

Eel Assessment – Pêcheurie Bassin Nord Bretagne (Brittany North)

Assessment against:

Component 1: Generic Requirements

Component 2: Glass eel fisheries

Component 7: Traceability

Completed by
Mr Alex Senechal

28th March 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 Pêcheurie Bassin Nord Bretagne (Brittany North) for glass eel, hereafter referred to as the “Brittany North” fishery. This assessment has been completed against Components 1: Generic Requirements, Component 2: Glass eel fisheries and Component 7: Traceability of the Standard only.

The assessment is of the Brittany North Fishery for glass eels (*Anguilla anguilla*). The fishery is operated by 1 fisherman using towed nets from the sides of the vessel. The fishery is located on the Rance River in the North of Brittany referred to by the local regulator as BRE09.

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

Geographical Location:	Nord Bretagne - BRE 09
Fishing Method:	Towed nets from boat
Life Stage:	Glass Eels (Elvers) only.
Eligible Fishers:	The fishery currently consists of a total of 2 fishermen on 1 vessel. The details of the vessel and fisherman is maintained, per season, by the Committee Regional De Peche.

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).

List of fishermen assessed for certification against SES

Zone de Peche	N° licence	Nom	Prénom	Navire	Qam	N° navire
BRETAGNE NORD	BZH 038	LAURENTI	ALAIN	JULMADA III	SM	922493

2. The assessment

The assessor was Alex Senechal of MacAlister Elliott and Partners Ltd, who visited the Brittany North Fishery on the 14th of February 2018. The visit commenced on the 12th with a visit to the offices of the Comite Regional De Peche, located in Auray, France. Here the assessor, Mr Alex Senechal met with Mr Guillaume Le Priellec (the nominated representative of the fishery) to gather the latest information on the fishery. Following this meeting Mr Senechal observed the fishery in action on the Rance on the night of the 14th February by joining the fishermen, Mr Alan Laurenti and his son, on their vessel Julmada III (BZH 038) who showed how the fishery works in practice and the quality of their catch along with their handling practices. This concluded the initial assessment process.

3. Client Contact Details

Client Contact Name	Guillaume Le Priellec
Client Address	Comite Regional Des Peches De Bretagne, 7 Rue Du Danemark, 56000, Auray, France
Client Email	glepriellec@bretagne-peches.org
Client Phone Number	02 97 50 07 90

4. Results of the assessment

The outcome of this assessment is as follows;

The Brittany North Glass Eel Fishery has passed Component 1: Commitment to Sustainability and legality

that the Brittany North Glass Eel Fishery scored **7 green scores**, **2 amber scores** against Component 2 (Glass Eel Fisheries) and therefore **should be considered sustainable under the SEG standard, Component 2: Glass Eel Fisheries.**

that the Arzal Glass Eel Fishery scored **4 green scores** against Component 7 (Traceability) and therefore **should be considered sustainable under the SEG standard, Component 7: Traceability.**

5. Next Audit

No next audit has yet 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 12th February 2020** (in 2 years' time) and shall be an on-site audit.

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

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.

	the appropriate authorities); AND/OR the organisation is involved in activities which put in serious question their commitment to sustainability.
Discussion	<p>The Brittany North Glass Eel Fishery currently consists of two vessel with only one showing interest in being certified. The vessel makes use of a universal net design used on the Arzal which is acknowledged to have improved the quality of catches in the region further. Fishing effort is low with only the vessel under assessment fishing on the river and only at times when water released from the barrage is under a certain quantity as it is recognised to impact fish mortality above these levels. Due to a lack of competition, the vessel is not required to work at faster speeds, therefore this has not changed, unlike other fisheries.</p> <p>No evidence of illegal activity in the fishery was provided or obtained during the assessment. As discussed later in the assessment, the small compact nature of the fishery is likely to make illegal practices more difficult to occur undetected.</p> <p>In summary, the assessor sees no reason why Component 1 cannot be provided a Green score.</p>
Score	A green score indicator is provided here

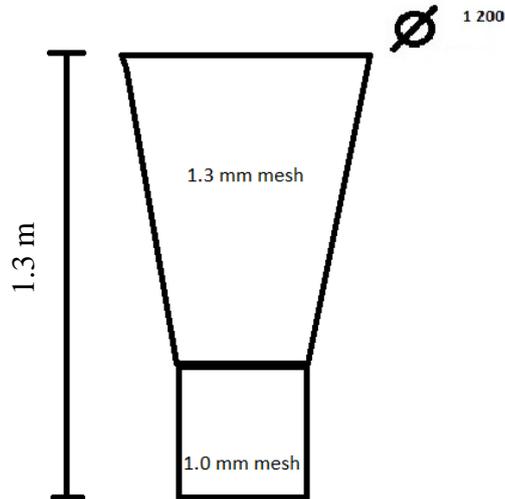
2. Component 2: Glass Eel Fisheries

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>The French national Eel Management Plan was approved in 2010 by the European Commission.</p> <p>Based on discussions with Mr Le Priellec and the quantity of fish taken in the Brittany North fishery, the 60% of the quota designated for restocking has been achieved in recent years.</p> <p>However, in spite of these efforts, the current management plan has not been achieved to ensure that silver eel escapement targets have been met therefore a green score cannot be awarded.</p> <p>In summary an amber score is provided as some evidence of implementation is available (including increased local efforts to increase restocking quantities of eels available for French and EU programs, but it remains behind its required level to meet the 40% escapement level of silver eel.</p>

