

Eel Assessment – Eeline UK Ltd.

Assessment against:

Component 1: Generic Requirements

Component 3: Glass eel buyers

Component 7: Traceability

Completed by

Alex Senechal

29th March 2018

FINAL

1. Introduction

This document presents the report completed following the verification audit carried out under the Sustainable Eel Standard (Version 5, 21st June 2013), and Sustainable Eel Methodology (Version 1, 21st June 2013) against Eeline UK Ltd. This assessment has been completed against Components 1,3 & 7 of the Standard only.

The assessment is of the elver buyer Eeline UK Ltd. who buy eels from a number of fishermen fishing the rivers Parrett and Taw. The Parrett fishery is currently undergoing SEG re-assessment while the Taw undergoes the first assessment in parallel to this assessment. Elvers are purchased and stored in tank facilities for on-ward sale to clients and stockists. The company has 2 holding systems, one indoors and one outdoors. The location and address of these is listed below:
Offshute, Butterleigh, Cullompton, Devon EX15 1PR

The size of the facility has changed over time depending on other fish farming activity, however, this has now reduced to only storing glass eels during the fishing season in the UK.

2. The assessment

The assessor was Mr Alex Senechal of MacAlister Elliott and Partners Ltd, who visited the Tiverton facility on the 29th March 2018. The visit included a tour of the fish facility which is at a separate location in Butterleigh, followed by the assessment of the paper based records held at Diptford Farm. Included in the paper based records were purchase and sales records for the previous and current season to date. The verification audit was overseen by Mr Peter Neusinger and Mrs Nonie Neusinger.

3. Client Contact Details

Client Contact Name	Peter & Nonie Neusinger
Client Address	Diptford Farm, Stoodleigh, Tiverton, Devon, EX 16 9RU
Client Email	enquiries@dyslexikit.com
Client Phone Number	01884 881264

4. Results of the assessment

The outcome of this assessment is as follows;

That EELINE UK Ltd. has **passed** Component 1: Commitment to Sustainability and legality

That EELINE UK Ltd. scored **8 green scores** and **2 amber scores** against Component 3 and therefore **should be considered sustainable under the SEG standard, Component 3: Glass Eel Buyers.**

That EELINE UK Ltd. scored **4 green scores** against Component 7 and therefore **should be considered sustainable under the SEG standard, Component 7: Traceability.**

5. Next Audit

At the completion of the audit the client was assessed for components 1, 3 and 7 against the risk assessment set out in the Methodology. This is set out in the table below.

Question	Performance of Client At Audit	Yes	No
1	Has the client been part of any external investigation which may be of concern to SEG AND/OR been suspended from any other certification standard?	Enhanced Surveillance	Go to Q2
2	Has the client received a borderline pass ¹ for a Component in its previous audit?	Enhanced Surveillance	Go to Q3
3	Does the client only buy and sell product (does not physically handle it?)	Minimum Surveillance	Go to Q4
4	All other scenarios	Standard Surveillance	Go to Q5

	Certification Audit	Year 1	Year 2	Year 3	Year 4 Recertification Audit
Minimum Surveillance	On-Site Audit	Remote Audit	Remote Audit	Remote Audit	On-Site Audit
Standard Surveillance	On-Site Audit	No Audit	On-Site Audit	No Audit	On-Site Audit
Enhanced Surveillance	On-Site Audit	On-Site Audit	On-Site Audit	On-Site Audit	On-Site Audit

As the client has been seen to fall into the Standard Surveillance bracket, the next audit will be due on the **28th March 2020** (in 2 years' time) and shall be an on-site audit.

