



Sustainable  
*Eel* Group

# The SEG Standard V6.0a

## Guidance Note 1

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## 1. Purpose

This is a minor revision to provide guidance, interpretation and clarification of certain contents of the [SEG Standard](#), version 6.0, published June 2018.

It addresses areas of uncertainty and ambiguity experienced by each clients and the assessor (Compliance Assessment Body [CAB]) during assessments since application of the updated standard in June 2018.

The revisions are provided here as Version 6.0a as the **current working version of the standard**, which is provided within this current document. These revisions will be built into Version 6.1 following consultation on these and other proposed changes.

## 2. Revisions

The following revisions are made, to include a rationale and explanation for the changes. The changes are then incorporated into the Standard in the document below.

### 1.1 Legality

The indicator definitions under Criterion 1.1 require revision following consultation. Changes have been made to the [SEG Standard Assurance System](#) and the [Investigation Procedure](#) to indicate that where an organisation has outstanding legal action being taken by enforcement authorities, the issue of a SEG Certificate would normally be suspended, pending the outcome of that court case.

### 2.1 'Organisation'

#### Revision

The term 'organisation' is to be used in place of the terms 'facility' or 'farm' with the **changes indicated highlighted in blue** in the standard below in the following criteria:

**1.3    5.7**

#### Definition

A precise definition for 'organisation' is not easy and the following is a guide for the CAB to interpret:

*An organisation would normally be a single business or legal entity, or a more than one entity where they are in co-ownership. The term is to include assets of the organisation – i.e. employees, associates and equipment.*

The Assessor should consider the association of other companies. The scope of the organisation must be defined in advance of the assessment. The organisation must be a legal entity (or entities). It should include any supply chain (upstream and downstream) under co-ownership.

## Rationale

The standard was written on the basis that the majority of organisations or companies trading eel are small and single site operations. There are however a number of larger organisations that have multiple sites, locations or facilities and adoption of the existing term caused misinterpretation or confusion.

For example:

1. Traceability is important across the whole organisation to be transparent and credible. It is not sufficient to have good traceability records at just one site of several.
2. A whole organisation might meet the target for % of eels used for restocking, whilst a single site (farm) might not.

## 2.2 Segregation

### Revision

New criteria are provided for the segregation of SEG certified and non-certified eels at buyers holding facilities and at farms. **Changes are indicated highlighted in blue** in the standard below in the following criteria:

**1.4    4.0    5.0**

### Rationale

Ideally, we require that traders and farms keep certified and non-certified stock separate to give assurance of traceability to responsibly fished eel. However, we acknowledge that (1) there aren't currently adequate supplies of certified eel for organisations to source 100% certified eel and (2) not all organisations have the facilities to keep all batches separate.

As the sector transitions towards being 90% SEG certified by 2029, the standard must be able to recognise non-ideal but acceptable practices as part of that transition.

In the responsible indicator, there is complete separation of SEG certified and non-certified eels throughout the farm, from entry to exit.

If certified and non-certified (SEG) fish are mixed the assessor may apply methods using auditable records that no more than the same percentage of certified eels were output as were input. Where mixing of stock occurs (1) the organisation must apply mass-balance calculations to show that it does not sell more certified product than it sourced (a formula of 2800 eels per 1kg of glass eels will be applied) and (2) where mixing occurs, the lesser 'aspiring' assessment score can only be applied.

Note that this is a transitional and time-limited arrangement to enable the sector to adapt to a greater proportion of SEG-certified eel becoming available.

## 2.3 Minor revisions

See also minor amendments at: **2.8**

## The Standard

Each component of the standard is described in more detail in this section. Guidance notes are provided for the use of clients and assessors where supplementary explanation or clarification may be required.

### Component 1 – Generic requirements

#### Criterion 1.1: Commitment to legality

<b>Issues</b>	<p>Illegal trade (trafficking) has increased in recent years. Although export out of the EU has been banned, demand from Asia has encouraged an illegal market (trafficking) equal in size to 50 – 150% of the reported legal glass eel catch in recent years (<a href="#">reference</a>).</p> <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 commercial activity is carried out in full compliance with the law and in full transparency.</p> <p>The requirements in this component of the standard must be met by any organisation wishing to be certified against any other part of this standard, regardless of the specific nature of its activity.</p>
<b>Notes</b>	<p>Several authorities monitor the illegal trade so we are able to get an estimate of the extent of trafficking. We publish reports on the <a href="#">SEG website</a>.</p> <p>Where an organisation has outstanding legal action being taken by enforcement authorities, the issue of a SEG Certificate would normally be suspended, pending the outcome of that court case. See the SEG <a href="#">Investigation Procedure</a> for more guidance.</p>
<b>Benefits</b>	<ul style="list-style-type: none"> <li>• Discourages and reduces illegal practices and trading</li> <li>• Increased commitment to sustainable recovery of the European eel</li> </ul>
<b>Rationale</b>	<p>By encouraging a responsible market via the SEG standard, illegal practices will be discouraged and phased out.</p>
<b>Targets &amp; Measures</b>	<ul style="list-style-type: none"> <li>• The illegal trade (measured as the unaccountable reported catch in Europe) reduces by 10% per year over the next 10 years.</li> <li>• In 10 years (2028) the level of illegal trade has reduced by 75%</li> </ul>
<b>Responsible indicators</b>	<p>For at least the past two years: the organisation has not been found guilty for any offences relating to eel fishing or trading.</p>
<b>Aspiring indicators</b>	<p>For at least the past 12 months: the organisation has not been found guilty for any offences relating to eel fishing or trading.</p>

#### Criterion 1.2: Contribution to Eel Conservation Projects. (Optional bonus score) **The intention is for this to be mandatory from summer 2020.**

<b>Issues</b>	<p>The destruction of eel habitat and the implementation of thousands of weirs, sluices, barriers, abstractions, pumps and hydropower schemes have progressively reduced the eel's range in freshwaters since the start of the industrial revolution. To undo that will cost billions, take decades and require enormous political will.</p> <p>The costs are being borne to some degree via legislation and Eel Management Plans to require companies and countries to undo the damage caused by their actions.</p> <p>Eel conservation projects are those such as habitat restoration, eel passes, removal of barriers and screening of pumps to mitigate for the degradation caused.</p>
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<b>Notes</b>	<p>Organisations are invited to make financial contributions to eel conservation projects as a positive contribution to aid the eel's recovery, particularly if or where it is challenging to demonstrate a positive contribution elsewhere (e.g. eel farms for consumption and wholesalers / retailers).</p> <p><a href="#">Eel Stewardship Funds</a> (ESFs) have been set up and are convenient mechanisms for companies, organisations or individuals to make financial contributions to eel conservation projects and a hence a positive contribution for the eel.</p> <p>See also Component 8.</p>
<b>Benefits</b>	<ul style="list-style-type: none"> <li>Increased investment on eel and environmental improvement projects to increase eel escapement</li> </ul>
<b>Rationale</b>	By increasing financial contributions, more work targeted at eel conservation, protection and improvement can be undertaken to speed up the journey to the eel's recovery and sustainability
<b>Targets &amp; Measures</b>	<ul style="list-style-type: none"> <li>The number of businesses and the total financial contributions will be measured. Existing ESFs raise approximately €1M per year. An aspirational target is to double that in 5 years and to reach €3M in 10 years</li> <li>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</li> </ul>
<b>Responsible indicators</b>	The organisation donates at least 2% of its profits or at least 20% of its corporate responsibility programme to projects that make a positive contribution to eel conservation or population enhancement, such as Eel Stewardship Funds, River Restoration projects, conservation and education projects.
<b>Aspiring indicators</b>	The organisation donates 1 – 1.99% of its profits or 10 - 20% of its corporate responsibility programme to projects that make a positive contribution to eel conservation or population enhancement, such as Eel Stewardship Funds, River Restoration projects, conservation and education projects.

