

Eel Assessment – Sevre Niortaise Fishery

Assessment against:

Component 1: Core requirements

Component 2: Glass eel fishing

Completed by
Alex Senechal

2nd December 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 Sevre Niortaise fishery. This assessment has been completed against Components 1 & 2 of the Standard only.

The assessment is of a fishery located in Charron France on the Sevre Niortaise river. This fishery is made up of a considerable number of vessels, not all of which have been included under this assessment due to eligibility and willingness. Those that have are part of the OP Estuaires group, associated with the fishers along the coast up to the Loire. The fishery is from vessels using rectangular fixed frame openings to the trawls on either side. The nets in many cases are in excess of 7m in length, terminating in a cod end made of a mesh which is less than or equal to 1mm in mesh size. The rest of the net is made of slightly larger mesh size however it is not large enough that it would cause glass eels to get stuck in it or damaged. Vessels are able to fish on the surface or down in the water column until just above the river bed. The cod end is sealed with a zip in most cases, or Velcro in a few.

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

NOM	Prénom	Armement	NOM	Prénom	Armement
BARON	Yannis	Mistigri	BERNARD	Vincent	Mistral
NICOLEAU	Freddy	Le Spatial	BITARD	Christophe	Le Mariaude
NICOLEAU	Cyril	Caryoanchris	BOBINET	Olivier	Gobelune
CHARLEUX	Stéphane	Moby Dick	COUTANCEAU	Romuald	Reine de la Mer
GROLIER	Hervé	Alizé II	GIRAULT	Teddy	Papy
GUYARD	Stany	La Santa Maria	PINEAU	Sébastien	Helena
LAURENT	Johann	Minaki			

1. The assessment

The assessor was Alex Senechal of MacAlister Elliott & Partners Ltd, who visited the Sevre Niortaise fishery based in Charron on the 5th March 2019. The audit included interviews with Alexandra Collias of the OP Estuaires and fishermen from the fishery while aboard a 3 of the vessels for which permission was granted by the relevant French authorities. 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

3. 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	0033 (0) 2.51.96.15.67

4. 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 Sevre Niortaise 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
1.5.1 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 Sevre Niortaise has scored the following for Component 2: Glass eel fishing and has been found to meet the requirements of the 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	Aspiring	2	0
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	7
Percentage Responsibility Score:		64%	

Summary of assessment and scoring

Component	Aspiring	Responsible
1	0	5
2	4	7
Total	4	12
Total Responsibility Score		75%

Recommendations:

2.4 It is recommended that all vessels adopt the practice of having the entirety of the net in the water for the entire period of the trawl rather than only for some of the trawl duration. Should this be completed, it is assumed that certification of the entrants will be considered by SEG.

5. Next Audit

At the completion of the audit the client was assessed not to have met all of the requirements of the standard.

Based on the recommendation set out above, it is suggested by the auditor that a conditional certificate is issued provided that all fishermen sign an agreement to indicate that they will only fish with the entirety of the net in the water. The fishing practice will need to be verified by an on-site audit during the next season to ensure compliance by all entrants.

01/12/2019 UPDATE – The above recommendation was followed by the fishers and signed testimonies were collected from the above fishers wishing to be part of this certification. As a result, it is the recommendation of the assessor that the above fishers are granted a conditional certificate with a requirement to be monitored within the first year to check that vessels are submerging the entirety of the net for the duration of each trawl as opposed to only part of the trawl and or part of the trawl duration.

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 assessments 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
	<ul style="list-style-type: none"> • If resolved through mass- or number- balance calculations, the margin of error does not exceed 5%
Discussion	All fishers are required to declare their landings on the Telecapêche system as well as filling in the fiche de pêche 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.
Score	Pass: Responsible indicator
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: • 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: • 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	National reports evaluating the progress made by the national and regional eel management plans, have shown that there is good progress being 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. Conversation with some of the fishermen indicated that when the barriers to the river are opened there are large quantities of silver eels present which go into the sea in the next few ours. These quantities are considerable according to the individuals who have recorded these sightings on camera.
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. Restocking targets are being met by the region since restocking efforts commenced in 2013 and there has been a reduction in mortality from causes other than fishing thanks to the efforts made in conjunction with the water framework directive. It is suggested in the reports that all tasks set out in the management plans have either been completed or remain ongoing.
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	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.
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 <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 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	<p>From the fishing which was seen on the night of the audit, the fishing speed was slow and appeared to be in line with what is expected in the standard. Vessels all have viviers on board and mortality figures from buyers were indicated to be around 5% normally. Haul time was normally less than 15 minutes and mesh size was with a cod end no greater than 1 mm. It was noted that net length is generally longer than 6m meaning that water pressure in the cod end would normally be low, however not all vessels were noted to have the cod end in the water during the main part of the fishing between hauls. Instead, the cod end would be retained on board, while the rest of the net fished, and the cod end dropped into the water approximately 1-2 minutes before hauling to allow any catch to move back towards the cod end. This of course defeats the benefits of a longer net to minimise turbulence in the cod end and means that during the majority of the trawling period, the fish is in an area of net which is superior to 1mm mesh size. While this was not the case for all vessels, it is a concern that some of the vessels do not have the entire net in the water for the duration of each trawl and therefore have a “pinch zone”.</p>
Score	Pass: Aspiring 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	By catch during the audit was limited to a large number of lice which were returned to the water alive. This was due to the period of fishing at the end of the season and the warming of the water which meant that there was a sudden large increase in the species presence. Other bycatch species were limited to a few juveniles which were returned to the water alive in general.
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 does not appear to be any indication that the fishery would have any negative impact on rare or protected species in the Sevre Niortaise. Any fish other than glass eels or other species are returned to the water alive where ever possible and as soon as possible.
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	Contact with the benthos by fishing gear does occur on occasion however, it is never the intention of the fishermen for their gear to make contact as it risks damage to the mesh and any eels present in the cod end as well as restricting fishing activity while the silt and other material is removed from the trawl following contact.
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 have buyers on site who are able to buy at the point of landing, However this is not always the case and stocking in vivier tanks at private premises does also occur.
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).
Discussion	N/A
Score	N/A