

## **Eel Assessment – Martens P.K B.V.**

### **Assessment against:**

Component 1: Core requirements

Component 5: Eel farming

### **Completed by**

Alex Senechal

15<sup>th</sup> January 2019

## **FINAL**

### **Introduction**

This document represents the report completed following the 2019 audit carried out under the Sustainable Eel Group (SEG) Standard (Version 6.0, June 2018) against Martens P.K. BV (hereafter referred to as Marten P.K.). This assessment has been completed against the relevant Components of the Standard: 1 and 5.

The assessment is of the Martens farm in the Netherlands. The farm was taken over by Martens P.K. BV from Passie voor Vis in March 2018 following total closure and clean down of the facility the previous winter when all eels had been removed from the facility.

The farm is relatively small but modern and well equipped. There are two systems; one with 10 small tanks (1.9m<sup>3</sup>) for the smallest eels, and one with 12 large tanks (10m<sup>3</sup>) for larger fish.

### **1. The assessment**

The assessor was Alex Senechal of Control Union Pesca Ltd, who visited Martens P.K. B.V on the 15<sup>th</sup> January 2019. The audit included interviews with Kamil Wójcik the farm manager and John van Dooren who is the previous owner of the farm and leases out the farm to Martens P.K. The farm has a strict no entrance policy to persons who have been to other facilities, therefore access to the farm building was not physically permitted, however camera systems installed at the facility did allow the layout to be explained and water systems seen. While it was noted that there was good willingness during the audit visit to answer all questions posed and assistance was provided for translation by Mr Van Dooren, Mr Wójcik and the farm appeared to be under-prepared for the audit and were not fully aware of all of the requirements of the assessment process for certification under the present SEG standard. However, the Mr Wójcik was able to present valid and verifiable documentation following the audit to demonstrate that the requirements of the standard were met.

## 2. Client Contact Details

<b>Client Contact Name</b>	Kamil Wójcik
<b>Client Address</b>	Zeesweg 26, 5975 PP Sevenum, The Netherlands
<b>Client Email</b>	milenska_w@vp.pl
<b>Client Phone Number</b>	077 3980900

## 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 is taken into consideration for each element.

Martens P.K has scored the following for Component 1, General Requirements:

Component 1: General Requirements	Auditor's findings	Weighting	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	Responsible	1	1
1.5 Biosecurity & welfare –			
1.5.3	Aspiring	1	0
1.5.5	Responsible	1	1
Total		7	6/7
<b>Percentage Responsibility Score:</b>		<b>86%</b>	

: and therefore **should** be considered **RESPONSIBLE** under the SEG standard.

Martens P.K has scored the following for Component 5, Eel farming:

Component 5: Eel farming	Auditor's findings	Weighting	Score
5.1 The total mortality rate during the culture is low	Responsible	2	2
5.2 The fish meal/oil ingredients in the feed come from a responsible source	Aspiring	1	0
5.3 Feed is used as efficiently as possible	Responsible	1	1
5.4 Water Quality	Responsible	1	1
5.5 There are minimal ecological impact from effluent discharge	Responsible	1	1

5.6 Grading, slaughter and transportation are carried out with respect to welfare	Responsible	1	1
5.7 The farm provides eel for restocking	N/A	N/A	N/A
5.8 The farm provides eel for restocking	Responsible	2	2
Total		9	8/9
<b>Percentage Responsibility Score:</b>		<b>89%</b>	

### Summary of assessment and scoring

Component	Aspiring	Responsible
1	1	6
5	1	8
<b>Total</b>	<b>2</b>	<b>14</b>
<b>Total Responsibility Score</b>		<b>88%</b>

#### 1. Recommendations (numbers relevant to standard criteria):

1.5.3 It is recommended that the correct authorisation documentation are available at the time of any future audit for verification by the auditor.

5.2 That the feed supply be verified to be from sources which meet the requirements of the standard in addition to supplier documents declaring that the ingredients are from a sustainable source.

#### 2. 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 <sup>1</sup> 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 on the Jan 2021 (in 2 years' time) and shall be an on-site audit.**

<sup>1</sup> 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.

