

## **Eel Assessment – Deutsche Fischerei Verband, Hamburg, Germany**

### **Assessment against:**

Component 1: Generic Requirements

Component 3: Glass eel buyers

Component 4: Cultured Eel

Component 7: Traceability

**Completed by**  
Max Goulden

30<sup>th</sup> March 2017

**FINAL**

### **1. Introduction**

This document presents the report completed following the audit carried out under the Sustainable Eel Standard (Version 5, 21<sup>st</sup> June 2013), and Sustainable Eel Methodology (Version 1, 21<sup>st</sup> June 2013) against Deutsche Fischerei Verband (hereafter, DFV). This assessment has been completed against Components 1, 3, 4 and 7 of the Standard only. DFV were previously audited on the 30<sup>th</sup> February 2014 against the same version of the Eel Standard. This audit represents an early re-assessment of the company whose certificate is due to expire on the 10<sup>th</sup> February 2018. In 2014, following re-assessment of the facility it was recommended that in line with the Version 5 requirements, an onsite audit should be completed two years from the certificates issue date (corresponding to around the 10<sup>th</sup> February 2016). This was not completed and hence it was agreed that an early re-assessment should be completed in March 2017 to allow the whole operation to be fully assessed against the requirements.

The assessment is of the glass eel storage facility and small eel on-growing farm at DFV's facility near Hamburg, Germany. DFV purchase and on-grow glass eels for the purposes of re-stocking only (none are used for consumption). This is completed either by the direct purchase, temporary holding and subsequent re-stocking of elvers or the purchase of glass eels and on-growing to a size of around 10g for subsequent restocking.

The storage facility consists of four flow-through holding tanks which are aerated and allow for the temporary holding of elvers. The on-growing facility consists of 13 separate cylindrical tanks which are operated on a re-circulation based system (around 5 to 10% water exchange per day). DFV also own two HGVs for the live transport of eels for re-stocking.

### **2. The assessment**

The assessor(s) was Max Goulden of MacAlister Elliott and Partners Ltd, who visited DFV on the 30<sup>th</sup> and 31<sup>st</sup> March 2017. The visit started with an opening meeting with the manager of DFV, Mr Arne Koops in which the operations of the company were discussed in detail. It was confirmed that no changes had occurred since the previous audit and that the operation still completes the same processes, uses the same suppliers and services the same customers.

Following this, the auditor considered the previous recommendations made in 2014. The recommendation's focused on a number of separate areas.

### **Component 3: Glass Eel Buyers**

**Recommendation 1:** A documented system for recording daily mortality in the holding facility should be implemented to allow for transparency within the system (in light of future audits).

**This is now implemented**

**Recommendation 2:** A documented bio-security and handling procedure should be drawn up by the client at the holding facility

**Not implemented. Please see condition raised below.**

### **Component 4: Cultured Eel**

**Recommendation 3:** A documented bio-security and handling procedure should be drawn up by the client at the farm facility.

**Not implemented. Please see condition raised below.**

### **Component 7: Traceability**

**Recommendation 4:** DFV will be required to request an ecolabel licence from SEG prior to the use of the SES ecolabel.

**Completed although has never actually been used by client (no product sold as SEG certified)**

**Recommendation 5:** On the sale of certified product DFV will be required to label product as certified on any outgoing invoice as per Principle 3 of Component 7 below.

**As per above.**

A site inspection was completed by the auditor with DFV staff of both the holding and farm facility. The audit ended with a review of necessary paperwork in the company's office with Mr Arne Koops.

