

Eel Assessment – Loire Fishery

Assessment against:

Component 1: Generic Requirements

Component 2: Glass eel fisheries

Component 7: Traceability

Completed by

Alex Senechal

5th April 2017

DRAFT

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

The assessment is of the below specified vessels working as part of the fishery on the Loire River. At present there are a number of glass eel fishermen that are interested in the SEG standard for the river in order to market their eels as SEG certified. The assessment is only to cover the specified vessels and not all vessels working on the Loire river who do not all work in a uniform manner in keeping with the findings of the assessment. The vessels use round nets (one on each side of the vessel) which are towed along side the vessels and lowered appropriately in the water column to catch glass eels. This is usually dependant on the size of the tide and location on the river but can extent up to 5m below the water surface.

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

Geographical Location:	Pays de la Loire in LCV01
Fishing Method:	Pole fishing from boat
Life Stage:	Glass Eels (Elvers) only.

Eligible Fishers:	Only the 19 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 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

OP EST	N° licence	NAVIRE			PECHEUR		Zone de pêche
		Nom Navire	QM	Immat.	NOM	Prénom	
1	00084	PETIT BORIS	NA	687 155	BARAUD	Martial	Loire
1	PL 051	LAURALEX	SN	707 261	BAUMAL	Alexis	Loire
1	PL 018	LOUP DE MER	SN	738 244	BAUMAL	Franck	Loire
1	PL 019	PIBALOU	SN	488 017	BAUMAL	Patrice	Loire
1	PL 028	SOLEIL ROYAL	NA	606 994	BLANCHARD	Louis	Loire
1	12255	CARPILLON	NA	384 354	BOURVEAU	Yann	Loire
1	PL 040	LE VAUCLIN	SN	883 729	BRIERE	Patrice / Ronan	Loire
1	PL 088	LEA FLORA	NA	916 001	IVANIUK	Stéphane	Loire
1	PL 090	JUNIOR II	NA	285 047	JOSNIN	Franck	Loire
1	PL 173	ARMEN	SN	750 731	JULIO	Mallory	Loire
1	PL 098	FRUIT DU LABEUR	NA	689 360	LERAY	Michel	Loire
1	13 684	FRIMOUSSE	NA	867 798	LE HECHO	David	Loire
1	PL 105	L'ETOILE DU BERGER	SN	276 624	LORCY	Frédéric	Loire
1	PL 107	LE REFLECHI	SN	916 061	LUSSAUD	Jean Pierre	Loire
1	PL 125	AR PEOCH II	SN	916 068	PERIN	Tony	Loire
	PL 129	RANDY	SN	293 465	PITON	Grégory	Loire
1	PL 146	ELODIE	NA	839 511	RIGAULT	Pascal	Loire
1	PL 156	T'IMOUSSE	NA	565 103	TAILLANDIER	Yann	Loire
1	PL 159	MUSTANG III	SN	929 391	VALLEE	Mickaël	Loire

2. The assessment

The assessor was Alex Senechal of MacAlister Elliott and Partners Ltd, who visited the Loire river as requested by Alexis Pengrech of the Comité régional des pêches et des élevages marins des Pays de la Loire on the 16th March 2017. The visit commenced on the 16th with meeting Alexis on the ponton Bélèm in Nantes to go aboard a selection of the fishing vessels requesting certification. Once introduced to Michael Valet and some of the other interested skippers, Michael and skippers Franck Baumal and Franck Josnin explained the aeration systems which all vessels have on board. The gear used by the fishermen was explained along with sorting of catch and selection. The assessor along with Mr Alexis Pengrech of COREPEM proceeded to be shown the fishery in practice on board the Junior II, Loup de Mer and AR Pech II. Mr Alex Senechal then met with Mr Alexis Pengrech at the COREPEM offices in Les Sables d'Olonne where Mr Pengrech proceeded to provide further information regarding the Loire fishery and Vie fishery which was visited the following morning. Records relating to the fishery's activities were reviewed and Mr Senechal was shown the national declarations system where all catches of glass

eels have to be declared within 24 of landing. There are 3 systems which are used to monitor landing in the region to ensure accurate recordings of landing: paper logbooks, declarations of purchase by glass eel buyers and the use of the Télécacivelle system. This concluded the initial assessment process for the Loire fishery.