### Criterion 1.3: The **organisation facility** trades in certified responsibly sourced eel

<b>Issues</b>	<p>In previous versions, the standard could be achieved by demonstrating the procedures and processes to have the <u>ability</u> to trade in certified eel. This caused some confusion as it made it difficult for traders to know who was holding certified product. This standard intends to give assurance and clarity that those who are certified are achieving the high standards expected, <u>and have supply of certified responsibly sourced eel</u>, traceable back to the fishery.</p> <p>Some commentators have indicated that allowing suppliers to have both certified and uncertified eel could allow some to mix those supplies and present uncertified eels as certified. We recognise that risk, but 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. The higher indicator is achieved if the operator trades in a majority of certified eel.</p> <p>We intend to transition to certified suppliers handling 100% certified eel over the next 10 years. We need to give a reasonable amount of time for a sufficient supply of certified eel to be available, and for businesses to adjust to the change.</p>
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<b>Benefits</b>	<ul style="list-style-type: none"> <li>• Improved clarity over the meaning of the standard</li> <li>• Increased take-up of the standard</li> <li>• Increased market share for certified eel</li> </ul>
<b>Rationale</b>	With the focus on supplies rather than just processes, we anticipate greater demand for certified sources, bringing an increasing proportion of businesses seeking the responsible route on the journey to sustainability
<b>Targets &amp; Measures</b>	<ul style="list-style-type: none"> <li>• The number of businesses achieving the standard increases by 20% per year, over the next 10 years, from 17 now, to 60 in 2029</li> <li>• The proportion (by percentage weight) of the market that is from certified responsible sources increases by 15% per year, from 5% now to 75% in 2029</li> </ul>
<b>Responsible indicators</b>	The <b>facility organisation</b> trades in at least 50% (by number) of certified responsibly sourced eel and has the documentation to demonstrate that.
<b>Aspiring indicators</b>	The <b>facility organisation</b> trades in 10 – 49.9% (by number) of certified responsibly sourced eel and has the documentation to demonstrate that.

### Criterion 1.4: Traceability

<b>Issues</b>	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 standard to show that the product they are buying is what it is claimed to be, i.e. from certified responsible 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 and those certified.
<b>Notes</b>	<p><b>If the client has demonstrated Traceability via another standard, that evidence can be used here</b></p> <p><b><i>Incoming Product</i></b> The client will need to have full traceability and provide access to the certificates of all suppliers with whom they deal, to prove to the auditor that they are certified. These will need to be backed up by incoming invoices from these suppliers showing the purchase of product.</p> <p><b><i>Separation and Segregation</i></b> Certified and non-certified stock should be segregated to give greater assurance of traceability. Where it is unavoidable, for a time-limited period, mass balance calculations must be applied to show that no greater numbers of certified eels left the organisation than entered.</p> <p><b><i>Outgoing Product</i></b> It is a requirement that all products that wish to be labelled as meeting the standard also carry the relevant documentation. Organisations will need to use batch-coding (see section <a href="#">12.3</a>) to identify products as certified on labels or invoices. Invoices will also need to have the quantity of certified product. This code needs to link clearly to the certified product (so if non-certified product is also included on the invoice, it is clear that this product is not included). It is not required that end-consumers are provided with an invoice meeting these requirements but they should receive documentation (receipt and product packaging)</p>

	<p>showing that the product is certified. Records will still need to be kept regarding the quantities sold to end consumers.</p> <p><b>Record Keeping and Documentation</b></p> <p>The key to traceability is good record-keeping. Organisations will need to be able to provide records that allow for the tracking of product throughout their ownership. They will also be required to show 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 that glass eels shrink during storage (they aren't fed), 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><b>Tele-declaration systems</b></p> <p>New IT technology has been implemented in parts of France, and is being trialled in the UK, for fishermen to record their catches on a tele-declaration system, and for buyers to record what they have bought and sold. This provides a more efficient method for fishermen, buyers and fisheries authorities to record catches. It also provides a mechanism to improve traceability, by providing a more robust and real-time account of who has handled what quantity of glass eels and when. We believe that responsible operators will wish to use these new systems.</p>
<b>Benefits</b>	<ul style="list-style-type: none"> <li>• Assurance to customers that they are purchasing genuine certified product</li> <li>• Credibility of the standard</li> <li>• Increased market share of certified responsibly sourced eel</li> <li>• Increasing traceability through the supply chain leading to a reduction in illegal exports</li> </ul>
<b>Rationale</b>	Traceability, auditable good record keeping, trust and honesty are core to the standard working. A minority are likely to abuse the system, but, through audits and reporting, they will find themselves excluded.
<b>Targets &amp; Measures</b>	<ul style="list-style-type: none"> <li>• Auditors report a high confidence (90%+) in the quality of records of a high proportion (90%+) of those assessed</li> <li>• All those handling certified eel are using batch-coding to label the product and do so correctly</li> <li>• Reports of transgressions are handled promptly and fairly</li> <li>• Increasing proportion of fishermen and buyers use a tele-declaration system</li> </ul>

#### 1.4.1: Traceability - Incoming product, separation and segregation

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• Certified and uncertified eel products can be clearly and easily traced back to their source.</li> <li>• Where a fishery or buyer, an electronic tele-declaration system is used</li> <li>• It operates a clear system which ensures that the product remains separated at all stages from arrival to dispatch from non-certified eel products.</li> <li>• The organisation ensures that any products wishing to make a claim as certified do not contain any non-certified eel-based ingredients.</li> </ul>
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	<ul style="list-style-type: none"> <li>• If resolved through mass- or number- balance calculations, the margin of error does not exceed 2%</li> </ul>
<b>Aspiring indicators</b>	<ul style="list-style-type: none"> <li>• Certified and uncertified eel products can be traced back to their source.</li> <li>• If segregation is not possible, there are clear and auditable records of the numbers of certified and uncertified eels entering the organisation at each facility</li> <li>• It can demonstrate through auditable records that the number of certified eels exiting the organisation in a year did not exceed the number that entered</li> <li>• If resolved through mass- or number- balance calculations, the margin of error does not exceed 5% or if a farm, the 2800 pieces per 1 kg of glass eels is applied.</li> </ul>

### 1.4.2: Traceability - Outgoing product

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• Where a fishery or buyer, an electronic tele-declaration system is used</li> <li>• Documentation is well maintained with a maximum of 2% error in the following: <ul style="list-style-type: none"> <li>• The organisation correctly uses batch-coding for labelling certified product, which can be on the packaging for the product, or included in the documentation (e.g. invoice) with the assignment</li> </ul> </li> <li>• All product to be sold as certified by an organisation is accompanied by an invoice which meets the following criteria: <ul style="list-style-type: none"> <li>- Includes an appropriate batch code</li> <li>- Includes a record of the quantity (no. &amp; weight) of product and to whom it was sold</li> </ul> </li> </ul>
<b>Aspiring indicators</b>	<ul style="list-style-type: none"> <li>• Documentation is well maintained. If resolved through mass- or number- balance calculations, the margin of error does not exceed 5% in the following (or if a farm, the 2800 pieces per 1 kg of glass eels is applied): <ul style="list-style-type: none"> <li>• The organisation correctly uses batch-coding for labelling certified product, which can be on the packaging for the product, or included in the documentation (e.g. invoice) with the assignment</li> </ul> </li> <li>• All products to be sold as certified by an organisation are accompanied by an invoice which meets the following criteria: <ul style="list-style-type: none"> <li>- Includes an appropriate batch code</li> <li>- Includes a record of the quantity (no. &amp; weight) of product and to whom it was sold</li> </ul> </li> </ul>

### 1.4.3: Traceability - Record keeping and documentation

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• The organisation operates a system that allows the tracking and tracing of all eel from purchase to sale and including any steps in between. In the case of live eels this should include the ability to track each batch delivered to a buyer to be connected back to a water, a time period (maximum duration one month) and specific fisherman/vessel</li> <li>• If a fisherman or buyer, a tele-declaration system is used to report catches and trade</li> <li>• The organisation operates a system that also allows for the completion of a batch reconciliation of eel product by weight over a given period.</li> <li>• The organisation maintains records for a minimum of three (3) years.</li> </ul>
<b>Aspiring indicators</b>	<p>The above requirements are met except that:</p> <ul style="list-style-type: none"> <li>• Records have been maintained for less than three (3) years</li> <li>• If a fisherman or trader, a tele-declaration system is planned to be used to report catches and trade in the next season</li> </ul>



**Criterion 1.5: Biosecurity & welfare – Eel and eel products are provided with minimal risk of diseases, parasites and alien species**

