

## Eel Assessment – Loire Second Group

### Assessment against:

Component 1: Core requirements

Component 2: Glass eel fishing

**Completed by**

Alex Senechal

6<sup>th</sup> March 2019

Updated 6 January 2020

### 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 a group of selected fishermen from the Loire glass eel fishery. This assessment has been completed against Components 1 & 2 of the Standard only.

The assessment is of fishermen of glass eel fishery located along the Loire river in France starting at Saint Nazaire and working up stream past Cordemais and onwards into Nantes. Fishers all use the same method of fishing however, while some have adopted the modernised and improved gear designed by Ifremer which is already in use by those fishermen currently certified on the Loire, not all of these vessels have made the move yet with variable and concerning results in some cases as described below.

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

| NOM       | Prénom      | Armement       | NOM       | Prénom   | Armement           |
|-----------|-------------|----------------|-----------|----------|--------------------|
| ROCHER    | Didier      | Roule ta bille | BATARD    | Fabrice  | L'Exocet           |
| ANDRE     | Sébastien   | L'Avenir       | COLLIOT   | Benjamin | Loma               |
| BLANCHARD | Louis       | Soleil Royal   | LORCY     | Frédéric | L'étoile du Berger |
| BONNET    | Franck      | Pilet          | MENU      | David    | Benjy Yomi         |
| HERVEL    | Cédric      | Lewin          | CONORD    | Stéphane | Le Condor IV       |
| QUEMENER  | Christopher | Filia Mea      | GOURDON   | Franck   | Cormaris           |
| RIO       | Yvon        | Mon Désir      | JOSNIN    | Franck   | Junior II          |
| COUEDEL   | Mickaël     | Alcor          | LE CORNEC | Gaylord  | Kerthilou          |
| BURGOT    | Marc        | Toison d'Or    | LYON      | Henri    | Maya               |
| BONNET    | Gaëtan      | Pile Poil      | ROUINSARD | Alain    | Mistral Gagnant    |
| BLANDIN   | Régis/Kévin | Triskell       | ROUINSARD | Cyrille  | Oke Aloha          |

|        |               |            |         |          |           |
|--------|---------------|------------|---------|----------|-----------|
| BRIERE | Ronan/Patrice | Le Vauclin | IVANIUK | Staphane | Lea Flora |
|--------|---------------|------------|---------|----------|-----------|

## 1. The assessment

The assessor was Alex Senechal of Control Union Pesca Ltd, who visited Saint Nazaire and Cordemais on the 6<sup>th</sup> March 2019. The audit included interviews with Alexandra Collias of the OP Estuaires and the boarding of vessels from St Nazaire and Cordemais to observe their fishing methods.

## 2. Client Contact Details

|                               |   |
|-------------------------------|---|
| <b>3. Client Contact Name</b> | Alexandra COLLIAS   |
| <b>Client Address</b>         | OP Estuaires<br>2, rue Colbert<br>85100 Les Sables d'Olonne |
| <b>Client Email</b>           | op.estuaires@gmail.com                                      |
| <b>Client Phone Number</b>    | 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 the group were given the following for Component 1: General Requirements and therefore **should** be considered **RESPONSIBLE** under the SEG standard.

| Component 1: General Requirements  | Auditor's findings | Weighting | Score |
|--|--------------------|-----------|-------|
| 1.1 Commitment to Legality   | Aspiring           | 1         | 0     |
| 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         | 4/5   |
| Percentage Responsibility Score:   |                    | 80%       |       |

that the group were given the following for Component 2: Glass eel fishing and assessed as **not achieving** this component of the SEG Standard.

