Eel Assessment – Mooijer-Volendam BV

Assessment against:

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

Completed by
Richard Wailes

21st January 2019

FINAL REPORT

Introduction

This document represents the report completed following the 2019 audit carried out under the Sustainable Eel Standard (Version 6.0, June 2018) against Mooijer-Volendam BV. This assessment has been completed against Components 1, 4 & 7 of the Standard only.

The assessment is of a Processor / Retailer located in Volendam, Netherlands. This is a large very modern operation employing 110-120 staff selling multiple species (mainly pelagic) and certified against a number of Standards including IFS, GMP+ and MSC.

1. The assessment

The assessor was Richard Wailes of Control Union Pesca Ltd, who visited Mooijer-Volendam BV on the 21st January 2019. The audit included interviews with Nicolas Kwakman (QM) and Jan Kwakman (GM).

2. Client Contact Details

Client Contact Name	Nicolas Kwakman (Quality Manager)
Client Address	Dwarskuul 2, 1131 PS , Volendam, Netherlands
Client Email	nicokwakman@mooijer.nl
Client Phone Number	00316 51 611 982

3. Results of the assessment

The outcome of this assessment is as follows;

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

That Mooijer-Volendam BV has scored the following for Component 1: General Requirements and therefore **should** be considered **RESPONSIBLE** under the SEG standard.

Component 1: General Requirements	Auditor's findings	Weighting	Score
1.1 Commitment to Legality	Pass	1	1
1.2 Contribution to eel conservation projects	Pass	1	1
1.3 The facility trades in certified responsibly sourced eels	Pass	1	1
1.4 Traceability:			
1.4.1 Incoming products, separation and segregation	Pass	1	1
1.4.2 Outgoing products	Pass	1	1
1.4.3 Record keeping and documentation	Pass	1	1
1.5 Biosecurity & welfare – eel and eel products are provided with minimal risk of diseases, parasites and alien species	Pass	1	1
Total		7	7
Percentage Responsibility Score:		100%	

That Mooijer-Volendam BV has scored the following for Component 4: Eel buying and trading and therefore **should** be considered **RESPONSIBLE** under the SEG standard.

Component 4: Eel buying and trading	Auditor's findings	Weighting	Score
4.1 The glass eel holding facility is a registered aquaculture production business	N/A	1	N/A
4.2 Mortality in storage facility	Pass	2	2
4.3 Mortality during transport and initial holding if transported to farm		2	2
4.4 Water quality	Pass	1	1
4.5 Handling and welfare	Pass	1	1
4.6 Transport	Pass	1	1
4.7 The required percentage of glass eels is being used for restocking	N/A	2	N/A
Total		10	7/10
Percentage Responsibility Score:		70%	

That Mooijer-Volendam BV has scored the following for Component 7: Processing, wholesale and retail supplies, and therefore **should** be considered **RESPONSIBLE** under the SEG standard.

Component 7: Processing, wholesale and retail supplies	Score
Comments: The company is new to the SEG Standard and believes passionately in the responsible sourcing and processing requirements. From intake, care of the eels in tanks, humane slaughtering (electric) and processing (up to 1000kgs per day), efficient brining, up to date smoking and to finally the latest in packing techniques the operation is slick and hygienic. Currently nothing is shown on the packaging (MAP, VP) as the company is waiting for its suppliers to be certified. In 2018 sales of potentially certified eels were at 70% and this is expected to grow following certification.	Pass 1

Summary of assessment and scoring

Component	**Aspiring**	**Responsible**
1		7
4		7
7		1
Total		**15**
Total Responsibility Score		**100%**

Recommendations:

There are no recommendations as the operation has met each part of the Standard

4. Next Audit

At the completion of the audit the client was assessed against the risk assessment set out in the Methodology. This is set out in the table below.

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

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

As the client has been seen to fall into the Standard surveillance bracket, the next audit will be due on the 21st January 2021 (in 2 years' time) and shall be an on-site audit.

[1] A borderline pass, under versions 1.0 to 5.0 of the standard, was considered a pass when one less amber indicator is received then would be required to fail (i.e. 5 green indicators and 4 amber indicators) or when a client is certified with equal number of amber and green indicators.

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

Component 1 – Generic requirements	
Criterion 1.1: Commitment to legality	
Responsible indicators	For at least the past two years: the organisation has not been found guilty for any offences relating to eel fishing or trading.
Aspiring indicators	For at least the past 12 months: the organisation has not been found guilty for any offences relating to eel fishing or trading.
Discussion	There have never been any issues regarding illegal eel trading in the history of the Company.
Score	1 - Responsible
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	The company is committed to being responsible – checks website for supplier's accreditations and also it pays about 3% of its profits to the Eel Stewardship Funds through DUPAN (figures taken). They are also an investor in laboratory 'Glasaal Volendam BV' where they are trying to take eels through the full breeding and growth cycle so that there will be no need for the use of wild glass eels.
Score	1 - Responsible
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 company buys mainly responsibly certified eels, buying from four farms – Salco Fishfarm Dronten BV, Troelstra Aquacultuur BV, Naturaal BV (owned by Mooijer-Volendam) & Koman's Vishandel BV. which are all undergoing recertification/certification. About 30% of non certified eels were purchased in 2018 mainly from one supplier who is not certified but working under the KRW (The Water Framework Directive)
Score	1 – Responsible

