	1
Total Score:			9
Total Possible Score			12
Percentage Responsibility Score:			75%

2.8 Audit outcomes

A finding of 'not in conformance' for any criterion in the audit scope will result in a failure to achieve or maintain certification.

A Percentage Responsibility Score of 50% or greater for component 1 will result in the issuance of a certification.

A Percentage Responsibility Score of 50% or greater for any additional component within the audit scope will result in the issuance of the addition of that component to the scope of the certification.

A Percentage Responsibility Score of less than 50% for any component within the audit scope will be recorded as having achieved an Aspiring level. The client will be invited to implement an improvement plan for re-assessment and will be required to demonstrate improvements in order to achieve the Responsible level and certification.

If a component is evaluated as Aspiring or Not In Conformance the client may choose to re-submit evidence of conformance to a sub-set of criteria within the component at any time within two years after the findings of Aspiring or Non-Conformance were issued in order to have the CAB re-evaluate the scoring and Percentage Responsibility Score. After two years have passed the client must re-submit evidence to all

² include all criteria in scope of audit.

criteria of the component for assessment in order to have the CAB re-evaluate the scoring and Percentage Responsibility Score.

2.9 Continuous Improvement

Clients not yet achieving a 80% Percentage Responsibility Score will be required to make improvements to achieve a higher score by their next recertification audit. If they show no improvement after two attempts, they will revert to the Aspiring status and will no longer be considered certified.

3. Certification procedures

SEG Certification means that a client has:

- Achieved the standard, and passed the requirements for the components of the standard relevant to that business;
- demonstrated responsible practices to make a positive contribution to the recovery of the European eel population;
- is trading in responsibly sourced, SEG certified eel; and
- contributed to an Eel Stewardship Fund (ESF) according to the ESF agreement, as agreed by the ESA membership in order to meet the standard criteria, and as part of making a positive contribution to the eel population.

3.1 Issuing certificates

Certificates will be issued by the certification body and shall include the following details:

- The client's name and address
- The components that the client is certified against (the audit scope)
- The certificate number
- The issue date
- The expiry date (four years after the issue date)
- Date of next surveillance audit
- Signature of an appropriate signatory of the issuing certification body

3.2 Conditions of certificates

The certificate will last for a maximum of four years but may be withdrawn at any time should evidence become available to demonstrate the client is no longer meeting the standard (i.e. if a client were to receive a finding of not in conformance in a subsequent audit).

The client will be sent a copy of the certificate, conditions for its use, and improvements expected by the next audit.

Certificates are not transferable between clients. So, when a certified client merges with, acquires or is acquired by another company, the certificate cannot be transferred to the new client(s).

The certificate alone does not show, and shall not be used to give the impression, that any individual batch of eel or eel product is SEG certified. Certified products shall have relevant batch labelling to denote to enable assurance of traceability in the chain of custody.

The client may show their certificate to customers to show that they have passed the general requirements of the relevant section of the standard. Clients should also show them the terms and conditions of use.

3.2 Publication of certificates

All current and expired certificates will be published on the SEG website.

3.3 Suspension and cancellation of certificates

Certificates (or the relevant components of the certificate) will be suspended by the certification body under the following circumstances:

- a finding of not in conformance or a percentage responsibility score of less than 50% in any component is the outcome of a surveillance audit or investigation conducted under Section 4;
- not meeting the terms and conditions of certification

Certificates will be cancelled by the CAB under the following circumstances:

- a surveillance audit is not completed (i.e. the final report written and submitted to SEG for posting on the SEG website) within three (3) months of its anniversary date; or
- the conditions for certification are not met during a recertification audit.

The CAB must notify SEG of a change in the status of a certificate and SEG shall update the Register of certificates accordingly.

4. Transgressions and investigations

4.1 Investigations

In all cases, concerns or issues raised by stakeholders regarding the activities of an existing or potential SEG standard certificate holder, shall be investigated by the CAB that issued their certification. Any concerns raised first to SEG (or that SEG becomes aware of through media reports or otherwise) will be delegated to the CAB to investigate. SEG accredited CABs are required to have open, transparent issues resolution policies to address such issues. Only in situations where a party feels that a concern or issue is not satisfactorily addressed should the concern or issue be raised to SEG directly.

It is noted that in the competitive world of business, allegations can be made vindictively by rivals. At the same time, the credibility and reputation of the SEG standard must be maintained. All concerns or issues raised to SEG or a SEG CAB will be taken seriously and will be investigated sensitively and carefully.

If the client is found to be guilty of the allegations, the certificate may be withdrawn for periods between 3 months and 2 years, depending on the severity of the transgression, any mitigating circumstances, and the with reference to the timescales in Component 1.1 of the SEG standard.

Interested parties are encouraged to report suspected transgressions by contacting the SEG standard system owner at: standard@sustainableeelgroup.org. SEG will then require the CAB to investigate. All reports will be treated sensitively and in confidence.

4.2 SEG investigation procedure

This is described in more detail in document [208 Investigation Procedure](#).

SEG will initiate these procedures in the following instances:

- A stakeholder does not feel the issue or concern they raised was adequately dealt with by the CAB;
- A CAB raises an issue of fraudulent, illegal or suspicious behaviour of a client to SEG.

Investigation Procedures:

1. SEG standard panel chair receives report or information of alleged transgression
2. SEG standard panel chair seeks to verify the report via independent sources, such as police and local enforcement authorities, to understand if the report is credible. Depending on the seriousness of the alleged breach, it may be deemed necessary to suspend the client's certificate whilst the investigation is carried out.
3. Allegations are presented to the client, and the client asked to provide an explanation and their version of events in writing. Clients will be advised that there is a possibility of suspension of the certificate if a fuller investigation is to be carried out. An on-site audit may be conducted to verify the claims. All costs will be borne by SEG, until an outcome is reached in step 6.
4. If those initial enquiries suggest there is no case to answer, there will be no further action – no suspension and no further investigation.
5. If, on the balance of probability, it is concluded that there is a case to answer, the certificate will be suspended, pending the outcome of further investigations. The suspension will be stopped if and when credible evidence is presented that reverses the balance of probability of guilt.
Note: suspension does not mean revocation of a certificate. It is temporary, pending the outcome of further investigations. If found not guilty, the suspension will be lifted and the certificate immediately re-instated.
6. If the client is found guilty of the allegations and result in the scoring of any component to result in the certification to be revoked, the certificate will be revoked for a commensurate period and the client will be charged the costs of the investigation. After that period, the client can seek re-assessment for a new certificate. Note the timescales in Component 1 will apply.
7. If the transgression is an offence under statutory legislation, SEG will have the responsibility to report it to the relevant enforcement authority.
8. Investigating alleged breaches of the standard shall be undertaken with great care and balanced objectivity. Clients shall be considered innocent until proven guilty. The balance of probability test will be applied.

5. Review

The SEG Assurance system will be reviewed every five years or as needed based on feedback during implementation or through the SEG standard monitoring and evaluation system. Reviews will aim at ensuring that the system is sound, adequate and effective. It will take account of:

1. Results of CAB, auditor and SEG personnel training;
2. Insights gathered from CAB review reports, CAB audit reports and shadow audits;

3. Outcomes of label and claims monitoring activities;
4. Insights gathered from the SEG standard monitoring and evaluation system;
5. Any input received from stakeholders.

SEG will provide notification of changes within thirty days of making a change to the following SEG stakeholders:

1. SEG registered and accredited CABs;
2. SEG personnel;
3. SEG standard panel members.

Notification will include, minimally:

1. the original requirement;
2. the revised requirement; and
3. the timeline for implementation of the new/revised requirement.

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