<p><b>Issues</b></p>	<p>Transporting live fish carries with it the real risk of transporting other organisms, and therefore the risk of spreading disease and invasive species, whether into the wild or into an eel farm, with disastrous consequences for the environment or the business. Examples include the parasites such as the swim-bladder nematode, <i>Anguillicola crassus</i>, viruses such as EVEX (Eel Virus European X) <i>Herpesvirus anguillae</i> and alien species such as the invasive shrimp, <i>Dikerogammarus villosus</i>. However, unlike e.g. salmon, there are no ‘notifiable diseases’ for the eel.</p> <p>Certified eel farmers and traders should not buy and resell infected eels. A certified eel trader must be responsible for the health status of the eels sold for stocking purposes. At processors, the preparation of food requires a fully documented hygiene system to ensure food is fit for human consumption.</p> <p>Fishers usually operate in the same river or estuary. They need only disinfect equipment between fishing in different catchments, to avoid the possibility of spreading organisms between rivers.</p>
<p><b>Notes</b></p>	<p>Good biosecurity is important for any business, and this standard is intended to provide assurance, that the supply chain applies high standards and with minimal risk of spreading disease and alien species. <b>However, whilst the standard can help to minimise risk of spread, it cannot eradicate or prevent the spread of these organisms.</b></p> <p>Sweden has introduced quarantine procedures to significantly decrease the risk of introducing diseases.</p>
<p><b>Benefits</b></p>	<ul style="list-style-type: none"> <li>• Minimises the risk of the spread of diseases and alien species</li> <li>• Assurance to customers that certified eels have a high likelihood of being disease and alien species-free</li> </ul>
<p><b>Rationale</b></p>	<p>By requiring all sections of the supply chain to seek assurances on the bio-security of those they purchase from, and applying their own high bio-security standards, this will maximise, though not guarantee. the safety and security of products from source to end supply.</p>
<p><b>Targets &amp; Measures</b></p>	<ul style="list-style-type: none"> <li>• All suppliers have high quality, effective, bio-security plans</li> <li>• All customers provide and seek evidence of bio-security before buying</li> <li>• There are no, or very rare (&lt;1%), examples of a disease or alien species associated with a batch of certified eel</li> </ul>

**Eel Fishing: Biosecurity measures are adopted**

<p><b>Responsible indicators</b></p>	<ul style="list-style-type: none"> <li>• The fishery conducts good biosecurity measures such as the disinfection and drying of nets and equipment between each fishing in different waters. OR:</li> <li>• The fishermen only operate in the same river or estuary, with no risk of transferring diseases or alien species between catchments</li> </ul>
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**Eel buying & trading: Biosecurity is present and disease is treated rapidly and appropriately**

<p><b>Responsible indicators</b></p>	<ul style="list-style-type: none"> <li>• The use of chemicals follows legal requirements of the appropriate EU regulations and of the country concerned.</li> <li>• The facility has the appropriate permissions to operate from the relevant licensing authority</li> </ul>
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	<ul style="list-style-type: none"> <li>• An effective and documented biosecurity plan is in place and there is evidence that it is being followed.</li> <li>• Records are available showing regular monitoring of health and possible signs of stress according to the facility’s plan (including the completion of microscope parasite checks) and daily mortality is recorded.</li> <li>• Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility.</li> </ul>
<b>Aspiring indicators</b>	<ul style="list-style-type: none"> <li>• The use of chemicals follows legal requirements of the appropriate EU regulations and of the country concerned.</li> <li>• The facility has the appropriate permissions to operate from the relevant authority</li> <li>• An effective and documented biosecurity plan is in place and there is evidence that it is being followed.</li> <li>• Eels are regularly monitored for health and possible signs of stress (although this might not be documented) and daily mortality is recorded.</li> <li>• Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility.</li> </ul>
<b>Eel farming: Biosecurity is present and disease is treated rapidly and appropriately</b>	
<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• The facility has the appropriate permissions to operate from the relevant authority.</li> <li>• The use of chemicals follows legal requirements of the EU and of the country concerned</li> <li>• An effective and documented biosecurity plan is in place and there is evidence that it is being followed.</li> <li>• Daily records are available showing monitoring of fish health and signs of stress and daily mortality is recorded</li> <li>• Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility</li> <li>• UV is used at an appropriate level and separation between tanks</li> </ul>
<b>Aspiring indicators</b>	<ul style="list-style-type: none"> <li>• The facility has the appropriate permissions to operate from the relevant licensing authority</li> <li>• The use of chemicals follows legal requirements of the EU and of the country concerned.</li> <li>• An effective and documented biosecurity plan is in place and there is evidence that it is being followed.</li> <li>• Eels are regularly inspected for disease (although this may not be documented) and daily mortality is recorded.</li> <li>• Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility.</li> </ul>
<b>Restocking: The risk of restocked eels introducing disease into wild populations has been assessed and is minimal</b>	
<b>Responsible indicators</b>	Eels are tested before restocking and found to be free of disease AND/OR eels are from a known source which is tested on at least an annual basis and known to be free of disease.
<b>Aspiring indicators</b>	Eels are tested before restocking when first sourced from a new area, and periodically (at least annually) thereafter to ensure they are free from disease.
<b>Wholesale / Retail / Processing: Hygiene Plans are followed and there are rare examples of infection</b>	
<b>Responsible indicators</b>	Food processing hygiene plans are followed

## Component 2 - Glass eel fishing

### Issues

#### **Size of market**

Glass eel fishing forms by far the greatest portion of the overall catch of eels (by number). Catches are about 60 tonnes per year in recent years (180 million glass eels). Commercial fishing is from a relatively small number of estuaries (25 - 30) on the west coasts of Morocco, Portugal, Spain, France and the UK where there are local concentrations of glass eels. There is little or no glass eel fishing in the hundreds of other estuaries around Europe. This standard is designed to demonstrate a positive contribution from those that are fished.

#### **Sustainable, responsible and acceptable fisheries**

A discussion about what constitutes a responsible or acceptable fishery, and therefore able to provide a positive contribution, is provided in Sections 5. and 6. above. In summary: a 'Sustainable' fishery, is one where the river is meeting the long term 40% of B0 target. If / where they exist, double-scoring for 'Responsibility' is given. A responsible fishery is one meeting the 70% of Bbest target. An 'acceptable' fishery, is one where the escapement targets are not being met due to short-term anthropogenic impacts, where there are short and longer term measures or plans to overcome that impact, and where a crop of glass eels is recognised by the local fisheries authority to be making a positive contribution to eel stocks as an 'emergency measure', pending those anthropogenic impacts being resolved (an example is the Arzal fishery described in Section 6). 'Aspiring' fisheries are such 'Acceptable' fisheries, or where between 40% and 70% of Bbest is being met (see also Section 5.4).

#### **Traceability – sale to certified buyers**

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. It is illegal to sell eels for export outside of the EU. To aid traceability and increase assurance of a traceable supply chain, it is preferable (but not mandatory) that certified fisheries only sell to certified buyers. Other mechanisms such as tele-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.

#### **Fishery data**

Good fishery data are important to enable effective fisheries management by local, national and European fishing authorities.

#### **Survival & eating glass eels**

It is obviously important to maximise welfare and survival for glass eels to then maximise their contribution. There will inevitably be some mortalities and those can be kept, frozen and supplied for an albeit diminishing market in eating 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. Whilst SEG feels that direct consumption of glass eels is poor use of the stock and does not provide a positive contribution, we do recognise that (1) it is a traditional (social & economic) activity and (2) as long as these come from the 'consumption quota', this form of consumption has no more impact than similar numbers going into aquaculture.

## Notes

### ***Unit of fishery***

Fisheries can be assessed at a range of size of 'units', from individual fishermen, through groups, co-operatives, to a whole estuary to the Eel Management Unit (or District) on which Eel Management Plans are based. The default unit will be the Eel Management Unit unless there are good data or information available at a smaller catchment level.

Smaller units, eg. a single fisherman, brings individual responsibility but greater cost per fisher (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. Contract agreements / conditions of use will be provided so that individuals and collectives understand their responsibilities.

Where assessment for individuals is prohibitively expensive, collaboration to bring groups together is encouraged to conduct multiple single assessments.

