

Eel Assessment – Le Lay Fishery

Assessment against:

Component 1: Core requirements

Component 2: Glass eel fishing

Completed by
Alex Senechal

6th March 2019

FINAL

Introduction

This document represents the report completed following the 2019 audit carried out under the Sustainable Eel Standard (Version 6.0, June 2018) against the Le Lay fishery. This assessment has been completed against Components 1 & 2 of the Standard only.

The assessment is of le Lay river fishery located at L’Aiguillon sur Mer. The fishery consists of only a small number of vessels, not all of which are being considered for this assessment due to various reasons presently, but which may be interested in joining the certification later if eligible as they fish in the same way as others covered under this assessment. Trawls are relatively short in length, working from the surface down 3m when required and at the right state of the tide. The fishery operates both during the day and at night when fishers wish. The stretch of river fished before the barrage is relatively short with large quantities of glass eels seen each year to more than accommodate individual quotas for each vessel.

The following fishermen and their vessels are to be considered for this assessment:

NOM	Prénom	Armement
ROBERGEAU	Philippe	Flash
TAUPIER	Pascal	Pivot
CARRE	Christian	Relax

1. The assessment

The assessor was Alex Senechal of MacAlister Elliott & Partners Ltd, who visited the Aiguillon sur Mer fishery on Le Lay on the 6th March 2019 during daylight hours. The audit included interviews with Alexandra Collias of the OP Estuaires and the two fishermen from the fishery who gained permission for me to board. As all their quota for both consumption and restocking had already been exhausted this season, all fish captures were released at the end of the fishing demonstrations. The

following findings are based on the opinions formed by the assessor for the fishing seen on the day outlined above and the information provided by the OP Estuaires and the fishermen seen on the day.

2. Client Contact Details

Client Contact Name	Alexandra COLLIAS
Client Address	OP Estuaires 2, rue Colbert 85100 Les Sables d'Olonne
Client Email	op.estuaires@gmail.com
Client Phone Number	033 (0) 2.51.96.15.67 033 (0) 6.78.05.07.27

3. Results of the assessment

The outcome of this assessment is as follows;

A responsible score will result in 1, an aspiring score in 0. Score weighting will be taken into consideration for each element.

That Le Lay fishery has scored the following for Component 1: General Requirements and therefore **should** considered **RESPONSIBLE** under the SEG standard.

Component 1: General Requirements	Auditor's findings	Weighting	Score
1.1 Commitment to Legality	Responsible	1	1
1.2 Contribution to eel conservation projects	N/A	N/A	N/A
1.3 The facility trades in certified responsibly sourced eels	N/A	N/A	N/A
1.4 Traceability:			
1.4.1 Incoming products, separation and segregation	Responsible	1	1
1.4.2 Outgoing products	Responsible	1	1
1.4.3 Record keeping and documentation	Responsible	1	1
1.5 Biosecurity & welfare – eel and eel products are provided with minimal risk of diseases, parasites and alien species	Responsible	1	1
Total		5	5
Percentage Responsibility Score:		100%	

that Le Lay fishery has scored the following for Component 2: Glass eel fishing and therefore **should** be considered **RESPONSIBLE** under the SEG standard.

Component 2: Glass eel fishing	Auditor's findings	Weighting	Score
2.1 Eel fishing is in a catchment that is meeting its escapement targets	Aspiring	2	0
2.2 There is good progress with the applicant's responsibilities in the eel management plan for the river or district	Responsible	2	2
2.3 The fishery is well managed	Responsible	1	1
2.4 Mortality during fishing is minimised	Responsible	2	2
2.5 The fishery has negligible impacts on by-catch species	Responsible	1	1
2.6 The fishery has negligible impacts on rare or other protected species	Responsible	1	1
2.7 The fishery has negligible impacts on habitats	Responsible	1	1
2.8 Transport	Responsible	1	1
2.9 Bonus score: fishermen donate a proportion of their catch for a local positive contribution	N/A	N/A	N/A
Total		11	9
Percentage Responsibility Score:		82%	

Summary of assessment and scoring

Component	Aspiring	Responsible
1	0	5
2	2	9
Total	2	14
Total Responsibility Score		88%

4. Next Audit

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 the 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 ¹ pass 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 by March 2021 (in 2 years' time) and shall be an On-site audit.

¹ A borderline pass, under versions 1.0 to 5.0 of the standard, was considered a pass when one less amber indicator is received then would be required to fail (i.e. 5 green indicators and 4 amber indicators) or when a client is certified with equal number of amber and green indicators.