### **3. Client Contact Details**

<b>Client Contact Name</b>	Mr Arne Koops
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<b>Client Address</b>	Deutscher Fischerei Verband, Aalversandstelle, Gärtnerstraße 81 a, 25469 Halstenbek, Deutschland
<b>Client Email</b>	info@aalversandstelle-dfv.de
<b>Client Phone Number</b>	0049 4101 44330

#### 4. Results of the assessment

The outcome of this assessment is as follows;

That DFV has passed Component 1: Commitment to Sustainability and legality

that DFV scored **6 green scores** and **4 amber scores** against Component 3 and therefore **should be considered sustainable under the SEG standard, Component 3: Glass Eel Buyers.**

that DFV scored **7 green scores** and **3 amber score** against Component 4 and therefore **should be considered sustainable under the SEG standard, Component 4: Cultured Eel.**

that DFV scored **3 green scores** and **1 amber score** against Component 7 and therefore **should be considered sustainable under the SEG standard, Component 7: Traceability**

One condition was raised by the auditor;

**Condition 1:** In the previous audit it was noted that no documented procedures were present for the facilities biosecurity or handling methods. It is understood that this is seen as superfluous to requirements at DFV since all staff are highly experienced and understood the process fully. However, this is a standard requirement and must therefore be met for a green core to be obtained. **A period of one year (until the 31<sup>st</sup> March 2018) is therefore provided for this to be completed and evidence provided to MEP.**

#### 5. Certificate Dates

Should the re-assessment of the client be approved by the SEG Certification Committee, the client's new certificate should be made effective commencing the **31<sup>st</sup> March 2017** and expiring on the **31<sup>st</sup> March 2021**, in four years' time.

#### 6. Next Audit

At the completion of the audit the client was assessed against the risk assessment set out in the Methodology. This is set out in the table below.

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 <sup>1</sup> for a Component in its previous audit?	Enhanced Surveillance	Go to Q3

<sup>1</sup> A borderline pass is considered a pass that occurs when one less amber indicator is received then would be required to fail (i.e. 5 Green indicators and 4 Orange indicators) or when a company is certified with equal number of orange and green indicators.

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	

	Certification Audit	Year 1	Year 2	Year 3	Year 4 Recertification Audit
Minimum Surveillance	On-Site Audit	Remote Audit	Remote Audit	Remote 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

As the client has been seen to fall into the Standard Surveillance bracket, the next audit will be due on **the 31<sup>st</sup> March 2019** (in 2 years' time) and shall be an on-site audit.

The tables below give the standard and a rationale for the score given. The score is highlighted in the appropriate colour.

## 1. Component 1 - Commitment to Sustainability & Legality

1. Commitment to sustainability & legality ( <a href="#">See Note 1</a> )	
green score indicator	All trading and commercial relationships are aligned with SEG goals AND the organisation has declared to the assessor any historic conflicts of interest with regard to eel sustainability AND there is no evidence of illegal trading and/or of circumventing the EU Eel Regulation AND any evidence of illegality by commercial partners or other organisations is immediately reported to the appropriate authorities.
red score indicator	The organisation or a member of the organisation has been arrested on suspicion of illegal buying, holding, selling or trading of eels in the last 12 months, AND/OR for failure to declare eel fishing or trading activities appropriately to the authorities, AND/OR for other serious breaches of national or international eel regulations; AND/OR credible sources suggest that the organisation has been involved in serious breaches of national or international eel regulations in the last 12 months (the above applies to close business partners of the organisation, which members of the organisation must reasonably have known about, without the organisation informing the appropriate authorities); AND/OR the organisation is involved in activities which put in serious question their commitment to sustainability.
Discussion	The client is known to be proactive in its support of SEG. No conflicts of interest were declared and no evidence (or suspicion) of illegal trading found or made to the assessor. The company's position as a re-stocking operation are also well in line with SEGs goals and objectives.
Score	Green Score Provided

