

Eel Assessment – Devon Eel Company

Assessment against:

Component 1: Core requirements
Component 4: Eel buying and trading
Component 5: Eel farming
Component 7: Processing, wholesale and retail supplies

Completed by
Mr Alex Senechal

15th August 2018

FINAL

Introduction

This document represents the report completed following the 2018 audit carried out under the Sustainable Eel Standard (Version 6.0, June 2018) of the Devon Eel Company Ltd. (Devon Eel). This assessment has been completed against Components 1, elements of Components 4 and 5, and Component 7 of the Standard only. AS discussed with David Bunt of SEG, the elements of Components 4 and 5 will be combined to form one score when evaluating the performance and therefore responsibility score.

The assessment is of the Devon Eel Company Ltd. registered at **50 Fore Street, Seaton, Devon, United Kingdom, EX12 2AD**. The business has recently been taken over from the Dutch Eel Company Limited located in the North of England and relocated and is therefore undertaking its first assessment under the SEG standard. Devon Eel receives live and frozen adult eels from Dutch Eel Company only presently. Dutch Eel Company are assisting in the transition and setup of the business currently. The origin of the eels purchased is from the SEG certified Koman Vis in the Netherlands which are delivered to a meeting point in London, UK every 2 weeks.

The assessment

The assessor was Alex Senechal of MacAlister Elliott and Partners Ltd, who visited Devon Eel on the 15th August 2018. The audit included interviews with Mrs Sue Elsworth and Mr Neil Fuzzard at Devon Eel, visual inspection of the facilities used to receive live eels and the processes undertaken to process and package the eels. Product traceability was also verified through a paper audit. The audit was organised by Mr Neil Fuzzard and Ms Sue Elsworth of Devon Eel Company Ltd.

Client Contact Details

Client Contact Name	Sue Elsworth
Client Address	50 Fore Street, Seaton, Devon, United Kingdom, EX12 2AD
Client Email	office@devoneel.co.uk
Client Phone Number	07947256214

Results of the assessment

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

The outcome of this assessment is as follows;

That the Devon Eel Company Ltd. glass eel fishery has scored the following for Component 1: General Requirements and therefore should be considered as **RESPONSIBLE** for this component of the SEG Standard.

Component 1: General Requirements	Auditor's findings	Weighting	Total 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	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	Aspiring	1	0
1.5 Biosecurity & welfare – eel and eel products are provided with minimal risk of diseases, parasites and alien species (1.5.2 &1.5.5)	Aspiring Responsible	2	1
Total:		7	5/7
Percentage Responsibility Score:		71%	

That the Devon Eel Company Ltd. glass eel fishery scored the following for Component 4 and 5: Eel buying and trading, and Eel farming, therefore should be considered as **RESPONSIBLE** for this component of the SEG Standard.

Component 4: Eel buying and trading	Auditor's findings	Weighting	Score
4.4 Handling and welfare	Responsible	1	1
4.5 Transport	Responsible	1	1
5.4 Water Quality	Aspiring	1	0
5.5 There are minimal ecological impacts from effluent discharge	Responsible	1	1
5.6 Grading, slaughter and transportation are carried out with respect to welfare	Aspiring	1	0

Total:	5	3/5
Percentage Responsibility Score:	60 %	

That Devon Eel Company Ltd. received the following for Component 7: Processing, wholesale and retail supplies, and therefore should be considered as **RESPONSIBLE** for this component of the SEG Standard.

Component 7: Processing, wholesale and retail supplies

Comments:

Devon Eel have currently committed to only deal in certified eel products presently. This is with a view of getting the best quality product to their customers from sustainable sources of EU eels. Part of the business plan is to promote the sustainable nature of the product they are producing to increase the number high end clients taking orders on a regular basis.

Recommendations:

Component 1.4.3:

1. Ensure that all batch numbers for product coming into the facility are received from the supplier and recorded on the master spreadsheet for ease. These should be made available for the auditor when requested.

Component 1.5:

1. It is recommended that all staff members should go through biosecurity training to ensure that there is a reduced risk of contamination and all staff to be covered by internal training and procedures.
2. Records are kept of the health monitoring which is undertaken each day. This includes a log of water quality parameters (pH, Oxygen levels, Ammonia etc.) and any mortalities (number and weight).

Component 5.4:

1. It is recommended that an alarm linked water quality monitoring system is installed in the event of a sudden drop in water quality.

Component 5.6:

1. It is strongly recommended that an alternative method of slaughter is found to ice such as electric stunning or percussive stunning to ensure instant death or rendering of eels insensible to pain prior to the next verification audit as required by the standard.