Criterion 1.4: Traceability	
1.4.1: Traceability - Incoming product, separation and segregation	
Responsible indicators	• 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	• 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	When eels arrive at the premises they are given a unique batch number which links directly to the delivery note/invoice from the supplier. This Batch code follows the product through the holding tanks (separated by farm and batch), electric stunning operation, processing, smoking and packing and is finally shown on the labels on each pack. The batch code is key to the claim of certification and the procedures in place ensure that there are no possibilities of mixing certified and non-certified eels. With both IFS and MSC Standards in place there are no issues of mixing. The SAP system ensures clear and accurate documentation.
Score	1 - Responsible
1.4.2: Traceability - Outgoing product	
Responsible indicators	• 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: - Includes an appropriate batch code - Includes a record of the quantity (no. & weight) of product and to whom it was sold

Aspiring indicators	• 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: - Includes an appropriate batch code - Includes a record of the quantity (no. & weight) of product and to whom it was sold
Discussion	The traceability is excellent overall with each batch being identified clearly right up to final label on the packaging. This links up with the invoices through date and a record which shows which products are sold on which day from which batch. There is minimal margin for error and documentation is sufficient. Checked – SAP system and Crystal Reports.
Score	1 - Responsible
1.4.3: Traceability - Record keeping and documentation	
Responsible indicators	• 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	The above requirements are met except that: • 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	Full traceability in place with each stage of the process identified through batch code. A copy of reconciliation of Batch 18912 taken showing an overall yield of 49%. (this is also part of the IFS & MSC requirements). Records are kept for 5 years +.
Score	1 - Responsible
Criterion 1.5: Biosecurity & welfare – Eel and eel products are provided with minimal risk of diseases, parasites and alien species	
Eel Fishing: Biosecurity measures are adopted	
Responsible indicators	• The fishery conducts good biosecurity measures such as the disinfection and drying of nets and equipment between each fishing in different waters. OR: • The fishermen only operate in the same river or estuary, with no risk of transferring diseases or alien species between catchments
Eel buying & trading: Biosecurity is present and disease is treated rapidly and appropriately	

Responsible indicators	• The use of chemicals follows legal requirements of the appropriate EU regulations and of the country concerned. • The facility has the appropriate permissions to operate from the relevant licensing authority • An effective and documented biosecurity plan is in place and there is evidence that it is being followed. • Records are available showing regular monitoring of health and possible signs of stress according to the facility's plan (including the completion of microscope parasite checks) and daily mortality is recorded. • Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility.
Aspiring indicators	• 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	This is only applicable for the eels held in storage for up to 5 days prior to slaughter. No chemicals are used, an effective biosecurity plan is in place (and being used), daily mortality is recorded (though minimum – less than 0.1%). This is part of the GMP+ requirements.
Score	1 - Responsible
Eel farming: Biosecurity is present and disease is treated rapidly and appropriately	
Responsible indicators	• The facility has the appropriate permissions to operate from the relevant authority. • The use of chemicals follows legal requirements of the EU and of the country concerned • An effective and documented biosecurity plan is in place and there is evidence that it is being followed. • Daily records are available showing monitoring of fish health and signs of stress and daily mortality is recorded • Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility • UV is used at an appropriate level and separation between tanks
Aspiring indicators	• The facility has the appropriate permissions to operate from the relevant licensing authority • The use of chemicals follows legal requirements of the EU and of the country concerned. • An effective and documented biosecurity plan is in place and there is evidence that it is being followed. • Eels are regularly inspected for disease (although this may not be documented) and daily mortality is recorded.

	• Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility.
Discussion	N/A as not a farm
Score	N/A
Restocking: The risk of restocked eels introducing disease into wild populations has been assessed and is minimal	
Responsible indicators	Eels are tested before restocking and found to be free of disease AND/OR eels are from a known source which is tested on at least an annual basis and known to be free of disease.
Aspiring indicators	Eels are tested before restocking when first sourced from a new area, and periodically (at least annually) thereafter to ensure they are free from disease.
Discussion	N/A as not a farm
Score	N/A
Wholesale / Retail / Processing: Hygiene Plans are followed and there are rare examples of infection	
Responsible indicators	Food processing hygiene plans are followed
Discussion	There is a fully approved and IFS verified HACCP plan in place (summary taken) with full hygiene plans (checked on site) and there have never been any issues with infection amongst the eels and listeria on the products (continuously swabbed). The place is very clean and well laid out being brand new (2 years old) and is also GMP+ certified.
Score	1 - Responsible