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

1. Component 1 - Commitment to Sustainability & Legality

1. Commitment to sustainability & legality (See Note 1)	
green score indicator	All trading and commercial relationships are aligned with SEG goals AND the organisation has declared to the assessor any historic conflicts of interest with regard to eel sustainability AND there is no evidence of illegal trading and/or of circumventing the EU Eel Regulation AND any evidence of illegality by commercial partners or other organisations is immediately reported to the appropriate authorities.
red score indicator	The organisation or a member of the organisation has been arrested on suspicion of illegal buying, holding, selling or trading of eels in the last 12 months, AND/OR for failure to declare eel fishing or trading activities appropriately to the authorities, AND/OR for other serious breaches of national or international eel regulations; AND/OR credible sources suggest that the organisation has been involved in serious breaches of national or international eel regulations in the last 12 months (the above applies to close business partners of the organisation, which members of the organisation must reasonably have known about, without the organisation informing the appropriate authorities); AND/OR the organisation is involved in activities which put in serious question their commitment to sustainability.
Discussion	Eeline UK have been SEG members since its inception and regularly attend and support SEG functions. Eeline UK have demonstrated a continued commitment to the same sustainable thinking expressed in the standard throughout this time. Staff at Eeline UK have made every effort to inform and educate glass eel fishermen on local rivers about best practice and methods to improve the quality of their catches. Eeline UK have a history of collaboration with local regulators (EA) to reduce the number of incidences of illegal activity in the fishery. EELINE UK have tried to align local fishery practice with the SEG Standard to prepare the fishery for certification. This has already been achieved on the Parrett and is now being implemented on the Taw with all costs borne by EELINE UK. There is no evidence of illegal trading or circumventing of EU Eel regulations to the assessor's knowledge. As discussed below in more detail, Eeline UK have also been involved in a number of restocking initiatives in recent years and continue to promote best practice within the fisheries in order to improve population numbers of the European eel.
Score	A Green score indicator is awarded

2. Component 3: Glass Eel Buyers

1. Mortality in storage facility (See Note 5)																					
Weighting: 2																					
green score indicator	Mortality rate over the season is less than or equal to 2% on average.																				
amber score indicator	Mortality rate over the season is less than or equal to 5% on average but greater than or equal to 3%																				
red score indicator	Mortality rate over the season is greater than 5% on average.																				
Discussion	<p>Mortality records were provided for the glass eel tanks for the 2014, 2015, 2016 and 2017 and the 2018 season up to 28/03/2018. These being given in the table below:</p> <table border="1" data-bbox="422 795 1508 985"> <thead> <tr> <th>Year</th> <th>Stock bought (kg)</th> <th>Mortality (kg)</th> <th>% Mortality</th> </tr> </thead> <tbody> <tr> <td>2015</td> <td>1,042.0</td> <td>6.08</td> <td>0.58</td> </tr> <tr> <td>2016</td> <td>1,544.89</td> <td>3.15</td> <td>0.20</td> </tr> <tr> <td>2017</td> <td>1,357.75</td> <td>8.24</td> <td>0.61</td> </tr> <tr> <td>2018</td> <td>244.27</td> <td>0.825</td> <td>0.33</td> </tr> </tbody> </table> <p>These figures average 0.43% mortality over the seasons provided, well below the 2% mortality required under this principle.</p> <p>In addition to mortality, data on shrinkage is also calculated and retained by Eeline based on figures provided for the duration of time spent at the Eeline facility and at the UK Glass Eel facility before onward sale to clients. From 2014 to 2017 inclusively, total stock loss per year averages 6.09% for mortality and shrinkage which is to be expected as glass eels retained at the facilities are not fed during the entire period while still expending energy.</p>	Year	Stock bought (kg)	Mortality (kg)	% Mortality	2015	1,042.0	6.08	0.58	2016	1,544.89	3.15	0.20	2017	1,357.75	8.24	0.61	2018	244.27	0.825	0.33
Year	Stock bought (kg)	Mortality (kg)	% Mortality																		
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Score	A Green score indicator is provided																				
2. Mortality during transport and initial holding if transported to farm (See Note 9)																					
Weighting: 2																					
green score indicator	Mortality during transport and for the first week at the farm is less than or equal to 1.5% on average.																				
amber score indicator	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.																				
red score indicator	Mortality during transport and for the first week at the farm is more than 3% on average.																				
Discussion	Eels are transported from the facility in Devon to UK Glass Eel in Gloucester before any onward sales. This means that transport is very limited and will generally not result in any further mortality than what has already been seen at the Eeline UK facility. However, full stock loss is recorded by UK Glass Eel and sent back to Eeline for monitoring.																				

