

Eel Assessment – Vie Fishery

Assessment against:

Component 1: Generic Requirements

Component 2: Glass eel fisheries

Component 7: Traceability

Completed by

Alex Senechal

5th April 2017

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 the vessel listed below and managed under the *Comité régional des pêches et des élevages marins des Pays de la Loire (COREPEM)*. This assessment has been completed against Components 1, 2 and 7 of the Standard only.

The assessment is of the French fishing vessel “LS 664 551 CONDOR” run by owner/skipper Eric Fouquet who works as part of the fishery on the River Vie in the Pays de la Loire. At present, he is the only glass eel fishermen that is interested in the SEG standard for the river, however the other fishermen are interest to see what the result of such an assessment could bring. It is hoped that if the standard is awarded fishermen may be able to add market value to their eels as SEG certified. The assessment is only to cover the specified vessel and not all vessels working on the Vie river. The vessel use rectangular nets (one on each side of the vessel) which are towed along side the vessel and lowered appropriately in the water column to catch glass eels. The Unit of Certification (UoC) for this fishery has been determined as follows;

Geographical Location:	Pays de la Loire in LCV03
Fishing Method:	Pole fishing from boat
Life Stage:	Glass Eels (Elvers) only.
Eligible Fishers:	Only the licenced vessel “LS 664 551 CONDOR” run by owner/skipper Eric Fouquet. Further information regarding the vessel can be obtained from the Committee Regional De Peche

2. The assessment

The assessor was Alex Senechal of MacAlister Elliott and Partners Ltd, who visited the river Vie as requested by Alexis Pengrech of the Comité régional des pêches et des élevages marins des Pays de la Loire on the 17th March 2017. The visit commenced on the 16th with meeting Alexis Pengrech at the COREPEM offices in Les Sables d'Olonne where Mr Pengrech proceeded to provide information regarding the Vie fishery which was visited the following morning. Records relating to the fishery's activities were reviewed and Mr Senechal was shown the national declarations system where all catches of glass eels have to be declared within 24 hours of landing. There are 3 systems which are used to monitor landing in the region to ensure accurate recordings of landing: paper logbooks, declarations of purchase by glass eel buyers and the use of the Télécacivelle system. On the morning of the 17th March, Mr Alex Senechal met Mr Alexis Pengrech and Mr Eric Fouquet at the port of Saint-Gilles-Croix-de-Vie. The gear used by the fishermen was explained along with sorting of catch and selection. The assessor along with Mr Alexis Pengrech of COREPEM proceeded to be shown the fishery in practice on board for the full extent of the fishing trip up the river.

3. Client Contact Details

Client Contact Name	Alexis Pengrech
Client Address	2 rue Colbert, 85100, Les Sables d'Olonne
Client Email	alexis.pengrech@orange.fr
Client Phone Number	+33 6.98.99.94.90 / +33 2.51.96.15.67

4. Results of the assessment

The outcome of this assessment is as follows;

The Vie Glass Eel Fishery for the above specified vessel has passed Component 1: Commitment to Sustainability and legality

that the Vie Glass Eel Fishery for the above specified vessel scored **6 green scores, 3 amber scores** against Component 2 and therefore **should not be considered sustainable under the SEG standard, Component 2: Glass Eel Fisheries.**

that the Vie Glass Eel Fishery for the above specified vessel scored **4 green scores and 0 amber scores** against Component 7 and therefore **should be considered sustainable under the SEG standard, Component 7: Traceability.**

Some conditions to certification were raised by the auditor;

CONDITION 1 (Traceability): Examples of complete fiche documents (stating LCV 03: SEG VIE) and fisherman's invoices (stating SEG Certified and showing the SEG certificate number shall be sent to the assessors within one month of certification being granted (and the fishery being 'in season')

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	

	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 17th March 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. Delete Components as Applicable

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

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.