## 2. Component 3: Glass Eel Buyers

<b>1. Mortality in storage facility</b> ( <a href="#">See Note 5</a> )	
<b>Weighting: 2</b>	
green score indicator	Mortality rate over the season is less than or equal to 2% on average.
amber score indicator	Mortality rate over the season is less than or equal to 5% on average but greater than or equal to 3%
red score indicator	Mortality rate over the season is greater than 5% on average.
Discussion	<p>DFV buy and sell eels at a range of sizes from glass eels up to 11g fingerlings. The sizes bought are reflective of what the client wants for their particular restocking programme. In order for a fair consideration of mortality to be assessed its was considered prudent to check batches at both ends of the scale (i.e. glass eels and fingerlings).</p> <p><u>Glass Eels</u> Records were checked for the two batches of eels received in the holding facility at DFV in 2016. The figures and corresponding mortality are shown below; <u>Batch 1</u> received 15/03/2016 Total of 599kg received Total of 0.657kg recorded as mortality <math>(0.657\text{kg}/599\text{kg}) * 100 = 0.11\%</math> <u>Batch 2</u> received 13/04/2016 Total of 475kg received Total of 0.521kg recorded as mortality <math>(0.521\text{kg}/475\text{kg}) * 100 = 0.10\%</math></p> <p>Average mortality across both batches is 0.15% so a green score is awarded here.</p> <p><u>Fingerlings</u> Records were checked for a batch of eels received in the holding facility at DFV. The total batch weight was 938kg.. During their time in the DFV holding facility no mortality was recorded. Indeed, sale figures for this batch show a recorded sale of 941kg (a 3kg increase!). A green score is clearly awarded here.</p>
Score	Green Score Provided
<b>2. Mortality during transport and initial holding if transported to farm</b> ( <a href="#">See Note 9</a> )	
<b>Weighting: 2</b>	
green score indicator	Mortality during transport and for the first week at the farm is less than or equal to 1.5% on average.
amber score indicator	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.
red score indicator	Mortality during transport and for the first week at the farm is more than 3% on average.
Discussion	No eels are provided to farms, all are sent for re-stocking. It is therefore not possible to receive mortality figures for initial holding periods.

	The key consideration for this criteria at DFV must therefore be the quality of the company's transportation which is assessed below. An orange indicator score is provided since nothing to ensure caution but it appears highly likely that a green score is actually being achieved here.
Score	Amber Score Provided
<b>3. Water quality</b>	
<b>Weighting: 1</b>	
green score indicator	A system is in place that is expected to keep key water quality parameters within suitable tolerances for healthy eel survival (e.g. Ammonia, Suspended Solids, pH, Oxygen) AND water quality management procedures are in place including regular monitoring of relevant parameters which shows that water quality is always high and stable AND water quality monitoring is linked to an alarm-based system in the event of a sudden drop in water quality AND the facility operates a back-up system to ensure that water quality will not adversely affect survival rates in the case of a power supply failure.
amber score indicator	A system is in place that is expected to keep key water quality parameters within suitable tolerances (e.g. Ammonia, Suspended Solids, pH, Oxygen) AND 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.
red score indicator	No water quality monitoring occurs AND/OR water quality is not held regularly at levels which are considered suitable for healthy eel survival.
Discussion	The holding facility operates a complete flow through system and does not recycle any water meaning water parameters are kept at suitable levels at all times. Aeration is provided to the water and this is fully backed up by a spare aerator and also a generator (which switches on automatically) should power be seen to fail. The facility also regularly monitors water quality parameters to ensure all remain within safe operating parameters (the low mortality rates seen suggest this is happening). A green score is provided here.
Score	Green Score Provided
<b>4. Biosecurity is present and disease is treated rapidly and appropriately</b>	
<b>Weighting: 1</b>	
green score indicator	An effective and documented biosecurity plan (including the washing and disinfection of equipment) is in place AND records are available showing regular monitoring of health and possible signs of stress (including the completion of periodic microscope parasite checks) AND records are maintained in relation to the name, administrator, amount, dates and reason for use of any medicines and/or chemicals used in the facility AND the use of chemicals follows legal requirements of the appropriate EU regulations and of the country concerned.
amber score indicator	The facility follows bio-security measures (including the washing and disinfection of equipment) although this is not documented AND eels are regularly monitored for health and possible signs of stress (although this might not be documented) AND records are maintained in relation to the name, administrator, amount, dates and reason for use of any medicines and/or chemicals used in the facility AND the use of chemicals follows legal requirements of the appropriate EU regulations and of the country concerned.
red score indicator	The facility operates no bio-security measures (including the washing and disinfection of equipment) AND/OR there is no checking of the eels for health and possible signs of stress AND/OR records are not maintained with regards to the use