### 3. Detailed Assessment Against Components

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

<b>Component 1 – Generic requirements</b>	
<b>Criterion 1.1: Commitment to legality</b>	
<b>Responsible indicators</b>	For at least the past two years: the organisation has not been found guilty for any offences relating to eel fishing or trading.
<b>Aspiring indicators</b>	For at least the past 12 months: the organisation has not been found guilty for any offences relating to eel fishing or trading.
Discussion	The Company took over from the previous owners in 2018. While undertaking the audit, criminality was discussed and it was declared by Mr Wójcik that since taking over the farm there have not been any incidences of criminal activity.
Score	Pass: Responsible indicator
<b>Criterion 1.2: Contribution to Eel Conservation Projects. (Optional bonus score)</b>	
<b>Responsible indicators</b>	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.
<b>Aspiring indicators</b>	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	Due to the lack of time the company has been operating there are not currently any profits for this to be assessed against. Therefore, this component will not be assessed.
Score	N/A
<b>Criterion 1.3: The facility trades in certified responsibly sourced eel</b>	
<b>Responsible indicators</b>	The organisation trades in at least 50% (by number) of certified responsibly sourced eel and has the documentation to demonstrate that.
<b>Aspiring indicators</b>	The facility trades in 10 – 49.9% (by number) of certified responsibly sourced eel and has the documentation to demonstrate that.
Discussion	Since taking over the company, the facility started with no eels and purchased all of its eel in 2018 from UK Glass eels, 100% of which were from SEG certified sources.
Score	Pass: Responsible indicator
<b>Criterion 1.4: Traceability</b>	
<b>1.4.1: Traceability - Incoming product, separation and segregation</b>	

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• Certified and uncertified eel products can be clearly and easily traced back to their source.</li> <li>• Where a fishery or buyer, an electronic tele-declaration system is used</li> <li>• It operates a clear system which ensures that the product remains separated at all stages from arrival to dispatch from non-certified eel products.</li> <li>• The organisation ensures that any products wishing to make a claim as certified do not contain any non-certified eel-based ingredients.</li> <li>• If resolved through mass- or number- balance calculations, the margin of error does not exceed 2%</li> </ul>
<b>Aspiring indicators</b>	<ul style="list-style-type: none"> <li>• Certified and uncertified eel products can be traced back to their source.</li> <li>• It operates a system which ensures that the product remains separated at all stages from arrival to despatch from non-certified eel products.</li> <li>• The organisation ensures that any products wishing to make a claim as certified do not contain any non-certified eel-based ingredients</li> <li>• If resolved through mass- or number- balance calculations, the margin of error does not exceed 5%.</li> </ul>
Discussion	<p>At present all incoming product currently at the farm has been from one batch, all being SEG certified fish. The aim in coming years will be to continue in this way and ensure that incoming fish is from a SEG certified supplier. Procedure for any new stock received at the facility will be to keep year classes separated throughout the farming process although all eels will be SEG certified.</p>
Score	Pass: Responsible indicator
<b>1.4.2: Traceability - Outgoing product</b>	
<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• Where a fishery or buyer, an electronic tele-declaration system is used</li> <li>• Documentation is well maintained with a maximum of 2% error in the following: <ul style="list-style-type: none"> <li>• 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</li> </ul> </li> <li>• 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"> <li>- Includes an appropriate batch code</li> <li>- Includes a record of the quantity (no. &amp; weight) of product and to whom it was sold</li> </ul> </li> </ul>
<b>Aspiring indicators</b>	<ul style="list-style-type: none"> <li>• Documentation is well maintained with a maximum of 5% error in the following: <ul style="list-style-type: none"> <li>• 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</li> </ul> </li> <li>• 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"> <li>- Includes an appropriate batch code</li> <li>- Includes a record of the quantity (no. &amp; weight) of product and to whom it was sold</li> </ul> </li> </ul>
Discussion	<p>To date, 3103 kilos of fish from the first year's stock has been sold. Invoicing will need to match SEG requirements. Currently they have weight, size range and name of who</p>

	the invoice is for. Batch numbering in accordance with SEG guidelines will be used should certification be granted and a certification number received.
Score	Pass: Responsible indicator
<b>1.4.3: Traceability - Record keeping and documentation</b>	
<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>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</li> <li>If a fisherman or buyer, a tele-declaration system is used to report catches and trade</li> <li>The organisation operates a system that also allows for the completion of a batch reconciliation of eel product by weight over a given period.</li> <li>The organisation maintains records for a minimum of three (3) years.</li> </ul>
<b>Aspiring indicators</b>	<p>The above requirements are met except that:</p> <ul style="list-style-type: none"> <li>Records have been maintained for less than three (3) years</li> <li>If a fisherman or trader, a tele-declaration system is planned to be used to report catches and trade in the next season</li> </ul>
Discussion	The organisation has a system that shows quantities of eels in each tank and quantity sold from each, every time there is a sale. To date only one batch has entered the farm, therefore batch reconciliation has been simple. The second batch of fish will be purchased in 2019, which will require batches to be kept separate from then on as confirmed by Mr Wójcik. The organisation has not been running for 3 years therefore the last bullet point is N/A.
Score	Pass: Responsible indicator
<b>Criterion 1.5: Biosecurity &amp; welfare – Eel and eel products are provided with minimal risk of diseases, parasites and alien species</b>	
<b>1.5.3 Eel farming: Biosecurity is present and disease is treated rapidly and appropriately</b>	
<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>The facility has the appropriate permissions to operate from the relevant authority.</li> <li>The use of chemicals follows legal requirements of the EU and of the country concerned</li> <li>An effective and documented biosecurity plan is in place and there is evidence that it is being followed.</li> <li>Daily records are available showing monitoring of fish health and signs of stress and daily mortality is recorded</li> <li>Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility</li> <li>UV is used at an appropriate level and separation between tanks</li> </ul>