### ***Progress with Eel Management Plans***

In assessing progress of an eel management plan (EMP), the assessor will seek evidence from the relevant agencies to identify whether the fishery or applicant fishermen have made credible progress with the majority of management actions. For an Aspiring score, over 50% of actions must be in place or achieving good progress. For a Responsible score the minimum is 75%.

Note also that for countries where the EU Regulation does not apply, a similar standard that is at least the equivalent of that set out in the EU Regulation and is based on the implementation of an eel management plan approved by an international scientific committee.

### ***Eel Management District***

The Eel Management Districts described in Criteria 2.2 and 3.2 are the smallest level of catchment at which silver eel escapement targets have been set. Depending on the country, these may be individual rivers, groups of catchments (river basins) or, in some cases, whole countries.

### ***Mortality rates during fishing for glass eels***

It would be more straightforward to have only a direct statement about the mortality rate, but in developing this standard, stakeholders were concerned that: i) the mortality rate is variable e.g. over the season; ii) the mortality rate is difficult to measure because eels may look fine but have invisible injuries that subsequently cause mortality outside the specified timeframe and iii) it would be relatively easy for fishermen to 'put on a good show' for inspectors in this regard (for example, poor physical condition can be masked by raising salinity of the tank water with salt to between 10 and 16 ppt). Therefore, we have chosen to include a series of criteria about the fishing method, such that the standard requires fishermen to use techniques that are known by the industry to result in low mortality rates. These are also in line with the French '[Good Practice Guide for Glass Eel Fishing & Restocking](#)'.

### ***Mortality rates in glass eel fishery and in storage***

The quality and survival of glass eels caught depends on the combination of the following parameters:

1. The gear used. Hand operated dip or scoop nets are the most gentle, but are less efficient than boats. When using boats, scoop nets or trawls ('pibalours' in France) might be used. When these are used the quality of glass eels depends on:
  2. The speed of the vessel
  3. The duration of the trawl
  4. The configuration of the net
  5. The handling and storage of the fish, e.g. the use of vivier tanks

In France, the following criteria are described for different categories of fishing in their [Good Fishing Practice Guide](#)

Criteria	Methods	Category 1	Category 2	Category 3
Estuarine environment	a. Open	X	X	
	a. Not open			X
	b. Turbid		X	X
	b. Clear	X		X
Gear used	Net Ø 1.20m	X	X	X
	Pibalour		X	X
Power of vessels	< 100hp	X	X	X
	> 100hp			X
Ratio between filtered and flowing volume	Low	X	X	
	High			X

For the purposes of this standard, Category 1 equates to a Responsible level of fishing and Category 2 to Aspiring.

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 – e.g. 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) 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.

Carmin indigo dye can be used to identify damage to glass eels. There is a protocol developed in France to use this dye to sample batches of glass eels to assess the damage after fishing and the likely mortality. This is another potential method to objectively assess fishing damage and mortality.

### ***Design of net for glass eel fishing***

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 and/or refer to the France Good Fishing Practice Guide.

### ***Vivier tank***

This is a tank for holding live fish with systems to replenish water and monitor and maintain water quality standards appropriate to the fish species and life stage. Best practice specifications of a design for a Vivier tank are being developed.

### ***By-catch in glass eel fisheries***

In order to evaluate impacts of the fishery on by-catch over a fishing season, the assessor will require evidence which will include:

- Species represented in the by-catch
- A quantitative or qualitative evaluation of the quantity of each species caught over a given period (e.g. 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)
- Protocols or methods for dealing with by-catch
- The actual or likely discard survival

Some species are of course an acceptable by-catch, assuming fished according to regulations.

‘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.

Infrequent but large catches of gelatinous zooplankton in glass eel nets during bloom periods may be excluded from these criteria.

### ***Mortality during first week in culture***

It was agreed between glass eel buyers and eel farmers represented in a stakeholder group in 2011 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.

### ***Good data***

Good data are defined as those that can be used for statistical analysis within accepted scientific limits.

### ***Quotas and Sustainable Yield***

	Given the size, range and diversity of the stock of the European eel, it is not yet possible to properly set overall Total Allowable Catch, Sustainable Yield or Catch Quotas, though it may be possible in individual fisheries where data are reliable. Fisheries scientists have applied quotas to regulate fishing catches in France.
<b>Benefits</b>	<ul style="list-style-type: none"> <li>• Glass eels are fished from a place where they can provide a positive contribution</li> <li>• Survival is maximised</li> <li>• Impact on the environment / other species is minimal</li> <li>• Good fishery data enable effective fisheries management</li> <li>• Glass eels are sold to SEG certified buyers to meet the demand for responsibly sourced fish</li> </ul>
<b>Rationale</b>	The rationale is described for each of these above
<b>Targets &amp; Measures</b>	<ul style="list-style-type: none"> <li>• The amount (weight) and proportion (%) of glass eels caught from each certified and non-certified fisheries will be monitored. The proportion from certified fisheries increases from 5% to 90% over the next 10 years.</li> <li>• Survival rates will be monitored and targets set to seek a continuous improvement in survival. Current overall rates are not known, but long term targets are a minimum of 95%</li> <li>• Fishery authorities will develop increasing confidence in fishery data, including catch per unit of effort, to make fisheries management decisions</li> <li>• The unaccountable &amp; probable sale to illegal exports to be measured through mass-balance analysis of catch-declaration systems, to support the target for illegal trade in Component 1, i.e. In 10 years (2028), the level of illegal trade has reduced by 75%</li> </ul>

### Criterion 2.1: Eel fishing is in a catchment that is meeting its escapement targets

#### Weighting: 2

<b>Sustainable Indicator</b> (worth 2 x Responsible Indicator score)	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.
<b>Responsible indicators</b>	There are good data which show to the satisfaction of the fisheries authority that at least 70% of the Bbest target for silver eel escapement is being met in the river or eel management district.
<b>Aspiring indicators</b>	Eel fishing is in a place accepted by the fishery authority as providing a positive contribution to the eel stock or, the river or RBD is meeting 40% - <70% of the Bbest target.

### Criterion 2.2: There is good progress with the applicant's responsibilities in the Eel Management Plan for the river or District

#### Weighting: 2

<b>Responsible indicators</b>	There is credible progress with at least 75% of the actions relating to the fishery for the implementation of the Eel Management Plan for the river or eel management district.
<b>Aspiring indicators</b>	There is credible progress with at least 50% of the actions relating to the fishery for the implementation of the Eel Management Plan for the river or eel management district.

### Criterion 2.3: The fishery is well-managed

#### Weighting: 1

<b>Responsible indicators</b>	<ul style="list-style-type: none"><li>• Fishers are licensed and provide catch and effort data via a tele-declaration system.</li><li>• Data on catch and effort are collected and analysed regularly by the fishery authority (at least annually at the end of the season).</li><li>• There is a data set for at least the last 5 years that is considered by the fishery authority to be accurate, useful for statistical purposes and provide a comprehensive picture of the glass eel fishery under assessment.</li><li>• Enforcement is in place throughout the fishing area and there is no evidence of systematic non-compliance.</li></ul>
<b>Aspiring indicators</b>	<ul style="list-style-type: none"><li>• Fishers are licensed and provide catch and effort data.</li><li>• Data on catch and effort are collected and analysed regularly by the fishery authority (at least annually at the end of the season).</li><li>• There is a data set for at least the last 3 years that is considered by the fishery authority to be accurate and provide enough information on the glass eel fishery under assessment for management and to track annual trends in glass eel arrival.</li><li>• There is no evidence of systematic non-compliance.</li></ul>

