

Eel Assessment – Dries van den Berg BV

Assessment against:

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

Completed by
Thomas Bourner

5th 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 Dries van den Berg BV. This assessment has been completed against Components 1 & 7 of the Standard only.

The assessment is of a processor/smoker located at Stephensonstraat 2, 3846 AK Harderwijk, Netherlands. The company was opened in 1978 originally and in 2018 moved to a brand new premises. The company smokes eels for the use in their own restaurant and fish counter.

Currently around 2000kg of eel are processed monthly. 4 members of staff work in the processing part of the company. Eels are brought in pre-slaughtered and then smoked. They are sold retail on the fish counter or in the restaurant.

1. The assessment

The assessor was Thomas Bourner of Control Union Pesca Ltd, who visited Dries van den Berg BV on the 5th February 2019. The audit included interviews with Peter van den Berg who is the owner and manager of the company.

2. Client Contact Details

Client Contact Name	Peter van den Berg
Client Address	Stephensonstraat 2, 3846 AK Harderwijk, Netherlands
Client Email	paling@driesvandenbergnl
Client Phone Number	+31 341 423 723

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 Dries van den Berg BV 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	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	Aspiring	1	0
Total		7	5/7
Percentage Responsibility Score:		71%	

That Dries van den Berg BV 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:</p> <p>The company has recently moved to a new premises. The new site has been purpose built and includes a smokery/factory which provides smoked eels for the retail counter and restaurant. Above this is a small eel museum which aims to promote responsible eel sourcing. Although the company lacks some traceability documents and recorded hygiene plans, all products are sold on to the final consumer (as opposed to business). They are passionate about assisting the recovery of the eel and ensuring compliance.</p>	1

Summary of assessment and scoring

Component	Aspiring	Responsible
1	2	5
7	0	1
Total	2	6
Total Responsibility Score		75%

Recommendations:

1. That the client ensures at least 50% of the eels purchased going forward are SEG certified in order to maintain the responsible indicator.
2. That the client implements a written food hygiene plan for the factory.
3. That the client develops an improved traceability system to assist in easier tracing of products from supplier invoice to sale.

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 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	It was confirmed by the client during the audit that there had not been any legal proceeding against the company in the past 2 years and that there were no ongoing investigations either.
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	Around 5 – 7% of the companies profits are paid into DUPAN. This is a once a year contribution. Once a month it is reported to DUPAN how much has been sold. €1 per kgs of fillets and €0.50 per kgs of round eels is then paid to DUPAN. The company also has a sustainable eel museum above the factory to educate the consumers. This is thought to meet the responsible indicator.
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 eels are sourced from two suppliers. These are currently Nijvis BV (around 95%) and Vishandel TH Schilder (around 5%). Neither of them are currently certified however have both been audited as part of this DUPAN certification. Going forward they will ensure that these 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	Products are purchased and sold very quickly. They are purchased pre-slaughtered and smoked on arrival. Only one batch is ordered, used and then the next batch arrives. There is very little overlap of products and it is therefore difficult for mixing to occur. Once the supplier is certified, nearly all of the eels will be SEG certified.
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: • 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	All products sold by the company are sold to the final consumer (as opposed to other businesses). As a result there are no sales invoices. There are also no other traceability documents other than the incoming supplier invoices to link products through. Most of

	the indicator described above therefore do not apply. The system could be improved however to make it easier to trace products from purchase to sale (as opposed to relying on the date). It is therefore thought that the aspiring indicator is met.
Score	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 mostly kept online in the cloud and these are kept indefinitely. This meets the 3 year requirement.
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	There is no HACCP plan specifically in place yet for the new site. General food hygiene rules are followed however they are not documented. No examples of infections.
Score	Aspiring 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>
	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.
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>The company has recently moved to a new premises. The new site has been purpose built and includes a smokery/factory which provides smoked eels for the retail counter and restaurant. Above this is a small eel museum which aims to promote responsible eel sourcing. Although the company lacks some traceability documents and recorded hygiene plans, all products are sold on to the final consumer (as opposed to business). They are passionate about assisting the recovery of the eel and ensuring compliance.</p>
Score	Responsible indicator