	of medicines and/or chemicals AND/OR legal requirements of the appropriate EU regulations and country concerned are not met for the use of medicines or chemicals.
Discussion	<p>The company does have effective biosecurity measures. All equipment is disinfected once a week and tanks are thoroughly cleaned in between use. The veterinarian completes an HVA diagnosis on a regular basis. No chemicals are used for treatment (fish are held for an average of a few days).</p> <p><b>The procedures are not documented however and so can only score a amber score.</b> Since this was also raised at the previous audit a year is provided for this to be closed out by the client.</p>
Score	Amber Score Provided
<b>5. Handling and welfare</b> (see <a href="#">notes 10</a> and <a href="#">11</a> )	
<b>Weighting: 1</b>	
green score indicator	Systems are in place and the facility is designed to keep handling to an absolute minimum AND documented procedures are in place for handling, and handling, where necessary, is careful AND 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) AND eels are moved without being allowed to dry out.
amber score indicator	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 AND handling, where necessary, is carefully planned and executed AND the infrastructure has been optimised as far as possible to avoid injuries AND nets are small-mesh (1mm maximum) AND eels are moved without being allowed to dry out.
red score indicator	Excess, poorly planned or careless handling is likely to result in additional mortality.
Discussion	<p>The facility keeps handling to a complete minimum and does not use nets at all (relying on gravity for the movement of eels). All eel handling is carefully planned and welfare levels appear high.</p> <p><b>Again though, these are not documented at all and so only an amber score can be provided.</b> Since this was also raised at the previous audit a year is provided for this to be closed out by the client.</p>
Score	Amber Score Provided
<b>6. Transport</b> ( <a href="#">See note 12</a> )	
<b>Weighting: 1</b>	
green score indicator	Transport is carefully planned to minimise travel time AND packing is done in a way that minimises handling, time and stress AND eels are kept cool and wet with an adequate supply of oxygen.
red score indicator	The above criteria are not met.
Discussion	<p>Transportation is carefully planned and uses own transportation at all times. A variety of methods for transport were reviewed and seen to be suitable. A copy of a travel plan was also seen and it is clear that great care is taken to ensure eels reach the required destination safely.</p> <p>A green score is provided here.</p>

Score	Green Score Indicator
<b>7. The required percentage of glass eels from the fishery is being used for restocking (See Note 13)</b>	
<b>Weighting: 2</b>	
green score indicator	The buyer can provide documented evidence that <u>he has sold</u> at least the required target percentage of its glass eels from the latest season for the primary purpose of conservation / escapement.
amber score indicator	The buyer can provide documented evidence that the <u>has made</u> at least the required target percentage of its glass eels from the latest season available for the primary purpose of conservation / escapement, OR 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 that the buyer can provide credible evidence that re-stocking will occur in the forthcoming season.
red score indicator	The buyer does not make or has no evidence to show that he has made the required target percentage of its glass eels available for restocking in the last year.
Discussion	All eels are for restocking and so this is met
Score	Green Score Provided



### 3. Component 4 - Cultured Eel

<b>1. The total mortality rate during the culture process is low</b> (See <a href="#">note 14</a> and <a href="#">note 9</a> )	
<b>Weighting: 2</b>	
green score indicator	The Percentage Mortality Rate (See <a href="#">note 14</a> for formula) 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 (See <a href="#">note 9</a> regarding first week mortality)
amber score indicator	The Percentage Mortality Rate (See <a href="#">note 14</a> for formula) 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. (See <a href="#">note 9</a> regarding first week mortality)
red score indicator	The Percentage Mortality Rate (See <a href="#">note 14</a> for formula) of eels in culture is greater than or equal to 15% on average in the current and previous year OR as an average of the previous five years. (See <a href="#">note 9</a> regarding first week mortality)
Discussion	<p>Mortality on the farm has been recorded two different ways. The first as a percentage of the total biomass received and the second using a ‘per piece’ based calculation. Both provided a similar outcome and both calculations are presented here.</p> <p>For 2016, the farm took in a total stock of 104kg of glass eels and produced a total biomass for the year of 1,366kg. During this period a total of 7.237kg of eels were recorded as official mortality.</p> <p>Using the total biomass method this equates to a mortality percentage as follows;</p> $(7.237/104)*100 = \underline{7\%}$ <p>Using the ‘per piece’ calculation;</p> <p>An average of 2,700 pieces/kg of glass eels is presumed An average sale size of 6g is presumed (sales are across a range from 4-9g)</p> <p>Total Pieces incoming = 2,500 * 104 = 260,000 pieces Total Outgoing Pieces = (1,366*1000)/6 = 227,667 pieces</p> $(227,667/260,000)*100 = 88\% \text{ so Mortality} = \underline{12\%}$ <p>The two methods above calculate the mortality at 7 and 12% respectively. This reflects the different methods of calculating mortality and also the difficulty in working on an average by piece method of calculation. In the auditors view it is expected that the average is most likely below 10% but for consistency and to ensure precaution the higher figure of 12% is used here (plus the ‘per piece’ method is the recommended one in the standard notes). <b>12% mortality equates to the provision of an amber score.</b></p>
Score	Amber Score Provided
<b>2. The fish meal/oil ingredients in the feed come from a sustainable source</b> (See <a href="#">Note 15</a> and <a href="#">16</a> )	
<b>Weighting: 1</b>	

