Eel Assessment – Seudre Fishery

Assessment against:

Component 1: Generic Requirements
Component 2: Glass eel fisheries
Component 7: Traceability

Completed by

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FINAL

1. Introduction

This document 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 vessels listed below. This assessment has been completed against Components 1, 2 and 7 of the Standard only and were commissioned by Civelle Durable.

The assessment is of the below specified vessels working as part of the fishery on the Seudre River. At present, there are a number of glass eel fishermen that are interested in the SEG standard for the river in order to showcase good practice and to provide SEG certified to buyers such as Civelle Durable. The assessment is only to cover the specified vessels and not all vessels working on the Seudre river. The vessels use rectangular nets (one on each side of the vessel) fixed to a steel frame which is lowered to the side of the vessel to the desired depth to catch glass eels. Depth is usually dependant on the size of the tide and location on the river but can extent up to 7m below the water surface.

The Unit of Certification (UoC) for this fishery has been determined as follows;

Geographical Location:	Seudre River
Fishing Method:	Pole fishing from boat
Life Stage:	Glass Eels (Elvers) only.
Eligible Fishers:	Only the 3 fishermen working on the vessels specified below are to be considered for this certification. The definitive list of eligible fishermen is maintained, per season, by Civelle Durable.

Only product originating from the UoC determined above is eligible to carry a claim against the Sustainable Eel Standard (providing a pass is awarded to the fishery).

2. The assessment

The assessor was Alex Senechal of MacAlister Elliott and Partners Ltd, who visited the Seudre river as requested by Peter Wood of Civelle Durable on the 19th December 2017. The visit commenced on the 18th with meeting Benoit Chambon at the offices of Civelle Durable to present figures for the quantity of eels purchased from these fishermen during the 2017/18 season so far and the 2016/17 season. On the evening of 19th it was arranged by Mr Chambon that Mr Senechal would join the skipper of La Petit Nana for a fishing trip during the night of the 19th. During this trip Mr Senechal was able to observe the full fishing process from setting up, to setting of the gear and fish handling from point of capture to sale at the end of the night. The gear used by the fishermen on this river is all very similar, therefore providing a good indication of fishing practices on this river for other vessels wishing to be certified under SEG. Other fishers were observed from a distance from the fishing vessel throughout the night, along with sorting of catch and handling/storage. Mr Senechal was able to observe the document preparation for the sale and transportation of the eels following landing and sale before meeting with Mr Wood and Mr Chambon the next morning to go through any outstanding matters for the audit and request additional paperwork which was provided once Mr Senechal had returned to the UK. 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 transportation documentation. This concluded the initial assessment process for the vessels participating from the Seudre fishery.

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;

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

that the Seudre Glass Eel Fishery for the above specified vessels scored **6 green scores** and **3 amber score** against Component 2 and therefore **should be considered sustainable under the SEG standard, Component 2: Glass Eel Fisheries**.

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

RECOMMENDATION 1: Component 2.3: Fishers should be encouraged to limit towing times to less than 30 minutes to be in line with SEG and to maintain working speeds of less than 2 knots at all times with an aim to work at less than 1 knot.

5. Next Audit

No next audit has been agreed based on the outcome of the assessment.
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 18th Dec 2019** (in 2 years' time) and shall be an on-site audit.

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

1. Component 1 - Commitment to Sustainability & Legality

1. Commitment to sustainability & legality (See Note 1)	
green score indicator	All trading and commercial relationships are aligned with SEG goals AND the organisation has declared to the assessor any historic conflicts of interest with regard to eel sustainability AND there is no evidence of illegal trading and/or of

[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.

	circumventing the EU Eel Regulation AND any evidence of illegality by commercial partners or other organisations is immediately reported to the appropriate authorities.
red score indicator	The organisation or a member of the organisation has been arrested on suspicion of illegal buying, holding, selling or trading of eels in the last 12 months, AND/OR for failure to declare eel fishing or trading activities appropriately to the authorities, AND/OR for other serious breaches of national or international eel regulations; AND/OR credible sources suggest that the organisation has been involved in serious breaches of national or international eel regulations in the last 12 months (the above applies to close business partners of the organisation, which members of the organisation must reasonably have known about, without the organisation informing the appropriate authorities); AND/OR the organisation is involved in activities which put in serious question their commitment to sustainability.
Discussion	The auditor has discussed the activities of the fishermen included in this assessment with the representative of Civelle Durable and one of the fishermen from the glass eel fishery on the Seudre. No evidence of illegal trading by the fishermen has been provided to MEP and the auditor received information indicating that French authorities regularly check the activities of the fishermen to ensure compliance with regulations. The auditor has also received proof of documentation that all catches of glass eels purchased by Civelle Durable are reported to the national FranceAgriMer system within 48 hours and paperwork is cross checked by authorities on inspection when landings occur and during transportation spot checks. Fishermen all filled in catch logbooks which were completed by the skippers and Mr Chambon of Civelle durable before transporting the catches from the landing site to the Civelle Durable facility. Since no evidence of illegal trading or breaches of regulation has been provided and all documentation required is in place a green score indicator is given for Component 1.
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	When discussed with Mr Chambon, evidence was given to indicate that the eel management plan had been approved for the Seudre river. Information provided at the French national meeting recently indicated that restocking efforts are improving year on year thanks to quotas still being set at 40% for consumption and 60% for restocking.
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	The fishery under assessment consists of 3 vessels which are part of a larger fleet working on the Seudre all of which are licenced each year before the beginning of the season. The fishery is governed by a strict quota system which is updated regularly due to catch declarations. Data is cross checked between paper and electronic returns and spot checks. Quotas are controlled centrally by the local

