

Eel Assessment – River Parrett and River Taw, UK, Glass Eel Fishery

Assessment against:

Component 1: Generic Requirements

Component 2: Glass eel fisheries

Component 7: Traceability

Completed by

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FINAL

1. Introduction

This document represents the report completed following the 2018 audit carried out under the Sustainable Eel Standard (Version 5, 21st June 2013), and Sustainable Eel Methodology (Version 1, 21st June 2013) against the River Parrett and River Taw Glass Eel Fisheries. This assessment has been completed against Components 1, 2 and 7 of the Standard only.

The assessment is of the hand net elver fisheries located on the River Parrett and River Taw. The Parrett has previously been certified and is being re-assessed while the Taw has not been assessed before. The elver fisheries on the Parrett and Taw rivers have been operating for generations and consist of hand net fisheries only (no boat fishing is allowed for elvers). The season runs between February and May only and all fishermen are required to be licenced with an authorisation card by the Environment Agency (EA) which is renewed each year, and to follow the byelaws as set out by the EA. Fisherman provide glass eel catches in the main to Eeline UK Ltd. and UK Glass Eels.

2. The assessment

The assessor was Alex Senechal of MacAlister Elliott and Partners Ltd, who visited the River Parrett elver fishery on the 28th March 2018 and River Taw on the 29th March accompanied by Mr Peter Neusinger for the Parrett and Mr Max Neusinger on the Taw. The audit included observation of the two fisheries and general discussions with fisherman. Traceability for the fisheries was discussed and confirmed with Nonie and Peter Neusinger on the 29th March.

The fishery audit was organised by Mr Peter Neusinger of Eeline UK Ltd. (the main vivier for the region) in addition to UK Glass Eels.

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;

The River Parrett and River Taw glass eel fishery has passed Component 1: Commitment to Sustainability and legality

that the River Parrett and River Taw glass eel fishery scored **7 green scores** and **2 amber scores** against Component 2 and therefore **should be considered sustainable under the SEG standard, Component 2: Glass Eel Fisheries.**

that River Parrett and River Taw glass eel fishery scored **4 green scores** against Component 7: Traceability 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 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

¹ A borderline pass is considered a pass that occurs when one less amber indicator is received then would be required to fail (i.e. 5 Green indicators and 4 Orange indicators) or when a company is certified with equal number of orange and green indicators.

	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 rivers in this assessment have 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	The River Parrett and River Taw glass eel fisheries can be seen to be well aligned to the SEG goals. The fisheries are well managed and regulated and use only the hand net method of fishing. Increased efforts have been made by eel buyers and local fishermen to work with regulators to improve fishing and handling practices. This has led to best practice being adopted by most fishermen and no prosecutions for illegal activity for two years prior to this assessment.
Score	A Green Score indicator is provided

2. Component 2: Glass Eel Fisheries

1. The management target (40% escapement or otherwise) is being achieved (See Note 2)	
Weighting: 2	
green score indicator	The Eel Management Plan is approved and there are good data which shows with reasonable confidence that the EU silver eel escapement target is being achieved in the eel management district.
amber score indicator	The Eel Management Plan is approved and there is evidence that it is being implemented.
red score indicator	The Eel Management Plan is not approved AND/OR there is little evidence of it being implemented AND/OR key parts of it are not being implemented AND/OR there is strong evidence of widespread non-compliance which is undermining implementation.
Discussion	<p>These fisheries relate to the eel management plans for the South West River Basin District. The Eel Management Plans were approved and published in 2010 and updated in 2015.</p> <p>For the South West River Basin District Eel Management Plan, the situation remains much the same for both rivers, with the 40% escapement target not being met presently. However, the recent Draft UK NDF paper submitted to the EU CITES Scientific Review Group indicates that although there may not be official figures on the quantity of silver eel escapement, there are indications that through two modelling methods, there was a surplus of glass eels available. In the case of the Parrett and Taw, Method 1 indicated a surplus in both rivers based on the average catches of 2015-2017 while the more conservative Method 2 (based on B₀ silver eel equivalent) only indicated a surplus on the Parrett and not the Taw.</p> <p>Therefore, while the 40% escapement of silver eels has not been achieved yet by the RBD for the Parrett and Taw, the evidence provided for estimated quantity of surplus glass eels entering the respective rivers is considered solid, therefore it is thought that an Amber score is justified here.</p>
Score	An Amber score indicator is provided
2. The fishery is well-managed (See Note 3)	
Weighting: 2	
green score indicator	Fishers are licensed and provide logbook data AND data on catch and effort are collected and analysed regularly by the management agency (at least annually at the end of the season), AND data are made available to the management agency at any time if required AND data are considered to be accurate, useful for statistical purposes and provide a comprehensive picture of the glass eel fishery under assessment AND fishermen only use legal gear AND enforcement is in place throughout the fishing area with no evidence of systematic non-compliance.
amber score indicator	Fishers are licensed AND data on catch and effort are collected and analysed regularly by the management agency (at least annually at the end of the season) AND data are considered to be accurate and provide enough information on the glass eel fishery under assessment for management and to track annual trends in glass eel arrival AND fishermen only use legal gear AND there is no evidence of

