

Eel Assessment – Civelle Durable (2656 FR)

Re-Assessment against:

Component 1: Generic Requirements

Component 3: Glass eel buyers

Component 7: Traceability

Completed by

Alex Senechal

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Final

1. Introduction

This document presents the report completed following the audit carried out under the Sustainable Eel Standard (Version 5, 21st June 2013), and Sustainable Eel Methodology (Version 1, 21st June 2013) against Civelle Durable. This assessment has been completed against Components 1 (Generic Requirements), 3 (Glass Eel Buyers) & Component 7 (Traceability) of the Standard only.

The assessment is of the glass eel buyer, Civelle Durable, a privately-owned company based in Ste Gemme in France. The business buys eels from the following fisheries, Eels are then stored as required in the facility at Ste Gemme before being sold on to the customer (either restocking organisations or aquaculture facilities). The company is owned by Mr Peter Wood who is also the owner of the UK Glass Eels company. Some of the eels stored at the Civelle Durable facility are sent to the UK Glass Eels site before further onward transport to the clients.

2. The assessment

The assessor was Mr Alex Senechal of MacAlister Elliott and Partners Ltd, who visited Civelle Durable on the 18th December 2017. The audit commenced with the paperwork for the facility on site in Ste Gemme. The traceability assessment and normal functioning of the facility was completed here with Lauren and Benoit who run the Civelle Durable facility for Mr Wood. This was followed by a site visit to view the facility itself as well as a delivery of hand netted glass eels, stocking of tanks with eels collected from ports by Lauren and Benoit and sale of ~122kg of glass eels. During this visit the facility had one system in operation while the other was still empty due to it only being the start of the season and no need to have both system in operation. Each system consists of 8 tanks and one water storage tank for use if and when needed. Any

information required for mortality traceability which was not available in France was later provided by the main office in the UK.

3. Client Contact Details

Client Contact Name(s)	Mr Peter Wood & Mr Benoit Chambon
Client Address	La Fromigere Sud, 17250 Ste Gemme, France
Client Email	peterwood@mailbox.co.uk office@glasseels.com civelledurablefrance@gmail.com
Client Phone Number	0033 635102185 0033 626715763

4. Results of the assessment

The outcome of this assessment is as follows;

That Civelse Durable has passed Component 1: Commitment to Sustainability and legality

that Civelse Durable scored **5 green scores** and **4 amber scores** against Component 3. and therefore passed **Component 3: Glass Eel Buyers**

that Civelse Durable scored **3 green scores** against Component 7 and therefore passed **Component 7: Traceability**.

It appears clear that the facility is meeting the requirements of Components 1, 3 & 7. It is therefore recommended that the facility is granted certification against the SEG standard.

Some further recommendations and observations were raised by the auditor;

OBSERVATION & RECOMMENDATION 1: Mortality figures for the facility are done by weight and currently include dead lice removed at the same time as any dead eels. Presence of lice is due to their presence with the purchased eels and contribute to the purchase weight. This figure must be maintained for continuity with French authorities. While already discussed with Benoit during the audit it is recommended that Civelse Durable staff find a way of separating the lice at the point of purchase so that they are not included in the original weight with the eels purchased and that any lice which are introduced to the tanks are then separated from any dead eels when calculating and recording mortality figures.

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

	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

The client has been placed in the Standard surveillance category.

As the client has been seen to fall into the Standard Surveillance bracket, the next audit will be due around Dec 2019 (in 2 years' time) and shall be an on-site audit.

The tables below gives 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.

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 Amber indicators) or when a company is certified with equal number of orange and green indicators.

Discussion	<p>Civelle Durable continue to show interest and the will to be aligned with the SEG requirements during the auditors visit and have indicated a desire for more fisheries to be SEG accredited so that it is able to market more SEG glass eels in the future.</p> <p>The French investigation which was ongoing during the previous audit inspection has been dropped by the authorities with no sign of any ongoing investigations at the time of this audit. There are no other issues at present and the company and its employees undergo regular checks by authorities as with all glass eel purchasers at ports with no issues or concerns reported.</p> <p>Since no evidence of illegal trading or breaches of regulation has been provided and all documentation required is in place the auditor must provide a green score indicator for Component 1.</p>
Score	A Green score indicator is awarded