	authority. The initial quota is split between all the licensed fishermen before the start of the season. As the season progresses unused quota is then again divided amongst the active fishermen (to avoid unused quota remaining with fishermen who are not fishing). Fishers have been provided with example logbook sheets with annotated explanations on how to complete paper logbooks correctly. These are to be filled in by the skipper of the vessel before any catch is loaded into any vehicle. Data to be included on the log sheet before loading must include fisher's 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 vehicle registration number before departure from the place of landing. Spot checks are carried out by authorities at landing sites regularly throughout the season and can occur at the landing site, during transportation or at a buyer's holding facility. Infractions are applied if logbooks or sales notes have not been completed correctly or fully and do not match up with declared figures.
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	Fishing is done from powered vessels working six hours of the tide. Vessel were noted as working at average speeds of between 0.8-3.2 knots speed over ground (SOG) with and against the tide. However, it was noted that the majority of the time fishing speed was ~1.3 knots. However, the slightly higher speeds at some points during fishing does not appear to have a negative impact on the catch of these vessels as the quality of eels brought on board appear of a general very high standard. Haul times vary from between 45-55 minutes on average but very rarely exceed this. Gear specifications are adhered to with slight modifications between vessels with regards to final length of cod end provided they fall within the regulatory size

restrictions. Nets were attached to large steel frames (figure 1) which are lowered into the water at changeable depths depending on the state of the tide and depth or area being worked. Mesh size of the cod end was less than 1mm with zip openings allowing minimal handling. The catch from each of the two cod ends is emptied directly onto a separate large mesh which allows eels to work their way through to a finer mesh layer and be retained while any bycatch, damaged eels and debris remains on the surface of the top mesh so as to be returned to the water.

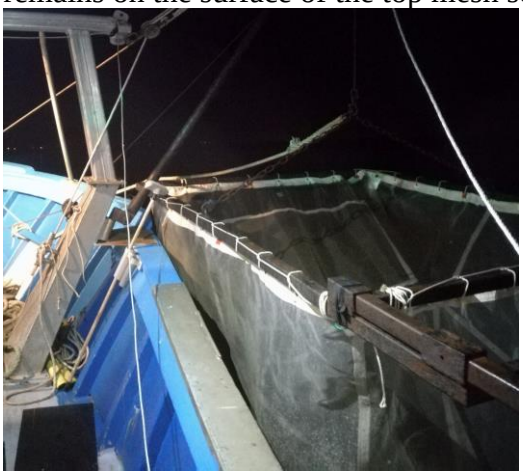

Figure 1. Fishing gear lifted out of water while cod end was emptied.

The nets appeared well made and suitable for the avoidance of abrasions on the glass eels (indeed during the observation of fishing the quality of the eel seen appeared very good).

All vessels operate a vivier system on board, each with slightly different methods of separating the catch and storage in the vivier tanks. On the observed vessel, retained eels were kept in a sack made of cod end material suspended in the vivier tank so as not to be directly impacted by the constant water circulation.

The quantity of damaged/ stressed glass eels which were not kept as catch but returned to the water was negligible for the whole trip.

Mortality figures for the 3 vessels being audited were provided by Civelle Durable for the current season. With at least 50% of the catch from these vessels being purchased by Civelle Durable this was the best indicator of mortality available for these vessels. Of the 85.26 kg purchased so far, this year, average mortality was 1.18% and maximum mortality of 1.70% per batch, well below the 4% requirement.

