

Eel Assessment – Troelstra Aquacultuur B.V.

Assessment against:

Component 1: Core requirements
Component 4: Eel buying and trading
Component 5: Eel farming

Completed by
Richard Wailes

4th February 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 Troelstra Aquacultuur (TA). This assessment has been completed against Components 1, 4(part) & 5 of the Standard only.

The assessment is of an eel farm located in Rohel in northern Holland.

TA buys in and grows on glass eels for on growing, sale and restocking.

TA has been operating since 1992 with the operation based on a similar one in Canada. The business has grown steadily to the expected tonnage of 200 tonnes in 2019 which is its optimal size.

The farm is owned and run by Johan Troelstra with the help of Farm Manager, Chris Huisman, Farmer Joroen van Duik and Administration Manager, Jolanda Troelstra-Luinstra (Total staffing 2 FT and one PT)

The farm is designed around four separate water and filtration systems so that bio security is maintained and risk is minimized – one for Glass Eels, one for Fingerlings and two for growing on Eels.

Currently it has 27 stainless steel tanks and 10 plastic tanks with one system for Glass Eels (6 tanks – 80kg/tank), one for fingerlings – 10g-60g (8 tanks) and one for larger eels – 60g+ (20 tanks for growing on up to 500g and 3 tanks for purging eels prior to despatch for 3-5 days)

The farm is able to batches of glass eels (350/500 kg) at any one time. These are placed on arrival in the nursery units that are separated from the rest of the system for bio-security reasons. Eels are then moved to the fingerling development section after six weeks or when the size after grading is 5-10g.

They are then moved through the system until market weight 130 – 150g for the domestic market and 400 – 800g for the German market is reached.

All the main tanks are either round or rectangular and supplied by a ‘timed’ feeding system (4 times/day). Eels are fed cod roe for the first 10 days of development during which time they are slowly weaned on to a crumbled pelleted feed (supplied by Skretting and BioMar).

The farm sells live eels (no slaughtering is done on the premises) to a number of local and European clients – these are despatched every two weeks.

1. The assessment

The assessor was Richard Wailes of Control Union Pesca Ltd, who visited Troelstra Aquacultuur on the 4th February 2019. The audit included interviews with Jolanda Troelstra-Luinstra and Joroen van Duik.

2. Client Contact Details

Client Contact Name	Jolanda Troelstra-Luinstra
Client Address	Meerweg 1a, 8507 CA, Rohel, The Netherlands
Client Email	troelstra.aqua@planet.nl
Client Phone Number	00315153552121 & 0031651496361

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 Troelstra Aquacultuur 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	N/A	N/A	N/A
1.3 The facility trades in certified responsibly sourced eels	Aspiring	1	0
1.4 Traceability:			
1.4.1 Incoming products, separation and segregation	Aspiring	1	0
1.4.2 Outgoing products	Aspiring	1	0
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	Responsible	1	1
Total		6	3
Percentage Responsibility Score:		50%	

That Troelstra Aquacultuur has scored the following for Component 4: Eel buying and trading and therefore **should** be considered **RESPONSIBLE** under the SEG standard.

Component 4: Eel buying and trading	Auditor's findings	Weighting	Score
4.1 The glass eel holding facility is a registered aquaculture production business	Responsible	1	1
4.2 Mortality in storage facility	Responsible	2	2
4.6 Transport	Responsible	1	1
Total		4	4/4
Percentage Responsibility Score:		100%	

That Troelstra Aquacultuur has scored the following for Component 5: Eel farming and therefore **should** be considered **RESPONSIBLE** under the SEG standard.