### Criterion 2.4: Mortality during fishing is minimised

#### Weighting: 2

<b>Responsible indicators</b>	<ul style="list-style-type: none"><li>• Fishing is by hand-held nets and has effective nearby holding facilities OR</li><li>• Fishing from vessels meets the following criteria:<ul style="list-style-type: none"><li>i) fishing is at slow speed (no more than 1 knot relative to water);</li><li>ii) haul duration is on average no longer than 20 minutes, with the maximum duration not more than 30 minutes;</li><li>iii) mesh size of cod end no greater than 1mm;</li><li>iv) rest of the net designed such that glass eels do not become trapped or abraded;</li><li>v) vivier tank on board and in use</li><li>vi) fishermen maintain accurate daily records of mortality. OR</li></ul></li><li>• Fishermen can demonstrate that the mortality rate of the catch over the duration of holding in the storage facility is less than 4% for each batch captured. OR</li><li>• Fishing methods (in France) meet the criteria in Category 1 of the France Good Practice Guide OR</li><li>• The Carmin Indigo or similar test indicates that mortality averages less than 4%</li></ul>
<b>Aspiring indicators</b>	<ul style="list-style-type: none"><li>• Fishing from vessels meets the following criteria:<ul style="list-style-type: none"><li>i) fishing is at slow speed (no more than 1.5 knots relative to water);</li><li>ii) maximum haul duration no longer than 30 minutes;</li><li>iii) mesh size of cod end no greater than 1mm;</li><li>iv) rest of the net designed such that glass eels do not become trapped or abraded;</li><li>v) vivier tank on board and in use;</li><li>vi) fishermen maintain accurate daily records of mortality. OR</li></ul></li><li>• Fishermen can demonstrate that the mortality rate of the catch over the duration of holding in the storage facility is between 4% and 8% for each batch captured. OR</li><li>• Fishing methods (in France) meet the criteria in Category 2 of the France Good Practice Guide OR</li></ul>



- The Carmin Indigo or similar test indicates that mortality averages between 4% and 8%

### Criterion 2.5: The fishery has negligible impacts on by-catch species

**Weighting: 1**

- Responsible indicators**
- The fishery has a negligible impact on by-catch
  - By-catch is returned to the water alive as gently and rapidly as possible.

- Aspiring indicators**
- The fishery has low-level impacts on by-catch
  - By-catch is returned to the water alive as gently and rapidly as possible.

### Criterion 2.6: The fishery has negligible impacts on rare or other protected species

**Weighting: 1**

**Responsible indicators** The fishery has no direct interactions resulting in mortality or injuries with other species that are considered vulnerable, threatened, endangered or are protected under national or international law.

**Aspiring indicators** Interactions, resulting in mortality or injury, with other species that are considered vulnerable, threatened, endangered, or are protected under national or international law, are rare and have no overall measurable impact on the population.

### Criterion 2.7: The fishery has negligible impacts on habitats

**Weighting: 1**

**Responsible indicators** The fishing gear does not cause any damage to the benthos.

**Aspiring indicators** Damage to the benthos by gear is limited or minimal.

### Criterion 2.8: Transport

**Weighting: 1**

- Responsible indicators**
- The operator holds the relevant transport authorisations
  - There is a Transport Plan in place to minimise travel time – this meets the Transport requirements for vertebrates
  - Packing is done in a way that minimises handling, time and stress
  - Eels are kept cool and wet with an adequate supply of oxygen

### Criterion 2.9: Bonus Score: Fishermen donate a proportion of their catch for a local positive contribution

**Weighting: 1**

**Responsible indicators** Fishermen have donated an average of at least 5% of their catch in the past 2 years to local stocking programmes, e.g. translocating over barriers to aid upstream migration and recruitment in the catchment, or have credible plans in place to do so next season (note that this is separate from any planned restocking to meet the 60% target).

## Component 3 - Yellow and silver eel fishing

**Issues** Yellow and silver eel fisheries have greatly reduced in the past 10 years – in part because of the reduction in eel populations making it less viable, and in part because many countries' fishery authorities closed or reduced fishing as part of their Eel Management Plans. Where this fishing continues, we seek for them to become certified.

<b>Notes</b>	<p><b>Eating wild yellow and silver eels</b></p> <p>Yellow and silver eels are maturing eels. Those in the wild have survived the period of greatest mortality and are adapted to life in the environment. These fish are those that have the greatest opportunity to survive to migrate to the Sargasso to spawn. This is why many Eel Management Plans have stopped or reduced yellow and silver eel fishing. Like glass eels, the standard is designed to only support fishing where the River or District is meeting the escapement target and/or other criteria.</p> <p><b>Fishing methods</b></p> <p>In a future version of the standard we expect to be able to specify greater detail on differences between fishing methods and other parameters relevant to yellow and silver eel fishing.</p> <p>Many notes, e.g. Unit of Fishery, Definition of a sustainable fishery, Good data, are the same as for Glass eel fishing, above, and for brevity, are not repeated here.</p>
<b>Benefits</b>	<ul style="list-style-type: none"> <li>• Impact on the environment / other species is minimal</li> <li>• Good fishery data enable effective fisheries management</li> </ul>
<b>Rationale</b>	Where yellow and silver eel fishing exists, we wish to enable it to become and show itself to be responsible via the SEG standard
<b>Targets &amp; Measures</b>	<ul style="list-style-type: none"> <li>• 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</li> <li>• Fishery authorities will develop increasing confidence in fishery data to make fisheries management decisions</li> </ul>

### Criterion 3.1: Eel fishing is in a catchment that is meeting its escapement targets

**Weighting: 2**

<b>Sustainable Indicator</b> (worth 2 x Responsible Indicator score)	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.
<b>Responsible indicators</b>	There are good data which show to the satisfaction of the fisheries authority that 70% of the Bbest target for silver eel escapement is being met in the river or eel management district.
<b>Aspiring indicators</b>	Eel fishing is in a place accepted by the fishery authority as providing a positive contribution to the eel stock or, the river or RBD is meeting 40% - <75% of the Bbest target.

### Criterion 3.2: There is good progress with the applicant's responsibilities in the Eel Management Plan for the river or District

**Weighting: 2**

<b>Responsible indicators</b>	There is credible progress with at least 75% of the actions relating to the fishery for the implementation of the Eel Management Plan for the river or eel management district.
<b>Aspiring indicators</b>	There is credible progress with at least 50% of the actions relating to the fishery for the implementation of the Eel Management Plan for the river or eel management district.

### Criterion 3.3: The fishery is well-managed

#### Weighting: 1

<b>Responsible indicators</b>	<ul style="list-style-type: none"><li>• Fishers are licensed. At least 90% provide catch and effort data</li><li>• Data on catch and effort are collected and analysed regularly by the fishery authority (at least annually at the end of the season)</li><li>• There is a data set for at least the last 5 years that is considered by the fishery authority to be accurate, useful for statistical purposes and provide a comprehensive picture of the glass eel fishery under assessment</li><li>• Enforcement is in place throughout the fishing area with good evidence of high levels of compliance with fishing regulations.</li></ul>
<b>Aspiring indicators</b>	<ul style="list-style-type: none"><li>• Fishers are licensed. At least 75% provide catch and effort data</li><li>• Data on catch and effort are collected and analysed regularly by the fishery authority (at least every 2 years)</li><li>• There is a data set for at least the last 3 years that is considered by the fishery authority to be accurate and provide enough information on the glass eel fishery under assessment for management and to track annual trends in glass eel arrival</li><li>• There is good evidence of high levels of compliance with fishing regulations.</li></ul>

### Criterion 3.4: The fishery has negligible impacts on by-catch species

#### Weighting: 1

<b>Responsible indicators</b>	<ul style="list-style-type: none"><li>• The fishery has a negligible impact on by-catch</li><li>• By-catch is returned to the water alive as gently and rapidly as possible</li><li>• Dead by-catch is landed and recorded and utilised appropriately where possible</li><li>• The fisheries show initiatives to reduce the amount of dead by-catch</li></ul>
<b>Aspiring indicators</b>	<ul style="list-style-type: none"><li>• The fishery has low-level impacts on by-catch</li><li>• By-catch is returned to the water alive as gently and rapidly as possible.</li></ul>

### Criterion 3.5: The fishery has negligible impacts on rare or other protected species

#### Weighting: 1

<b>Responsible indicators</b>	The fishery has no direct interactions resulting in mortality or injury with other species that are considered vulnerable, threatened, endangered or are protected under national or international law.
<b>Aspiring indicators</b>	Interactions, resulting in mortality or injury, with other species that are considered vulnerable, threatened, endangered or are protected under national or international law, are rare and have no overall measurable impact on the population.

### Criterion 3.6: The fishery has negligible impacts on habitats

#### Weighting: 1

<b>Responsible indicators</b>	The fishing gear does not cause any damage to the benthos.
<b>Aspiring indicators</b>	Damage to the benthos by gear is limited or unusual.

