

Eel Assessment – UK Glass Eels, Gloucester, UK

Assessment against:

Component 1: Generic Requirements

Component 3: Glass eel buyers

Component 7: Traceability

Completed by

Alex Senechal

9th April 2018

Draft

1. Introduction

This document presents the report completed following the audit carried out under the Sustainable Eel Standard (Version 5, 21st June 2013), and Sustainable Eel Methodology (Version 1, 21st June 2013) against UK Glass Eels Ltd (hereafter, UKGE). This assessment has been completed against Components 1: General Requirements, 3: Glass Eel Buyers and 7: Traceability of the Standard only.

The assessment is of the elver buyer UKGE. UKGE buy eels from South West England, South Wales and North-West England, all fisheries being undertaken using the same method, apart from fish from the Parrett fishery where a different type of hand fishery is employed. Elvers are purchased and stored in tank facilities for on-ward sale to clients be it restocking or aquaculture.

2. The assessment

The assessor was Alex Senechal of MacAlister Elliott and Partners Ltd, who visited UKGE on the 19th March 2018. The visit commenced with the assessment of the paper based records with Office Manager, Vicky Hale. This was followed by a tour of the facility by Mr David Blennerhasset (Operation Manager) to answer any further questions of the assessor regarding handling and welfare, transportation preparation, water quality and general operations at the facility regarding the eels at the facility. This was followed by Mr Peter Wood (owner of UKGE) demonstrating the use of Rose Bengal stain as a means of identifying damaged glass eels as a predictive tool for mortality of individuals caused by fishing and handling practices.

3. Client Contact Details

Client Contact Name	Mr Peter Wood
Client Address	UK Glass Eels Ltd, Over Causeway, Over, Gloucester, GL2 8DB
Client Email	peterwood@glasseel.com office@glasseel.com
Client Phone Number	07785 350661

4. Results of the assessment

The outcome of this assessment is as follows;

UKGE has passed Component 1: Commitment to Sustainability and legality

that UKGE scored 10 **green scores** against Component 3 and therefore **should be considered sustainable under the SEG standard, Component 3: Glass Eel Buyers.**

that UKGE scored 4 **green scores** against Component 7 and therefore **should be considered sustainable under the SEG standard, Component 7: Traceability**

5. 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 ¹ for a Component in its previous audit?	Enhanced Surveillance	Go to Q3
3	Does the client only buy and sell product (does not physically handle it?)	Minimum Surveillance	Go to Q4
4	All other scenarios	Standard Surveillance	Go to Q5

	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

¹ 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.

As the client has been seen to fall into the Standard Surveillance bracket, the next audit will be due on the 19th March 2020 (in 2 years' time) and shall be an on-site surveillance audit.

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

1. Component 1 - Commitment to Sustainability & Legality

1. Commitment to sustainability & legality (See Note 1)	
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	<p>UKGE are fully paid up members of SEG and regularly attend and support SEG functions. UKGE are also heavily involved in re-stocking and educational activities in relation to SEG as well as through independent initiatives.</p> <p>UKGE is not currently undergoing or has been convicted for breaches of eel regulations (to the assessor's knowledge and as confirmed by UKGE). UKGE has also been heavily involved with restocking programs in the UK and the rest of Europe as well as spending considerable time each year educating local school children in the life cycle of the eels, the history of the fishery and involving them in restocking events.</p> <p>As such, the commitment of UKGE to SEG and sustainability is confirmed as meeting the green indicator for this component.</p>
Score	A Green score indicator is awarded