Score	A Green score indicator is provided
3. Water quality	
Weighting: 1	
green score indicator	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) AND water quality management procedures are in place including regular monitoring of relevant parameters which shows that water quality is always high and stable AND water quality monitoring is linked to an alarm-based system in the event of a sudden drop in water quality AND 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.
amber score indicator	A system is in place that is expected to keep key water quality parameters within suitable tolerances (e.g. Ammonia, Suspended Solids, pH, Oxygen) AND 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.
red score indicator	No water quality monitoring occurs AND/OR water quality is not held regularly at levels which are considered suitable for healthy eel survival.
Discussion	The facility is supplied by a low-pressure gravity fed system which houses spring water in a battery of 16 tanks. The water source is on land owned by the business this is also the source of drinking water for the property through a separate line. The battery of tanks supply the stocking tanks with fresh water at a temperature of 7-10C. Any waste water from the stocking tanks is run off into a soakaway on the property behind the stocking sheds. pH is monitored regularly and is normally at 6.5. Oxygen levels are maintained by a system of oxygen canisters which are linked in series to ensure there is always a supply going to the tanks. This means that there is no constant requirement for electricity at the facility, therefore limiting the demand for a constant power supply. A backup generator system is in place at the facility if required and staff are present at the facility 24/7 when stocking density increases to ensure safety of the fish through water parameters and from intruders.
Score	A Green score indicator is awarded
4. Biosecurity is present and disease is treated rapidly and appropriately	
Weighting: 1	
green score indicator	An effective and documented biosecurity plan (including the washing and disinfection of equipment) is in place AND records are available showing regular monitoring of health and possible signs of stress (including the completion of periodic microscope parasite checks) AND records are maintained in relation to the name, administrator, amount, dates and reason for use of any medicines and/or chemicals used in the facility AND the use of chemicals follows legal requirements of the appropriate EU regulations and of the country concerned.
amber score indicator	The facility follows bio-security measures (including the washing and disinfection of equipment) although this is not documented AND eels are regularly monitored for health and possible signs of stress (although this might not be documented) AND records are maintained in relation to the name, administrator, amount, dates and reason for use of any medicines and/or chemicals used in the facility AND the use of chemicals follows legal requirements of the appropriate EU regulations and of the country concerned.
red score	The facility operates no bio-security measures (including the washing and

indicator	disinfection of equipment) AND/OR there is no checking of the eels for health and possible signs of stress AND/OR records are not maintained with regards to the use of medicines and/or chemicals AND/OR legal requirements of the appropriate EU regulations and country concerned are not met for the use of medicines or chemicals.
Discussion	A documented biosecurity manual is used and regularly updated by Eeline senior staff. Director Peter Neusinger is the designated biosecurity manager for the facility, being responsible for all training of staff through practical demonstration and repeated use of best practice. Additional biosecurity expert contacts are noted, including eel experts and local veterinary staff. Specified procedures for the cleaning of equipment and vehicles are noted in addition to procedures when visiting other facilities where fish aquaculture occurs.
Score	A Green score indicator is awarded
5. Handling and welfare (see notes 10 and 11)	
Weighting: 1	
green score indicator	Systems are in place and the facility is designed to keep handling to an absolute minimum AND documented procedures are in place for handling, and handling, where necessary, is careful AND 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) AND eels are moved without being allowed to dry out.
amber score indicator	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 AND handling, where necessary, is carefully planned and executed AND the infrastructure has been optimised as far as possible to avoid injuries AND nets are small-mesh (1mm maximum) AND eels are moved without being allowed to dry out.
red score indicator	Excess, poorly planned or careless handling is likely to result in additional mortality.
Discussion	<p>Eels are handled as little as possible with emptying of the tanks on transport vehicles through the outflow pipe, directly into the stocking tanks. Eels are passed over a floating raft mesh system to stop any injured or dead eels from entering tanks. Live, healthy eels pass through the mesh into the tanks reducing any more handling until tanks are emptied for weighing and delivery to the buyer in Gloucester, UK Glass Eel.</p> <p>When preparing to deliver eels, fish are emptied from the tanks again using a pipe system out into submerged sieving boxes. Boxes are then lifted out and poured into the transport tanks in the vans. Fish are not weighed at this point to limit stress and risk of damage.</p> <p>Temperature and oxygen levels are monitor and controlled during transport to UK Glass Eels before unloading in a similar way as before at the Eeline facility. Eels are never allowed to dry out and are carefully maintained at appropriate temperatures during transportation.</p>
Score	A Green score indicator is awarded
6. Transport (See note 12)	
Weighting: 1	