### Criterion 3.7: Bonus score: Fishermen donate a proportion of their catch for a positive contribution

#### Weighting: 1

<b>Responsible indicators</b>	Fishermen have donated an average of at least 5% of their catch in the past 2 years to local stocking programmes, e.g. translocating over barriers to aid downstream migration and escapement, or have credible plans in place to do so in the next season. The eels used for restocking are representative of the catch.  (note that this is separate from any planned restocking to meet the 60% target).
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## Component 4 - Eel buying and trading

<b>Issues</b>	<p>Glass eel buyers hold an integral, important but also challenging position in the supply chain. They are relatively few, and are considered by some to ‘control’ the market and in some places there are monopolies, whilst in others there are sufficient to enable competition. Their relationship with fishermen is crucial – mutual trust and loyalty are important – and this relationship has often influenced changes to more sustainable fishing practices as buyers have become more aware of market pressures.</p> <p>Buyers also have the challenge of winning tenders from customers in a very competitive market (where the driver has too often been cost rather than quality &amp; sustainability), and then seeking to balance that with the uncertainty of supply when the number of returning glass eels or fishing conditions might not provide the market demand.</p> <p>On top of this there is an illegal trade to Asia. The higher prices are a temptation to some and this can significantly affect market demand and prices.</p> <p>Millions of glass eels pass through a small number of buyers so issues such as welfare and influence are important for many factors around responsibility.</p>
<b>Notes</b>	<p><b>Segregation</b> Where buyers are sourcing SEG certified and non-certified eels, they must be kept separate– in clearly labelled tanks. This applies to glass eels and yellow &amp; silver eels.</p> <p><b>Mortality during transport and initial holding if transported to farm</b> Assessors’ experience has strongly advised that the previous indicator of measuring mortality over the first week in the holding facility was unworkable. The advice is to:</p> <ul style="list-style-type: none"> <li>- Emphasise purchase from good quality (certified) sources and</li> <li>- To develop Transport Best Practice criteria.</li> </ul> <p>So, the standard currently specifies sourcing from certified suppliers or measurement of mortality pending the development of best practice criteria for Transport and holding of glass eels.</p> <p><b>Careful handling</b> Careful handling will involve, amongst other things, no dropping or tipping from any height, no drying out, minimal contact with sharp edges or corners, nothing in which the tail could be caught; moving the eels with water rather than nets where possible, and the procedure to be planned in advance and completed as quickly as possible.</p>

	<p><b>Design of glass eel holding facilities</b></p> <p>To be ideal for glass eel holding, there should be, for example, no sharp corners or edges, no excessive flow rates and no abrupt changes in flow rate. Some buyers may use facilities that have been adapted rather than specially designed, and thus may not be ideal.</p> <p><b>Transport</b></p> <p>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. Animals that are injured or that present physiological weaknesses or pathological processes shall not be considered fit for transport. We will develop best practice for transport for a future version of the standard.</p> <p>We were not able to design an ‘aspiring’ score criterion for transport – anything less than the optimum standard was considered not acceptable.</p> <p><b>Restocking requirements under the EU Regulation</b></p> <p>The EU Regulation requires that 60% of glass eels from fisheries should be made available for restocking (although the EU can make temporary changes to the % in response to a significant decline of average market prices for eels used for restocking).</p> <p>NB. due to the French quota and market system, it is rare that 60% of Glass eels from France are available for restocking. Considerations are being made on how to deal with this to (1) encourage a shift in the market whilst (2) recognising those that are operating as responsible as possible, within the constraints of their system.</p>
<b>Benefits</b>	<ul style="list-style-type: none"> <li>• Increased supply, demand and proportion of certified eels in the market</li> <li>• Improved welfare and survival of eels during handling</li> <li>• Reduction in demand and supply of eels for illegal export leading to a reduction in illegal trafficking</li> </ul>
<b>Rationale</b>	The rationale in the issues and notes are described above.
<b>Measures</b>	<ul style="list-style-type: none"> <li>• The amount (weight) and proportion (%) of eels traded by each certified and non-certified traders will be monitored. The proportion from certified traders increases from 5% to 90% over the next 10 years</li> <li>• Survival rates will be monitored and targets set to seek a continuous improvement in survival</li> </ul>
<b>Criterion 4.0: Segregation of certified and uncetified eels</b>	
<b>Weighting: 2</b>	
<b>Responsible indicators</b>	Certified and non-certified are kept separated, from point of collection through holding to sale and onward transport
<b>No Aspiring indicators</b>	
<b>Criterion 4.1: The Glass eel holding facility is a registered Aquaculture Production Business</b>	
<b>Weighting: 1</b>	
<b>Responsible indicators</b>	The Glass eel holding facility is a registered Aquaculture Production Business
<b>Aspiring indicators</b>	The facility is not a registered Aquaculture Production Business, but has credible plans to register within the next 6 months

#### Criterion 4.2: Mortality in storage facility

Weighting: 2

**Responsible indicators** Mortality rate over the season is less than 2% on average.

**Aspiring indicators** Mortality rate over the season is less than or equal to 5% on average but greater than or equal to 2%

#### Criterion 4.3: Mortality during transport and initial holding if transported to farm

Weighting: 2

**Responsible indicators**

- Buyers source at least 90% of their eels from certified suppliers OR
- Mortality during transport and for the first week at the farm is less than 2% on average

**Aspiring indicators**

- Buyers source 50% - 89.9% of their eels from certified suppliers OR
- Mortality during transport and for the first week at the farm is less than or equal to 3% on average but greater than or equal to 2% on average.

#### Criterion 4.4: Water quality

Weighting: 1

**Responsible indicators**

- 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)
- Water quality management procedures are in place including regular monitoring of relevant parameters which shows that water quality is always high and stable
- The facility operates a back-up system to ensure that water quality will not adversely affect survival rates in the case of an equipment failure

**Aspiring indicators**

- 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)
- The facility has a minimum of a back-up generator and oxygen supply

#### Criterion 4.5: Handling and welfare

Weighting: 1

**Responsible indicators**

- Systems are in place and the facility is designed to keep handling to an absolute minimum
- Documented procedures are in place for handling, and handling, where necessary, is careful
- The infrastructure is designed to avoid injuries, and so that the use of nets is rarely necessary. When used, nets are small-mesh (1mm maximum)
- Eels are moved without being allowed to dry out.

**Aspiring indicators**

- The facility may not be optimally designed, but systems are in place to avoid handling as much as possible within the constraints of the facility
- Handling, where necessary, is carefully planned and executed
- The infrastructure has been optimised as far as possible to avoid injuries
- Nets are small-mesh (1mm maximum)
- Eels are moved without being allowed to dry out.

#### Criterion 4.6: Transport

Weighting: 1

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• There is a Transport Plan in place to minimise travel time – this meets the Transport requirements for vertebrates</li> <li>• Packing is done in a way that minimises handling, time and stress</li> <li>• Eels are kept cool and wet with an adequate supply of oxygen</li> <li>• The operator holds the relevant transport authorisations</li> </ul>
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#### Criterion 4.7: The required percentage of glass eels is being used for restocking

Weighting: 2

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• The buyer can provide documented evidence that <u>they have sold</u> at least 60% for restocking the required target percentage of its glass eels from the last season for the primary purpose of conservation / escapement.</li> </ul>
<b>Aspiring indicators</b>	<ul style="list-style-type: none"> <li>• The buyer can provide documented evidence that they <u>have reserved or made available at least 60%</u> of the required target percentage of its glass eels from the latest season available for the primary purpose of conservation / escapement, OR</li> <li>• The buyer can provide documented evidence that it has made available glass eels to the maximum level possible within the constraints of the implementation of the EMP in that country OR</li> <li>• The buyer can provide credible evidence that re-stocking will occur in the forthcoming season.</li> </ul>

