

Eel Assessment – Gironde Fishery

Assessment against:

Component 1: Generic Requirements

Component 2: Glass eel fisheries

Component 7: Traceability

Completed by
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9th January 2018

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 Civelles Durable.

The assessment is of the below specified vessels working as part of the fishery on the Gironde 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 interested buyers such as Civelles Durable. The assessment is only to cover the specified vessels and not all vessels working on the Gironde river. The vessels use rectangular nets suspended at the bow of the vessel and lowered into the water by pulley and winch systems, effectively being pushed through the water rather than pulled (figure 1).

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

Geographical Location:	Gironde River
Fishing Method:	Push fishing
Life Stage:	Glass Eels (Elvers) only.
Eligible Fishers:	Only the 6 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 Civelles 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 Gironde river as requested by Peter Wood of Civelles Durable on the 19th December 2017. The visit commenced on the 18th with meeting Benoit Chambon at the offices of Civelles Durable who presented figures for the quantity of eels purchased from these fishermen during the 2017/18 season so far and the 2016/17 season. Mr Chambon then organised for a RIB to take Mr Senechal out on the Gironde to board and observe fishing on the river. Mr Senechal was put onboard Santa Lazaro with Mr Joel Lorente to observe normal fishing and sorting of catch. During this trip Mr Senechal was able to observe the full fishing process including gear manipulation, catch sorting and fish handling from point of capture to storage in the onboard vivier tank. The gear used by the fishermen on this river is all very similar as seen on the day, therefore providing a good indication of fishing practices on this river for other vessels wishing to be certified under SEG. Other fishers were observed both from a distance and alongside the RIB. All vessels seen had onboard vivier tanks which were in operation. Mr Senechal was able to meet 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 assessment process for the vessels participating from the Gironde 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 Gironde Glass Eel Fishery for the above specified vessels has passed Component 1:
Commitment to Sustainability and legality

that the Gironde Glass Eel Fishery for the above specified vessels scored **9 green scores** against Component 2 and therefore **should be considered sustainable under the SEG standard, Component 2: Glass Eel Fisheries.**

that the Gironde 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 1.5 knots.

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 gives the standard and a rationale for the scores 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	The organisation or a member of the organisation has been arrested on suspicion 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 Orange indicators) or when a company is certified with equal number of orange and green indicators.


indicator	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	<p>The auditor has discussed the activities of the fishermen included in this assessment with the representative of Civelles Durable and one of the fishermen from the glass eel fishery on the Gironde. 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.</p> <p>The auditor has also received proof of documentation that all catches of glass eels purchased by Civelles 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 Civelles durable before transporting the catches from the landing site to the Civelles Durable facility.</p> <p>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.</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	The auditor has discussed the activities of the fishermen included in this assessment with the representative of Civelles Durable and no evidence of illegal trading by the

	<p>fishermen has been provided.</p> <p>The auditor has also received proof of documentation that all catches of glass eels purchased by Civelles 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 Civelles durable before transporting the catches from the landing site to the Civelles Durable facility.</p> <p>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.</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 fishery under assessment consists of 6 vessels which are part of a larger fleet working on the Gironde all of which are licenced each year before the beginning of the season. The number of licences has been reduced in the past 10 years as part of the active management to improve stocks. The fishery is governed by a strict quota system which is updated regularly depending on 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).</p> <p>Fishers have been provided with example logbook sheets with annotated explanations on how to complete paper logbooks correctly. These are to be filled in</p>

	<p>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.</p> <p>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.</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 powered vessels working either during the day or at night time. Vessels were noted as working at average speeds of between 0.5-1.2 knots speed over ground (SOG) with and against the tide. However, it was noted that during the majority of the time, fishing speed was less than 1 knot and that some of the vessels anchor themselves to work. Haul times vary from between 5-15 minutes on average with time decreasing when water quality drops.</p> <p>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 steel frames (figure 1) which are lowered into the water from the bow of the vessels. Steel frame extremities had skids in case of contact with the bottom. Mesh size of the cod end was less than 1mm with zip openings allowing minimal handling. 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).</p> <p>The catch from each of the two cod ends is emptied directly onto a separate large</p>

	<p>mesh container which allows eels to work their way through to a finer mesh layer and be retained while any bycatch, damaged eels or debris remains on the surface of the top mesh so as to be returned to the water.</p>  <p>Figure 1. typical fishing gear configuration on Gironde.</p> <p>Sorting gear varies between vessels with some having more elaborate designs than others involving shoots where eels travel down to holding containers before being emptied into vivier tanks.</p> <p>All vessels operate a vivier system on board for storage of retained catch. The quantity of damaged/ stressed glass eels which were not kept as catch but returned to the water was low.</p> <p>Mortality figures for the 6 vessels being audited were provided by Civelles Durable for the current season. With at least 50% of the catch from these vessels being purchased by Civelles Durable this was the best indicator of mortality available for these vessels. Of the 128.85 kg purchased thus far this year, average mortality was 2.54%, well below the 4% requirement.</p> <p>In summary, all parts of this criteria have been accomplished by the fishing vessels observed as a sample of those wishing to be certified therefore, it is the auditor's opinion that a green score should be awarded.</p>
Score	A Green 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 assessors witnessed low levels of bycatch. During the total duration of observation all except a very few small fry, less than a dozen fish (unidentifiable), were returned alive. The majority of bycatch consisted of <i>Cragon spp.</i> (grass shrimps), with other species seen consisting of juvenile bass, juvenile bream and juvenile mullet as well as the small unidentifiable

	<p>fry. All catch which is not eel must be returned to the water because of EU fisheries regulations, with most returned alive as soon as practical to avoid drying out, stress or unnecessary mortality.</p> <p>The fishermen provided general agreement that by-catch is seen and consists mainly of juvenile fish species, but that it was in their best interest to return unwanted undersized catch alive as they would catch them later when larger outside of the eel season.</p> <p>From observations, the quantity of bycatch was small and was unlikely to have an impact on species populations in the estuary, especially considering the healthy state in which bycatch was returned to the water.</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	<p>As discussed during the previous criteria fishing by-catch appears low with almost all non-eels being returned alive to the water.</p> <p>No additional information was available on possible impact on vulnerable, threatened or endangered species and none were seen during the observation onboard or alongside vessels. As such it is suggested that a green score is provided as incidences on vulnerable species are likely to be rare and have no measurable overall impact on populations.</p>
Score	A Green 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, constant monitoring of depth to

	<p>work close to but not touch the bottom and skids to limit contact with the bottom if contact is made, an impact event is unlikely to occur and is discouraged by the fishermen because of the cost implications if this were to occur.</p> <p>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.</p>
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	<p>As the fishermen is the initial collector of the glass eels this criteria point is not applicable. The provision of a list of approved fishermen for the fishery allows all buyers of SEG eel from the Gironde to confirm that the fishermen are covered by the certificate.</p> <p>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. Therefore, by default a green score is awarded.</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 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. It is the buyer's responsibility to ensure separations if certified caught eels are to be sold as such later. Therefore, by default a green score is awarded.</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	<p>The above requirements are met except that:</p> <ul style="list-style-type: none"> Products have O not been correctly labelled through the invoice
red indicator	<p>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.</p>
Discussion	<p>Currently no product is being sold as SEG 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 by SEG). Examples of this should be made available to the assessors during the verification audit.</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 eels 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 fisherman and a date of capture using both the paper and electronic systems.</p> <p>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.</p>
Score	A green score indicator is provided here.