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	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 15th August 2020 (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 score given. 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	While the organisation has only been running since 1 st July 2018, Mr Neil Fuzzard, one of the company director, has been transporting eels for a number of years and has not been found guilty of 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	As the business has only been set up since July, there is not currently any profit for contributions to have been made from. Therefore, it is considered by the assessor unreasonable to expect the organisation to donate part of its turnover at this stage.
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 organisation currently trades only in SEG certified eels sourced through Dutch Eel company and originating from Koman's in the Netherlands
Score	Pass: 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 • If resolved through mass- or number- balance calculations, the margin of error does not exceed 5%
Discussion	The company only trades in certified product presently and therefore does not need to keep any product coming in or waiting to go out separated or segregated. Stock date is the main driver for separation of eels.
Score	Pass: 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	<p>The organisation is currently using the Dutch Eel Company's labels which were purchased with the company, these will be replaced with new labels once the current supply is exhausted. Labelling is currently being placed on all outgoing product which includes batch numbering and is also matched and identified on the invoicing sent out.</p> <p>Invoices have been checked during the audit and include the company's certification number, batch number for outgoing product and the weight of product sent to the client with client name and address present.</p>
Score	Pass: 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	<p>The company maintains a clear paper trail for all product coming in (invoiced quantities from Dutch Eel Company) and going out to clients. This includes excel spreadsheet with weekly running totals to assess the stock at the facility, losses on waste based on live weight in and processing spoils and product sold. No SEG numbers had been seen from product coming in to the facility at the time of inspection. These were requested from the supplier Dutch Eel which is itself certified and were provided to the auditor at a later date.</p> <p>The company does not currently have 3 years of records as it has not been running for this period of time yet, however all records are maintained and available for inspection.</p>
Score	Pass: Aspiring indicator
Criterion 1.5: Biosecurity & welfare – Eel and eel products are provided with minimal risk of diseases, parasites and alien species	
1.5.2: 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.

	<ul style="list-style-type: none"> 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	<p>The company has its APB certificate which was verified and abides by all transportation legislation Live eels are not retained for periods greater than 2 weeks, with no chemicals required to date for disease control or treatment of live fish, should this be required in the future, appropriate use will be completed by Mr Neil Fuzzard and verified by trained veterinary staff. A biosecurity plan present for the carp farm on site has been adopted and adapted for the eels kept on site and is maintained by Mr Fuzzard.</p> <p>Eels are checked twice daily for signs of stress or to remove any dead eels however to date no eels have been found dead in the tanks. This monitoring process is not currently documented.</p> <p>Cleaning of tanks is completed every time they are emptied (i.e. every two weeks) using Virion S before the introduction of new eels.</p>
Score	Pass: Aspiring indicator
1.5.5: Wholesale / Retail / Processing: Hygiene Plans are followed and there are rare examples of infection	
Responsible indicators	Food processing hygiene plans are followed
Discussion	Food health certifications for all members of staff handling product through the various stages of processing have been checked and are valid.
Score	Pass: Responsible indicator

Component 4 - Eel buying and trading	
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) • 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	<p>Devon Eels received its eels at a meeting point where they are passed directly into the transportation vehicles' holding tanks by shoot. On arrive at the Devon Eel facility, eels are currently transferred to the holding tanks using appropriate nets designed to limit the risk of damage to the eels. This is done by trained members of the team who are habituated to transporting and transferring live fish. Handling then only occurs when removed from the tanks using the nets again before slaughter. Plans are that on arrival at the facility, eels will be unloaded into holding tanks using a shoot system in future once a new vehicle has been purchased. Eels are never allowed to dry out and are always kept in well oxygenated water.</p>
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	<p>A transportation plan is present for the eels. This is accompanied by all required transportation book and associated paperwork required by CEFAS for the transportation of live fish.</p> <p>Maximum transportation time is limited to London to Devon (~5 hours).</p> <p>NO onward transportation from the facility is completed.</p>
Score	Pass: Responsible indicator

Component 5 – Eel farming

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>The eels held at the facility are only present for a maximum period of 2 weeks, fresh water to the two holding tanks is supplied by an on sight natural well which has been tested by the local authorities and is safe for human consumption (certification evidence provided during the audit). Well water for the tanks is passed through a UV and filtration system prior to entering the tanks. Waste water is evacuated into a large soakaway on the farm away from other water sources. Water quality parameters are verified, and oxygen levels checked manually using handheld oxygen monitor presently. The water is flushed for 12 hours in 24 to ensure safe water quality levels. An automated system is not currently installed but is planned for the future once the facility has been fully set up. Backup electrical generation is available at the facility and is set to start automatically in addition to an automatic backup oxygen supply. As there is not currently an alarm-based back-up system, the facility cannot be awarded a responsible indicator for this element, however an Aspiring indicator is justified.</p>
Score	Pass: Aspiring 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	Waste water is removed from the system to a large soakaway on the property away from other water sources. The system has not been found to be non-compliant in the past 5 years and all effluent discharge is in compliance with local and national requirements.
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	Grading is done by hand based on the orders received, mostly post smoking. Three sizes of eels are currently ordered from the supplier and processed 400g-600g, 600g-800g and 1kg-1.2kg. Slaughter is currently done over ice however, plans are to invest in electric stunning or percussive stunning in the future once appropriate equipment has been found.
Score	Pass: 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> <p>Where the facility undertakes other processes in this standard, e.g. perhaps eel farming, the business and assessor should decide the relevant parts to audit.</p>
Benefits	<ul style="list-style-type: none"> • Consumers have the opportunity and choice to purchase responsibly sourced eel

Targets & Measures	<ul style="list-style-type: none"> • An increasing number and proportion of processors, wholesalers and retailers provide certified eel, from 5% now to 90% in 10 years • An increasing proportion of total retail sales is of certified eel, from 5% now to 75% in 10 years
Discussion	<p>Devon Eel have shown a positive attitude to ensuring that they are a responsible member of the SEG group with the will to continue the work done by Dutch Eel Company at the end of the SEG chain of custody. Since purchasing the company and stock from Dutch Eel, Devon Eel have committed to only deal in certified eel products using traditional smoking methods to produce high quality final products. This is with a view of getting the best quality product to their customers from sustainable sources of EU eels. Part of the business plan is to promote the sustainable nature of the product they are producing to increase the number high end clients taking orders on a regular basis.</p>
Score	Pass: Responsible indicator