

Eel Assessment – Pêcheurie Bassin Sud Bretagne (Brittany South)

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 Sud Bretagne (Brittany South) for glass eel, hereafter referred to as the Brittany South Glass Eel 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 South Fishery for glass eels (*Anguilla anguilla*). The fishery is operated by 4 separate fishermen using several types of hand gear id differing conditions. The fishery is located on the Brevet in a region referred to by the local regulator as BRE21. In addition to working on the Brevet, the fishermen may work other waterways in the vicinity.

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

Geographical Location:	Sud Bretagne - BRE 21
Fishing Method:	Hand fishing
Life Stage:	Glass Eels (Elvers) only.
Eligible Fishers:	The fishery currently consists of a total of 4 fishermen. The definitive list of eligible fishermen is maintained, per season, by the Committee Regional De Peche (and the most recent version is attached as an Annex to this report).

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	N° Marin
BRETAGNE SUD	BZH 008	BOHIC	OLIVIER	89-1344
BRETAGNE SUD	BZH 050	LE LEUCH	STEPHANE	98U1519
BRETAGNE SUD	BZH 057	LEFEVRE	GAEL	94D1577
BRETAGNE SUD	BZH 060	LEYLDE	LOIC	86S2078

2. The assessment

The assessor was Alex Senechal of MacAlister Elliott and Partners Ltd, who visited the Blavet Fishery on the 12th February 2018. The visit commenced at 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) and gathered the latest information on the fishery including how the hand fishery continues to produce a high-quality product for the consumption and repopulation markets. Following this meeting, Mr Senechal travelled with Mr Le Priellec on the evening of the 12th to attempt to observe the fishery in action on the Blavet. The assessor joined the fisherman, but was unable to observe the capture of any glass eels. The fishing method was demonstrated unsuccessfully and all gear used, including storage boxes shown. While no glass eels were caught, the fishing methods were demonstrated fully with debris from the river present in nets but no glass eels or other fish species. No bycatch was seen to be caught during the demonstration.

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 South Glass Eel Fishery has passed Component 1: Commitment to Sustainability and legality

that the Brittany South Glass Eel Fishery scored **6 green scores** and **3 amber scores** against Component 2 (Glass Eel Fisheries) and therefore **should not be considered sustainable under the SEG standard, Component 2: Glass Eel Fisheries.**

that the Britany South Glass Eel Fishery scored **4 green scores** against Component 7 (Traceability) and therefore **should be considered sustainable under the SEG standard, Component 7: Traceability, providing the Condition of Certification noted below is completed by the client in the deadline specified.**

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	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 Brittany South Glass Eel Fishery is a hand fishery unlike others in the region but continues to make changes to its practices including local regulation to improve the fishery. Fishing effort has remained low with only 4 individuals licenced presently. Due to the nature of the fishery (un-powered fishery) and the high-quality fish produced, evidence provided indicates that it is aligned with SEG goals.</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 as authorities know each fisher well and landing and therefore sale points are only permitted at set locations within the region as set by the CRPEM.</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, despite these efforts, the current management plan has not been achieved</p>

	<p>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 consists of a total of 4 fishermen all of whom are licensed to fish within the BRE21 zone. Licences are agreed before any fishing season commences (meaning that no licences are granted during the fishing season itself).</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 and then distributed by CRPEM to the fishers to have individual quotas that they are responsible for. Managers are able to close the fishery in periods of cold weather to reduce losses of glass eels through temperature differences in water and air when required. Catch data for the fishery is recorded using two methods described below.</p> <p>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 landed. 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 (just that it is caught in the BRE district).</p>

	<p>The second method is through the electron 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 (BRE21). This is then correlated within the system centrally by the CRPEM allowing them to monitor catch levels and remaining quota.</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.</p> <p>Data from the Brittany South Fishery is of a relatively high standard through the use of the Telecapeche system. Electronic catch data is verified 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 regarding 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	Local regulations denote the size of the gear used by the hand fishermen. The below photos show the basic set up of each gear used by the hand fishermen. Some are designed to be pulled along the river bank, others waded along the shore where accessible and others on an extended pole which allow fishing to occur below the

water surface when fish are slightly deeper.