Score	An amber score is provided here.
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 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 being assessed consists of a total of 2 fishermen (father and son) on one vessel which is licensed to fish within the BRE09 zone of Brittany. The licence is agreed before any fishing season commences (meaning that no licences are granted during the fishing season itself). The assessors verified the list provided for the assessment with the vessel seen during the fishing observation and found this to correlate.</p> <p>Glass Eel quotas have been put in place by the French authorities. These are provided to the individual districts with a 40/60 split between consumption and restocking. This is then divided between the areas and the vessel is provided with its quota prior to the commencement of the fishery.</p> <p>Managers are able to accurately monitor landings as they only occur at one location for this river and by the single vessel, under the bridge. Data is recorded using two methods in the fishery. The first is the traditional ‘fiche de peche’ or logbook. This is carried by all fishermen and a copy must be provided to the buyer and the authorities every 24 hours for all catch landings. The fiche provides data on the quantity landed, who has caught it and the method used. It does not specify the exact location of the catch however (just that it is caught in the BRE district).</p> <p>The second method is through the electronic system “Telecapeche” which enables fishermen to send a catch declaration by SMS to a central server. This message has to be received by the system within 12 hours of the start of fishing on that day. The SMS message contains the catch quantity, whether it was for consumption or for restocking and the location of capture (BRE30). This is then correlated within the</p>

	<p>system centrally by the CRPEM allowing them to monitor catch levels and remaining quota.</p> <p>Quotas at the start of the season are allocated as an “individual” quota for the vessel. This is all controlled by Mr Guillaume Le Priellec of the CRPEM. Whether quota is for consumption or restocking is dictated when it is allocated.</p> <p>Due to this rapid assimilation of the catch data, Mr Le Priellec is able to assess quota use and where required re-distribute quota accordingly on a day to day basis when required within Brittany, this includes additional quota received from other regions in France sometimes.</p> <p>The use of the Telecapêche system has been widely adopted and seems to show accurate real-time data which can then be correlated against the Fiches records (once recorded by the authorities) and the data provided by the buyers. This system allows for accurate and real-time controls of the fisher quotas (both for consumption and restocking).</p> <p>Additional local regulation in Brittany means that landing locations have now been specified resulting in authorities being able to check and control any use of illegal gear and verify more easily paperwork relating to landings and transportation. No reports have been forthcoming regards illegal activity in the fishery.</p>
Score	A green score indicator is provided here
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	All nets have a maximum diameter of 1.2 metres at the entrance and cannot be more than 1.3 metres in length for the main body of the net. The cod end can be extended by up to 1 m, but with a maximum diameter of 40cm. The nets are conical

shaped with a decreasing mesh size as you move towards the cod end. The below diagram shows the basic set up. The mesh Size can be slightly larger in the main body of the net, being 1.1-1.2mm but the cod end being 1 mm.



Nets used presently are all individually marked and were issued to fishermen of the region in 2017.

The nets are dragged slightly below the water surface on either side of the boat. Lowering is done through a bespoke hand operated pulley system on board with sliding bars to retain the solid circular frame of the net opening in place. With this method fishermen raise the nets between every 5-7 minutes to check for catches. Both nets are raised at the same time and emptied by both parties on board meaning that fish are never left in the nets for extended periods of time.

The speed that fishing is completed was between 1.3-1.7 knots working in relatively small circles in the middle of the river. With only minimal water movement from the release at the barrage this meant that working speed was sufficiently low to ensure that it did not effect the catch of glass eels or other species seen in the nets when hauled.

The nets are the same as those on the Arzal and appear 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).