	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	<p>The auditor has discussed the activities of the fisherman included in this assessment with the representative of the Comité régional des pêches et des élevages marins des Pays de la Loire (COREPEM) responsible for the glass eel fishery on the river Vie. No evidence of illegal trading by the fisherman has been provided to MEP and COREPEM confirmed verbally that the fisherman being assessed have not received any prosecutions relating to eel purchase or trading, and that French authorities regularly check the activities of the fishermen from this river to ensure compliance with regulations.</p> <p>The auditors have also received proof of documentation that all catches of glass eels are now input into the national France AgriMer system within 24 hours and paperwork is cross checked by authorities on inspection when landings occur and during transportation spot checks. The fisherman fills in catch logbook before transporting the catch to his viviers and then the buyers.</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

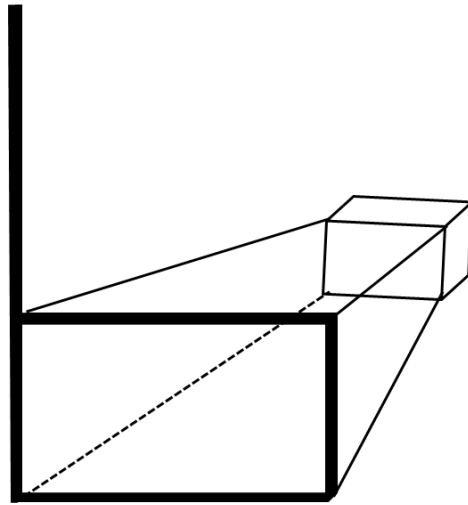
2. Component 2: Glass Eel Fisheries

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>When discussed with the COREPEM representative, evidence was given to indicate that the eel management plan had been approved for the Pays de la Loire and there was good evidence from restocking and recapture programs for the area.</p> <p>While escapement figures are increasing and being worked towards, the percentage of the quota set for restocking for the Pays de la Loire region has not been reached</p>

	<p>in recent years. Restocking for the previous 2 full seasons and current season (provisional figure for current season) has been 33.5%, 53.5% and 40.5% for 2014/15, 2015/16 and 2016/17 respectively. Fishers in the Pays de la Loire are requested to complete and sign the ‘ CHARTE DE BONNES PRATIQUES relative à la pêche professionnelle de la civelle’ which specifies best practice with an aim at continuing to work towards EU targets for escapement.</p> <p>In summary, a green score is provided as evidence of implementation is available and figures from the COREPEM indicate that while the 60% of quota for restocking has not been achieved, good progress has been made to ensure that restocking into in neighbouring rivers and further upstream has occurred averaging over 40% of captured eels in the past 3 years.</p>
Score	A Green score indicator is awarded
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 fisherman in the Vie is managed as part of a larger fleet working on the Vie and in the Pays de la Loire region. The fisherman is licenced each year before the beginning of the season and provided with an allocation of the quota. The fishery is governed by a strict quota system which is updated daily from paper logbook, online and Telecavicelle catch declarations. Data is cross checked between paper and electronic returns and spot checks. Quotas are controlled centrally by COREPEM. The initial quota is split between all of the licensed fishermen before the start of the season. As the season progresses unused quota is then again divided among the active fishermen (to avoid unused quota remaining with fishermen who are not fishing). Quota levels appear to be controlled almost on a day by day basis by COREPEM to ensure its efficient use.</p> <p>Fishermen in the region have been provided with example logbook sheets with annotated explanations on how to complete paper logbooks correctly. These are to</p>

	<p>be filled in by the skipper of the vessel before any catch is loaded into any vehical. Data to be included on the logsheet before loading must include fishers personal details, vessel details, area fished and weight of catch, etc. The logbook sheet then acts as a transportation document and must be updated with the vehical registration number before departure from the place of landing. Spot checks are carried out by authorities at landing sites and during transportation. Infractions are applied if the weight of the catch is more than 10% out from the stated quantity on the logbook entry or if logbooks have not been completed correctly or fully. A copy must be provided to the buyer and the authorities every 24 hours for all catch landed.</p> <p>Vessels working on the Vie are only permitted to land catch at two location, by the barrage and at the main port where the vessels berth. Checks are completed by authorites and all completed paperwork as specified above must be present at the time of inspection.</p>
Score	A Green score indicator is awarded
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>Fishing is done from a powered vessel working both with and against the tide and due to the narrowness of the river generally works close to the edge of the river where there is slower water flow. The vessel observed had no onboard gauges to monitor the speed at which it was working. However, using a hand held GPS it was recorded that a speed of 4.7 – 9km/h was the working speed when towing gear. This is equivalent to 2.5 – 4.9 knots but with no measure of tidal speed available. It was pointed out by the fisherman that the working speed in the river is generally slow and limited by the person in front as vessel tend to follow each other at a set distance working up and down the rive throughout the flood tide. It is clear though that the 1.5 knot requirement is not met by the vessel or fishery in general as all vessels appear to work at a similar speed.</p> <p>Haul duration varied on the vessel between 3.5-6 minutes depending on the section of the river. This was done more on a distance basis rather than a timed interval.</p>