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

Component 1 – Generic requirements	
Criterion 1.1: Commitment to legality	
Responsible indicators	For at least the past two years: the organisation has not been found guilty for any offences relating to eel fishing or trading.
Aspiring indicators	For at least the past 12 months: the organisation has not been found guilty for any offences relating to eel fishing or trading.
Discussion	The entrants under consideration for this assessment have been identified by the OP Estuaires who have declared that to their knowledge these fishermen have not been found guilty of any eel related offences in the past 2 years.
Score	Pass: Responsible indicator
Criterion 1.2: Contribution to Eel Conservation Projects. (Optional bonus score)	
Responsible indicators	The organisation donates at least 2% of its profits or at least 20% of its corporate responsibility programme to projects that make a positive contribution to eel conservation or population enhancement, such as Eel Stewardship Funds, River Restoration projects, conservation and education projects.
Aspiring indicators	The organisation donates 1 – 1.99% of its profits or 10 - 20% of its corporate responsibility programme to projects that make a positive contribution to eel conservation or population enhancement, such as Eel Stewardship Funds, River Restoration projects, conservation and education projects.
Discussion	N/A
Score	N/A
Criterion 1.3: The facility trades in certified responsibly sourced eel	
Responsible indicators	The organisation trades in at least 50% (by number) of certified responsibly sourced eel and has the documentation to demonstrate that.
Aspiring indicators	The facility trades in 10 – 49.9% (by number) of certified responsibly sourced eel and has the documentation to demonstrate that.
Discussion	N/A
Score	N/A
Criterion 1.4: Traceability	
1.4.1: Traceability - Incoming product, separation and segregation	

Responsible indicators	<ul style="list-style-type: none"> • Certified and uncertified eel products can be clearly and easily traced back to their source. • Where a fishery or buyer, an electronic tele-declaration system is used • It operates a clear system which ensures that the product remains separated at all stages from arrival to dispatch from non-certified eel products. • The organisation ensures that any products wishing to make a claim as certified do not contain any non-certified eel-based ingredients. • If resolved through mass- or number- balance calculations, the margin of error does not exceed 2%
Aspiring indicators	<ul style="list-style-type: none"> • Certified and uncertified eel products can be traced back to their source. • It operates a system which ensures that the product remains separated at all stages from arrival to despatch from non-certified eel products. • The organisation ensures that any products wishing to make a claim as certified do not contain any non-certified eel-based ingredients • If resolved through mass- or number- balance calculations, the margin of error does not exceed 5%
Discussion	<p>All fishers are required to declare their landings on the Telecapeche system as well as filling in the fiche de peche for every landing of fish that they undertake. The logbook also acts as the transportation documents for the fishers to bring their catch back to a vivier if kept away from the vessel before collection by their buyers.</p>
Score	<p>Pass: Responsible indicator</p>
1.4.2: Traceability - Outgoing product	
Responsible indicators	<ul style="list-style-type: none"> • Where a fishery or buyer, an electronic tele-declaration system is used • Documentation is well maintained with a maximum of 2% error in the following: <ul style="list-style-type: none"> • The organisation correctly uses batch-coding for labelling certified product, which can be on the packaging for the product, or included in the documentation (e.g. invoice) with the assignment • All product to be sold as certified by an organisation is accompanied by an invoice which meets the following criteria: <ul style="list-style-type: none"> - Includes an appropriate batch code - Includes a record of the quantity (no. & weight) of product and to whom it was sold
Aspiring indicators	<ul style="list-style-type: none"> • Documentation is well maintained with a maximum of 5% error in the following: <ul style="list-style-type: none"> • The organisation correctly uses batch-coding for labelling certified product, which can be on the packaging for the product, or included in the documentation (e.g. invoice) with the assignment • All products to be sold as certified by an organisation are accompanied by an invoice which meets the following criteria: <ul style="list-style-type: none"> - Includes an appropriate batch code - Includes a record of the quantity (no. & weight) of product and to whom it was sold