Component 5: Eel farming	Auditor's findings	Weighting	Score
5.1 The total mortality rate during the culture is low	Responsible	2	2
5.2 The fish meal/oil ingredients in the feed come from a responsible source	Aspiring	1	0
5.3 Feed is used as efficiently as possible	Aspiring	1	0
5.4 Water Quality	Responsible	1	1
5.5 There are minimal ecological impact from effluent discharge	Responsible	1	1
5.6 Grading, slaughter and transportation are carried out with respect to welfare	Responsible	1	1
5.7 The farm provides eel for restocking	Responsible	2	2
5.8 The farm provides eel for restocking	Responsible	2	2
Total		11	9/11
		82%	

Summary of assessment and scoring

Component	Not Achieved	Aspiring	Responsible
1	0	3	3
4	0	0	0
5	0	2	9
Total		5	12
Total Responsibility Score			71%

Recommendations:

The operation has yet to purchase any SEG certified eels and to reach the responsible indicator (and maintain aspiring) a commitment must be made to source these eels.

The Batch system based on the year is basic (but works) and perhaps this can be reflected on the invoices out though unique codes which will further help traceability.

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 February 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	Confirmed – the organization has not been involved with or found guilty for any offences relating to eel fishing or trading.
Score	Pass: 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	While the company contributes 0.02 EUR per kg of feed purchased, this has been done each year since 2010 to help fund eel conservation projects in the Netherlands and the EU, the yearly contributions are not sufficient to meet the requirements of this component and as an optional bonus score, no scoring is being applied for this element.
Score	N/A
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	The company has not purchased any certified responsibly sourced eel in the last three years buying from French operations who are not yet certified. In the last three years 1126 kgs of eels were purchased (526kgs, 350kgs & 250kgs). This has been deemed as aspiring as they have not been certified during this period. Going forward to maintain this, and reach responsible indicator, SEG eels must be purchased with records kept to demonstrate it.
Score	Pass: Aspiring 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 • If resolved through mass- or number- balance calculations, the margin of error does not exceed 5%
Discussion	Despite there being no certified eels stock the company is able to provide documentation tracing each tank back to the certified supplier in each year (in fact there has only been one purchase per year of glass eels). This can be done through weight and number. Note that if and when SEG eels are purchased these can be identified and kept separate from non SEG eels
Score	Pass: Aspiring indicator as the system is in place but is not yet used for SEG eels
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: • 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: <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

Discussion	Currently there are no batch codes shown on any documentation out as the only codes are year date. This is shown in all the back-up documentation (which is well maintained and comprehensive) and so can be linked to the invoice. This was not shown on the invoice due to worries that the client may be upset at getting “2015” eels. A new code will be set up which will be linked directly to the year.
Score	Pass: Aspiring 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	Records are present for more than 5 years to date. All records for purchases and sales of fish are maintained for a minimum of 7 years as with all other accounts in accordance with Netherlands regulation. The growth of fish is monitored regularly through grading and therefore weight of fish within separate systems is monitored closely between systems. It is possible to do batch reconciliations – this was demonstrated on the computerized system
Score	Pass: Responsible indicator
Criterion 1.5: Biosecurity & welfare – Eel and eel products are provided with minimal risk of diseases, parasites and alien species	
Eel farming & trading: 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	<p>The eels are checked and monitored constantly and so any possible disease outbreaks are treated instantly. Any issues found are immediately raised with the local vet, Biomar representative or Olga Haenen from the local university. The company is approved with approval number NL 00021731.</p> <p>A log book is kept for all treatments (preventative) of the eels with salt being used as the main method of preventing disease (max 0.3-0.5%) and is dosed every other week. Formalin is also used to control gill worms but the use of salt is the main way to prevent infection.</p> <p>The volume of chemicals used is so small that the effect on the water quality is virtually non-existent.</p> <p>There are good biosecurity measures in place with foot and handwashing control. No outside personnel are allowed onto the premises</p>
Score	Pass: Responsible indicator
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	Depending on the client, the testing may or may not be required of the facility. In the instance of German clients, this was previously requested but nothing has been asked in the past three years. In all cases it is always the intention of the facility to provide eels which are free of disease.
Score	Pass: Aspiring indicator