However, haul times were generally closer to 4.5 mints on average.



The gear is formed of mesh sizes of 1300 microns for the main body of the net down to 1000-1100 microns at the cod end. Unlike the neighbouring Loire fishery, vessels in the Vie are not restricted by a cylindrical cone net design. Instead the mouth of the net is held open by a rectangular frame with maximum dimensions of 2.0m x 0.9m. One net is towed on either side of the vessels before being emptied onto a stretched out tarpauline which is laid across the vessel with a central square cut out over the vivier tank. The vivier tank has a “large” mesh top for catch to glide onto when nets are emptied.

The frames are fixed to poles which can be lowered into the water column to the desired depth much like the Loire fishery. However, due to the shallow nature of the river, much of the fishing on the Vie is nearer the surface to limit the risk of contact with the bottom.

The nets appeared carefully made to avoid any abrasions on the glass eels (indeed during the observation of fishing the quality of the eels seen appeared good). As mentioned above, there is a vivier on board which has an aerator to ensure good oxygen levels are maintained at all times for the glass eels which are retained. All the contents of the nets are emptied onto the sorting mesh. Larger bycatch and debris is removed immediately while smaller fish fry and weed is left on the mesh to allow eels to fall into the vivier tank. The quantity of damaged/ stressed glass eels which were not kept as catch but returned to the water with fish fry was low with the majority of unwanted catch returned alive.

Catch is removed from the onboard vivier with upmost delicacy and transported to the nearby vivier tanks still within the port where they are kept until there are sufficient quantities to be sold on to a buyer which can be up to a week on occasions. The majority of mortality occurs within the first 24 hours after capture and is between 1-1.5% on average. Insidences of higher mortality do occur although this was found to be rare and when reported insidences of pollutants entered the river or if there had been bad weather and water quality in the river had been affected. On such occasions, batches were kept separate from previous batches.

The standard also required mortality rates in the storage facility to be assessed and determined as less than 4% (green score) or 8% (orange score) to pass the standard. To do this the main buyer of eels from the vessel under assessment was contacted and confirmed that mortality seen in the first week was on average 1.5%. This added to the maximum of 1.5 % declared by the fishermen results in a maximum mortality rate of 3%.

	In summary the only parts of this criteria not currently met by the fishery is that the fishery is not conducted at a speed of less or equal to 1.5 knots (relative to the water) as required for an amber score. However, from first hand assessment of the fishery and having witnessed the low level of bycatch and damaged or tired glass eels present in the catch, it is the auditors recommendation that an amber score indicator is awarded.
Score	An amber score indicator is provided here
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	<p>During the observation of fishing activities the assessors witnessed low to negligible levels of bycatch with all fish which were big enough to handle without causing damage such as the small soles and bass returned to the water immediately after emptying of the nets onto the tarpauline. Smaller fry liable to be damaged from handling and glass eels which have not fallen into the vivier are returned to the water every few hauls with any other debris. The majority of bycatch was returned alive however this cannot be confirmed 100% from observations alone.</p> <p>The fisherman provided general agreement that bycatch is low and consists mainly of juvenile fish species which are returned periodically throughout the fishing trip. A study conducted with COREPEM and Ifremer demonstrated that bycatch from vessels in the Vie is limited with a list of bycatch commonly seen available.</p> <p>Based on observation and data provided it is therefore the recommendation that a green score indicator is provided for this criteria.</p>
Score	A green score indicator is provided here
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	To discuss these criteria in more detail it is important for us to consider first what the potential vulnerable, threatened, endangered species are within the geographical location of the fishery. Having reviewed species listed in Annex II of the