3. Client Contact Details

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

4. Results of the assessment

The outcome of this assessment is as follows;

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

that the Loire Glass Eel Fishery for the above specified vessels scored **4 green scores, 3 amber scores, and 1 red score** against Component 2 and therefore **should not be considered sustainable under the SEG standard, Component 2: Glass Eel Fisheries.**

The assessor notes that should evidence relating to the correction of the red indicator given here be provided then it may be possible for the team to update the certification recommendation to the SEG Committee without requiring a further audit (provided it happens within one week of the second month from the start of the fishing season 2017/18). The assessment team would then review these changes at a Year 1 annual surveillance audit during the 2018/2019 season.

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

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 16th March 2019** (in 2 years' time) and shall be an on-site audit.

The tables below gives the standard and a rationale for the score given. The score is highlighted in the appropriate colour. Delete Components as Applicable

1. Component 1 - Commitment to Sustainability & Legality

1. Commitment to sustainability & legality (See Note 1)	
green score indicator	All trading and commercial relationships are aligned with SEG goals AND the organisation has declared to the assessor any historic conflicts of interest with regard to eel sustainability AND there is no evidence of illegal trading and/or of circumventing the EU Eel Regulation AND any evidence of illegality by commercial partners or other organisations is immediately reported to the appropriate authorities.
red score indicator	The organisation or a member of the organisation has been arrested on suspicion of illegal buying, holding, selling or trading of eels in the last 12 months, AND/OR for 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

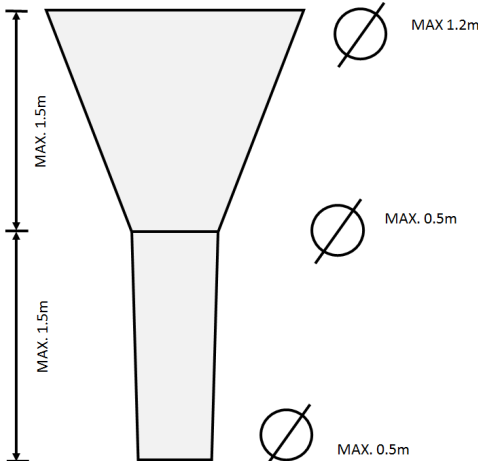
¹ A borderline pass is considered a pass that occurs when one less amber indicator is received than would be required to fail (i.e. 5 Green indicators and 4 Orange indicators) or when a company is certified with equal number of orange and green indicators.

	<p>with the the representative of the Comité régional des pêches et des élevages marins des Pays de la Loire (COREPEM) responsible for the glass eel fishery on the Loire. No evidence of illegal trading by the fishermen has been provided to MEP and COREPEM confirmed verbally that the fishermen being assessed have not received any prosecutions relating to eel purchase or trading, and 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 are now input into the national FranceAgriMer system within 24 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, persons transporting the catches from the landing site to the viviers and then the buyers.</p> <p>Since no evidence of illegal trading or breaches of regulation has been provided and all documentation required is in place the auditor must provide a green score indicator for Component 1.</p>
Score	A Green score indicator is awarded

2. Component 2: Glass Eel Fisheries

1. The management target (40% escapement or otherwise) is being achieved (See Note 2)	
Weighting: 2	
green score indicator	The Eel Management Plan is approved and there are good data which shows with reasonable confidence that the EU silver eel escapement target is being achieved in the eel management district.
amber score indicator	The Eel Management Plan is approved and there is evidence that it is being implemented.
red score indicator	The Eel Management Plan is not approved AND/OR there is little evidence of it being implemented AND/OR key parts of it are not being implemented AND/OR there is strong evidence of widespread non-compliance which is undermining implementation.
Discussion	<p>Published data indicate that the Loire is not achieving the 40% escapement target.</p> <p>When discussed with the COREPEM representative, evidence was given to indicate that the eel management plan had been approved for the Loire river and there was good evidence from restocking and recapture programs for this river.</p> <p>While escapement figures are increasing and being worked towards, the 60 percentage of the quota set for restocking for the Pays de la Loire region has not been reached in recent years. Restocking for the previous 2 full seasons and current season (provisional figure for current season) has been 33.5%, 53.5% and 40.5% for 2014/15, 2015/16 and 2016/17 respectively. Fishers in the Pays de la Loire are requested to complete and sign the ‘ CHARTE DE BONNES PRATIQUES relative à la pêche professionnelle de la civelle’ which specifies best practice with an aim at continuing to work towards EU targets for escapement.</p>