Component 4 - Eel buying and trading

Criterion 4.1: The Glass eel holding facility is a registered Aquaculture Production Business

Weighting: 1

Responsible indicators	The Glass eel holding facility is a registered Aquaculture Production Business
Aspiring indicators	The facility is not a registered Aquaculture Production Business, but has credible plans to register within the next 6 months

Discussion	The company is a registered Aquaculture Production business – the TRACES authority is in place
Score	Pass: Responsible indicator
Criterion 4.2: Mortality in storage facility	
Weighting: 2	
Responsible indicators	Mortality rate over the season is less than 2% on average.
Aspiring indicators	Mortality rate over the season is less than or equal to 5% on average but greater than or equal to 2%
Discussion	In the past four years the glass eel mortality rate has been recorded as follows: 2015 – 4.5% 2016 – 0.65% 2017 – 1.33% 2018 – 11.8% (poor batch of eels – refund given) General mortality rate is averaging 100kgs per month (ex FIROL collection records) or 1200kgs per year which is less than 1% Taken overall the percentage is less than 2% on average
Score	Pass: Responsible indicator
Criterion 4.6: Transport	
Weighting: 1	
Responsible indicators	<ul style="list-style-type: none"> • There is a Transport Plan in place to minimise travel time – this meets the Transport requirements for vertebrates • Packing is done in a way that minimises handling, time and stress • Eels are kept cool and wet with an adequate supply of oxygen • The operator holds the relevant transport authorisations
Discussion	There is a basic transport plan in place which covers the delivery of up to 1000kgs eels to clients in oxygenated water up to five hours away. The vehicle is small and only has three compartments and does not need special transport authorisation. All requirements are met
Score	Pass: Responsible indicator
Criterion 4.7: The required percentage of glass eels is being used for restocking	
Weighting: 2	
Responsible indicators	<ul style="list-style-type: none"> • The buyer can provide documented evidence that <u>they have sold</u> at least 60% for restocking the required target percentage of its glass eels from the last season for the primary purpose of conservation / escapement. • The eels for restocking are representative of the stock – slow growers are not selected

Aspiring indicators	<ul style="list-style-type: none"> The buyer can provide documented evidence that they <u>have reserved or made available at least 60%</u> of the required target percentage of its glass eels from the latest season available for the primary purpose of conservation / escapement, OR 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 The buyer can provide credible evidence that re-stocking will occur in the forthcoming season. The eels for restocking are representative of the stock – slow growers are not selected
Discussion	Refer 5.7
Score	

Component 5 – Eel farming

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

Weighting: 2

Responsible indicators	<ul style="list-style-type: none"> The Percentage Mortality Rate of eels in culture is less than or equal to 10% on average in the current and previous year OR as an average of the previous five years An accurate daily log is maintained of the number and causes of mortality
Aspiring indicators	<ul style="list-style-type: none"> The Percentage Mortality Rate of eels in culture is between 10 and 15% on average in the current and previous years OR as an average of the previous five years. An accurate daily log is maintained of the number of mortalities
Discussion	<p>Dutch law dictates that dead eels are required to be disposed of and that this is payable by weight. As such, detailed records are maintained (in kgs ex Firof collection notes) of all dead eels as they are collected from the tanks.</p> <p>As such the results below are estimated against yearly production figures. TA freezes the eels and disposes of them once a viable amount is reached (normally monthly). Normally only the Glass eels have a mortality of about 1-3% but in 2018 TA received a batch of poor glass eels with a 11.8% loss</p> <p>Figures for the provided by the farm show the average monthly mortality of grown on fish (not glass eels) was about 100kg which related to the total 200,000 kg production is 0.6%</p>
Score	Pass: Responsible indicator