<b>Aspiring indicators</b>	<ul style="list-style-type: none"> <li>• The facility has the appropriate permissions to operate from the relevant licensing authority</li> <li>• The use of chemicals follows legal requirements of the EU and of the country concerned.</li> <li>• An effective and documented biosecurity plan is in place and there is evidence that it is being followed.</li> <li>• Eels are regularly inspected for disease (although this may not be documented) and daily mortality is recorded.</li> <li>• Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility.</li> </ul>
<b>Discussion</b>	<p>The authorisation documents are currently being processed by the national authorities and therefore are pending. This will be presented to the assessor when they are available.</p> <p>Biosecurity plan and best practice guidance notes were provided to the new managers when the farm was taken over from Mr Van Dooren. Mr Van Dooren is still available to the new manager for advice and help with regards to eel husbandry and biosecurity procedures.</p> <p>Use of nitric acid to lower pH when glass eels are introduced account for the extent of chemicals used at the facility. Cleaning is completed using only fresh water at high pressure. The facility operates a no access policy for all non-farm staff whereby access is prohibited to all others to limit the risk of the introduction of disease.</p> <p>A vet undertakes checks yearly, following glass eel deliveries. Records are kept with Vet reports for the medicines used and quantities administered. Both systems at the facility are equipped with UV filtration in addition to biological filtration.</p>
<b>Score</b>	Pass: Aspiring indicator
<b>1.5.5 Wholesale / Retail / Processing: Hygiene Plans are followed and there are rare examples of infection</b>	
<b>Responsible indicators</b>	Food processing hygiene plans are followed
<b>Discussion</b>	No plans are required by the local authorities therefore this is not something which is present for the facility due to the “artisanal” nature of any processing which is done. There are unannounced inspections twice a year where samples of processed eel are taken for testing.
<b>Score</b>	Pass: Responsible indicator



<b>Component 5 – Eel farming</b>	
<b>Criterion 5.1: The total mortality rate during the culture process is low</b>	
<b>Weighting: 2</b>	
<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• The Percentage Mortality Rate of eels in culture is less than or equal to 10% on average in the current and previous year OR as an average of the previous five years</li> <li>• An accurate daily log is maintained of the number and causes of mortality</li> </ul>
<b>Aspiring indicators</b>	<ul style="list-style-type: none"> <li>• The Percentage Mortality Rate of eels in culture is between 10 and 15% on average in the current and previous years OR as an average of the previous five years.</li> <li>• An accurate daily log is maintained of the number of mortalities</li> </ul>
<b>Discussion</b>	At the time of the audit there was only 1 year of data available for the facility due to the short period of time that it has been operational under the new owners and management. A daily log of weight of mortality is was not maintained at the time of the audit, however the number of pieces was. Only a record of what had been sent for biological destruction was available identifying that 60kg had been sent to date. As such the farm manager has been advised that weight should also be recorded daily to ensure that they meet the requirements of the farm. Based on numbers of eels recorded as dead, there appears to be mortality of below 2% for the period, April 2018-April 2019.
<b>Score</b>	Pass: Aspiring indicator
<b>Criterion 5.2: The fish meal/oil ingredients in the feed come from a responsible source</b>	
<b>Weighting: 1</b>	
<b>Responsible indicators</b>	Fish meal/oil in the feed (including juvenile feeds) is certified by IFFO or MSC or shown in some other way to be from responsible or sustainable sources
<b>Aspiring indicators</b>	Fish meal/oil in the feed (including juvenile feeds) is not certified by IFFO or MSC or shown to be from responsible sources, but there are credible plans to move to such a supplier within 2 years
<b>Discussion</b>	Fishmeal and oil are supplied to the farm by Skretting. Communications with Skretting were opened following the audit to acquire additional information on the sustainability of the feeds supplied. Some information was provided by the company however, no clear information was provided to indicate that the feed was IFFO or MSC certified. Company policy was provided which identified the responsibility criteria for ingredient supply to make the feed, and the company have confirmed that ingredients are sustainably sourced.
<b>Score</b>	Pass: Aspiring
<b>Criterion 5.3: Feed is used as efficiently as possible</b>	
<b>Weighting: 1</b>	

