

Eel Assessment – Severn and Wye Smokery

Assessment against:

Component 1: Core requirements
Component 7: Processing, wholesale and retail supplies

Completed by
Thomas Bourner

04th March 2019

FINAL REPORT

Introduction

This document represents the report completed following the 2019 audit carried out under the Sustainable Eel Standard (Version 6.0, June 2018) against Severn and Wye Smokery. This assessment has been completed against Components 1 & 7 of the Standard only.

The assessment is of a smoker in Chaxhill, Gloucestershire, England. Primarily producing smoked salmon, the company only uses traditional production techniques with a lot of grading, filleting, curing and cutting being done by hand. They are active supporters and members of the Sustainable Eel Group and continue to run an ‘eels in school’ campaign to increase awareness of the use of sustainable eels. Frozen eels are purchased from a certified supplier before being defrosted and then either hot or cold smoked.

They have not had any sales labelled as SEG since 2015.

1. The assessment

The assessor was Mr Thomas Bourner of Control Union Pesca Ltd, who visited Severn & Wye Smokery on the 4th March 2019. The audit included interviews with Mark Romans, Technical Manager.

2. Client Contact Details

Client Contact Name	Mark Romans
Client Address	Chaxhill, Westbury-on-Severn, Gloucestershire, GL14 1QW
Client Email	mark.romans@severnandweye.co.uk
Client Phone Number	01452 760190

3. Results of the assessment

The outcome of this assessment is as follows;

A responsible score will result in 1, an aspiring score in 0. Score weighting will be taken into consideration for each element.

That Severn & Wye Smokery has scored the following for Component 1: General Requirements and therefore **should** be considered **RESPONSIBLE** under the SEG standard.

Component 1: General Requirements	Auditor's findings	Weighting	Score
1.1 Commitment to Legality	Responsible	1	1
1.2 Contribution to eel conservation projects	Responsible	1	1
1.3 The facility trades in certified responsibly sourced eels	Responsible	1	1
1.4 Traceability:			
1.4.1 Incoming products, separation and segregation	Responsible	1	1
1.4.2 Outgoing products	Responsible	1	1
1.4.3 Record keeping and documentation	Responsible	1	1
1.5 Biosecurity & welfare – eel and eel products are provided with minimal risk of diseases, parasites and alien species	N/A	X	N/A
Total		6	6/6
Percentage Responsibility Score:		100%	

That Severn & Wye Smokery has scored the following for Component 7: Processing, wholesale and retail supplies, and therefore **should** be considered **RESPONSIBLE** under the SEG standard.

Component 7: Processing, wholesale and retail supplies	Score
<p>Comments: All eels purchased are purchased as SEG certified eels. These are not currently sold as certified as they do not have the customer demand. Procedures are in place to cover the SEG requirements and the company is aware of the importance of separation, segregation, identification etc.</p> <p>Eels are purchased in frozen and then smoked before sale. Full traceability is in place and the company is committed to the responsible sourcing of eels.</p>	1

Summary of assessment and scoring

Component	Aspiring	Responsible
1	0	6
7	0	1
Total	0	7
Total Responsibility Score		100%

Recommendations:

No recommendations made.

4. 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 the 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 ¹ pass 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	

	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 March 2021 (in 2 years' time) and shall be an on-site audit.

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

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

Component 1 – Generic requirements	
Criterion 1.1: Commitment to legality	
Responsible indicators	For at least the past two years: the organisation has not been found guilty for any offences relating to eel fishing or trading.
Aspiring indicators	For at least the past 12 months: the organisation has not been found guilty for any offences relating to eel fishing or trading.
Discussion	The client confirmed during the audit that they have not been prosecuted for any eel related offences.
Score	Responsible indicator.
Criterion 1.2: Contribution to Eel Conservation Projects. (Optional bonus score)	
Responsible indicators	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.
Aspiring indicators	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.
Discussion	<p>The client is actively involved in “eels in schools” which places tanks of eels in primary schools. This is an educational program set up by the company to promote sustainable eels putting around 30 – 50 tanks in classrooms each year.</p> <p>The client is also actively involved in the re-stocking program in the UK.</p> <p>It is very difficult to put a % quantity on the amount of time/money on this as it is all dealt with inhouse however it is thought to meet this requirement by the auditor.</p>
Score	Responsible indicator.
Criterion 1.3: The facility trades in certified responsibly sourced eel	
Responsible indicators	The organisation trades in at least 50% (by number) of certified responsibly sourced eel and has the documentation to demonstrate that.
Aspiring indicators	The facility trades in 10 – 49.9% (by number) of certified responsibly sourced eel and has the documentation to demonstrate that.
Discussion	All of the eels purchased are from Royal Danish and are 100% are SEG certified.
Score	Responsible Indicator

Criterion 1.4: Traceability	
1.4.1: Traceability - Incoming product, separation and segregation	
Responsible indicators	<ul style="list-style-type: none"> Certified and uncertified eel products can be clearly and easily traced back to their source. Where a fishery or buyer, an electronic tele-declaration system is used It operates a clear system which ensures that the product remains separated at all stages from arrival to dispatch from non-certified eel products. The organisation ensures that any products wishing to make a claim as certified do not contain any non-certified eel-based ingredients. If resolved through mass- or number- balance calculations, the margin of error does not exceed 2%
Aspiring indicators	<ul style="list-style-type: none"> Certified and uncertified eel products can be traced back to their source. It operates a system which ensures that the product remains separated at all stages from arrival to despatch from non-certified eel products. The organisation ensures that any products wishing to make a claim as certified do not contain any non-certified eel-based ingredients
	<ul style="list-style-type: none"> If resolved through mass- or number- balance calculations, the margin of error does not exceed 5%
Discussion	All the eels purchased are from one certified supplier, Royal Danish. There is an approved supplier list in place and currently they are the only ones listed. The certification of suppliers will be checked as part of this approval and only those listed will be able to be bought from. Once they have been ordered as certified they will be listed on a GRN which is passed to goods in. They then know to expect a certified product only and would reject if this was not was delivered.
Score	Responsible Indicator
1.4.2: Traceability - Outgoing product	
Responsible indicators	<ul style="list-style-type: none"> Where a fishery or buyer, an electronic tele-declaration system is used Documentation is well maintained with a maximum of 2% error in the following: <ul style="list-style-type: none"> 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 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"> - Includes an appropriate batch code - Includes a record of the quantity (no. & weight) of product and to whom it was sold

