

Eel Assessment – FA. R. de Groot

Assessment against:

Component 1: Core requirements
Component 4: Eel buying and trading
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 FA. R. de Groot. This assessment has been completed against Components 1, 4 & 7 of the Standard only.

The assessment is of a processor/smoker located at Buitenbrinkweg 48 b 3853 LX Ermelo, Netherlands. The company was opened in 1976 as an eel smoker and celebrated.

Currently around 100T of eel are processed annually with an average of about 2T per week. 4 members of staff work in the factory. Eels are brought in live, slaughtered and then smoked. Finally they are filleted, have the skin taken off and are then packed for retail. All products are sold for the domestic market.

1. The assessment

The assessor was Thomas Bourner of Control Union Pesca Ltd, who visited FA. R. de Groot on the 4th February 2019. The audit included interviews with Jacco De Groot (Plant Manager), Jacob Mansveld (Quality Control & Assurance Manager) and Robert J van Boven (Accountant).

2. Client Contact Details

Client Contact Name	Jacco De Groot
Client Address	Buitenbrinkweg 48 b 3853 LX Ermelo, Netherlands
Client Email	jaccodegroot@live.nl ; rgroot01@xs4all.nl
Client Phone Number	+31 341 55 12 53

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 FA. R. de Groot 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	Responsible	1	1
Total		7	7/7
Percentage Responsibility Score:		100%	

That FA. R. de Groot 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	N/A	N/A	N/A
4.2 Mortality in storage facility	Responsible	2	2
4.3 Mortality during transport and initial holding if transported to farm	N/A	N/A	N/A
4.4 Water quality	Responsible	1	1
4.5 Handling and welfare	Responsible	1	1
4.6 Transport	Responsible	1	1
4.7 The required percentage of glass eels is being used for restocking	N/A	N/A	N/A
Total		5	5/5
Percentage Responsibility Score:		100%	

That FA. R. de Groot 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>Having been in the business a long time, the company takes the relevant requirements seriously. Full traceability is in place throughout and the eels are handled carefully at all stages. The process flow is clear with quick movement from intake through to packing. Full HACCP is in place.</p>	1

Summary of assessment and scoring

Component	Aspiring	Responsible
1	0	7
4	0	5
7	0	1
Total	0	13/13
Total Responsibility Score		100%

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 amends the lot numbering system to ensure two purchases on the same day cannot have the same lot number.

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	€1 per kgs of fillets and €0.50 per kgs of round eels is paid to DUPAN for the Eel Stewardship Fund. This equates to between 2% and 3% of the company profits.
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	Currently eels are purchased from Dilvis / Gebr Dil Import-Export BV (certified), Koman's Vishandel BV (certified), Ijsselmeer (not certified) and Lough Neach Fishermens Co-operative Society (not certified). 85T a year come from Dilvis or Koman a year with around 10T from Lough Neach and 5T from Ijsselmeer.
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 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
	<ul style="list-style-type: none"> • If resolved through mass- or number- balance calculations, the margin of error does not exceed 5%
Discussion	Full traceability is in place which allows the tracing of products throughout the company. Individual lot numbers are used and these are on the final packs. The lot number links to the incoming material. There are therefore no issues of non-certified eels being mixed upon input with certified eels (with the exception of the situation described below).
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	The lot number is based on the production day. If products from two incoming lots are processed on one day the production lot number is the same regardless of the outgoing. In that very particular situation, the outgoing products could not be linked to an incoming lot but instead, to two lots. This is a very specific situation however and is unlikely to occur with the current purchasing frequency.
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	Records are kept for at least 5 years. This is part of the Dutch law. Reconciliation of products can occur if needed.
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.

	<ul style="list-style-type: none"> 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	A full HACCP plan is in place for the factory. There have been no instances of eel infections.
Score	Responsible 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	N/A
Score	N/A
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	Products are purchased and delivered as live eels. They are then stored in holding tanks for up to 2 days. During this time the mortality rate is very low (<1%).
Score	Responsible indicator

Criterion 4.3: Mortality during transport and initial holding if transported to farm	
Weighting: 2	
Responsible indicators	<ul style="list-style-type: none"> Buyers source at least 90% of their eels from certified suppliers OR Mortality during transport and for the first week at the farm is less than 2% on average
Aspiring indicators	<ul style="list-style-type: none"> Buyers source 50% - 89.9% of their eels from certified suppliers OR 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.
Discussion	N/A
Score	N/A
Criterion 4.4: 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 The facility operates a back-up system to ensure that water quality will not adversely affect survival rates in the case of an equipment 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 for healthy eel survival (e.g. Ammonia, Suspended Solids, pH, Oxygen) The facility has a minimum of a back-up generator and oxygen supply
Discussion	All of the water used to store the eels is of drinking quality and sufficient for the eels to survive. They are only held very temporarily. The water meets legal requirements.
Score	Responsible indicator
Criterion 4.5: Handling and welfare	
Weighting: 1	
Responsible indicators	<ul style="list-style-type: none"> Systems are in place and the facility is designed to keep handling to an absolute minimum Documented procedures are in place for handling, and handling, where necessary, is careful 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)

	<ul style="list-style-type: none"> Eels are moved without being allowed to dry out.
Aspiring indicators	<ul style="list-style-type: none"> 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 Handling, where necessary, is carefully planned and executed The infrastructure has been optimised as far as possible to avoid injuries Nets are small-mesh (1mm maximum) Eels are moved without being allowed to dry out.
Discussion	The factory is designed so as to minimise handling with a quick and efficient product flow (intake, storage, stunning, brining, gutting, smoking, chilling and packing). There are documented procedures in place as part of the HACCP and Quality Manual. Eels are moved quickly and killed humanely.
Score	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	The eels are transported in specially designed containers. The truck is designed for eel transport with aerated water in each compartment and is approved by the Authorities.
Score	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	N/A
Score	N/A

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	Having been in the business a long time, the company takes the relevant requirements seriously. Full traceability is in place throughout and the eels are handled carefully at all stages. The process flow is clear with quick movement from intake through to packing. Full HACCP is in place.
Score	Responsible indicator