At March 2019:

| 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   | <b>Not Achieved</b> | 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     |
| Total   |                     | 11        | 7/11  |
| Percentage Responsibility Score:  |                     | 64%       |       |

At January 2020 on verification of purchase and use of appropriate nets, the group were given the following for Component 2: Glass eel fishing and assessed as **achieving** this component of the SEG Standard.

| Component 2: Glass eel fishing   | Auditor's findings | Weighting | Score |
|--|--------------------|-----------|-------|
| 2.9 Eel fishing is in a catchment that is meeting its escapement targets   | Aspiring           | 2         | 0     |
| 2.10 There is good progress with the applicant's responsibilities in the eel management plan for the river or district | Responsible        | 2         | 2     |
| 2.11 The fishery is well managed   | Responsible        | 1         | 1     |
| 2.12 Mortality during fishing is minimised   | Responsible        | 2         | 2     |
| 2.13 The fishery has negligible impacts on by-catch species  | Responsible        | 1         | 1     |
| 2.14 The fishery has negligible impacts on rare or other protected species   | Responsible        | 1         | 1     |
| 2.15 The fishery has negligible impacts on habitats  | Responsible        | 1         | 1     |
| 2.16 Transport   | Responsible        | 1         | 1     |
| Total  |                    | 11        | 9/11  |
| Percentage Responsibility Score:   |                    | 82%       |       |

## Summary of assessment and scoring At January 2020:

| Component                         | Not Achieved | Aspiring | Responsible |
|-----------------------------------|--------------|----------|-------------|
| 1                                 |              | 1        | 4           |
| 2                                 |              | 2        | 9           |
| <b>Total</b>                      |              | <b>3</b> | <b>13</b>   |
|                                   |              |          |             |
| <b>Total Responsibility Score</b> |              |          | <b>81%</b>  |

## Recommendations:

1.1 It is recommended that by the next audit of the fishery, no vessels have been found guilty of any offences relating to eels for a minimum period of 24 months. Any individuals found not to meet this criteria to be removed from the certification list.

### March 2019:

**2.4 It is recommended that for the fishers under assessment to be considered for certification, each fisher must first present evidence in the form of a signed letter from the OP Estuaires stating that an "improved style" trawl net which has a cod end with mesh size no larger than 1mm and a main body which has mesh size small enough to ensure no eels may become trapped or abraded are either already previously owned and in use by the vessel, or that they have been purchased by the vessel for the next season (with invoice as proof). It will be required that these are verified as such by the OP Estuaires representative.**

## Results of the assessment:

### January 2020:

Following on from the initial assessment in March 2019 and with the adoption of the above recommendation, those vessels identified in the following table have provided satisfactory evidence of purchase of the improved fishing gear to satisfy that efforts have been made to limit mortality of glass eels during fishing as of 6<sup>th</sup> January 2020. As such, it is recommended to SEG that the below identified vessel are provided with a conditional certification for the remainder of the 2019/20 glass eel season with a requirement for re-assessment at the start of the 2020/2021 season.

| NOM       | Prénom      | Armement       |  | NOM     | Prénom        | Armement   |
|-----------|-------------|----------------|--|---------|---------------|------------|
| ROCHER    | Didier      | Roule ta bille |  | BATARD  | Fabrice       | L'Exocet   |
| QUEMENER  | Christopher | Filia Mea      |  | MENU    | David         | Benjy Yomi |
| BONNET    | Gaëtan      | Pile Poil      |  | GOURDON | Franck        | Cormaris   |
| BLANDIN   | Régis/Kévin | Triskell       |  | JOSNIN  | Franck        | Junior II  |
| LYON      | Henri       | Maya           |  | IVANIUK | Stéphane      | Léa Flora  |
| BURGOT    | Marc        | Toison D'Or    |  | BRIERE  | Ronan/Patrice | Le Vauclin |
| BLANCHARD | Louis       | Soleil Royal   |  | JULIO   | Mallory       | AR MEN     |
| COUEDEL   | Théo        | DEN HELIGA II  |  | COLLIOT | Benjamin      | LOMA       |

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

| <b>Component 1 – Generic requirements</b>   |  |
|---|--|
| <b>Criterion 1.1: Commitment to legality</b>  |  |
| <b>Responsible indicators</b>   | For at least the past two years: the organisation has not been found guilty for any offences relating to eel fishing or trading.   |
| <b>Aspiring indicators</b>  | For at least the past 12 months: the organisation has not been found guilty for any offences relating to eel fishing or trading.   |
| Discussion  | Of the fishermen under assessment, one individual has had an infraction in the last 2 years but not within 12 months. For all other fishers that are no known infractions where they were found to be guilty in the last 24 months.  |
| Score   | Pass: Aspiring indicator   |
| <b>Criterion 1.2: Contribution to Eel Conservation Projects. (Optional bonus score)</b> |  |
| <b>Responsible indicators</b>   | 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. |
| <b>Aspiring indicators</b>  | 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  |
| <b>Criterion 1.3: The facility trades in certified responsibly sourced eel</b>          |  |
| <b>Responsible indicators</b>   | The organisation trades in at least 50% (by number) of certified responsibly sourced eel and has the documentation to demonstrate that.  |
| <b>Aspiring indicators</b>  | 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  |
| <b>Criterion 1.4: Traceability</b>  |  |
| <b>1.4.1: Traceability - Incoming product, separation and segregation</b>               |  |