Fig.1



Fig.2



Fig.3

These nets are used by one of three methods;

1. The first involves the nets simply being dragged slightly below the water surface while walking along the river bank wall (Fig.1).
2. The second is a smaller net at the end of a long pole which can be held deeper in the water to get glass eels which are swimming nearer the bottom of the river (Fig.2).
3. The third method is used when wading out into the river and is more like a modified trawl net including chafer panel on the bottom which is held or walked through the water in some locations. The net opening is a solid semi-circular ring holding the mouth of the net open and is weighted on either side (Fig.3).

The speed that fishing is completed at is no more than walking pace and therefore it more reliant on water speed.

	<p>As fishers do not have viviers available during fishing, the catch is removed from the nets either by tipping or with the use of soft brushes to direct glass eels out onto sorting trays where they descend through the mesh leaving any other material or bycatch behind. This is returned to the water immediately. The eels are then kept “dry/strained” in trays or tubs limiting the volume of water they stand in to reduce the chances of drowning and mortality yet preventing extreme temperature differences between water and air temperatures.</p> <p>The standard also requires 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. From discussions with the fishermen, mortality during stocking tends to be between 1-1.5% before the eels are purchased.</p> <p>In summary due to the nature of the fishery and the adherence to the requirements set out in the criteria, a Green score indicator is provided here.</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	Although no successful catch of glass eels was witnessed during the audit, the usual fishing method was demonstrated and with no bycatch being seen although small amounts of debris from the water column was seen in nets. In addition to this conversation with the fishermen, the CRPEM and previous experience with hand fisheries, any bycatch seen tends to be returned to the water alive with very little to none being returned dead. This is due to the generally passive nature of the fishing activity. However, as this could not be fully verified during the audit while glass eels were caught, an amber score must be provided here.
Score	An Amber 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 negligible from conversations with the fishermen and CRPEM as well as previous experience with hand net glass eel fisheries. Anecdotal evidence indicates that no potentially vulnerable, threatened or endangered species are captured as part of the fishery except occasional fingerling European eels which are returned to the water alive.</p> <p>In summary, a green score is provided here for the fishery.</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	<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>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 and cause them to be very heavy.</p> <p>Use of the gear in Fig.3 is on the bottom however, this is held in place and rarely dragged. The intention is to keep gear just above the bottom to catch eels rather than disturb the bottom.</p> <p>It therefore appears very unlikely that the fishing gear and methods described here cause more than limited or minimal damage to the bottom and any interaction would be superficial.</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	As the fishermen are the starting point of the trackability chain, they are not able to have any incoming product, therefore a green score must be provided

	here.
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 being put forward for certification the need for separation and segregation is not required unless fish are caught outside of the unit of certification (BRE21) at which point uncertified eels will need to be segregated should the SEG eels wish to be sold on as such. It is therefore down to the eel buyers to keep fish separated from any other fish collected elsewhere which may not be certified.
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 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 SEG by the fishery and so a green score is automatically provided here.</p> <p>Fishermen are to be advised by the CRPEM that they should include on their outgoing invoices that product is ‘SES Certified’ along with the certificate number of the fishery.</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 fisherman and a date of capture using both the paper and electronic systems.</p> <p>The fishery is able to show accurately the total quantity of product that is caught over any given period and across any selected group of fishermen.</p> <p>The quantity of outgoing fish from the fishery is generally the same as that being landed as it is caught and then sold on the same night. Any stocking of fish occurs for fish not collected the same night and is kept in viviers at the fisherman’s properties before collecting. Any losses must therefore be recorded for inspection by national authorities when required.</p> <p>Fishing records are currently maintained by CRPEM for a period exceeding three years.</p>
Score	A green score indicator is provided here.