2. Component 3: Glass Eel Buyers

1. Mortality in storage facility (See Note 5)	
Weighting: 2	
green score indicator	Mortality rate over the season is less than or equal to 2% on average.
amber score indicator	Mortality rate over the season is less than or equal to 5% on average but greater than or equal to 3%
red score indicator	Mortality rate over the season is greater than 5% on average.
Discussion	<p>During the 2016/17 season, 1565.872 kg of eels were purchased (declared weight) Mortality is recorded for individual holding tank every other day or daily at the facility. The assessor was provided with the required records which identified that of the 1565 kg of eels, mortality (including lice) came to a total of 43.61kg.</p> <p>Using these figures, we are able to calculate an average mortality for the season of 2.79%. Figures were available for the first batch of eels sold at the start of the 2017/18 season where by 62.48kg had been purchased and mortality for this batch was recorded as 1.21kg, therefore mortality of 1.95%. This provides an average of 2.37% however, it is the auditors impression that if lice had been separated from the figures, mortality figures are likely to have been under 2%. This figure is less than 3% but greater than 2%, therefore an amber score must be awarded.</p>
Score	An amber score indicator is provided here
2. Mortality during transport and initial holding if transported to farm (See Note 9)	
Weighting: 2	
green score indicator	Mortality during transport and for the first week at the farm is less than or equal to 1.5% on average.
amber score indicator	Mortality during transport and for the first week at the farm is less than or equal to 3% on average but greater than or equal to 2% on average.

red score indicator	Mortality during transport and for the first week at the farm is more than 3% on average.
Discussion	<p>Figures on mortality were provided from Royal Danish through Peter Wood.</p> <p>Royal Danish received 500 kg of glass eels on the 9th February 2017 from Civelle Durable. During the first 4 days, 0.7% mortality was recorded with comments suggesting that numbers and quality of fish received looked good. At the time of submitting, Royal Danish had been contacted to get figures to include first 7 days after delivery, with no further information received yet. However, it is the auditor's opinion that mortality is unlikely to greatly increase beyond 3% over the following 3 days. Therefore, a conditional Amber score should be provided here with green awarded if more favourable information is received and red score if mortality figures above 3% are provided.</p>
Score	An Amber score is provided here
3. Water quality	
Weighting: 1	
green score indicator	A system is in place that is expected to keep key water quality parameters within suitable tolerances for healthy eel survival (e.g. Ammonia, Suspended Solids, pH, Oxygen) AND water quality management procedures are in place including regular monitoring of relevant parameters which shows that water quality is always high and stable AND water quality monitoring is linked to an alarm-based system in the event of a sudden drop in water quality AND the facility operates a back-up system to ensure that water quality will not adversely affect survival rates in the case of a power supply failure.
amber score indicator	A system is in place that is expected to keep key water quality parameters within suitable tolerances (e.g. Ammonia, Suspended Solids, pH, Oxygen) AND water quality management procedures are in place and there is regular monitoring of relevant parameters which shows that water quality is always high and stable.
red score indicator	No water quality monitoring occurs AND/OR water quality is not held regularly at levels which are considered suitable for healthy eel survival.
Discussion	<p>During the site visit only one system was operational due to the quantity of eels stored at the facility. However, both systems were identically set up. Both are supplied with oxygenated water which is temperature controlled. All systems are electronically monitored for water temperature (maintained at between 8-9 degrees C), and oxygen levels and backed up using a generator which is tested and run every week. Due to the remote nature of the facility, the backup system was regularly used during the 2016/17 season with no adverse effects on fish kept at the facility. Should there be a sudden drop in water quality or temperature change, automated systems are activated and an alarm system rings selected phone numbers and does not stop until deactivated at the facility.</p> <p>Water quality is checked daily by Benoit for suspended solids, and salinity levels are controlled for individual tanks depending on the location at which the eels were fished to limit stress.</p> <p>The systems in place appear suitable to meet this Criterion.</p>
Score	A green score indicator is provided here