|   |  |
|---|--|
| <b>Responsible indicators</b>                 | <ul style="list-style-type: none"> <li>• Certified and uncertified eel products can be clearly and easily traced back to their source.</li> <li>• Where a fishery or buyer, an electronic tele-declaration system is used</li> <li>• It operates a clear system which ensures that the product remains separated at all stages from arrival to dispatch from non-certified eel products.</li> <li>• The organisation ensures that any products wishing to make a claim as certified do not contain any non-certified eel-based ingredients.</li> <li>• If resolved through mass- or number- balance calculations, the margin of error does not exceed 2%</li> </ul>  |
| <b>Aspiring indicators</b>                    | <ul style="list-style-type: none"> <li>• Certified and uncertified eel products can be traced back to their source.</li> <li>• It operates a system which ensures that the product remains separated at all stages from arrival to despatch from non-certified eel products.</li> <li>• The organisation ensures that any products wishing to make a claim as certified do not contain any non-certified eel-based ingredients</li> <li>• If resolved through mass- or number- balance calculations, the margin of error does not exceed 5%</li> </ul>   |
| Discussion                                    | <p>All fishers are obligated to use Telecapêche as well as filling in the fiche de pêche for every landing of fish that they do and transportation. Fish caught by the fishermen is either collected after stocking at their own premises or at the SAS Estuaires facility, therefore there is no opportunity for there to be a mix with the fishermen in question. In addition, currently the fishermen under assessment are not certified and therefore only handle “non-SEG fish”.</p>  |
| Score   | Pass: Responsible indicator  |
| <b>1.4.2: Traceability - Outgoing product</b> |  |
| <b>Responsible indicators</b>                 | <ul style="list-style-type: none"> <li>• Where a fishery or buyer, an electronic tele-declaration system is used</li> <li>• Documentation is well maintained with a maximum of 2% error in the following: <ul style="list-style-type: none"> <li>• 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</li> </ul> </li> <li>• 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"> <li>- Includes an appropriate batch code</li> <li>- Includes a record of the quantity (no. &amp; weight) of product and to whom it was sold</li> </ul> </li> </ul> |
| <b>Aspiring indicators</b>                    | <ul style="list-style-type: none"> <li>• Documentation is well maintained with a maximum of 5% error in the following: <ul style="list-style-type: none"> <li>• 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</li> </ul> </li> <li>• 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"> <li>- Includes an appropriate batch code</li> <li>- Includes a record of the quantity (no. &amp; weight) of product and to whom it was sold</li> </ul> </li> </ul>  |