green score indicator	Fish meal/oil in the feed (including juvenile feeds) comes from a fishery where the stock is at or above a target or precautionary reference point (for example is certified by a standard which is aligned with the FAO Code of Conduct for Responsible Fishing).
amber score indicator	Fish meal/oil in the feed (including juvenile feeds) <u>does not</u> come from a fishery where the stock is at or above a target or precautionary reference point (for example is certified by a standard which is aligned with the FAO Code of Conduct for Responsible Fishing) <u>but</u> the product <u>does come</u> from fish waste from processing that would otherwise be discarded.
red score indicator	One or more of the sources of fish meal/oil in the feed (including juvenile feeds) is from a depleted stock with no rebuilding plan in place AND/OR the product comes from fish waste from processing that would otherwise be discarded.
Discussion	<p>The company uses three sources of feed. Powder feed is bought from Skretting and larger pelleted feed from Biomar. The ingredients for both products have been previously approved as sustainable by the SEG committee.</p> <p>Cod roe is also used for the first few days of the eel's life and this is purchased from a supplier that is MSC certified for Cod supplied from the Eastern Baltic and North East Arctic. It is not confirmed if this is the Cod sold to DFV but is never less a product that would otherwise be discarded. A green score is provided.</p>
Score	Green Score Provided
<b>3. Feed is used as efficiently as possible (See <a href="#">note 17</a>)</b>	
<b>Weighting: 1</b>	
green score indicator	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
amber score indicator	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
red score indicator	The average feed conversion ratios in the farm are as follows: glass eel to fingerlings: greater than 1.3 fingerlings to 200g: greater than 1.8 large eels: greater than 2.2
Discussion	<p>The FCR figures for 2016 were calculated with the auditor on site from production figures. During the year, the farm has fed a total of 1,294kg of feed to produce the 1,366kg total of biomass. This equates to an FCR as follows;</p> $1294/1366 = 0.95$ <p>The FCR for the facility of 1.05 is seen to be well below the requirements for providing a green score indicator.</p>
Score	Green Score Provided
<b>5. Water quality</b>	
<b>Weighting: 1</b>	
green score indicator	A system is in place that is expected to keep key water quality parameters within suitable tolerances for healthy eel survival (e.g. Ammonia, Suspended Solids, pH,