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

Weighting: 1

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

Discussion	<p>As for all eel farms, the eels are started feeding on cod roe and then moved on to commercial eel food manufactured by BioMar & Skretting (for the Glass Eel feed – 0.5-0.8mm - up to the first grading – 5g).</p> <p>The cod roe normally comes from Klooster in Enkhuizen & Varia Vis in Urk and it is from MSC certified North Sea Cod.</p> <p>The cod roe must be freshly frozen, but does not have to be in perfect physical condition, so usually offcuts and slightly squashed pieces are used which cannot be sold for smoking and would probably otherwise be discarded.</p> <p>TA uses as little cod roe as possible, but in common with other eel farmers do not believe that it can be eliminated entirely. Kg for kg purchased as per the glass eels (250kg in 2018)</p> <p>BioMar who were contacted as part of the assessment and declared that:</p> <p>“The marine raw materials in the eel feed are variable in origin. The overall scores for fish meal and fish oil used by BioMar Brande during 2018 was:</p> <ul style="list-style-type: none"> - 88% of sourced fish meal was IFFO RS compliant - 96% of sourced fish oil was IFFO RS compliant.” <p>The Skretting Feed is sourced wherever possible from sustainable stocks something which Skretting takes seriously (www.skretting.com) and an average of 33% comes from fish off cuts and waste. Communications with Skretting were opened following the audit to acquire additional information on the sustainability of the feeds supplied. Some information was provided by the company however, no clear information was provided to indicate that the feed was IFFO or MSC certified. Company policy was provided which identified the responsibility criteria for ingredient supply to make the feed, and the company have confirmed that ingredients are sustainably sourced.</p>
Score	Pass: Aspiring
Criterion 5.3: Feed is used as efficiently as possible	
Weighting: 1	
Responsible indicators	<p>The average feed conversion ratios in the farm are as follows:</p> <ul style="list-style-type: none"> glass eel to fingerlings: 1.1 or less fingerlings to 200g: 1.6 or less large eels: 2.0 or less
Aspiring indicators	<p>The average feed conversion ratios in the farm are as follows:</p> <ul style="list-style-type: none"> glass eel to fingerlings: 1.3 or less fingerlings to 200g: 1.8 or less large eels: 2.2 or less
Discussion	<p>TA records show the FCR last year as</p> <ul style="list-style-type: none"> Glass eels up to fingerling size -1.13 Fingerling size – 1.67 Fingerlings to 147g -1.66 Larger eels to 500g – 1.34 Currently (2019) the figures are 1.4 to 1.6

	All records link to year and grading sheets
Score	Pass: Aspiring indicator
Criterion 5.4: Water quality	
Weighting: 1	
Responsible indicators	<ul style="list-style-type: none"> A system is in place that is expected to keep key water quality parameters within suitable tolerances for healthy eel survival (e.g. Ammonia, Suspended Solids, pH, Oxygen) Water quality management procedures are in place including regular monitoring of relevant parameters which shows that water quality is always high and stable Water quality monitoring is linked to an alarm-based system in the event of a sudden drop in water quality 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.
Aspiring indicators	<ul style="list-style-type: none"> A system is in place that is expected to keep key water quality parameters within suitable tolerances (e.g. Ammonia, Suspended Solids, pH, Oxygen) 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.
Discussion	<p>A system is in place where by water is taken from a deep well (80 m) on site before use in the separate recirculation systems. The water parameters for each system are monitor by automated computer systems which observes: pH (average 5.9), temperature (average 25 c) oxygen and feed rates. Water level systems are present on each tank separately. Visual monitoring and manual pH and oxygen testing are also done in each tank. The pH of the water for each system is altered automatically to ensure it remains constant. This can be manually modified when eels display any signs of stress from a possible increase in pathogens in the water.</p> <p>Nitrates, BOD & COD levels are checked daily on the site</p> <p>All systems and parameters which are monitored by the computer systems are also connected to an alarm system which notifies the on-site staff member (lives also on the premises). The facility has 1 backup power generator (400KVA) in case of power failure from the grid which is ample to cover the power requirements of the facility. In addition to this, Oxygen reserves are kept at the facility in case, any of the system require immediate saturation should one of the oxygenation systems fail or require maintenance.</p>
Score	Pass: Responsible indicator
Criterion 5.5: There are minimal ecological impacts from effluent discharge	
Weighting: 1	
Responsible indicators	<ul style="list-style-type: none"> The system is closed-circuit and has no discharge OR 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.