2. Component 3: Glass Eel Buyers

1. Mortality in storage facility (See Note 5)	
Weighting: 2	
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>Mortality records were assessed during the audit for all sources of eels. Average mortality figures are provided below for the 2015, 2016 and 2017 seasons. Eel mortality is currently noted as being: eels from the Parrett, eels from Eeline UK and All Other Eels (AOE) received at the facility. These having mortality figures of 0.94, 1.03, 1.13; 2.15, 0.58, 2.41; 1.51, 0.52, 1.58 for 2015, 2016, 2017 respectively.</p> <p>Average mortality rates for the seasons are seen to be below the 2% average at 1.03%, 1.71% and 1.20% for 2015, 2016 & 2017 respectively. As such a Green score is provided. In addition to mortality figures retained, shrinkage is also recorded for the stock retained at the facility which is to be taken into consideration when noting weight difference from purchase and sale weights. These figures are what is generally expected from such a facility with mortality and shrinkage amounting to between 5.5-6.5% in a season.</p>
Score	A Green Score indicator is provided
2. Mortality during transport and initial holding if transported to farm (See Note 9)	
Weighting: 2	
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	In order to assess mortality from fish sold to aquaculture businesses after transport, two of UKGE's clients were contacted, Royal Danish and Scandinavian Silver Eel (both of which are SEG certified farms). Figures provided were of mortality seen in the first week after arriving at the farms for the 2017 season of 0.7% and 0.06% respectively.
Score	A Green Score Given
3. Water quality	
Weighting: 1	
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>UKGE operate a system for eels including biological, mechanical and UV treatment systems. Water monitoring is done automatically for oxygen, pump failure and water temperatures with back-up systems provided for all crucial systems. Other water quality parameters are not regularly treated but are managed through regular husbandry and health checks of the stock.</p> <p>Systems have been updated since the last assessment to include automated alarm systems which send text and ring alerts to selected telephone numbers. In addition to this a remote camera system is in place to monitor the facility when required to work in parallel with the intruder alert system which can identify where the point of entry was and location of activity at the facility. Connections to electrical supply have been upgraded to limit malfunction in case of surcharge power cuts and backup generators are on site in case of extended power loss periods. Systems are connected to sufficient oxygen supplies working in relay should one cylinder run out while staff are not present at the facility. Oxygen levels for the tanks are regulated according to the quantity of fish present in each system. pH is not adjusted from the water supply to the tanks as it is at 8.2-8.9 from source (water collected and stored on site).</p> <p>The assessor finds that all requirements for this criteria are met by the facility.</p>
Score	Green Score indicator is provided
4. Biosecurity is present and disease is treated rapidly and appropriately	
Weighting: 1	
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	The facility operates no bio-security measures (including the washing and

indicator	<p>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.</p>
Discussion	<p>UKGE have a thorough and documented biosecurity plan which is regularly updated by Mr Wood with the latest regulatory requirements and best practice procedures as set out by UK national regulatory authorities. Elvers are regularly monitored for stress and health condition by senior members of stall. No drugs are generally used due to the short period of time that elvers will spend in the system however, when required, any medication or chemicals added to the systems are only administered by Mr David Blennerhasset.</p> <p>Persons visiting the facility from other facilities with elvers or eels, or in order to undertake inspections of the facility and have therefore been in contact with other facilities are required to disinfect footwear before entering the stocking facility to ensure mitigation against contamination. In addition to this, only 5 members of the UKGE team are permitted to enter the stocking building.</p> <p>Although other species are stored at the facility at other times of year, these periods do not overlap with the eel season and all areas are severely treated to increase the pH to above 13 with caustic soda to ensure all living organisms are destroyed. This is all overseen by David Blennerhasset to ensure all areas are cleaned and subsequently flushed out thoroughly with fresh water.</p> <p>Any dead fish removed from tanks during the eel season are weighed and frozen to ensure mortality can be accounted for and weights sold equate to weight purchased, less shrinkage.</p>
Score	A Green score indicator is provided
5. Handling and welfare (see notes 10 and 11)	
Weighting: 1	
green score indicator	<p>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.</p>
amber score indicator	<p>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.</p>
red score indicator	<p>Excess, poorly planned or careless handling is likely to result in additional mortality.</p>
Discussion	<p>UKGE operate an effective system for the handling of elvers at all times. Nets are not used with the system designed to allow drainage of elvers into required containers whenever possible. Large mesh nets are only used on the main storage tanks in order to remove dead eels from the system. This is done by gently passing</p>

	<p>the large net through the water allowing all live elvers to swim away/through the net while dead eels remain on the surface. The system infrastructure is well designed in order to minimise stress and potential opportunities that may cause damage to elvers, with most stages for moving eels between tanks using draining systems where no touching of the eels is required.</p> <p>A documented handling procedure is in place and maintained by UK Glass Eels which any new staff are trained with. Fish being introduced to the system with any other species present when purchased are passed through a floating raft mesh which prevents any “tired” eels and most other species including shrimp from going into the holding tank.</p>
Score	Green score indicator is provided
6. Transport (See note 12)	
Weighting: 1	
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>UKGE take great care during transport to maximise eel survival. Packaging is done in an organised and well thought out manner which ensures that eels remain cool and wet during transportation. Eels are emptied from tanks using pipe systems into specially made sieving boxes where they are then scooped using soft edged boat bailers to ensure no damage is caused to the fish.</p> <p>Fish are then weighed and placed in specially designed transportation boxes which have separate cooling compartments included to keep ice separate from the fish allowing them to remain cool without risk of freeze burning. Transportation time is kept to below 24 hours allowing transportation from the UK to eastern Europe via the company’s private aircraft which helps to minimise transportation time dramatically. Average longer transportation journeys are between 12-18 hours generally. Temperature is controlled by UKGL from the point of packing until the client takes delivery of the eels.</p>
Score	A Green score provided
7. The required percentage of glass eels from the fishery is being used for restocking (See Note 13)	
Weighting: 2	
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 nor 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	<p>UKGE is heavily involved in re-stocking processes both through the sale of elvers and through voluntary re-stocking programmes.</p> <p>UKGE are required to provide 60% of all elvers for restocking in order to get a green score. Records provided to the assessor show that of the 2526kg, 3636kg and 3360kg of elvers sold during the 2015, 2016 and 2017 seasons respectively, 1877kg, 1950kg and 1616kg were sold directly for restocking each year. This equates to 58% on average over the 3 years. Additional glass eels have been made available for restocking by UKGE however these have not necessarily been sold and therefore count towards the figures provided above.</p> <p>In addition to this, UKGE have made a large number of contributions to local education programmes for school children and have previously voluntarily made contributions to Ireland for restocking processes which have not been part of the sold figures.</p> <p>With this in mind, it is considered highly likely that over the 60% required has been sold or donated for restocking, and that more than 60% have been made available for restocking.</p>
Score	A Green score indicator is provided