Discussion	Tele-declaration is used for any sales of glass eels from the fishermen to the buyers and registered with Visiomer by the buyer. Declarations are done on paper by the fishermen only.
Score	Pass: Responsible indicator
1.4.3: Traceability - Record keeping and documentation	
Responsible indicators	<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 batch delivered to a buyer to be connected back to a water, a time period (maximum duration one month) and specific fisherman/vessel If a fisherman or buyer, a tele-declaration system is used to report catches and trade 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.
Aspiring indicators	<p>The above requirements are met except that:</p> <ul style="list-style-type: none"> Records have been maintained for less than three (3) years If a fisherman or trader, a tele-declaration system is planned to be used to report catches and trade in the next season
Discussion	Electronic records are maintained by the OP and Comite de Peche as well as the fishermen having paper records for their own records for the required period.
Score	Pass: Responsible indicator
Criterion 1.5: Biosecurity & welfare – Eel and eel products are provided with minimal risk of diseases, parasites and alien species	
1.5.1 Eel Fishing: Biosecurity measures are adopted	
Responsible indicators	<ul style="list-style-type: none"> The fishery conducts good biosecurity measures such as the disinfection and drying of nets and equipment between each fishing in different waters. OR: The fishermen only operate in the same river or estuary, with no risk of transferring diseases or alien species between catchments
Discussion	Vessels are kept clean and tidy with gear only used in this river. The vessel does not enter other rivers during the season and is cleaned down prior to the commencement of fishing activity and at the end of the season, therefore there is no risk of disease transfer between water bodies.
Score	Pass: Responsible indicator

Component 2 - Glass eel fishing	
Criterion 2.1: Eel fishing is in a catchment that is meeting its escapement targets	
Weighting: 2	
Sustainable Indicator (worth 2 x Responsible Indicator Score)	There are good data which show to the satisfaction of the fisheries authority that the EU silver eel 40% escapement target (40% B0) is being achieved for the river or in the eel management district.
Responsible indicators	There are good data which show to the satisfaction of the fisheries authority that at least 70% of the Bbest target for silver eel escapement is being met in the river or eel management district.
Aspiring indicators	Eel fishing is in a place accepted by the fishery authority as providing a positive contribution to the eel stock or, the river or RBD is meeting 40% - <70% of the Bbest target.
Discussion	Based on national reports found which evaluate the progress made by the national and regional eel management plans, there has been good progress made but that there has not been sufficient local or national funding yet for monitoring of the silver eel escapement element to date. However, due to the low level of silver eel fishing in the region and the high numbers of glass eels which have been released into the regions rivers since the restocking commenced properly in 2013, glass eel fishers have in the last 2 years noticed a marked increase in the number of yellow and silver eels which they see in their nets when fishing for glass eels. The large opening in the barrier is a great way of ensuring that good quantities of glass eels are able to pass and restock naturally as well as allowing silver eels to return to the sea.
Score	Pass: Aspiring indicator
Criterion 2.2: There is good progress with the applicant's responsibilities in the Eel Management Plan for the river or District	
Weighting: 2	
Responsible indicators	There is credible progress with at least 75% of the actions relating to the fishery for the implementation of the Eel Management Plan for the river or eel management district.
Aspiring indicators	There is credible progress with at least 50% of the actions relating to the fishery for the implementation of the Eel Management Plan for the river or eel management district.
Discussion	The above mentioned national and regional review documents indicate that there has been good progress with the eel management plans in place. There has been a reduction of the number of glass eel fishermen in recent years to limit effort to more sustainable levels. Restocking targets have been met by the region since and there has been a reduction in mortality from activities other than fishing. It appears that
Score	Pass: Responsible indicator
Criterion 2.3: The fishery is well managed	

Weighting: 2	
Responsible indicators	<ul style="list-style-type: none"> • Fishers are licensed and provide catch and effort data via a tele-declaration system. • Data on catch and effort are collected and analysed regularly by the fishery authority (at least annually at the end of the season). • There is a data set for at least the last 5 years that is considered by the fishery authority to be accurate, useful for statistical purposes and provide a comprehensive picture of the glass eel fishery under assessment. • Enforcement is in place throughout the fishing area and there is no evidence of systematic non-compliance.
Aspiring indicators	<ul style="list-style-type: none"> • Fishers are licensed and provide catch and effort data. • Data on catch and effort are collected and analysed regularly by the fishery authority (at least annually at the end of the season). • There is a data set for at least the last 3 years that is considered by the fishery authority 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. • There is no evidence of systematic non-compliance.
Discussion	<p>The fishery is well managed, with vessels being licenced and issued individual quotas which are monitored closely by the relevant authorities to ensure that consumption and restocking elements are rigorously observed and not surpassed. These figures are also held by the OP which has a commercial interest in the sustainability of the fishery as well as general sustainability. Enforcement efforts are all surrounding the legal side of the fishery with high effort on inspections and any infractions taken to the full extent of the law when they occur. However, there are clear reports that illegal poaching of glass eels occurs at the same location and that authorities are not acting enough to prevent this presently. This is not something that the fishermen in question are able to impact on as they have already attempted to notify the authorities in the past with no success to date. The illegal poaching is a national issue rather than just at this location.</p>
Score	Pass: Responsible indicator
Criterion 2.4: Mortality during fishing is minimised	
Weighting: 2	
Responsible indicators	<ul style="list-style-type: none"> • Fishing is by hand-held nets and has effective nearby holding facilities OR • Fishing from vessels meets the following criteria: <ul style="list-style-type: none"> i) fishing is at slow speed (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 vi) fishermen maintain accurate daily records of mortality. OR