Aspiring indicators	<ul style="list-style-type: none"> • Effluent discharge is regularly tested by the farm AND/OR • Has been found to be non-compliant on no more than 1 occasion in the past 5 years.
Discussion	<p>The effluent from the farm is discharged into the local sewage system, with agreement from the local authority – this is cleaned and filtered.</p> <p>The farm has a series of filters (30 and 40 microns) to remove particles and nitrates from the water, after which the water is recycled back once again into the system before being finally discharged. The discharged water goes through a settlement tank before discharge into the sewage system and the residue sludge from the tank is sold for agriculture, in compliance with Dutch law.</p> <p>Any veterinary drugs are used after approval by the local vet for Glass Eels and fingerlings but the quantities are so minute that there is no effect on the water as they are all absorbed by the eels.</p>
Score	Pass: Responsible indicator
Criterion 5.6: Grading, slaughter and transportation are carried out with respect to welfare	
Weighting: 1	
Responsible indicators	<ul style="list-style-type: none"> • Grading is completed in an efficient manner • Slaughter is completed by a method that provides an instant death or renders them insensible to pain, i.e. electric stunning or percussive stunning. • Procedures are in place to ensure transportation provides suitable conditions for fish welfare.
Aspiring indicators	<ul style="list-style-type: none"> • Other, previously acceptable methods of stunning before slaughter are used, e.g. chilling, but there are credible plans in place to invest in the latest methods within the next 2 years
Discussion	<p>The main period of handling occurs during the grading of eels (to avoid larger eels out competing the smaller eels). All eels are purged and food withheld prior to this to reduce stress.</p> <p>This is completed using an automatic grader (using rollers with varied spacing) with lift up pumps and handling is minimized wherever possible</p> <p>The farm sells live eels (no slaughtering is done on the premises) to a number of local and European clients – these are despatched every two weeks after being purged for five days.</p>
Score	Pass: Responsible indicator
Criterion 5.7: The farm provides eel for restocking	
Weighting: 2	
Responsible indicators	The farm can provide documented evidence that 10% or more of the farm's annual eel production (by piece) <u>has been provided</u> for restocking for the purpose of conservation / escapement.
Aspiring indicators	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.

Discussion	<p>Figures were seen for the past two years restocking</p> <p>2018 – 370kgs sold for restocking – 3-8g – approx. 67,273 pieces</p> <p>2017 – 2114kgs sold for restocking to DUPAN and German clients – sizes, 10g, 2-4g, 2-10g, 3-8g and 4g – average 5g – 422,800 pieces</p> <p>2019 – Nothing to date</p> <p>Annual production 2016 – 1,166,000 average eels (140 tonnes)</p> <p>Annual production 2017 – 1,500,000 average eels (180 tonnes)</p> <p>Annual production 2018 – 1,333,000 average eels (160 tonnes)</p> <p>Restocking percentage</p> <p>2017 – 28%</p> <p>2018 – 5%</p> <p>Total over 2 years – 17.3% average</p> <p>Eels were sold to Dutch & German buyers for restocking</p>
Score	Pass: Responsible indicator
Criterion 5.8: Eels for restocking are not graded out slow-growers	
Weighting: 2	
Responsible indicators	The size range and quantities in the eels for restocking reflect 100% that for the age group in the whole farm
Aspiring indicators	The size range and quantities indicate no more than a 25% supplement of those for restocking are from slower growing fish of the same age group.
Discussion	Grading is only done to separate out fish to prevent larger fish from damaging or bullying smaller fish and therefore preventing them from feeding. All fish designated for restocking are sent regardless of size and are normally all below 10 grams on average when sent.
Score	Pass: Responsible indicator