Aspiring indicators	<ul style="list-style-type: none"> • Documentation is well maintained with a maximum of 5% error in the following: • 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 • All products to be sold as certified by an organisation are accompanied by an invoice which meets the following criteria: - Includes an appropriate batch code - Includes a record of the quantity (no. & weight) of product and to whom it was sold
Discussion	The company procedure states that codes specific to SEG products will be in use and can only be used for SEG products. They will produce labels that include SEG in the product description and all other information as required by the SEG. Batch codes follow the products through the company to the point of sale. Nothing has been sold as certified to date.
Score	Responsible Indicator
1.4.3: Traceability - Record keeping and documentation	
Responsible indicators	<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 batch delivered to a buyer to be connected back to a water, a time period (maximum duration one month) and specific fisherman/vessel • If a fisherman or buyer, a tele-declaration system is used to report catches and trade • 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.
Aspiring indicators	<p>The above requirements are met except that:</p> <ul style="list-style-type: none"> • Records have been maintained for less than three (3) years • If a fisherman or trader, a tele-declaration system is planned to be used to report catches and trade in the next season
Discussion	Documents are kept for a minimum of three years and in practice much longer. Records are sufficient to allow traceability of each batch of eels purchased and sold. A recent (though not sold as certified) traceability test was completed as part of the audit and clearly shows the eels throughout the whole process. A reconciliation can be completed demonstrating this over a given period. All eels used are certified so there is no evidence of mixing with non-certified products.
Score	Responsible Indicator
Criterion 1.5: Biosecurity & welfare – Eel and eel products are provided with minimal risk of diseases, parasites and alien species	
Eel Fishing: Biosecurity measures are adopted	
Responsible indicators	<ul style="list-style-type: none"> • The fishery conducts good biosecurity measures such as the disinfection and drying of nets and equipment between each fishing in different waters. OR: • The fishermen only operate in the same river or estuary, with no risk of transferring diseases or alien species between catchments

Eel buying & trading: Biosecurity is present and disease is treated rapidly and appropriately	
Responsible indicators	<ul style="list-style-type: none"> • The use of chemicals follows legal requirements of the appropriate EU regulations and of the country concerned. • The facility has the appropriate permissions to operate from the relevant licensing authority • An effective and documented biosecurity plan is in place and there is evidence that it is being followed. • 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. • Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility.
Aspiring indicators	<ul style="list-style-type: none"> • The use of chemicals follows legal requirements of the appropriate EU regulations and of the country concerned. • The facility has the appropriate permissions to operate from the relevant authority • An effective and documented biosecurity plan is in place and there is evidence that it is being followed. • Eels are regularly monitored for health and possible signs of stress (although this might not be documented) and daily mortality is recorded. • Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility.
Discussion	N/A
Score	N/A
Eel farming: Biosecurity is present and disease is treated rapidly and appropriately	
Responsible indicators	<ul style="list-style-type: none"> • The facility has the appropriate permissions to operate from the relevant authority. • The use of chemicals follows legal requirements of the EU and of the country concerned • An effective and documented biosecurity plan is in place and there is evidence that it is being followed. • Daily records are available showing monitoring of fish health and signs of stress and daily mortality is recorded • Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility • UV is used at an appropriate level and separation between tanks

Aspiring indicators	<ul style="list-style-type: none"> • The facility has the appropriate permissions to operate from the relevant licensing authority • The use of chemicals follows legal requirements of the EU and of the country concerned. • An effective and documented biosecurity plan is in place and there is evidence that it is being followed. • Eels are regularly inspected for disease (although this may not be documented) and daily mortality is recorded. • Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility.
Discussion	N/A
Score	N/A
Restocking: The risk of restocked eels introducing disease into wild populations has been assessed and is minimal	
Responsible indicators	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.
Aspiring indicators	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.
Discussion	N/A
Score	N/A
Wholesale / Retail / Processing: Hygiene Plans are followed and there are rare examples of infection	
Responsible indicators	Food processing hygiene plans are followed
Discussion	Severn & Wye Smokery have a full HACCP plan in place for the company. They are also MSC CoC certified and BRC certified. No examples of infections seen during the audit.
Score	Responsible Indicator

Component 7 – Processing, wholesale and retail supplies	
Issues	<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>
Notes	<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>
Benefits	<ul style="list-style-type: none"> • Consumers have the opportunity and choice to purchase responsibly sourced eel
Targets & Measures	<ul style="list-style-type: none"> • An increasing number and proportion of processors, wholesalers and retailers provide certified eel, from 5% now to 90% in 10 years • An increasing proportion of total retail sales is of certified eel, from 5% now to 75% in 10 years
Discussion	<p>All eels purchased are purchased as SEG certified eels. These are not currently sold as certified as they do not have the customer demand. Procedures are in place to cover the SEG requirements and the company is aware of the importance of separation, segregation, identification etc.</p> <p>Eels are purchased in frozen and then smoked before sale. Full traceability is in place and the company is committed to the responsible sourcing of eels.</p>
Score	Responsible Indicator