

## **Eel Recertification – Koman’s Vishandel B.V. (SES-C-006)**

### **Assessment against:**

Component 1: Generic Requirements  
Component 7: Traceability

**Completed by**  
Richard C Wailes

7<sup>th</sup> May 2015

**FINAL**

### **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 Koman’s Vishandel BV. This assessment has been completed against Components 1, 3 and 7 of the Standard only.

The assessment of Koman’s Vishandel BV who are a well established fish processing, smoking and trading company (with a small retail shop) supplying both the Dutch and northern European markets.

Founded in 1918 and it is a family business with 38 employees. The emphasis is on sustainability with the website showing the SES eco label. Currently they are not selling any processed product as SEG certified and are merely selling on live eels (about 40-50 tonnes per annum) ex three certified suppliers to one UK company (The Dutch Eel Company). In total about 500 tonnes of eels are handled each year.

They also are buying and selling glass eels for restocking – this is a recent development and to date only one deal has been done. The glass eels are picked up from glass eel fishermen in France and taken directly to a buyer in Germany who are using them for restocking – a maximum time from source to delivery of 24 hours in the tanker truck. At the time of the audit, the provenance of the eels could not be fully verified as sustainable and therefore cannot be assessed for Component 3 of the Standard. When these eels are verified as sustainable then Component 3 will be added to the scope.

Currently about a third of all factory production is dedicated to eel production with the balance producing assorted fish products (mainly for the hotel and restaurant trade)

The operation is comprised of a Traditional Smoker / Fish Processor, twenty live eel holding tanks (5 used for grading), processing & storage rooms, a mail retail shop and delivery business employing 35 staff in total. Eels are killed humanely, gutted and cleaned, brined, soaked,

chilled and either packed whole or in fillet form in vacuum packed pouches with Dupan labels (no SES labels currently used)

## 2. The assessment

The assessor was Richard Wailes of MacAlister Elliott and Partners Ltd, who visited Koman's Vishandel BV on the 7th May 2015.

The visit, which included a detailed site inspection of all areas, was led by Jaco Koman (Director – Koman's Vishandel BV) during which all on-site procedures were explained and demonstrated in full.

The tour incorporated all areas of the site including goods intake, raw material storage area (tanks), cold & chill stores, processing area, packaging, labelling, invoice, retail and data systems.

The path of the product from the start to finish of the client's Chain of Custody was traced, enabling the assessor to track batches of product and be satisfied that the chain is secure throughout.

## 3. Client Contact Details

<b>Client Contact Name</b>	Jaco Koman
<b>Client Address</b>	Den Bels 1, 4782 PG, Moerdijk, The Netherlands
<b>Client Email</b>	<a href="mailto:jaco@komanvis.nl">jaco@komanvis.nl</a>
<b>Client Phone Number</b>	0031 168-412422

## 4. Results of the assessment

The outcome of this assessment is as follows;

Koman's Vishandel BV has passed **Component 1: Commitment to Sustainability and legality** and Koman's Vishandel BV scored **3 green scores** and **1 amber score** against **Component 7** and therefore **should be considered sustainable under the SEG standard - Component 7: Traceability**.

Some recommendations were raised by the auditor;

**RECOMMENDATION 1:** Ensure that up to date certificates are held from all suppliers (including Glass eel) – up to now they had been merely checked on the SEG website which is currently three months out of date.

**RECOMMENDATION 2:** Ensure that the SEG details are written down correctly on the invoices. The current method used is confusing.

## 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 <sup>1</sup> 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

As the client has been seen to fall into the Standard Surveillance bracket, the next audit will be due in May 2017 (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.

<sup>1</sup> A borderline pass is considered a pass that occurs when one less amber indicator is received than 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.

## Component 1 - Commitment to Sustainability & Legality

<b>1. Commitment to sustainability &amp; legality (See Note 1)</b>	
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	Koman's Vishandel is fully committed to sustainability of all the eels they smoke and these are aligned to the SES goals and their website has been updated to reflect this. There is no evidence of any illegal trading in eels.
Score	A Green score is fully justified

## 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 (See Note 20)</b>	
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	All certified eels are checked back to the source – only three certified suppliers used. Passie Voor Vis, Jupiter Al & Royal Danish. The certificates are held for all three and email confirmation in place that the eels supplied are SEG certified.
Score	Green score
<b>2. – Separation and Segregation of Product (See Note 21)</b>	
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 eels are segregated at every stage from input into the factory (15 tanks – each marked with supplier, size and date). This segregation follows the eels through the processing (or onward sale if live). Even after processing (yield less than 50%) the batch is identified through the date number
Score	Green score as eels fully separated and segregated
<b>3. – Outgoing Product</b> <a href="#">(See Note 22)</a>	
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"> <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	<p>The above requirements are met except that:</p> <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	The invoices out are labelled with the SES information but the not the full details as required by the Standard. This will be changed for future documentation
Score	Amber score as products have not been correctly labelled through the invoice
<b>4. – Record keeping and documentation</b> <a href="#">(See Note 23)</a>	
green score indicator	<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 eel in 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> </ul>

	<ul style="list-style-type: none"> <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>
Amber 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>Full traceability and tracking procedures are in place at Komans and were fully demonstrated on both live eels and glass eels.</p> <p>Live Eels are purchased from three approved suppliers (Jupiter AI, Royal Danish and Passie voor vis) who purchase their certified glass eels from the UK fishery through Peter Wood. The SES details though sometimes not on the invoices in are confirmed by email and phone call.</p> <p>Glass Eels are purchased from SARL France Civelle who provide full details of all fishermen, place and dates on the documentation in.</p> <p>Batch reconciliation can be undertaken on each batch and a Mass balance achieved over a given period. If product is processed a yield is also factored in (just under 50%).</p> <p>Records are kept for 10 years plus</p>
Score	Green