### Component 5 – Eel farming

<b>Issues</b>	<p>High survival rates and growth rates in fish farms compared to the wild enable the efficient use of millions of glass eels for restocking, and for the provision of high quality food for human use. However, fish farms must be well run to be both profitable and responsible. Poor husbandry can lead to disease, high mortalities and pollution. Feed is often made with other fish species and these should be from <b>responsible certified</b> sources. The farm should be contributing to restocking to play its part in achieving what SEG believes to be a positive contribution.</p>
<b>Notes</b>	<p><b>If the eel farm has achieved another fish farming standard, evidence presented for that can be used in assessment here.</b></p> <p><b>Segregation</b>  Certified and non-certified stock should be segregated to give greater assurance of traceability. Where it is unavoidable, for a time-limited period, mass balance calculations must be applied to show that no greater numbers of certified eels left the organisation than entered.</p> <p><b>Mortality rate during culture</b>  Unlike for the fishery, traceability at the farm level should ensure that mortality can be measured directly and evaluated reliably by the assessors. In practice, calculating mortality can be a difficult task and finding a single method to fit all farms is problematic. It has been decided that a direct approach is the most feasible for use across the culture industry. The following methodology should therefore be used;</p> <ol style="list-style-type: none"> <li>1. (Total Mortality (by piece) in the year / Total Stock (by piece) in the year) X 100</li> </ol>

2. This then needs to be multiplied by the average time that an eel will spend in the system.
3. This should be completed on a yearly basis by the farm

#### An example:

A farm has recorded a total stock for the year of 1.8 Million eels (Calculated using an average weight). During the year it records a total mortality of 100,000 eels (Calculated using an average weight). This provides the following calculation;

$$(100,000/1,800,000) \times 100 = \underline{4.4\%}$$

On average, an eel will spend a maximum of two years in the facility meaning this mortality rate needs to be doubled, giving a total mortality percentage of 8.8%. The farm would therefore achieve the higher indicator for this.

It is emphasised that the farm manager will be asked to provide the calculation directly. The workings, including evidence of how the figures have been achieved, will need to be provided to the assessor.

#### **Feed**

For feed products other than pelleted feed (eg. cod roe), it is the responsibility of the organisation under assessment to show that the source is sustainable. Feed companies should be prepared to provide the sources and breakdown of feed ingredients, which should be from MSC accredited fisheries.

[IFFO](#), the Marine Ingredients Organisation, accredit fish feed for sustainability, so use of IFFO accredited feed is a way to meet this criterion.

#### **Feed conversion ratios**

A good Feed Conversion Ratio (FCR) is key to ensuring that the farm is operating efficiently and using its feed in an effective manner. The FCR will vary depending on the size of the fish and so three separate FCRs are given. FCR figures should be verified whenever possible by the assessor to ensure they have been calculated correctly.

Note that these figures are from eel farmers – no national or international standards appear to exist for eel farming.

#### **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.

#### **Restocking of Cultured Eels**

The requirement for restocking eels during culture distinguishes between the actual provision of eels for restocking and eels being 'made available' for re-stocking (i.e. a willingness on the part of the eel growers to provide eels for restocking as and when there is a market, even if the market is less lucrative than the market for eel product).

Whichever is used, the farm must be able to provide evidence to support this and to show that the eels are going for the purposes of restocking (documentation for the purchasers stating this intended purpose would act as sufficient evidence here). Restocking in this context refers to restocking for the primary purpose of enhancing escapement.

Restocking percentages should be calculated by piece, although an average weight may be used to calculate this. The calculation to be used would be:

$$((\text{Year Restocking Total (by piece)} / \text{Year Production (by piece)}) \times 100 = \% \text{ Restocked per year}$$



	Eels used for restocking are not graded out. There have been a number of suggestions/examples – given by people working in the sector – that ‘slow-growers’ are used for stocking. This skews the freshwater population in a way that is unnatural and could affect genetics.
<b>Benefits</b>	<ul style="list-style-type: none"> <li>• Survival is maximised</li> <li>• Eel farms play their part in providing a positive contribution</li> <li>• Food for human consumption is provided with minimal impact on the environment</li> </ul>
<b>Rationale</b>	The rationale in the issues and notes are described above.
<b>Targets &amp; Measures</b>	<ul style="list-style-type: none"> <li>• An increasing number and proportion of farms, from 2 and 5% to 35 and 90% in 10 years are certified.</li> <li>• In 10 years, the total proportion of certified eel that passes through eel farms is 90%.</li> </ul>

#### Criterion 5.0: Segregation of certified and uncertified eels

##### Weighting: 2

**Responsible indicators** Certified and non-certified are kept separated, from point of collection through holding to sale and onward transport

**Aspiring indicators** Through mass-balance calculations (by number), the organisation can prove that no more than the same percentage of certified eels were output as were input, whilst taking mortality into consideration. A formula of 2800 pieces per 1 kg of glass eels can be applied

#### Criterion 5.1: The total mortality rate during the culture process is low

##### Weighting: 2

**Responsible indicators**

- The Percentage Mortality Rate of eels in culture is less than or equal to 10% on average in the current and previous year OR as an average of the previous five years
- An accurate daily log is maintained of the number and causes of mortality

**Aspiring indicators**

- The Percentage Mortality Rate of eels in culture is between 10 and 15% on average in the current and previous years OR as an average of the previous five years.
- An accurate daily log is maintained of the number of mortalities

#### Criterion 5.2: The fish meal/oil ingredients in the feed come from a responsible source

##### Weighting: 1

**Responsible indicators** Fish meal/oil in the feed (including juvenile feeds) is certified by IFFO or MSC or shown in some other way to be from responsible or sustainable sources

**Aspiring indicators** Fish meal/oil in the feed (including juvenile feeds) is not certified by IFFO or MSC or shown to be from responsible sources, but there are credible plans to move to such a supplier within 2 years

#### Criterion 5.3: Feed is used as efficiently as possible

##### Weighting: 1

**Responsible indicators** The average feed conversion ratios in the farm are as follows:  
 glass eel to fingerlings: 1.1 or less  
 fingerlings to 200g: 1.6 or less  
 large eels: 2.0 or less

**Aspiring indicators** The average feed conversion ratios in the farm are as follows:  
 glass eel to fingerlings: 1.3 or less

fingerlings to 200g: 1.8 or less  
large eels: 2.2 or less

#### Criterion 5.4: Water quality

##### Weighting: 1

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• 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)</li> <li>• Water quality management procedures are in place including regular monitoring of relevant parameters which shows that water quality is always high and stable</li> <li>• Water quality monitoring is linked to an alarm-based system in the event of a sudden drop in water quality</li> <li>• 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.</li> </ul>
<b>Aspiring indicators</b>	<ul style="list-style-type: none"> <li>• A system is in place that is expected to keep key water quality parameters within suitable tolerances (e.g. Ammonia, Suspended Solids, pH, Oxygen)</li> <li>• Water quality management procedures are in place and there is regular monitoring of relevant parameters which shows that water quality is always high and stable.</li> </ul>

#### Criterion 5.5: There are minimal ecological impacts from effluent discharge

##### Weighting: 1

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• The system is closed-circuit and has no discharge OR</li> <li>• Effluent discharge is regularly tested by the farm AND</li> <li>• Effluent discharge complies with all local and national requirements AND</li> <li>• Has not been found to be non-compliant in the past 5 years.</li> </ul>
<b>Aspiring indicators</b>	<ul style="list-style-type: none"> <li>• Effluent discharge is regularly tested by the farm AND/OR</li> <li>• Has been found to be non-compliant on no more than 1 occasion in the past 5 years.</li> </ul>

#### Criterion 5.6: Grading, slaughter and transportation are carried out with respect to welfare

##### Weighting: 1

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• Grading is completed in an efficient manner</li> <li>• Slaughter is completed by a method that provides an instant death or renders them insensible to pain, i.e. electric stunning or percussive stunning.</li> <li>• Procedures are in place to ensure transportation provides suitable conditions for fish welfare.</li> </ul>
<b>Aspiring indicators</b>	<ul style="list-style-type: none"> <li>• Other, previously acceptable methods of stunning before slaughter are used, e.g. chilling, but there are credible plans in place to invest in the latest methods within the next 2 years</li> </ul>

#### Criterion 5.7: The farm organisation provides eel for restocking

##### Weighting: 2

<b>Responsible indicators</b>	The farm organisation can provide documented evidence that 10% or more of the farm's annual eel production (by piece) <u>has been provided</u> for restocking for the purpose of conservation / escapement.
<b>Aspiring indicators</b>	The farm organisation can provide documented evidence that it makes 10 % of their annual eel production (by piece) were made <u>available</u> for restocking for the primary purpose of conservation / escapement AND/OR for new clients, the farm can demonstrate

that they have bookings for re-stocking in the following year at more than 10% of the predicted annual eel production (by piece) for the purpose of conservation / escapement.