	systematic non-compliance.
red score indicator	There is evidence of illegal fishing that may adversely affect the fishery AND/OR data are not collected on catch and effort AND/OR data are too inaccurate or partial to provide enough information for management AND/OR there is evidence of systematic non-compliance in the fishery (e.g. widespread use of illegal gear, misreporting of catches, failure to respect quotas, closed periods or other management regulations, or other).
Discussion	<p>The management system used on the River Parrett and River Taw glass eel fisheries can be described as well-defined and implemented.</p> <p>The fishery is fully licenced through the Environment Agency, has a set season and is well policed by the authorities. This includes regular bailiff activity along the river banks to monitor fishing. Prosecutions have declined significantly in recent years and in 2016 and 2017, no prosecutions occurred. Some warning letters were issued in the last couple of years but not for any significant infringements, nor have any been repeated by individuals subsequently. Verbal warnings have been issued in relation to catch reporting however, the majority of licenced fishermen comply and provide catch data to the Environment Agency within the timeframe requirement. Failure to do so can result in a fine and not being able to gain a licence for the following season. In addition, the Telecapeche system, currently in use in France, is being trialled by fishermen on the Parrett and Taw with varying levels of success due to network issues. The main push behind this coming from glass eel buyers Eeline UK Ltd. The hope is for it to work successfully for all fisheries on both rivers in the coming years.</p> <p>Gear used meets the regulations set by the EA in collaboration with the fishermen. Gear used on the River Parrett must have a net size of 80cm x 100cm x 45cm with a handle which must not exceed 4m. While gear used on the Taw can be a maximum of 100cm x 125cm x 100cm with a maximum handle length of 2.5m however, most fishermen on the river use smaller nets. Licensed gear is required to carry a tag provided by the Environment Agency and gear must be held with at least one hand at all times while fishing.</p>
Score	A Green score indicator is provided
3. Mortality during fishing is minimised (See Notes 4 & 5)	
Weighting: 2	
green score indicator	Fishing is by hand-held nets OR fishing from vessels meets the following criteria: i) fishing is at slow speed (anchored in current or speed of no more than 1 knot relative to water); ii) haul duration is on average no longer than 20 minutes, with the maximum duration not more than 30 minutes; (iii) mesh size of cod end no greater than 1mm (iv) rest of the net designed such that glass eels do not become trapped or abraded; v) vivier tank on board and in use; AND fishermen can demonstrate that the mortality rate of the catch over the duration of holding in the storage facility is <4% for each batch captured.
amber score indicator	Fishing from vessels meets the following criteria: i) fishing is at slow speed (no more than 1.5 knots relative to water); ii) maximum haul duration no longer than 30 minutes; iii) mesh size of cod end no greater than 1mm; iv) rest of the net designed such that glass eels do not become trapped or abraded; v) vivier tank on board and in use; AND fishermen can demonstrate that the mortality rate of the catch over