	<p>92/43/EEC directive of the Council for the Pays de la Loire specifically, the following key species is identified.</p> <table border="1"> <thead> <tr> <th>Name</th> <th>Status</th> <th>Conservation</th> <th>Isolation</th> <th>Overall</th> </tr> </thead> <tbody> <tr> <td><i>Rhodeus amarus</i></td> <td>Résidence</td> <td>Average</td> <td>Non-isolée</td> <td>Moyenne</td> </tr> </tbody> </table> <p>It is clear that this species is currently listed on the IUCN Red List as Vulnerable or Endangered and so it appears unlikely that any rare or protected species are directly affected by the fishery.</p> <p>In summary, a green score is provided here for the fishery</p>	Name	Status	Conservation	Isolation	Overall	<i>Rhodeus amarus</i>	Résidence	Average	Non-isolée	Moyenne
Name	Status	Conservation	Isolation	Overall							
<i>Rhodeus amarus</i>	Résidence	Average	Non-isolée	Moyenne							

Score	A green score indicator is provided here
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6. The fishery has negligible impacts on habitats

Weighting: 1

green score indicator	The fishing gear does not cause any damage to the bottom.
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amber score indicator	Damage to the bottom by gear is limited or minimal.
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red score indicator	Damage to the bottom by gear is frequent or widespread.
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Discussion	<p>During the assessors observations it was clear that the surface fishing method employed has no interaction with the bottom whatsoever (it is simply not possible for the gear to reach the bottom).</p> <p>For the pole method it is apparently very uncommon for the gear to touch the bottom and certainly best avoided by the fishermen as it can cause damage to the fragile nets very easily.</p> <p>In conclusion it appears very unlikely that the fishing gear and methods described here causes even minimal damage to the bottom. It cannot be concluded though that none occurs through the pole fishing method and so an ambur score is provided.</p>
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Score	An ambur score indicator is provided here
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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	As there is only one fisherman being assessed on this river it should be

	<p>simple to monitor the sale of SEG eel from the Vie. The only risk that therefore exists is that the fishermen may fish for eels in other areas and bring it back to the Vie for onward sale as SEG certified. To mitigate this risk the fisherman will be asked to include the specific wording ‘FR 52 – SEG Vie’ on the Fiche documents. This ensures that the fishermen are confirming the exact location of the fishing activity.</p>
Score	A green score indicator 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>Since the whole fishery is not being put forward for certification, but only one vessel, the need for separation and segregation is required if eels are to be sold with catch from other vessels. Only product caught and landed by the certified vessel will be eligible for certification. From conversation with the skipper of the vessel under assessment, and having visited their vivier tanks, it can be seen that only catch from this vessel is stored at the facility until there is sufficient amount to be sold. It is then the responsibility of the buyer to ensure that any certified eels are kept separated from other eels if they are to be sold on as SES glass eels. The fisherman only lands eels from one river at a time so this should not be an issue at this point in the supply chain and is able to store eels in separate vivier tanks if required.</p>
Score	A green score indicator 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.</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	The above requirements are met except that:

	<ul style="list-style-type: none"> Products have O 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	<p>Currently no product is being sold as SES by the fishery and so a green score is automatically provided here.</p> <p>A condition of certification though is provided which requires that all fishermen include on their outgoing invoices that product is ‘SES Certified’ along with the certificate number of the fishery (To be provided). Examples of this should be sent to the assessors within one month of certification being granted.</p>
Score	A green score indicator is provided here.
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	<p>All product that is caught in the fishery can be traced back to a specific fishermen and a date of capture using both the paper and electronic systems.</p> <p>The fishery is able to show the total quantity of product that is caught over any given period. All eels from the fisherman under assessment are kept in vivier tanks and are only from the river Vie. Batches can be kept separate if required and are not kept in excess of 1 month before being sold on at first sale onto buyers.</p> <p>Fishing records are currently maintained by COREPEM for a period exceeding three years.</p>

Score	A green score indicator is provided here.