In summary two parts of this criteria are not currently met by the fishery. These are; the fishery is not conducted consistently at a speed of less or equal to 1 knots (relative to the water) as required for a green score; Time between hauls was greater than 30 minutes. However, from first hand assessment of the fishery and having witnessed the low level of damaged or dead bycatch and damaged or tired glass eels present in the catch and because fishing speed average 1.3 knots, it is the auditors opinion that an amber score should be 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	During the observation of fishing activities, the assessor witnessed medium levels of bycatch. During the total duration of observation (6 hours) all except a very few small fry, less than a dozen fish (unidentifiable), were returned alive as soon as practical to avoid drying out, stress or unnecessary mortality. The fishermen provided general agreement that by-catch is seen and usually equates up to 70% of the catch. However, this consists mainly of *Cragon* (grass shrimp) and juvenile fish species such as juvenile smelt, juvenile mullet, sticklebacks, gobies, sand eels, pipefish, juvenile bream, juvenile bass, and occasionally seahorses. Observation and conversation with the fishermen revealed that it was accepted to be in their best interest to return unwanted undersized catch alive as they would catch them later when larger and not targeting glass eels. It did appear that while bycatch was generally present in every haul, they were alive when sorted from the catch and returned alive to the water. Based on observation and the fact that if an average catch is between 2-5 kg of glass eels on a trip per vessel, the bycatch could only equate to ~12kg of bycatch per trip, the vast majority of which is returned alive. It is therefore the recommendation that a green score indicator is provided for this criteria as the fishery appears to have negligible impact on bycatch species populations.
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	As discussed during the previous criteria fishing by-catch appears medium to low with almost all non-eels being returned alive to the water. However, the only possible species identified to be rare or protected here are seahorses. This could be either *Hippocampus hippocampus* (short-snouted) or *H. guttulatus* (long-snouted).

	Both species are CITES protected. They are classified by IUCN as 'data deficient' (i.e. no evaluation possible). There is not enough information available at present (sample size of one night, one vessel and one seahorse) to understand the effect this fishery might have on the local seahorse population. However, clearly there was an interaction, although in this case it *appeared* not to involve injury or mortality (noting, however, that seahorses are rather sensitive to handling). No additional information was available on possible impact on vulnerable, threatened or endangered species, however none were seen during the observation. As such it is suggested that an amber score is provided as incidences are likely to be rare and have no measurable overall impact on populations.
Score	An amber score indicator is provided here
6. The fishery has negligible impacts on habitats	
Weighting: 1	
green score indicator	The fishing gear does not cause any damage to the bottom.
amber score indicator	Damage to the bottom by gear is limited or minimal.
red score indicator	Damage to the bottom by gear is frequent or widespread.
Discussion	During the assessor's observations, it was clear that fishing with such heavy gear would have a drastic impact on the bottom were it to come in contact. However, based the height at which gear is maintained above the sea bed to ensure that no damage is caused to the nets or the catch inside, an impact event is unlikely to occur and is discouraged by the fishermen because of the cost implications if this were to occur. In conclusion, it appears very unlikely that the fishing gear and methods described here would interact and cause damage to the bottom during normal safe operations.
Score	A Green score indicator 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	As the fishermen is the initial collector of the glass eels this criteria point is not really applicable. The provision of a list of approved fishermen for the fishery allows all buyers of SEG eel from the Seudre to confirm that the fishermen are covered by the certificate.

	It is then the responsibility of the buyer to ensure that no non SEG product is mixed with SEG product if it is to be sold on as such and that they buyer must also be SEG certified.
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	Since the whole fishery is not being put forward for certification, but only selected vessels the need for separation and segregation is required. Only product caught and landed by the certified vessels will be eligible for certification. They must therefore not be mixed with catch from non-certified vessels if they are to be sold as SEG certified. Fishers only land eels from one river at a time so this should not be an issue at this point in the supply chain.
Score	A green score indicator is provided here.
3. – Outgoing Product (See Note 22)	
green score indicator	The organisation only labels certified products with the 'SES' ecolabel once it has been approved to do so through the signing of an 'SES' ecolabel licence agreement. All product to be sold as certified by an organisation meets the following criteria: • Any product labelling shall be accompanied by the 'SES' logo. • Products shall be accompanied by an invoice which: ▪ 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: ▪ 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	Currently no product is being sold as SEG by the fishery and so a green

	score is automatically provided here. 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 by SEG**). Examples of this should be made available to the assessors during the verification audit.
Score	A green score indicator 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. ▪ 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	All product that is caught in the fishery can be traced back to a specific fisherman and a date of capture using both the paper and electronic systems. The fishery can show the total quantity of product that is caught over any given period and across any selected fishermen (or group of fishermen). The quantity going out is not recorded by the fishery as it is seen to be same as that landed (i.e. it is caught and then sold). In all cases for these vessels, the catch is sold to a collector/ buyer at the port of landing and therefore normally would not be stored prior to sale.
Score	A green score indicator is provided here.