Eel Assessment – Gurruchaga

Assessment against:

Component 1: Generic Requirements
Component 3: Glass eel buyers
Component 4: Eel Culture
Component 7: Traceability

Completed by

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17th January 2017

FINAL

1. Introduction

This document presents the report completed following the verification audit carried out under the Sustainable Eel Standard (Version 5, 21st June 2013), and Sustainable Eel Methodology (Version 1, 21st June 2013) against Gurruchaga Maree SARL (hereafter Gurruchaga). This assessment has been completed against Components 1,3, 4 & 7 of the Standard only.

The assessment is of the elver buyer Gurruchaga. Gurruchaga buy eels from a number of French and Spanish rivers ranging from Normandy in the North to the Basque country in the south. Those that are currently certified against the SEG standard are: the Arzal fishery however, no glass eels have been purchased from this fishery so far during the 2016/17 season. Elvers are purchased and stored in tank facilities for on-ward sale to clients or on-growing. The company has three holding systems in place with plans for a fourth. The locations and addresses of these are listed below:

Site Name	Address	Area Covered
Site 1 – Hendaye facility (also the Head Office Site)	88, Route de la Corniche, Quartier Haicabia, 64700 HENDAYE	Adour, Landes rivers
Site 2 – Charron Facility	Le Port du Corps de Garde, 17230 CHARRON	La Rochelle area
Site 3 – Epargnes Facility	Epargnes, Poitou Charentes	Gironde, Seudre and Charente rivers

The Hendaye facility has increased in size significantly since the last audit with a new growing facility built on site and plans to increase the growing area by a further 24 tanks in the near future.

2. The assessment

The assessors were Max Goulden and Alex Senechal of MacAlister Elliott and Partners Ltd, who visited the Hendaye facility on the17th January 2017. The visit included a tour of the Hendaye facility followed by the assessment of the paper based records held at the Hendaye central office. Included in the paper based records were purchase and sales records for the previous and current season to date. The verification audit was overseen by Mr Jerome Gurruchaga (Owner) and Office Manager Nathalie Immeln.

The audit was followed by a period of discussion and provision of evidence by Gurruchaga regarding the mortality and feed used in the culture system. This resulted in the publication of this version of the report in March 2017.

3. Client Contact Details

Client Contact Name	Nathalie Immeln
Client Address	88, Route de la Corniche, Quartier Haicabia, 64700 HENDAYE
Client Email	gurrumaree@wanadoo.fr
Client Phone Number	+33 559566891

4. Results of the assessment

The outcome of this assessment is as follows;

That Gurruchaga has **passed** Component 1: Commitment to Sustainability and legality

that Gurruchaga scored **6 green scores** and **4 amber scores** against Component 3 and therefore **should be considered sustainable under the SEG standard, Component 3: Glass Eel Buyers**.

that Gurruchaga scored 7 **green scores** and **1 amber scores** against Component 7 and therefore **should be considered sustainable under the SEG standard, Component 4: Cultured eels**.

that Gurruchaga scored **3 green scores** and **0 amber scores** against Component 7 and therefore **should be considered sustainable under the SEG standard, Component 7: Traceability**.

Recommendations

A number of recommendations were raised by the auditor. These are provided below.

RECCOMENDATION 1:

Component 3.7: It is recommended that the client should reach the 60% level for restocking which has been a requirement by the French government since the 2014-15 season so as to achieve a green score on this element.

RECCOMENDATION 2:

Component 4.2 It is recommended that the client keep a strict record of the sustainability of the feed sources that it uses at the facility to ensure that feed is from sustainable stocks so that this can be verified by the certification body. This is to include pelleted feeds and non-pelleted feeds such as cod roe.

5. Next Audit

At the completion of the audit the client was assessed for components 1, 3 and 7 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	Go to Q5

	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

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

As the client has been seen to fall into the Standard Surveillance bracket, the next audit will be due on the 16 January 2019 (in 2 years' time) and shall be an on-site audit.

The next audit will be to assess that the improvements made from the previous audit have continued to be observed and to assess if the recommendations from this audit for components 3.2 and 3.7 have been observed and improvements made.

It should be noted that at the time of assessment no glass eels from a SEG certified fishery were held or sold on from the facility for the 2016/17 season and that there had not been any SEG eels grown on at the facility to date.