	Oxygen) AND water quality management procedures are in place including regular monitoring of relevant parameters which shows that water quality is always high and stable AND water quality monitoring is linked to an alarm-based system in the event of a sudden drop in water quality AND the facility operates a back-up system to ensure that water quality will not adversely affect survival rates in the case of a power supply failure.
amber score indicator	A system is in place that is expected to keep key water quality parameters within suitable tolerances (e.g. Ammonia, Suspended Solids, pH, Oxygen) AND 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.
red score indicator	No water quality monitoring occurs AND/OR water quality is not held regularly at levels which are considered suitable for healthy eel survival.
Discussion	<p>The system employed at DFV is a fully contained RAS based system. The system continues to be well maintained and efficient.</p> <p>Water quality records are maintained and shown to be well within required tolerances. During the audit, water quality readings were taken. These showed the following;</p> <p>pH = 6.96 (well within tolerances)</p> <p>Average tank DO = 80.5% saturation (within tolerances)</p> <p>Average sump DO – 100% saturation (fully saturated)</p> <p>These figures are well within the ranges expected for a healthy and well maintained and managed eel farm.</p> <p>The system is clearly suitable for ensuring healthy eel stocks and the company maintains a range of back-up systems (pumps, electrical and oxygen based systems).</p> <p>A generator system is also maintained on site for back-up power if required.</p> <p>A green score indicator is met for this principle.</p>
Score	Green Score Provided
<b>5. There are no ecological impacts from effluent discharge</b>	
<b>Weighting: 1</b>	
green score indicator	Effluent discharge is regularly tested by the farm AND Effluent discharge complies with all local and national requirements AND has not been found to be non-compliant in the past 5 years.
amber score indicator	Effluent discharge is regularly tested by the farm AND/OR has been found to be non-compliant on 1 occasion in the past 5 years.
red score indicator	Effluent discharge is regularly tested by the farm AND/OR effluent discharge does not comply with all local and national requirements AND/OR has been found to be non-compliant on 2 or more occasions in the past 5 years.
Discussion	Effluent returns directly to the local sewage effluent system and is within all national legislation requirements. No evidence of illegal or non-compliant discharge has been seen at the facility and so green score is provided here.
Score	Green Score Provided
<b>6. Biosecurity is present and disease is treated rapidly and appropriately</b>	
<b>Weighting: 1</b>	
green score indicator	The farm operates an effective and documented biosecurity plan for the prevention and protection of fish AND daily records are available showing regular monitoring of fish health and signs of stress AND records are maintained in

	relation to the name, administrator, amount, dates and reason for use of any medicines and/or chemicals used in the facility AND the use of chemicals follows legal requirements of the EU and of the country concerned.
amber score indicator	The farm follows bio-security measures (although this may not be documented) AND eels are regularly inspected for disease (although this may not be documented) AND records are maintained in relation to the name, administrator, amount, dates and reason for use of any medicines and/or chemicals used in the facility AND the use of chemicals follows legal requirements of the EU and of the country concerned.
red score indicator	The farm has no bio-security measures in place AND/OR eels are not inspected regularly for disease AND/OR no records are maintained with regards to the use of medicines and/or chemicals AND/OR legal requirements of the EU and country concerned are not met for the use of medicines or chemicals.
Discussion	<p>It is clear that the staff are highly experienced and take the health of the eels very seriously. All treatment is approved by a vet and records maintained. Incoming eels are also subject to a number of additional screening checks.</p> <p>The bio-security procedure implemented at DFV is still not documented though and so an Amber Score can only be provided. This was also raised at the previous audit and has not been addressed. As a result, this will need closure within one year of re-certification being granted.</p>
Score	Amber Score Provided
<b>7. Grading, Slaughter and Transportation are carried out with respect to welfare (See note 18)</b>	
<b>Weighting: 1</b>	
green score indicator	Grading is completed in an efficient manner AND slaughter is completed by a method that provides an instant death or renders them insensible to pain AND procedures are in place to ensure transportation provides suitable conditions for fish welfare.
red score indicator	Grading is not seen to be completed in an efficient manner AND/OR slaughter is completed by a method other than one that provides an instant death or renders them insensible to pain instantaneously AND/OR transportation does not provide suitable conditions for fish welfare.
Discussion	The methods for the grading and transportation (no slaughtering occurs) were seen by the auditor to be highly efficient and well thought out. The transportation owned by the farm is well maintained and of a high quality (the extent that a separate back-up vehicle is maintained by the company at all times. A green score has been provided here.
Score	Green Score Provided
<b>8. The farm provides eel for restocking (See note 19)</b>	
<b>Weighting: 2</b>	
green score indicator	The farm can provide documented evidence that 10% or more of the farms (See <a href="#">Note 19</a> for calculation) annual eel production (by piece) <u>has been released</u> for restocking for the purpose of conservation / escapement.
amber score indicator	The farm can provide documented evidence that it makes 10 % of their annual eel production (by piece) <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.
red score indicator	The farm does not make or has no evidence to show that it has made any eels available for restocking in the last year.
Discussion	All eels produced at the farm are sold for re-stocking. A Green Score is provided
Score	Green Score Provided

#### 4. Component 7 - Traceability

This section is valid for any client taking ownership of SEG certified product and who wishes to sell it as such.