	<ul style="list-style-type: none"> Fishermen can demonstrate that the mortality rate of the catch over the duration of holding in the storage facility is less than 4% for each batch captured. OR Fishing methods (in France) meet the criteria in Category 1 of the France Good Practice Guide OR The Carmin Indigo or similar test indicates that mortality averages less than 4%
Aspiring indicators	<ul style="list-style-type: none"> Fishing from vessels meets the following criteria: <ul style="list-style-type: none"> 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; vi) fishermen maintain accurate daily records of mortality. OR Fishermen can demonstrate that the mortality rate of the catch over the duration of holding in the storage facility is between 4% and 8% for each batch captured. OR Fishing methods (in France) meet the criteria in Category 2 of the France Good Practice Guide OR The Carmin Indigo or similar test indicates that mortality averages between 4% and 8%
Discussion	From the observations completed during the audit aboard two vessels, the fishery appears to be at a very slow speed with using short nets which are hauled every 5-7 minutes on average and which have nets with a cod end of mesh size less than 1mm. The eels were lively when removed from the net and appear in very good condition. This was confirmed by buyers from the entrants who confirmed good quality fish with mortality below 2% due to stocking by the fishermen prior to purchase. Some fishers stock in the vivier aboard the vessel while other stock in viviers at home. The rest of the net was constructed of small mesh as well which did not allow eels to get trapped or abraded either.
Score	Pass: Responsible indicator
Criterion 2.5: The fishery has negligible impacts on by-catch species	
Weighting: 1	
Responsible indicators	<ul style="list-style-type: none"> The fishery has a negligible impact on by-catch By-catch is returned to the water alive as gently and rapidly as possible.
Aspiring indicators	<ul style="list-style-type: none"> The fishery has low-level impacts on by-catch By-catch is returned to the water alive as gently and rapidly as possible.
Discussion	Bycatch was very limited with only a few juvenile fish seen which were returned to the water alive as soon as possible with minimal handling. Further discussion with the fishermen indicated that this was usual and that it was rare to see other species in the nets due to the slow speed at which they worked.

Score	Pass: Responsible indicator
Criterion 2.6: The fishery has negligible impacts on rare or other protected species	
Weighting: 1	
Responsible indicators	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.
Aspiring indicators	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.
Discussion	There are no indications that the fishery has any impact on any rare or protected species in the river, this is especially true as bycatch is returned to the water alive soon after hauling which occurs regularly.
Score	Pass: Responsible indicator
Criterion 2.7: The fishery has negligible impacts on habitats	
Weighting: 1	
Responsible indicators	The fishing gear does not cause any damage to the benthos.
Aspiring indicators	Damage to the benthos by gear is limited or minimal.
Discussion	Fishing gear is never intended to come into contact with the benthos. Discussions with the fishermen have identified that on rare occasions, the gear does touch the benthos causing issues for the skipper as the gear may become damaged but will definitely become muddied. As such this is avoided whenever possible but cannot always be. It is not expected that the light contact on heavily silted benthos in the area fished will cause any damage to the benthos, therefore a Responsible indicator is justified.
Score	Pass Responsible indicator
Criterion 2.8: Transport	
Responsible indicators	<ul style="list-style-type: none"> • The operator holds the relevant transport authorisations • There is a Transport Plan in place to minimise travel time – this meets the Transport requirements for vertebrates • Packing is done in a way that minimises handling, time and stress • Eels are kept cool and wet with an adequate supply of oxygen
Discussion	The fishers under assessment have to stock fish in vivier tanks at private where they are later collected by a buyer. This means that transport requirements by fishermen is limited as all live within a short distance from the landing site. Therefore, there is not a requirement for there to be a transportation plan in place to minimise travel time. Eels are kept cool when transported the short distance and are not allowed to dry out.
Score	Pass: Responsible indicator

Criterion 2.9: Bonus Score: Fishermen donate a proportion of their catch for a local positive contribution

Weighting: 1

Responsible indicators	Fishermen have donated an average of at least 5% of their catch in the past 2 years to local stocking programmes, e.g. translocating over barriers to aid upstream migration and recruitment in the catchment, or have credible plans in place to do so next season (note that this is separate from any planned restocking to meet the 60% target).
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Discussion	N/A
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Score	N/A
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