green score indicator	Transport is carefully planned to minimise travel time AND packing is done in a way that minimises handling, time and stress AND eels are kept cool and wet with an adequate supply of oxygen.
red score indicator	Eels are washed out of the holding tanks Box system with through system
Discussion	<p>Transport is only done wet from the facility to Gloucester with travel times up to 5 hours. No packing is required and handling is minimised by use of pipes to empty the tanks. Transportation documents are maintained at all times with approximate weight, date, time, water source and delivery address. This is then followed by invoices being raised with accurate weights and sale price/value of elvers. Records of all transport, purchase and sale of elvers are kept in the companies “Elver Diaries” which are held for every season. Transport books are kept in each transport vehicle and are checked by the EA during inspections.</p> <p>Staff at Eeline UK have extensive experience of handling and transportation of glass eels being specifically employed by others around the world to manage and assist in the international transportation of large quantities of live eels.</p>
Score	A Green score indicator is awarded
7. The required percentage of glass eels from the fishery is being used for restocking (See Note 13)	
Weighting: 2	
green score indicator	The buyer can provide documented evidence that <u>he has sold</u> at least the required target percentage of its glass eels from the latest season for the primary purpose of conservation / escapement.
amber score indicator	The buyer can provide documented evidence that the <u>has made</u> at least 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 that the buyer can provide credible evidence that re-stocking will occur in the forthcoming season.
red score indicator	The buyer does not make or has no evidence to show that he has made the required target percentage of its glass eels available for restocking in the last year.
Discussion	<p>Eeline UK restock directly to the Parrett through the Rivers Trust, liaising with the EA to find agreed release points above barriers along the Parrett. This is in part done through voluntary donations of eels by the fishermen (e.g. 64 kg in 2014 was donated by fishermen, 31kg bought by Eeline and 580kg jointly purchased by Eeline and UK Glass Eels).</p> <p>The requirement for restocking is 60% of the eels taken from fisheries are sold however, while this quantity of fish has been made available by EELINE UK and UK Glass Eel, this has not always been purchased due to tendering processes. Based on the percentage of eels sold by UK Glass Eels for restocking (Eeline UK sell all eels to UK Glass Eels) for the years 2015, 2016 and 2017, plus voluntary donations by Eeline UK to local restocking initiatives in these years, an average of 58% of eels from Eeline UK were sold or made available for restocking. Therefore, although a Green Score cannot be provided, an Amber score is justified.</p>
Score	An Amber score indicator is awarded

1. Component 7 - Traceability

This section is valid for any client taking ownership of SEG certified product and who wishes to sell it as such.