A vivier tank is on board and running at all times to receive the catch as it come aboard. 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. As the fishermen only has catch collected occasionally (every 1-2 weeks) due to a lack of other vessels in the area, catch is retained in vivier systems at the fisherman's property where they average 0.2 % losses in mortality on average before collection by the buyers who represent Garruchaga Maree. This low mortality was confirmed through conversation with the local buyer responsible for

	collecting the catch.
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	<p>Relatively low levels of bycatch were witnessed during the assessment of the fishery. Of the bycatch seen, larger fish were returned by hand while eels moved through the sorting grids and smaller fish remaining on the grid were then returned to the water, the vast majority (90%+) still alive. It did appear that by-catch levels were indeed low from the observations undertaken.</p> <p>The standard requires the following under note 8:</p> <ol style="list-style-type: none"> 1. A breakdown of the main species represented in the by-catch 2. Evaluation of the quantity of each species caught 3. Population status of these species in the area 4. Protocols and methods for dealing with by-catch (as required) and catch survival rates <p>Although an assessment which incorporates the above was completed on the Arzal since the last assessment, this has not been done on other fisheries in the region and would not be practical or cost effective to do so.</p> <p>The fishermen provided general agreement that by-catch is low and consists mainly of juvenile fish species (many of which are freshwater species) and sometimes comb jellies. The quantities of bycatch for the fishery are not known exactly however, it is thought that impact on these species is not likely to be significant. Conversation with fishermen indicated that when other species present exceeded acceptable levels, they stopped fishing. This was particularly true when numbers of Ctenophores increased as they have been known to damage the glass eels causing burns when in high numbers in the nets with the eels.</p> <p>As mentioned above, methods for dealing with by catch are simply ‘to put them back in the water’ although it is unclear what else they could do here. Also based on observations fish bycatch survival tends to be dependent on fish size rather than species with smaller individuals more stressed than larger ones.</p> <p>Based on the discussion above the assessor has awarded a Green score here. It appears that the bycatch in the fishery is low to negligible and although there is not currently any report on bycatch for this fishery, it is not felt that this would bring any further information than has already been completed for the Arzal fishery.</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 bycatch appears very low.</p> <p>The potentially vulnerable, threatened or endangered species within the geographical location area are as follows:</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>Alosa alosa</i></td> <td>Concentration</td> <td>Average</td> <td>Non-isolée</td> <td>Moyenne</td> </tr> <tr> <td><i>Alosa fallax</i></td> <td>Concentration</td> <td>Average</td> <td>Non-isolée</td> <td>Moyenne</td> </tr> <tr> <td><i>Lampetra planeri</i></td> <td>Résidence</td> <td>Average</td> <td>Non-isolée</td> <td>Moyenne</td> </tr> <tr> <td><i>Salmo salar</i></td> <td>Concentration</td> <td>Average</td> <td>Non-isolée</td> <td>Moyenne</td> </tr> </tbody> </table> <p>From the above it is therefore assumed that the fishery does not currently have a direct impact on any species considered vulnerable, threatened, endangered or protected under national law.</p>					Name	Status	Conservation	Isolation	Overall	<i>Alosa alosa</i>	Concentration	Average	Non-isolée	Moyenne	<i>Alosa fallax</i>	Concentration	Average	Non-isolée	Moyenne	<i>Lampetra planeri</i>	Résidence	Average	Non-isolée	Moyenne	<i>Salmo salar</i>	Concentration	Average	Non-isolée	Moyenne
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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	<p>During the assessor's 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>It therefore appears very unlikely that the fishing gear and methods described here causes more than minimal interaction with the bottom when the vessel returns to its swinging mooring. Dredging of the banks and removal of reeds is done periodically by local authorities causing far greater interaction with the habitat than the fishery.</p>																													

Score	A Green 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	<p>Eels from this fishermen only go to one buyer who are themselves SEG certified but deal in both SEG and Non-SEG eels in France. The fisher is to be instructed by the CRPEM to include SEG on the Fiche de peche for each landing declaration as well as the exact location (BRE 09) as opposed to simply Brittany (BRE).</p> <p>This ensures that the fishermen are confirming the exact location of the fishing activity and that eels have not been fished elsewhere and mixed with fish from the Rance.</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	Since only one vessel is currently involved in this fishery and going forward for certification, the need for separation and segregation is not required by the vessel when it stocks its own fish. Only product caught and landed from the Rance by this vessel will be eligible for certification but these are also the only eels that will be on board during a fishing trip. It is therefore down to the eel buyers to keep fish separated from any other fish collected elsewhere which may not be certified should they wish to sell them on later as SEG certified fish.
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.

	<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	<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 SES by the fishery and so a green score is automatically provided here.</p> <p>As fish are not labelled as SEG when sold other than on a note on the fiche de peche, this component element is not relevant to the assessment being undertaken</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	<p>The above requirements are met except that records have been maintained for less than three (3) years</p>
red score indicator	<p>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.</p>

Discussion	<p>All product that is caught in the fishery can be traced back to a specific date of capture using both the paper and electronic systems for catch declaration.</p> <p>The fishery is able to show accurately the total quantity of product that is caught over any given period by the fisherman.</p> <p>The quantity of outgoing fish from the fishery to the buyer is not exactly the same as that being landed as fish are stocked, however, mortality losses as minimal and are accounted for.</p> <p>Fishing records are currently maintained by CRPEM for a period exceeding three years.</p>
Score	A green score indicator is provided here.