|  |  |
|--|--|
| Discussion   | Electronic declarations are made were required by the buyers of the eels. Written transportation documents are provided when eels are transported to account for all eels and no mixing is done by the fishermen as there is no pooling of fish by groups of fishermen. In addition, currently the fishermen under assessment are not certified and therefore only handle “non-SEG fish”.  |
| Score  | Pass: Responsible indicator  |
| <b>1.4.3: Traceability - Record keeping and documentation</b>  |  |
| <b>Responsible indicators</b>  | <ul style="list-style-type: none"> <li>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</li> <li>If a fisherman or buyer, a tele-declaration system is used to report catches and trade</li> <li>The organisation operates a system that also allows for the completion of a batch reconciliation of eel product by weight over a given period.</li> <li>The organisation maintains records for a minimum of three (3) years.</li> </ul> |
| <b>Aspiring indicators</b>   | <p>The above requirements are met except that:</p> <ul style="list-style-type: none"> <li>Records have been maintained for less than three (3) years</li> <li>If a fisherman or trader, a tele-declaration system is planned to be used to report catches and trade in the next season</li> </ul>  |
| Discussion   | All electronic declarations are available on line for each fo the fishermen under assessment and can be verified by the OP Estuaires to monitor the quantities of fish caught as consumption and restocking for each season. In addition to the there is still the national paper based system where the fishe de peche are sent every day. The OP and COREPEM have records for the fishery for more than 3 years.   |
| Score  | Pass: Responsible indicator  |
| <b>Criterion 1.5: Biosecurity &amp; welfare – Eel and eel products are provided with minimal risk of diseases, parasites and alien species</b> |  |
| <b>Eel Fishing: Biosecurity measures are adopted</b>   |  |
| <b>Responsible indicators</b>  | <ul style="list-style-type: none"> <li>The fishery conducts good biosecurity measures such as the disinfection and drying of nets and equipment between each fishing in different waters. OR:</li> <li>The fishermen only operate in the same river or estuary, with no risk of transferring diseases or alien species between catchments</li> </ul>   |
| Discussion   | All fishermen work within the same river or estuary and do no not fish for glass eels in other rivers of water ways. Gear is generally kept clean and free of biological matter between fishing trips.   |
| Score  | Pass: Responsible indicator  |



| <b>Component 2 - Glass eel fishing</b>  |   |
|---|---|
| <b>Criterion 2.1: Eel fishing is in a catchment that is meeting its escapement targets</b>  |   |
| <b>Weighting: 2</b>   |   |
| <b>Sustainable Indicator</b> <small>(worth 2 x Responsible Indicator Score)</small>   | 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.  |
| <b>Responsible indicators</b>   | 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.   |
| <b>Aspiring indicators</b>  | 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.   |
| <b>Discussion</b>   | 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, there is no marine fishing for silver eels and limited levels of fresh water fishing in the region. This in addition to the high numbers of glass eels which have been released into the regions rivers since the restocking commenced properly in 2013 is hoped will have improved things considerably in the coming years. Glass eel fishers have already 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. Therefore, thanks to the positive impact of the glass eel fishing, the regional authority has been able to ensure that a minimum quantity of glass eels is restocked into local river systems. |
| <b>Score</b>  | Pass: Aspiring indicator  |
| <b>Criterion 2.2: There is good progress with the applicant's responsibilities in the Eel Management Plan for the river or District</b> |   |
| <b>Weighting: 2</b>   |   |
| <b>Responsible indicators</b>   | 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.   |
| <b>Aspiring indicators</b>  | 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.   |
| <b>Discussion</b>   | 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 in the number of vessels/licences, a restriction on the period of fishing for yellow eels from April to September, and additional control on quota allocation and improved declaration system with the introduction of telecapeche. It is suggested in   |



|   |   |
|---|---|
|   | the reports that all tasks set out in the management plans have either been completed or remain ongoing and that the true results of their effects will not likely be seen until after the estimated 12 year average life cycle of eels in France, therefore indicating that 2020 is to be the earliest when meaningful data will begin to be collected to evaluate any positive progress in eel populations in France.   |
| <b>Score</b>                                      | Pass: Responsible indicator   |
| <b>Criterion 2.3: The fishery is well managed</b> |   |
| <b>Weighting: 2</b>                               |   |
| <b>Responsible indicators</b>                     | <ul style="list-style-type: none"> <li>• Fishers are licensed and provide catch and effort data via a tele-declaration system.</li> <li>• Data on catch and effort are collected and analysed regularly by the fishery authority (at least annually at the end of the season).</li> <li>• 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.</li> <li>• Enforcement is in place throughout the fishing area and there is no evidence of systematic non-compliance.</li> </ul>   |
| <b>Aspiring indicators</b>                        | <ul style="list-style-type: none"> <li>• Fishers are licensed and provide catch and effort data.</li> <li>• Data on catch and effort are collected and analysed regularly by the fishery authority (at least annually at the end of the season).</li> <li>• 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.</li> <li>• There is no evidence of systematic non-compliance.</li> </ul>  |
| <b>Discussion</b>                                 | <p>Licences are controlled and issued every year with no additional licences issued. Effort is all controlled through the electronic and paper declaration system which is closely monitored throughout the season by the OP and Comite Regional. Data for fish landings from the fishery exists for more than 5 years.</p> <p>All fishers must declare in writing (logbook sheet) and via the telecapeche system within 24 hours of landing. The logbook must be fully and accurately filled in at the time of landing before departing in any vehicle. A 10% allowance is allowed on the estimated weight of catch. The logbook sheet then acts as a transportation document and must be have the vehicle 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 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. 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> |
| <b>Score</b>                                      | Pass: Responsible indicator   |