4. Biosecurity is present and disease is treated rapidly and appropriately	
Weighting: 1	
green score indicator	An effective and documented biosecurity plan (including the washing and disinfection of equipment) is in place AND records are available showing regular monitoring of health and possible signs of stress (including the completion of periodic microscope parasite checks) AND records are maintained in relation to the name, administrator, amount, dates and reason for use of any medicines and/or chemicals used in the facility AND the use of chemicals follows legal requirements of the appropriate EU regulations and of the country concerned.
amber score indicator	The facility follows bio-security measures (including the washing and disinfection of equipment) although this is not documented AND eels are regularly monitored for health and possible signs of stress (although this might not be documented) AND records are maintained in relation to the name, administrator, amount, dates and reason for use of any medicines and/or chemicals used in the facility AND the use of chemicals follows legal requirements of the appropriate EU regulations and of the country concerned.
red score indicator	The facility operates no bio-security measures (including the washing and disinfection of equipment) AND/OR there is no checking of the eels for health and possible signs of stress AND/OR records are not maintained with regards to the use of medicines and/or chemicals AND/OR legal requirements of the appropriate EU regulations and country concerned are not met for the use of medicines or chemicals.
Discussion	<p>A biosecurity plan is in place and documented for the facility. Any use of medicines and chemicals would be subject to full documentation as is standard and required under normal aquaculture regulations (although none appear to be used by the client). Only salt was added to selected tanks and quantities recorded in the daily logs. Fish health was monitored daily through visual inspections of the tanks and monitoring of mortality.</p> <p>Staff are experienced in aquaculture practices and undertake regular and thorough cleaning of tanks as and when they are emptied of fish following sale. Each tank within a system is isolated and therefore any issues arising can be dealt with individually.</p>
Score	A Green score is provided here
5. Handling and welfare (see notes 10 and 11)	
Weighting: 1	
green score indicator	Systems are in place and the facility is designed to keep handling to an absolute minimum AND documented procedures are in place for handling, and handling, where necessary, is careful AND the infrastructure is designed to avoid injuries, and so that the use of nets is rarely necessary. When used, nets are small-mesh (1mm maximum) AND eels are moved without being allowed to dry out.
amber score indicator	The facility may not be optimally designed, but systems are in place to avoid handling as much as possible within the constraints of the facility AND handling, where necessary, is carefully planned and executed AND the infrastructure has been optimised as far as possible to avoid injuries AND nets are small-mesh (1mm maximum) AND eels are moved without being allowed to dry out.
red score	Excess, poorly planned or careless handling is likely to result in additional

indicator	mortality.
Discussion	<p>A documented procedure is in place for packing (a copy has been provided to the auditor). The facility appears well designed to avoid injuries to the fish with round tanks used and all movement completed through the drainage of tanks and the entire system if required. Emptying of the tanks was seen by the auditor during a sale of some 122kg of eels. This was done through the drainage of excess water from the tank prior to removal of the eel guard which releases the eels from the tanks. Eels then travel through the drainage system to a fine sieve area where they are drained before weighing and packing for transport. Eels are not touched by any nets during the process. The flow of eels from the drainage system is controlled through a closing sock system which restricts flow of the water.</p> <p>Eels are never allowed to dry out and appeared active throughout the process and no direct handling of eels occurred. When a brush was used this consisted of a soft paint brush to avoid any abrasion of the eels.</p>
Score	A Green Score indicator is provided here
6. Transport (See note 12)	
Weighting: 1	
green score indicator	Transport is carefully planned to minimise travel time AND packing is done in a way that minimises handling, time and stress AND eels are kept cool and wet with an adequate supply of oxygen.
red score indicator	The above criteria are not met.
Discussion	<p>Transport from ports where the eels are purchased to the facility is done in company owned vans which contain smooth custom-made plastic holding tanks which are filled with fresh water from the active system at the facility prior to departure for collecting. This water is saturated with oxygen prior to the introduction of the eels and monitored at regular intervals during the transport to ensure it remains at the correct levels.</p> <p>Transportation from the facility to clients is completed either through the use of the company's purpose owned aircraft or for shorter journeys by a company owned van. Packing of eels for transportation is completed in a carefully planned manner. This process involves larger boxes with O2 for shorter journeys (up to 4 hours) or the use of small polystyrene boxes which are open and designed not to spill when in transportation (angle of take-off and landing) for longer trips up to 24 hours.</p> <p>Temperature is monitored and controlled throughout transportation to limit risk of mortality.</p>
Score	A green score indicator is provided here
7. The required percentage of glass eels from the fishery is being used for restocking (See Note 13)	
Weighting: 2	
green score indicator	The buyer can provide documented evidence that <u>he has sold</u> at least the required target percentage of its glass eels from the latest season for the primary purpose of conservation / escapement.
amber score	The buyer can provide documented evidence that the <u>has made</u> at least the required

indicator	target percentage of its glass eels from the latest season available for the primary purpose of conservation / escapement, OR the buyer can provide documented evidence that it has made available glass eels to the maximum level possible within the constraints of the implementation of the EMP in that country OR that the buyer can provide credible evidence that re-stocking will occur in the forthcoming season.
red score indicator	The buyer does not make or has no evidence to show that he has made the required target percentage of its glass eels available for restocking in the last year.
Discussion	Civelle Durable is required to provide 60% of its eels for restocking under French law. During the season of 2016/17 the facility purchased 1565.872kg of glass eels. Of this, records show that 600.82kg were for consumption while 965.052kg went for restocking (61%) so within with the restocking requirement.
Score	A Green score is provided here.