	In summary, an amber score is provided as evidence of implementation is available and figures from the COREPEM indicate that while the 60% of quota for restocking has not been achieved, good progress has been made to ensure that restocking into in neighbouring rivers and further upstream has occurred averaging over 40% of captured eels in the past 3 years.
Score	An amber 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 19 vessels which are part of a larger fleet working on the Loire and adjacent rivers 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 daily from paper logbook, online and Telecavivelle catch declarations. Data is cross checked between paper and electronic returns and spot checks. Quotas are controlled centrally by COREPEM. The initial quota is split between all of the licensed fishermen before the start of the season. As the season progresses unused quota is then again divided among the active fishermen (to avoid unused quota remaining with fishermen who are not fishing). Quota levels appear to be controlled almost on a day by day basis by COREPEM to ensure its efficient use.</p> <p>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 vehical. Data to be included on the logsheet before loading must include fishers personal details, vessel details, area fished and weight of catch, etc. The logbook sheet then acts as a transportation document and must be updated with the vehical registration number before departure from the place of landing. Spot checks are carried out by authorities at landing sites and during transportation. Infractions are applied if the weight of the catch is more than 10% out from the stated quantity on the logbook</p>

	<p>entry or if logbooks have not been completed correctly or fully. A copy must be provided to the buyer and the authorities every 24 hours for all catch landed.</p> <p>Vessels are only permitted to land catch at specified landing sites along the river to allow checks to occur by authorities and all completed paperwork as specified above must be present at the time of inspection.</p>
Score	A Green score indicator is awarded
3. Mortality during fishing is minimised (See Notes 4 & 5)	
Weighting: 2	
green score indicator	Fishing is by hand-held nets OR fishing from vessels meets the following criteria: i) fishing is at slow speed (anchored in current or speed of no more than 1 knot relative to water); ii) haul duration is on average no longer than 20 minutes, with the maximum duration not more than 30 minutes; (iii) mesh size of cod end no greater than 1mm (iv) rest of the net designed such that glass eels do not become trapped or abraded; v) vivier tank on board and in use; AND fishermen can demonstrate that the mortality rate of the catch over the duration of holding in the storage facility is <4% for each batch captured.
amber score indicator	Fishing from vessels meets the following criteria: i) fishing is at slow speed (no more than 1.5 knots relative to water); ii) maximum haul duration no longer than 30 minutes; iii) mesh size of cod end no greater than 1mm; iv) rest of the net designed such that glass eels do not become trapped or abraded; v) vivier tank on board and in use; AND fishermen can demonstrate that the mortality rate of the catch over the duration of holding in the storage facility is <8% for each batch captured.
red score indicator	The fishing technique does not meet the amber requirements, AND/OR mortality rate in the storage facility exceeded 8% for one or more batches in the last 12 months.
Discussion	<p>Fishing is done from powered vessels working both with and against the tide with an aim to work as close to slack water when there is less current and generally is closer to the edge of the river where there is slower water flow. Vessels were noted as working at average speeds of between 3-4.5 knots speed over ground (SOG) with a tidal flow of 0.9 knots, however, tidal speed can be as high as 3+ knots on occasion according to fishermen. It is clear though that the 1.5 knot requirement is not met by the fishery. However, this 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 high standard.</p>  <p>Haul times vary from between 5-7 minutes on average but very rarely exceed 9 minutes.</p> <p>Gear specifications are adhered to with slight modifications between vessels with regards to final diameter of the cod end provided they fall within the regulatory size restrictions shown here. Most nets consisted of the first section being the full 1.2m diameter, 1.5m length and then a shortened second section of 0.5m diameter which is rarely more than 0.5 m long. The</p>