3. Component 7 - Traceability

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

1. - Incoming Product (See Note 20)	
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	<p>When eels are purchased, the licence of the fisherman is visually inspected. Currently though, no-check is completed to ensure that all incoming products are from a single licenced individual directly. Product is normally identified as being from a specific area but not individual location as fishermen may fish at several locations on one tide to improve catches.</p> <p>For every purchase of eels from an individual or group of individuals, a sales note is created with date, name of individual making the sale and weight of eels sold. This is then given a batch number in the office to enable all fish to be traced to a point of purchase.</p>
Score	A Green score indicator is provided
2. – Separation and Segregation of Product (See Note 21)	
green score	The organisation operates a system which ensures that the product remains separated

indicator	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	<p>The traceability system described in Principle 4 of this component ensures that all batches can be tracked from start to finish and separation of non-certified eels provided as and when required. In previous years this has enabled elvers from the North West of England and River Taw to be separated from SEG certified elvers taken from the Rivers Parrett and Severn.</p> <p>Fish are also separated from the time of arrival at the facility depending on their origin. Fishermen coming to the facility to sell fish caught are only allowed to enter the reception building by the designated door. Their catch is then weighed and temporarily stored in a collection tank. Fish collected from the Parrett or delivered by Eeline UK Ltd. are dealt with separately.</p> <p>At any given time and due to the specifications of certain clients, all SEG and NON-SEG eels are kept separate from each other using separate stocking tanks and water systems to ensure no mixing can occur.</p>
Score	Green score
3. – Outgoing Product (See Note 22)	
green score indicator	<p>The organisation only labels certified products with the ‘SES’ ecolabel once it has been approved to do so through the signing of an ‘SES’ ecolabel licence agreement.</p> <p>All product to be sold as certified by an organisation meets the following criteria:</p> <ul style="list-style-type: none"> • Any product labelling shall be accompanied by the ‘SES’ logo. • Products shall be accompanied by an invoice which: <ul style="list-style-type: none"> ▪ Includes the prefix ‘SES’ in the product description; ▪ Includes a record of the volume/quantity of product and to whom it was sold; ▪ Includes the certificate code on the invoice • The certificate code must be clearly related to the certified product only
amber score indicator	<p>The above requirements are met except that:</p> <ul style="list-style-type: none"> ▪ Products have not been correctly labelled through the invoice
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	UKGE are not currently selling any product as SEG certified and therefore are not required to comply with the labelling procedures set out above. However, when requested by the client, packing boxes are labelled with the river of origin, thus enabling the client to know the origin of the product and able to check if the fish delivered are from a certified fishery.

Score	A Green score indicator is provided
4. – Record keeping and documentation (See Note 23)	
green score indicator	<ul style="list-style-type: none"> ▪ 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. ▪ The organisation operates a system that also allows for the completion of a batch reconciliation of eel product by weight over a given period. ▪ The organisation maintains records for a minimum of three (3) years.
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>UKGE operate a good traceability system for elvers from point of purchase to sale. On receipt of elvers a ticket is provided to the fisherman and a note made on the stock spread sheet of the amount of elvers entered into the reception tank. Depending on the quantity received in a night or series of nights, the tank will retain a “batch” until the fish are transferred to the stocking tanks in the second building. When large volumes of fish are received in one night, a second reception tank is available to temporarily store fish until they are moved to the stocking tanks.</p> <p>When batches are sent to the stocking tanks, a note is made of which batch is stored in specific tanks. This system allows for the tracking of all products from ticket through batch to sale.</p> <p>Vicky Hale was able to provide data from 2015 onwards of the quantity of fish purchased from each individual fisherman, per year and summary tables indicating all fish purchased, all fish sold (which was always lower) and the total loss through mortality or shrinkage. This shows that for all sources less product has been sold than bought at UKGE.</p>
core	A Green indicator score is provided