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	<p>Upon purchase all product must be accompanied by a copy of the relevant ticket (different colour depending on jurisdiction and whether river or marine based fishing). A copy of each of the tickets is then maintained by Civelle Durable. This is all correlated in a single spread sheet which shows all the incoming product, its source and the person who supplied it.</p> <p>It does appear that the system in place does allow for product to be traced to a specific fishery and group of fishermen. Presently no certified fish is being held at the facility however, when certified fish is held this will be kept in separate tanks to that of uncertified fish. As Civelle Durable are responsible for trying to get specific fishers certified they will be well informed as to which fishers are certified and which are not going forward.</p>
Score	A Green score is provided here.
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	<p>The facility has a system for ensuring that the fish are traceable through the tank systems at Civelle Durable. This is done by recording the date of entry and to which tank it is placed both on the daily logs and on the side of the tanks including arrival weights for each batch received. A running total is then kept for each tank as it is removed and added. This system appears to be adequate and allows for the effective tracing and tracking of fish. The system though does not allow product to be caught and separated if taken from a non-SEG source.</p> <p>As it is not yet possible for the facility to function as a commercial business by only handling SEG certified product, any certified product will be kept in separate tanks to non-certified product and for transportation would be packaged and labelled separately should a client wish to have both certified and uncertified product. Segregation by the purchaser is then down to the buyer post transportation should the buyer wish to market SEG certified product as such beyond that. Civelle Durable is responsible for ensuring that no non-certified eels contaminate certified eels.</p>
Score	A Green score is provided here
3. – Outgoing Product (See Note 22)	
green score indicator	<p>The organisation only labels certified products with the ‘SES’ ecolabel once it has been approved to do so through the signing of an ‘SES’ ecolabel licence agreement AND</p> <p>All product to be sold as certified by an organisation meets the following criteria:</p> <ul style="list-style-type: none"> • Any product labelling shall be accompanied by the ‘SES’ logo. • Products shall be accompanied by an invoice which: <ul style="list-style-type: none"> ▪ Includes the prefix ‘SES’ in the product description; ▪ Includes a record of the volume/quantity of product and to whom it was sold; ▪ Includes the certificate code on the invoice • The certificate code must be clearly related to the certified product only
amber score indicator	<p>The above requirements are met except that:</p> <ul style="list-style-type: none"> ▪ Products have 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	Presently there is no demand for SES glass eels from the market, however, should a buyer wish to purchase SES certified eels from Civelle Durable,

	<p>invoices should state that product is SES certified and show the Civelle Durable certificate number going forward.</p> <p>The SES logo is not used by Civelle Durable and so no logo licence agreement is held.</p>
Score	There is currently no market demand for SES certified eels therefore no is required to be labelled as such. Therefore, no score is provided here.
4. – Record keeping and documentation (See Note 23)	
green score indicator	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 AND The organisation operates a system that also allows for the completion of a batch reconciliation of eel product by weight over a given period AND The organisation maintains records for a minimum of three (3) years.
orange score indicator	The above requirements are met except that records have been maintained for less than three (3) years
red score indicator	The organisation's tracking and tracing system shows evidence that certified and non-certified product have become mixed AND/OR batch reconciliation records are unable to confirm that outgoing quantities are in line with incoming quantities.
Discussion	<p>The traceability system employed at Civelle Durable appears to be suitable for tracking and tracing eel product from purchase to sale. It is based on the following chain; Incoming Fiche -> Summary Report -> Fisherman invoice -> Daily Tank Records -> Ministry Declaration Document-> Civelle Durable Invoice-UK Glass Eels Invoice,</p> <p>Records were verified at random with incoming batches, fishermen invoices from the 12th Dec 2017 -19th December and daily log entries for each tank during the office audit. Copies of all records have been maintained.</p> <p>Outgoing batches were chosen at random for the following two shipments;</p> <p>Mass balance reconciliation was completed for the 2016/2017 fishing season. The total incoming product purchased was 1565.72kg. The total quantity of glass eels sold was 1466kg. This represents a lowed sale than purchase so a pass for mass balance. The difference however is equivalent to 6.38% but this would include all weight loss and mortality (lice and eel during transport and in facility)</p> <p>All records at Civelle Durable are maintained for a period of seven (7) years.</p>
Score	Civelle Durable has a traceability system that allows all records to be traced from start to finish. Records appear in order (quantity and batches) and the mass balance was passed. A green score is provided here.