| Criterion 2.4: Mortality during fishing is minimised |   |
|--|---|
| <b>Weighting: 2</b>                                  |   |
| <b>Responsible indicators</b>                        | <ul style="list-style-type: none"> <li>• Fishing is by hand-held nets and has effective nearby holding facilities OR</li> <li>• Fishing from vessels meets the following criteria:               <ul style="list-style-type: none"> <li>i) fishing is at slow speed (no more than 1 knot relative to water);</li> <li>ii) haul duration is on average no longer than 20 minutes, with the maximum duration not more than 30 minutes;</li> <li>iii) mesh size of cod end no greater than 1mm;</li> <li>iv) rest of the net designed such that glass eels do not become trapped or abraded;</li> <li>v) vivier tank on board and in use</li> <li>vi) fishermen maintain accurate daily records of mortality. OR</li> </ul> </li> <li>• 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</li> <li>• Fishing methods (in France) meet the criteria in Category 1 of the France Good Practice Guide OR</li> <li>• The Carmin Indigo or similar test indicates that mortality averages less than 4%</li> </ul> |
| <b>Aspiring indicators</b>                           | <ul style="list-style-type: none"> <li>• Fishing from vessels meets the following criteria:               <ul style="list-style-type: none"> <li>i) fishing is at slow speed (no more than 1.5 knots relative to water);</li> <li>ii) maximum haul duration no longer than 30 minutes;</li> <li>iii) mesh size of cod end no greater than 1mm;</li> <li>iv) rest of the net designed such that glass eels do not become trapped or abraded;</li> <li>v) vivier tank on board and in use;</li> <li>vi) fishermen maintain accurate daily records of mortality. OR</li> </ul> </li> <li>• 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</li> <li>• Fishing methods (in France) meet the criteria in Category 2 of the France Good Practice Guide OR</li> <li>• The Carmin Indigo or similar test indicates that mortality averages between 4% and 8%</li> </ul>  |
| <b>Discussion</b>                                    | <p>Fishing by the vessels seen was at a low speed which aimed to be around 1.5 knots however, it was noted that not all vessels used the modernised and improved design of net developed by Ifremer when other fishers on the Loire were certified in 2017. This was notable in the composition of mesh size seen in the nets and the resultant effect. Those with the new nets had no eels getting trapped in the main body of the net, however, those with alternative net models which predated the modified nets had glass eels getting stuck in the main body of the net. Trawl duration by all vessels observed was short, not lasting more than 10-12 minutes and all vessels have working viviers on board to ensure eels remained oxygenated while on the vessels. Handling of the eels was kept to a minimum and efforts appeared to be made to ensure that eels were stressed as little as possible by the fishing process. Fish were generally sorted quickly, resulting in any bycatch or tired glass eels being returned to the water quickly</p>   |

|              |  |
|--------------|--|
|              | to increase the likelihood of survival while the quality of glass eels retained was very good for all vessels observed. Mortality was verified with the buyers but responses were only received from one of the buyers who suggested that mortality was normally ~2% following receipt of glass eels from these fishermen. These were normally already stored by the fishermen before pickup by the buyer. Mortality figures were checked with the SAS Estuaires based on the mortality seen in the French restocking fish provided this year. These appeared to be 3.5% or lower and averaging 2.3% which is within the 4% allowance for a responsible score. |
| <b>Score</b> | <b>Not Achieved March 2019</b>   |
|              | <b>Achieved January 2020 – Responsible Indicator</b>   |