<b>Responsible indicators</b>	The average feed conversion ratios in the farm are as follows: glass eel to fingerlings: 1.1 or less fingerlings to 200g: 1.6 or less large eels: 2.0 or less
<b>Aspiring indicators</b>	The average feed conversion ratios in the farm are as follows: glass eel to fingerlings: 1.3 or less fingerlings to 200g: 1.8 or less large eels: 2.2 or less
<b>Discussion</b>	Feed at the farm is used efficiently, The FCR were presented for the current stock which are all from the original same batch of glass eels. Based on an average of all tanks, the FCR is averaged out as 1.27 for average weight of eels of 79g.
<b>Score</b>	Pass: Responsible indicator
<b>Criterion 5.4: Water quality</b>	
<b>Weighting: 1</b>	
<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• 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)</li> <li>• Water quality management procedures are in place including regular monitoring of relevant parameters which shows that water quality is always high and stable</li> <li>• Water quality monitoring is linked to an alarm-based system in the event of a sudden drop in water quality</li> <li>• 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.</li> </ul>
<b>Aspiring indicators</b>	<ul style="list-style-type: none"> <li>• A system is in place that is expected to keep key water quality parameters within suitable tolerances (e.g. Ammonia, Suspended Solids, pH, Oxygen)</li> <li>• 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.</li> </ul>
<b>Discussion</b>	The 10 tanks and 11 tanks are on two separate water systems respectively. Oxygen and pH are constantly monitored at the out take from each system. Oxygen levels are checked daily by hand as well. Ammonia and suspended solids are also monitored daily all being through a routine which is documented. There is an alarm system in place for each system. This alarm will sound will sound should power/ water pressure/ temperature or oxygen fall outside the normal parameters. A backup system for power is automatic and can cover all power requirements. Oxygen tanks are available for backup in case of failure of the usual system present with sufficient supply to cover all needs for over 4 hours.
<b>Score</b>	Pass: Responsible indicator
<b>Criterion 5.5: There are minimal ecological impacts from effluent discharge</b>	
<b>Weighting: 1</b>	

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>The system is closed-circuit and has no discharge OR</li> <li>Effluent discharge is regularly tested by the farm AND</li> <li>Effluent discharge complies with all local and national requirements AND</li> <li>Has not been found to be non-compliant in the past 5 years.</li> </ul>
<b>Aspiring indicators</b>	<ul style="list-style-type: none"> <li>Effluent discharge is regularly tested by the farm AND/OR</li> <li>Has been found to be non-compliant on no more than 1 occasion in the past 5 years.</li> </ul>
<b>Discussion</b>	The facility operates a declaration system whereby surveys for the quantity of water discharged can be undertaken. Testing can be done but has not to date and water is considered to be clean when entering town sewer system. No issues have been found since the original construction of the farm.
<b>Score</b>	Pass: Responsible indicator

#### Criterion 5.6: Grading, slaughter and transportation are carried out with respect to welfare

**Weighting: 1**

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>Grading is completed in an efficient manner</li> <li>Slaughter is completed by a method that provides an instant death or renders them insensible to pain, i.e. electric stunning or percussive stunning.</li> <li>Procedures are in place to ensure transportation provides suitable conditions for fish welfare.</li> </ul>
<b>Aspiring indicators</b>	<ul style="list-style-type: none"> <li>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</li> </ul>
<b>Discussion</b>	Grading is efficiently completed using a gravity fed pipe system which then feed an air pump system to the grading machine. No transportation has occurred yet, however stunning for local processing is done by electric stunning using the machine produced by Rijpelaal B.V. Once stunned, the eels are plunged into 40 degree C + water before gutting for welfare reasons.
<b>Score</b>	Pass: Responsible indicator

#### Criterion 5.7: The farm provides eel for restocking

**Weighting: 2**

<b>Responsible indicators</b>	The farm can provide documented evidence that 10% or more of the farm's annual eel production (by piece) <u>has been provided</u> for restocking for the purpose of conservation / escapement.
<b>Aspiring indicators</b>	The farm can provide documented evidence that it makes 10 % of their annual eel production (by piece) <u>available</u> for restocking for the primary purpose of conservation / escapement AND/OR for new clients, the farm can demonstrate that they have bookings for re-stocking in the following year at more than 10% of the predicted annual eel production (by piece) for the purpose of conservation / escapement.
<b>Discussion</b>	To date no eel have been sold for restocking however, this is planned to change based on available market. At present as there have not been any sales at all, it is thought that this element cannot be assessed and therefore N/A is applied

<b>Score</b>	N/A
<b>Criterion 5.8: Eels for restocking are not graded out slow-growers</b>	
<b>Weighting: 2</b>	
<b>Responsible indicators</b>	The size range and quantities in the eels for restocking reflect 100% that for the age group in the whole farm
<b>Aspiring indicators</b>	The size range and quantities indicate no more than a 25% supplement of those for restocking are from slower growing fish of the same age group.
<b>Discussion</b>	No grading out is done by the farm to ensure that any restocking would be representative of the stock purchased as glass eels.
<b>Score</b>	Pass: Responsible indicator