Component 4 - Eel buying and trading	
Criterion 4.1: The Glass eel holding facility is a registered Aquaculture Production Business	
Weighting: 1	
Responsible indicators	The Glass eel holding facility is a registered Aquaculture Production Business
Aspiring indicators	The facility is not a registered Aquaculture Production Business, but has credible plans to register within the next 6 months
Discussion	N/A as not a farm
Score	N/A
Criterion 4.2: Mortality in storage facility	
Weighting: 2	
Responsible indicators	Mortality rate over the season is less than 2% on average.
Aspiring indicators	Mortality rate over the season is less than or equal to 5% on average but greater than or equal to 2%

Discussion	Mortality in the holding tanks (9) is minimal. Eels are stored for up to 5 days and any dead eels recorded daily – the mortality rate is negligible (less than 0.2%)
Score	2 - Responsible
Criterion 4.3: Mortality during transport and initial holding if transported to farm	
Weighting: 2	
Responsible indicators	• Buyers source at least 90% of their eels from certified suppliers OR • Mortality during transport and for the first week at the farm is less than 2% on average
Aspiring indicators	• Buyers source 50% - 89.9% of their eels from certified suppliers OR • Mortality during transport and for the first week at the farm is less than or equal to 3% on average but greater than or equal to 2% on average.
Discussion	Not an issue as this is a processor but mortality during transport (own approved) and in the holding tanks is negligible.
Score	2 - Responsible
Criterion 4.4: Water quality	
Weighting: 1	
Responsible indicators	• A system is in place that is expected to keep key water quality parameters within suitable tolerances for healthy eel survival (e.g. Ammonia, Suspended Solids, pH, Oxygen) • Water quality management procedures are in place including regular monitoring of relevant parameters which shows that water quality is always high and stable • The facility operates a back-up system to ensure that water quality will not adversely affect survival rates in the case of an equipment failure
Aspiring indicators	• A system is in place that is expected to keep key water quality parameters within suitable tolerances for healthy eel survival (e.g. Ammonia, Suspended Solids, pH, Oxygen) • The facility has a minimum of a back-up generator and oxygen supply
Discussion	Checked twice annually by the local authorities and approved (copies of approvals taken). There is also a well water treatment facility in place and GMP+ approved. There is no need for a back-up system as the tanks are and can be used/emptied immediately in case of electrical failure
Score	1 - Responsible
Criterion 4.5: Handling and welfare	
Weighting: 1	
Responsible indicators	• 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	• 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	Facility built in the last two years has been designed to minimize handling with a quick and efficient product flow (intake, storage, stunning, brining, gutting, smoking, chilling and packing). There are documented procedures in place as part of the HACCP. And Quality Manual. Eels are moved quickly and killed humanely with electricity – speed does not compromise quality.
Score	1 - Responsible
Criterion 4.6: Transport	
Weighting: 1	
Responsible indicators	• There is a Transport Plan in place to minimise travel time – this meets the Transport requirements for vertebrates • Packing is done in a way that minimises handling, time and stress • Eels are kept cool and wet with an adequate supply of oxygen • The operator holds the relevant transport authorisations
Discussion	The Company has its own truck to collect the eels with the maximum distance with the current farms of 2 hours. The truck is designed for eel transport with aerated water in each compartment and is approved by the Authorities.
Score	1 - responsible
Criterion 4.7: The required percentage of glass eels is being used for restocking	
Weighting: 2	
Responsible indicators	• The buyer can provide documented evidence that they have sold at least 60% for restocking the required target percentage of its glass eels from the last season for the primary purpose of conservation / escapement. • The eels for restocking are representative of the stock – slow growers are not selected
Aspiring indicators	• The buyer can provide documented evidence that they have reserved or made available at least 60% of the required target percentage of its glass eels from the latest season available for the primary purpose of conservation / escapement, OR • The buyer can provide documented evidence that it has made available glass eels to the maximum level possible within the constraints of the implementation of the EMP in that country OR • The buyer can provide credible evidence that re-stocking will occur in the forthcoming season. • The eels for restocking are representative of the stock – slow growers are not selected
Discussion	N/A as not a farm

Score	N/A

Component 7 – Processing, wholesale and retail supplies	
Issues **Notes**	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). 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. 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. 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.
	Where the facility undertakes other processes in this standard, e.g. perhaps eel farming, the business and assessor should decide the relevant parts to audit.
Benefits	• Consumers have the opportunity and choice to purchase responsibly sourced eel
Targets & Measures	• 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	The company is new to the SEG Standard and believes passionately in the responsible sourcing and processing requirements. From intake, care of the eels in tanks, humane slaughtering (electric) and processing (up to 1000kgs per day), efficient brining, up to date smoking and to finally the latest in packing techniques the operation is slick. Currently nothing is shown on the packaging (MAP, VP) as the company is waiting for its suppliers to be certified. Currently sales of potentially certified eels are at 70% and this is expected to grow following certification.
Score	1 - Responsible