	<p>main body of the net is usually made of 1300-1500 micron mesh size and cod end made of 1000-1100 micron mesh. Designs have been improved on the last 18-24 months thanks to studies carried out by Ifremer to adapt design and mesh size selection to limit the pressure on catch in the cod end.</p> <p>The method involves the use of a 3-5 m aluminium or steel poles (average size although no legal requirement) to which the nets are attached. These are then pushed down into the water column and tied to the side of the boat, allowing the fishing to occur at levels just below the surface of the water up to 5 metres below the surface.</p> <p>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 good).</p> <p>All vessels operate a vivier system on board which is either a simple water circulation system which pumps water in to improve aeration, while others use aerators to keep oxygen levels up for catch. Catch is emptied from nets into fishboxes or directly onto a large mesh which allows eels to work their way through while any bycatch, damaged eels and debris remains on the surface so as to be returned to the water.</p> <p>The quantity of damaged/ stressed glass eels which were not kept as catch but returned to the water was low. Fishermen were of the opinion that these glass eels would still survive provided they were returned soon after sorting and to the same body of water. It was suggested by fishermen that placing damaged eels into freshwater as would be the case if retained would be what caused death. This is due to osmotic effect of being put in fresh water and having sustained damage to their dermis, leading to subsequent dehydration of the damaged eels.</p> <p>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. Although the main buyers of eels from the fishery were contacted no reply was received to confirm a mortality rate and therefore assessment of component 2.3 cannot be completed</p> <p>In summary, two parts of this criteria are not currently met by the fishery. These are;</p> <ol style="list-style-type: none"> 1. the fishery is not conducted at a speed of less or equal to 1.5 knots (relative to the water) as required for an amber score. However, first hand assessment of the fishery witnessed the low level of bycatch and damaged or tired glass eels present in the catch; 2. the fishery was not able to provide proof from the buyers that mortality in the first week does not exceed the 8%. <p>Therefore it is the auditors opinion that a red score is given here.</p>
Score	A red score indicator is provided here

4. The fishery has negligible impacts on by catch species (See Note 8)	
Weighting: 1	
green score indicator	The fishery has a negligible impact on by-catch AND by-catch is returned to the water alive as gently and rapidly as possible.
amber score indicator	The fishery has low-level impacts on by-catch AND by-catch is returned to the water alive as gently and rapidly as possible.
red score indicator	The fishery has a severe impact on by-catch AND/OR by-catch is discarded dead
Discussion	<p>During the observation of fishing activities the assessors witnessed low levels of bycatch. During the total duration of observation on board the 3 vessels the only bycatch observed were less than a dozen fish (unidentifiable), although it must be noted that only the surface fishing method was observed.</p> <p>This observation is backed up by studies which can be verified with Ifremer and were in cooperation with COREPEM which assessed the quantity of bycatch species seen and size of fish seen which appears negligible.</p> <p>The fishermen provided general agreement that by-catch is very low and consists mainly of juvenile fish species with a definitive list of bycatch commonly seen available from COREPEM. The quantities across the whole fishery are not known therefore it is hard to provide a population status report.</p> <p>Methods for dealing with bycatch are simply ‘to put them back in the water’ although it is unclear what else they could do here. It did appear that bycatch levels were indeed negligible with fish fry generally being alive when sorted from the catch and returned alive to the water however this cannot be confirmed 100% from observations during the audit alone.</p> <p>Based on observation and data provided it is therefore the recommendation that a green score indicator is provided for this criteria</p>
Score	A green score indicator is provided here
5. The fishery has negligible impacts on rare or other protected species	
Weighting: 1	
green score indicator	The fishery has no direct interactions resulting in mortality or injuries with other species that are considered vulnerable, threatened, endangered or are protected under national or international law.
amber score indicator	Interactions, resulting in mortality or injury, with other species that are considered vulnerable, threatened, endangered, or are protected under national or international law, are rare and have no overall measurable impact on the population.
red score indicator	The fishery has interactions resulting in mortality or injuries, with species that are considered vulnerable, threatened, endangered or are protected under national or international law, which may have an impact at the population level.
Discussion	<p>As discussed during the previous criteria fishing by-catch appears very low.</p> <p>To discuss these criteria in more detail it is important for us to consider first what the potential vulnerable, threatened, endangered species are within the geographical</p>