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

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	Gurruchaga continue to show interest and the will to be aligned with the SEG requirements during the auditors visit and have indicated a desire for more fisheries to be SEG accredited so that Gurruchaga is able to market more SEG glass eels in the future. No evidence of illegal trading by Gurruchaga has been provided to MEP and Gurruchaga confirmed verbally that they have not received any prosecutions relating to eel purchase or trading, and that French authorities regularly check the activities of the company to ensure compliance with regulations. The auditors have also received proof of documentation that all purchases of glass eels are now input into the national France AgriMer system within 24 hours and paperwork is then cross checked by authorities on inspection.

	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.
Score	A Green score indicator is awarded

2. Component 3: Glass Eel Buyers

1. Mortality in storage facility (See Note 5)	
Weighting: 2	
green score indicator	Mortality rate over the season is less than or equal to 2% on average.
amber score indicator	Mortality rate over the season is less than or equal to 5% on average but greater than or equal to 3%
red score indicator	Mortality rate over the season is greater than 5% on average.
Discussion	Mortality records were provided for the Hendaye glass eel tanks for the 2015/16 season with a total mortality level of 2.3 % of the 17,235 kg of glass eels held in the facility. Records were proved for the 2016/17 season to date which indicated that of the 5,400kg there has been mortality of 0.8 %.
Score	A Green score indicator is justified
2. Mortality during transport and initial holding if transported to farm (See Note 9)	
Weighting: 2	
green score indicator	Mortality during transport and for the first week at the farm is less than or equal to 1.5% on average.
amber score indicator	Mortality during transport and for the first week at the farm is less than or equal to 3% on average but greater than or equal to 2% on average.
red score indicator	Mortality during transport and for the first week at the farm is more than 3% on average.
Discussion	Based on mortality of eels for the first week after transfer from the viviers to the growing tanks at the Hendaye facility average mortality was or <0.5 % by weight. The buyers Royal Danish (Danish based Farmer) and Palingkwekerij Bardoel (Dutch based farmer) have been contacted (selected at random) to provide confirmation of the mortality rates of received batches of glass eels purchased from Gurruchaga. These were confirmed by Royal Danish on 9th March 2017 who stated that batches had a mortality rate of 2.1% for the randomly selected date requested. This indicates that mortality from glass eels sold by Gurruchaga show an acceptable level of mortality level.
Score	An amber score indicator is awarded
3. Water quality	
Weighting: 1	
green score indicator	A system is in place that is expected to keep key water quality parameters within suitable tolerances for healthy eel survival (e.g. Ammonia, Suspended Solids, pH,

	Oxygen) AND water quality management procedures are in place including regular monitoring of relevant parameters which shows that water quality is always high and stable AND water quality monitoring is linked to an alarm-based system in the event of a sudden drop in water quality AND the facility operates a back-up system to ensure that water quality will not adversely affect survival rates in the case of a power supply failure.
amber score indicator	A system is in place that is expected to keep key water quality parameters within suitable tolerances (e.g. Ammonia, Suspended Solids, pH, Oxygen) AND water quality management procedures are in place and there is regular monitoring of relevant parameters which shows that water quality is always high and stable.
red score indicator	No water quality monitoring occurs AND/OR water quality is not held regularly at levels which are considered suitable for healthy eel survival.
Discussion	The 10 vivier tanks are fed 500L per hour of fresh tap water giving with a flow through system where the water is heated and aerated before going to the tanks. There is an automated system which continuously monitors, the pH and oxygen levels and has an alarm system which notifies three mobile phones if there is an issue which would cause risk to the eels held in the tanks. The facility has a backup system which is automatically activated if there is a power cut for more than 20 seconds. This system includes power generation through a 400kW external generator which is tested and run for between 20 and 60 minutes every Friday to maintain and check the system. There is also and separated liquid oxygen tank linked for automatic use should the system loose power which has an allowance of 12 hours for the entire facility.
Score	A Green score indicator is awarded
4. Biosecurity is present and disease is treated rapidly and appropriately	
Weighting: 1	
green score indicator	An effective and documented biosecurity plan (including the washing and disinfection of equipment) is in place AND records are available showing regular monitoring of health and possible signs of stress (including the completion of periodic microscope parasite checks) AND records are maintained in relation to the name, administrator, amount, dates and reason for use of any medicines and/or chemicals used in the facility AND the use of chemicals follows legal requirements of the appropriate EU regulations and of the country concerned.
amber score indicator	The facility follows bio-security measures (including the washing and disinfection of equipment) although this is not documented AND eels are regularly monitored for health and possible signs of stress (although this might not be documented) AND records are maintained in relation to the name, administrator, amount, dates and reason for use of any medicines and/or chemicals used in the facility AND the use of chemicals follows legal requirements of the appropriate EU regulations and of the country concerned.
red score indicator	The facility operates no bio-security measures (including the washing and disinfection of equipment) AND/OR there is no checking of the eels for health and possible signs of stress AND/OR records are not maintained with regards to the use of medicines and/or chemicals AND/OR legal requirements of the appropriate EU regulations and country concerned are not met for the use of medicines or chemicals.
Discussion	The matter of biosecurity was discussed with Gurruchaga when conducting the