<b>1. - Incoming Product</b> ( <a href="#">See Note 20</a> )	
green score indicator	The organisation/fishery operates a system which allows incoming eel products to be traced back to a certified source.
red score indicator	The organisation/fishery is unable to demonstrate that product can be traced back to a certified source.
Discussion	The system shown does allow the tracing back of product received to certified and non-certified sources and so this requirement is met. Consideration is given as to whether certified and non-certified product was kept separated in Criteria 2 below.
Score	Green Score Provided
<b>2. – Separation and Segregation of Product</b> ( <a href="#">See Note 21</a> )	
green score indicator	The organisation operates a system which ensures that the product remains separated at all stages from arrival to dispatch from non-certified eel products AND the organisation ensures that any products wishing to make a claim as certified do not contain any non-certified eel-based ingredients.
red score indicator	The organisation has no system in place to ensure that certified and non-certified product remains separate at all stages OR non-certified and certified products have become mixed OR certified products (or products wishing to be certified) contain or could contain non-certified eel-based ingredients
Discussion	The organisation does keep track of all batches received and is able to identify each batch by tank number. That said, all eels received by DFV are currently not certified and so no segregation of SEG and non-SEG product is necessarily maintained. The system is in place to complete this so a Green score is provided.
Score	Green Score Provided
<b>3. – Outgoing Product</b> ( <a href="#">See Note 22</a> )	
green score indicator	The organisation only labels certified products with the ‘SES’ eco label once it has been approved to do so through the signing of an ‘SES’ eco label licence agreement.  All product to be sold as certified by an organisation meets the following criteria: <ul style="list-style-type: none"> <li>• Any product labelling shall be accompanied by the ‘SES’ logo.</li> <li>• Products shall be accompanied by an invoice which: <ul style="list-style-type: none"> <li>▪ Includes the prefix ‘SES’ in the product description;</li> <li>▪ Includes a record of the volume/quantity of product and to whom it was sold;</li> <li>▪ Includes the certificate code on the invoice</li> </ul> </li> <li>• The certificate code must be clearly related to the certified product only</li> </ul>
amber score indicator	The above requirements are met except that: <ul style="list-style-type: none"> <li>▪ Products have not been correctly labelled through the invoice</li> </ul>

red indicator	Products or product invoices have been labelled as SES with the words SES or the SES Eco label despite not being completely derived from a certified source.
Discussion	<p>No ecolabel licence is currently in place but products are not labelled as SEG certified.</p> <p>As a result of product not being labelled as SEG it was not possible to verify the labelling system. An orange score is provided here.</p>
Score	Orange Score Provided
<b>4. – Record keeping and documentation</b> ( <a href="#">See Note 23</a> )	
	<p>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 eel in each batch delivered to a buyer to be connected back to water, a time period (maximum duration one month) and specific fisherman/vessel.</p> <p>The organisation operates a system that also allows for the completion of a batch reconciliation of eel product by weight over a given period.</p> <p>The organisation maintains records for a minimum of three (3) years.</p>
orange score indicator	The above requirements are met except that records have been maintained for less than three (3) years
red score indicator	The organisation's tracking and tracing system shows evidence that certified and non-certified product have become mixed AND/OR batch reconciliation records are unable to confirm that outgoing quantities are in line with incoming quantities.
Discussion	<p>Traceability records allow for the tracking of all products from start to finish. Two trace backs were completed during the audit.</p> <p>A full mass balance was also completed for the company during the 2015 and 2016 year by the auditor and appeared in line with expected parameters.</p> <p>All records are kept for well over the minimum three years that are required.</p>
Score	Green Score Provided