	<p>location of the fishery. Having reviewed species listed in Annex II of the 92/43/EEC directive of the Council for the Pays de la Loire specifically, the following key species are identified.</p> <table border="1"> <thead> <tr> <th>Name</th> <th>Status</th> <th>Conservation</th> <th>Isolation</th> <th>Overall</th> </tr> </thead> <tbody> <tr> <td><i>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>Concentration</td> <td>Average</td> <td>Non-isolée</td> <td>Moyenne</td> </tr> <tr> <td><i>Petromyzon marinus</i></td> <td>Concentration</td> <td>Average</td> <td>Non-isolée</td> <td>Moyenne</td> </tr> <tr> <td><i>Rhodeus amarus</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>IT is clear that none of these species are currently listed on the IUCN Red List as Vulnerable or Endangered and so it appears unlikely that any rare or protected species are directly affected by the fishery.</p> <p>In summary, a green score is provided here for the fishery but a recommendation is also made that the study referred to the previous by-catch criteria considers directly if any of the species being caught are indeed rare or protected.</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>	Concentration	Average	Non-isolée	Moyenne	<i>Petromyzon marinus</i>	Concentration	Average	Non-isolée	Moyenne	<i>Rhodeus amarus</i>	Résidence	Average	Non-isolée	Moyenne	<i>Salmo salar</i>	Concentration	Average	Non-isolée	Moyenne
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>	Concentration	Average	Non-isolée	Moyenne																																
<i>Petromyzon marinus</i>	Concentration	Average	Non-isolée	Moyenne																																
<i>Rhodeus amarus</i>	Résidence	Average	Non-isolée	Moyenne																																
<i>Salmo salar</i>	Concentration	Average	Non-isolée	Moyenne																																
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 assessors observations it was clear that the surface fishing method employed has no interaction with the bottom whatsoever (it is simply not possible for the gear to reach the bottom).</p> <p>For the pole method it is apparently very uncommon for the gear to touch the bottom and certainly best avoided by the fishermen as it can cause damage to the fragile nets very easily.</p> <p>In conclusion it appears very unlikely that the fishing gear and methods described here causes even minimal damage to the bottom. It cannot be concluded though that none occurs through the pole fishing method and so an amber score is provided.</p>																																			
Score	An amber 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>The provision of a list of approved fishermen for the fishery allows all buyers of SEG eel from the Loire to confirm that the fishermen are covered by the certificate.</p> <p>The only risk that therefore exists is that the fishermen may fish for eel in other areas (as their license does allow) and bring it back to the Loire for onward sale as SEG certified. To mitigate this risk fishermen will be asked to include the specific wording 'LCV 01 – SEG Loire' on the Fiche documents. This ensures that the fishermen are confirming the exact location of the fishing activity.</p> <p>It is suggested that as a condition of certification is raised here that asks for a copy of three separate fiche de peche (logbook documents) from three separate fishermen be sent to the assessors within one month of certification being granted.</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 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 or with catch from other rivers and must be kept separate 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.

	<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 SES by the fishery and so a green score is automatically provided here.</p> <p>A condition of certification though is provided which requires that all fishermen include on their outgoing invoices that product is ‘SES Certified’ along with the certificate number of the fishery (To be provided). Examples of this should be sent to the assessors within one month of certification being granted.</p>
Score	A green score indicator is provided here.
4. – Record keeping and documentation (See Note 23)	
green score indicator	<ul style="list-style-type: none"> ▪ The organisation operates a system that allows the tracking and tracing of all eel from purchase to sale and including any steps in between. In the case of live eels this should include the ability to track each eel in each batch delivered to a buyer to be connected back to a water, a time period (maximum duration one month) and specific fisherman/vessel. ▪ The organisation operates a system that also allows for the completion of a batch reconciliation of eel product by weight over a given period. ▪ The organisation maintains records for a minimum of three (3) years.
orange score indicator	The above requirements are met except that records have been maintained for less than three (3) years
red score	The organisation’s tracking and tracing system shows evidence that certified

indicator	and non-certified product have become mixed AND/OR batch reconciliation records are unable to confirm that outgoing quantities are in line with incoming quantities.
Discussion	<p>All product that is caught in the fishery can be traced back to a specific fishermen and a date of capture using both the paper and electronic systems.</p> <p>The fishery is able to show the total quantity of product that is caught over any given period and across any selected fishermen (or group of fishermen). This allows the incoming batch to be calculated. 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). It is considered sensible that for future audits the viviers are asked to provide total incoming quantities for the fishery over a set period. This can then be compared to the catch records of the fishery to ensure that less (or the same (although unlikely) is being bought from the fishery then is being caught.</p> <p>Fishing records are currently maintained by COREPEM for a period exceeding three years.</p>
Score	A green score indicator is provided here.