**Criterion 2.5: The fishery has negligible impacts on by-catch species**

**Weighting: 1**

|                               |  |
|-------------------------------|--|
| <b>Responsible indicators</b> | <ul style="list-style-type: none"> <li>The fishery has a negligible impact on by-catch</li> <li>By-catch is returned to the water alive as gently and rapidly as possible.</li> </ul>                        |
| <b>Aspiring indicators</b>    | <ul style="list-style-type: none"> <li>The fishery has low-level impacts on by-catch</li> <li>By-catch is returned to the water alive as gently and rapidly as possible.</li> </ul>                          |
| <b>Discussion</b>             | While observing the fishery, limited numbers of bycatch fish and prawns were seen. This was mostly alive due to the shortness of the trawl duration and was all returned to the water as quickly as possible |
| <b>Score</b>                  | Pass: Responsible indicator  |

**Criterion 2.6: The fishery has negligible impacts on rare or other protected species**

**Weighting: 1**

| <b>Responsible indicators</b> | 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.  |              |            |              |           |         |                    |               |         |            |         |                     |               |         |            |         |                         |               |         |            |         |                           |               |         |            |         |                       |           |         |            |         |
|-------------------------------|--|--------------|------------|--------------|-----------|---------|--------------------|---------------|---------|------------|---------|---------------------|---------------|---------|------------|---------|-------------------------|---------------|---------|------------|---------|---------------------------|---------------|---------|------------|---------|-----------------------|-----------|---------|------------|---------|
| <b>Aspiring indicators</b>    | 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.   |              |            |              |           |         |                    |               |         |            |         |                     |               |         |            |         |                         |               |         |            |         |                           |               |         |            |         |                       |           |         |            |         |
| <b>Discussion</b>             | <p>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" data-bbox="414 1601 1292 2004"> <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> </tbody> </table> | 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 |
| 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      |           |         |                    |               |         |            |         |                     |               |         |            |         |                         |               |         |            |         |                           |               |         |            |         |                       |           |         |            |         |

|  |   |                    |               |         |            |         |
|--|---|--------------------|---------------|---------|------------|---------|
|  | <table border="1"> <tr> <td><i>Salmo salar</i></td> <td>Concentration</td> <td>Average</td> <td>Non-isolée</td> <td>Moyenne</td> </tr> </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>   | <i>Salmo salar</i> | Concentration | Average | Non-isolée | Moyenne |
| <i>Salmo salar</i>   | Concentration   | Average            | Non-isolée    | Moyenne |            |         |
| <b>Score</b>   | Pass: Responsible indicator   |                    |               |         |            |         |
| <b>Criterion 2.7: The fishery has negligible impacts on habitats</b> |   |                    |               |         |            |         |
| <b>Weighting: 1</b>  |   |                    |               |         |            |         |
| <b>Responsible indicators</b>  | The fishing gear does not cause any damage to the benthos.  |                    |               |         |            |         |
| <b>Aspiring indicators</b>   | Damage to the benthos by gear is limited or minimal.  |                    |               |         |            |         |
| <b>Discussion</b>  | The fishery works both on the surface and down through the water column to just above the river bed. It is therefore not the intention of any vessel to make contact with the substrate and any contact should be considered to be accidental and rarely occurring, therefore the likelihood of impact is negligible.   |                    |               |         |            |         |
| <b>Score</b>   | Pass: Responsible indicator   |                    |               |         |            |         |
| <b>Criterion 2.8: Transport</b>                                      |   |                    |               |         |            |         |
| <b>Responsible indicators</b>  | <ul style="list-style-type: none"> <li>• The operator holds the relevant transport authorisations</li> <li>• There is a Transport Plan in place to minimise travel time – this meets the Transport requirements for vertebrates</li> <li>• Packing is done in a way that minimises handling, time and stress</li> <li>• Eels are kept cool and wet with an adequate supply of oxygen</li> </ul>   |                    |               |         |            |         |
| <b>Discussion</b>  | Transportation covered by this assessment is only for fishermen between the landing sites and their vivier facilities, either personal or to the SAS Estuaires vivier following stocking at their personal visiers first. Transportation from the point of landing must always be accompanied by fully filled in logbooks which act as the transportation documents. As such no transport plan is required. Appropriate packaging is used to transport the fish to ensure that they do not dry out or become stressed through excessive temperature difference or oxygen depletion. |                    |               |         |            |         |
| <b>Score</b>   | Pass: Responsible indicator   |                    |               |         |            |         |