	the duration of holding in the storage facility is <8% for each batch captured.
red score indicator	The fishing technique does not meet the amber requirements, AND/OR mortality rate in the storage facility exceeded 8% for one or more batches in the last 12 months.
Discussion	<p>All fishing on the River Parrett glass eel fishery is completed by hand nets, mostly on the flood of the tide. Depending on the strength of the current and conditions in the river, the net may be fished near the border or pushed further out into the river with retrieval of the net being every 30 seconds to 2 minutes to empty any catch. Catch is then stored in mesh trays to separate bycatch and debris and protect the catch from the weather.</p> <p>Fisherman report that mortality rates are negligible during fishing and lower than 1% during transportation from the river to the buyer. Currently there are no figures recorded between capture and purchase. Buyers indicate that mortality is likely to amount to ~1.5-2% when particular care hasn't been paid to protect the catch from the weather between capture and sale. This is highlighted to fishermen when it occurs to encourage better care in future for a healthier catch with less mortality.</p> <p>Fishing on the Taw is also by hand nets but almost exclusively on the ebb tide with the back of the net placed upstream, meaning that elvers swim into the net rather than being pushed into it by the flow of the river. Nets must be attended at all times with at least one hand on it at all times. Debris is non-existent due to the direction in which the net is held and bycatch negligible. Nets are checked on average every 1-3 minutes for catch. Elvers caught are emptied (tipping of the net) into a bucket before being passed over a sieve and retained in a mesh tray.</p> <p>Eeline UK Ltd. show that recorded mortality between point of purchase until point of resale is less than 1 % consistently across both fisheries indicating that the fishery is of a very good quality and fish well cared for when caught and stocked before onward sale.</p>
Score	Green Score indicator is Provided
4. The fishery has negligible impacts on by catch species (See Note 8)	
Weighting: 1	
green score indicator	The fishery has a negligible impact on by-catch AND by-catch is returned to the water alive as gently and rapidly as possible.
amber score indicator	The fishery has low-level impacts on by-catch AND by-catch is returned to the water alive as gently and rapidly as possible.
red score indicator	The fishery has a severe impact on by-catch AND/OR by-catch is discarded dead
Discussion	Bycatch in the fisheries is considered to be very low with only the occasional shrimp, fingerling or fish fry being caught within the hand nets. Generally, all bycatch is returned to the river directly in good condition. Any which reach Eeline UK at the point of purchase from fishermen are normally returned to the river if alive. Fishers are encouraged by the buyers to sort through catch by the river before departure, in order to return any by catch species alive. Evidence of this is also seen inside the collection vans of Eeline UK where notices and reminders of "Best Practice" can be seen.

	No specific quantitative assessment of bycatch has been completed but it is clear to the assessor that the impacts are negligible.
Score	A Green score indicator is provided
5. The fishery has negligible impacts on rare or other protected species	
Weighting: 1	
green score indicator	The fishery has no direct interactions resulting in mortality or injuries with other species that are considered vulnerable, threatened, endangered or are protected under national or international law.
amber score indicator	Interactions, resulting in mortality or injury, with other species that are considered vulnerable, threatened, endangered, or are protected under national or international law, are rare and have no overall measurable impact on the population.
red score indicator	The fishery has interactions resulting in mortality or injuries, with species that are considered vulnerable, threatened, endangered or are protected under national or international law, which may have an impact at the population level.
Discussion	The River Parrett and River Taw glass eel fishery can be seen to have no direct interactions resulting in injury or mortality with other species of conservation interest.
Score	A Green score indicator is provided
6. The fishery has negligible impacts on habitats	
Weighting: 1	
green score indicator	The fishing gear does not cause any damage to the bottom.
amber score indicator	Damage to the bottom by gear is limited or minimal.
red score indicator	Damage to the bottom by gear is frequent or widespread.
Discussion	The hand-held nets and methods employed on the rivers may lightly touch the bottom, however, the net is gently rested there at most and never dragged or swept across for fear of damaging the nets, eels or filling up with sediment. When fishing in this way disturbance to the bottom is extremely low and damage is negligible.
Score	A Green score indicator is provided

3. 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	All fishermen are required to be licenced by the EA, this licence number is provided to the buyer every time glass eels are presented for first sale. Eels can therefore be traced back to a group of fishermen for any particular day fishing on a particular river. As both rivers in the South West and the Severn

	are currently undergoing certification under the SEG standard, it is hoped that all glass eels caught in South West England will be certified and therefore improve traceability of all product from source.
Score	A Green score is provided
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	All elvers caught on the Taw and Parrett are covered by this assessment. No separation is therefore required at the fishery level if certification is provided for both rivers following this assessment.
Score	A Green score is provided
3. – Outgoing Product (See Note 22)	
green score indicator	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. All product to be sold as certified by an organisation meets the following criteria: <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	The above requirements are met except that: <ul style="list-style-type: none"> ▪ Products have not been correctly labelled through the invoice
red indicator	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.
Discussion	The system employed on the River Parrett and River Taw glass eel fishery does not include any invoicing. Product is directly delivered to the vivier, weighed and a ticket provided. Since the fisherman will fish in only assessed areas and do not catch any non-certified product a green score is felt justified here.
Score	A Green score is provided

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	This process is controlled fully by the vivier. Again, a green score is provided since no mixing can occur following successful certification of both rivers. Presently the Parrett was certified while the Taw was not however, separation of catches and detailed record keeping of the fisheries has been maintained by the main elver buyers. This will be continued going forward.
Score	A Green score is provided