### Criterion 5.8: Eels for restocking are not graded out slow-growers

**Weighting: 2**

<b>Responsible indicators</b>	The size range and quantities in the eels for restocking reflect 100% that for the age group in the whole farm
<b>Aspiring indicators</b>	The size range and quantities indicate no more than a 25% supplement of those for restocking are from slower growing fish of the same age group.

## Component 6 – Restocking

<b>Issues</b>	A discussion about in restocking is provided in Section 6.2. Whilst stocking is an accepted measure in the EU Eel Regulation, and this standard seeks to support the regulation, the standard sets criteria for doing it responsibly, and according to best practice.
<b>Benefits</b>	<ul style="list-style-type: none"> <li>Escapement of silver eels in the target catchment is increased by restocking, towards or beyond the 40% of B0 target</li> </ul>
<b>Rationale</b>	As described in Section 6, this depends on the assumption that taking Glass eels from areas of abundance and stocking them to areas of low recruitment, leads to an increase in the eel populations overall in European, Scandinavian and North African waters, and a corresponding increased escapement of silver eels, leading to increased spawning and subsequent increased recruitment of glass eels.
<b>Targets &amp; Measures</b>	<ul style="list-style-type: none"> <li>Silver Eel escapement in the recipient catchment is measured with increasingly confident calculation by the local fisheries authority</li> <li>Restocking and the impact on eel escapement is measured</li> <li>Silver eel escapement is increasing towards or at the 40% target</li> </ul>

### Criterion 6.1: Restocking is carried out in accordance with an approved EMP, in order to improve escapement to or above the 40% target and is approved by the relevant agency

**Weighting: 1**

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>The eel management plan is approved and the restocking is part of the agreed programme that should with reasonable confidence lead to the 40% escapement target being achieved in the future.</li> <li>Fishing of restocked eels does not have any measurable impact on escapement.</li> </ul>
<b>Aspiring indicators</b>	<ul style="list-style-type: none"> <li>The management plan is approved and there is evidence that it is being implemented. The restocking is a part of the management plan.</li> <li>Fishing of restocked eels may have measurable impacts on escapement.</li> </ul>

### Criterion 6.2: Survival and growth rates of restocked eels, and escapement from the system, can be estimated.

**Weighting: 1**

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>A monitoring programme calculates survival rates and growth rates of restocked eels such that there is good evidence that restocking is significantly enhancing eel biomass and contributing to escapement.</li> <li>There is active research on means of improving the restocking programme or restocking techniques.</li> </ul>
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<b>Aspiring indicators</b>	<ul style="list-style-type: none"> <li>• A monitoring programme estimates survival, growth and escapement. The existing evidence suggests that restocking is enhancing eel biomass and contributing to escapement.</li> </ul>
<b>Criterion 6.3: The restocked area is suitable for eel growth, survival and escapement</b>	
<b>Weighting: 1</b>	
<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• Ecological information suggests that the system into which eels are restocked is suitable eel habitat (eg. type of water body, productivity, former presence of eels).</li> <li>• There are no significant barriers to escapement of silver eels from the system OR systems are in place which demonstrably allows a significant proportion of silver eels to circumvent these barriers (e.g. effective passes trap and transport).</li> <li>• Stocking is carried out at densities appropriate to the capacity of the environment (productivity, temperature).</li> </ul>
<b>Aspiring indicators</b>	<ul style="list-style-type: none"> <li>• It is reasonable to assume by analogy with other systems the system into which eels are restocked is good eel habitat.</li> <li>• If there are barriers to escapement of silver eels, plans are being put in place to allow a reasonable level of escapement which will be implemented in time to allow this restocking cohort to contribute to escapement.</li> <li>• Stocking is carried out at densities appropriate to the capacity of the environment (productivity, temperature).</li> </ul>

## Component 7 – Processing, wholesale and retail supplies

<b>Issues</b>	<p>This component describes the sometimes short, sometimes long chain from the eel leaving the fishery or fish farm, processed for human consumption (e.g. filleted, smoked), distributed to retailers and then sold to the consumer (e.g. the public, restaurants).</p> <p>In some cases, a number of processes might be carried out by the same business, e.g. some family businesses in Holland have their own eel farm, their own smoker and sell direct to the public.</p>
<b>Notes</b>	<p>There are no separate criteria for processors, wholesalers and retailers, but the component is provided here to show how they are included in the supply chain.</p> <p>The most obvious and important component applying to these is Component 1.1, covering Commitment to legality, 1.3: Trading in certified eel and 1.4: Traceability.</p> <p>Where the facility undertakes other processes in this standard, e.g. perhaps eel farming, the business and assessor should decide the relevant parts to audit.</p>
<b>Benefits</b>	<ul style="list-style-type: none"> <li>• Consumers have the opportunity and choice to purchase responsibly sourced eel</li> </ul>
<b>Targets &amp; Measures</b>	<ul style="list-style-type: none"> <li>• An increasing number and proportion of processors, wholesalers and retailers provide certified eel, from 5% now to 90% in 10 years</li> <li>• An increasing proportion of total retail sales is of certified eel, from 5% now to 75% in 10 years</li> </ul>

## Component 8 – Contribution to Healthy Aquatic Ecosystems

<b>Issues</b>	<p>Many companies have a social &amp; corporate responsibility programme, to make contributions to society outside of their core business, and beyond their legal obligations.</p>
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<b>Notes</b>	<p>Where they make a contribution that benefits the eel, they can be recognised via the SEG standard.</p> <p>There are potentially many other factors to consider when considering a company’s ethical and environmental credentials, and there are other standards to cover those. This standard will therefore, by necessity, be kept simple. It is likely to develop with experience of its use.</p> <p><a href="#">Eel Stewardship Funds</a> are being established to provide a convenient mechanism for companies, organisations and individuals to make financial contributions towards eel conservation projects.</p> <p>A healthy aquatic ecosystem is defined as one that meets the criteria for ‘Good Ecological Status’ under the Water Framework Directive. Where we can be more specific with factors for good eel habitat and migration, particularly for specific locations and projects, we will also apply those.</p>
<b>Benefits</b>	<ul style="list-style-type: none"> <li>• Increased investment to improve the health of aquatic ecosystems, aiding the recovery of the European eel</li> <li>• Companies able to be recognised for their work</li> <li>• Companies able to choose the European eel as a species to support</li> </ul>
<b>Rationale</b>	By providing the opportunity of certification, more companies might choose the eel as a cause to support, leading to greater investment and faster recovery
<b>Targets &amp; Measures</b>	<ul style="list-style-type: none"> <li>• Annual increase in the number of companies seeking the SEG standard, from 0 now to 20 in 10 years</li> <li>• 10% pa increase in the value of eel conservation and restoration projects, doubling from €20M per year now to €40M in 10 years</li> </ul>
<b>Criterion 8.1: The company has a good environmental record</b>	
<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• There have been no prosecutions or warnings for breaches of environmental regulations in the past 5 years</li> <li>• There is a certified Environmental Management System in place such as ISO14001</li> </ul>
<b>Aspiring indicators</b>	<ul style="list-style-type: none"> <li>• There have been no prosecutions or warnings for breaches of environmental regulations in the past 2 years</li> <li>• There is a certified Environmental Management System in place such as ISO14001, or the company is actively pursuing one</li> </ul>
<b>Criterion 8.2: Contribution to eel conservation projects</b>	
<b>Responsible indicators</b>	• The company operates a social & corporate responsibility programme and at least 20% of that budget is allocated to projects that make a positive contribution to eel conservation or population enhancement, such as Eel Stewardship Funds, River Restoration projects, conservation and education projects.
<b>Aspiring indicators</b>	• The company operates a social & corporate responsibility programme and at least 10% of that budget is allocated to projects that make a positive contribution to eel conservation or population enhancement, such as Eel Stewardship Funds, River Restoration projects, conservation and education projects.

## End of Guidance Note 1