1. - Incoming Product (See Note 20)	
green score indicator	The organisation/fishery operates a system which allows incoming eel products to be traced back to a certified source.
red score indicator	The organisation/fishery is unable to demonstrate that product can be traced back to a certified source.
Discussion	Eels are purchased by Eeline directly from fishermen at set locations for both the Parrett and Taw. Fishermen are greeted before the fish are weighed and checked for quality. Location of fishing is verified with the fishermen and general conversation covers quality of the fish and fishing technique. Fishermen are asked to present their authorisation cards from the EA as a form of proof of identity and right to fish for and sell the catch. The collector (Eeline Staff) verify this with every purchase throughout the season without fail, before writing a receipt ticket with the date, authorisation number, weight and price per kg. Therefore, every transaction is logged and tickets produced which are then held by Eeline indefinitely for the auditing process. At the end of the tide, the total weight of eels purchased is noted on the last sales note for later noting in the “Elver Diary”. Therefore, a record of all transactions is retained. Ticket books for the Parrett are labelled as Book 1, Book 2 etc, while ticket books for the Taw are labelled as Book T1, Book T2 etc. to differentiate purchase notes.
Score	A Green score indicator is awarded
2. – Separation and Segregation of Product (See Note 21)	
green score indicator	The organisation operates a system which ensures that the product remains separated at all stages from arrival to dispatch from non-certified eel products AND the organisation ensures that any products wishing to make a claim as certified do not contain any non-certified eel-based ingredients.
red score indicator	The organisation has no system in place to ensure that certified and non-certified product remains separate at all stages OR non-certified and certified products have become mixed OR certified products (or products wishing to be certified) contain or could contain non-certified eel-based ingredients
Discussion	The organisation operates a system whereby eels from the Parrett and Taw can be segregated when required by clients. This is only necessary when SEG only eels are required. When this is the case fish from the Parrett are kept in separate stocking tanks to those from the Taw. This can easily be achieved as the company has more than one van in order to purchase eels from the two separate rivers on the same night. Fish are then unloaded into the separate tanks. However, it is hoped that following the recent assessment, all eels from both rivers will be certified, therefore meaning that

	all product being held at the Eeline facility will be SEG certified going forward.
Score	A Green score indicator is awarded
3. – Outgoing Product (See Note 22)	
green score indicator	<p>The organisation only labels certified products with the ‘SES’ ecolabel once it has been approved to do so through the signing of an ‘SES’ ecolabel licence agreement.</p> <p>All product to be sold as certified by an organisation meets the following criteria:</p> <ul style="list-style-type: none"> • Any product labelling shall be accompanied by the ‘SES’ logo. • Products shall be accompanied by an invoice which: <ul style="list-style-type: none"> ▪ Includes the prefix ‘SES’ in the product description; ▪ Includes a record of the volume/quantity of product and to whom it was sold; ▪ Includes the certificate code on the invoice • The certificate code must be clearly related to the certified product only
amber score indicator	<p>The above requirements are met except that:</p> <ul style="list-style-type: none"> ▪ Products have O not been correctly labelled through the invoice
red indicator	<p>Products or product invoices have been labelled as SES with the words SES or the SES Eco label despite not being completely derived from a certified source.</p>
Discussion	<p>Eels are not packaged and sold directly to sources other than UK Glass Eel where eco labelling is not required. Fish transported in separate tanks when sold on to UK Glass Eel are identified as such. Therefore, a green score must be provided.</p>
Score	A Green score indicator is awarded
4. – Record keeping and documentation (See Note 23)	
green score indicator	<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 eel in each batch delivered to a buyer to be connected back to a water, a time period (maximum duration one month) and specific fisherman/vessel. ▪ 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.

orange score indicator	The above requirements are met except that records have been maintained for less than three (3) years
red score indicator	The organisation's tracking and tracing system shows evidence that certified and non-certified product have become mixed AND/OR batch reconciliation records are unable to confirm that outgoing quantities are in line with incoming quantities.
Discussion	<p>There is a comprehensive and clear traceability trail for all eels and documentation was provided to prove this from purchased glass eels to final invoices. Duplicate copies of records are held for most aspects of the traceability line and maintained by Mrs Nonie Neusinger for easy access. Each catch of eels purchased and sold can be traced.</p> <p>Records are available for more than three years and have become more detailed in recent years in order to align with SEG requirements.</p>
Score	A Green score indicator is awarded