	audit. No documented bio-security procedure was produced during the visit. However, it was explained that the water is treated to have a lower the pH (4.5-5), and that staff are experience in identifying problems if they were to arise. Should this occur, water temperature would be lowered and salt levels increased until "normal" biological levels were restored in the effected system. Each system currently uses 12.5 kg of salt per day on average. No chemicals or medicines are currently used at all during the holding process but any use would be approved by a veterinarian first. The use of a flow through system with clean (originally chlorinated) mains water reduced the risk of the introduction of biosecurity risks. Hourly logs are maintained of water conditions for each system and electronic monitoring is in constant use 24/7. Written documentation of the biosecurity procedure was provided by the client post visit which identified procedures for cleaning of the facility and records of cleaning were also presented. After each tank is emptied for packaging and sales the tanks are cleaned with caustic soda and left for 24 hours to ensure that a pH of above 11 is maintained and all biological material is destroyed.
Score	A Green score indicator is awarded
5. Handling and welfare (see notes 10 and 11)	
Weighting: 1	
green score indicator	Systems are in place and the facility is designed to keep handling to an absolute minimum AND documented procedures are in place for handling, and handling, where necessary, is careful AND the infrastructure is designed to avoid injuries, and so that the use of nets is rarely necessary. When used, nets are small-mesh (1mm maximum) AND eels are moved without being allowed to dry out.
amber score indicator	The facility may not be optimally designed, but systems are in place to avoid handling as much as possible within the constraints of the facility AND handling, where necessary, is carefully planned and executed AND the infrastructure has been optimised as far as possible to avoid injuries AND nets are small-mesh (1mm maximum) AND eels are moved without being allowed to dry out.
red score indicator	Excess, poorly planned or careless handling is likely to result in additional mortality.
Discussion	No nets are used in the facility to eliminate the risk of introduction of disease. Eels are handles as little as possible with extraction through the outflow pipe directly into containers for packaging. A through system is in place which allows for minimal handling of the eels to reduce the risk of handling and welfare issues, pipes are cleaned periodically in the through system with escaped eels being washed out. Eels are gradually lower in temperature for transportation from 7-8 degrees C when in the viviers to 5 degrees C for sorting, followed by 3 degrees C for transportation

	Written documentation to confirm handling procedures was provided by the client post audit providing detailed procedures to minimise handling of eels and keep high welfare standards.
Score	A Green score indicator is awarded
6. Transport (See note 12)	
Weighting: 1	
green score indicator	Transport is carefully planned to minimise travel time AND packing is done in a way that minimises handling, time and stress AND eels are kept cool and wet with an adequate supply of oxygen.
red score indicator	Eels are washed out of the holding tanks Box system with through system
Discussion	Packing is done with minimal handling to produce 1kg quantities to be placed in trays which can be packed in polystyrene cold boxes in threes and kept cool. Each tray is designed to allow aeration but prevent spillage of the eels in transit. Transportation trays and boxes are all new and checked to be clean before use and eels are transferred to trays using pumps. Glass eels are sorted at 5 degree C and then transported at 3 degrees C.
Score	A Green score indicator is awarded
7. The required percentage of glass eels from the fishery is being used for restocking (See Note 13)	
Weighting: 2	
green score indicator	The buyer can provide documented evidence that he has sold at least the required target percentage of its glass eels from the latest season for the primary purpose of conservation / escapement.
amber score indicator	The buyer can provide documented evidence that the has made at least the required target percentage of its glass eels from the latest season available for the primary purpose of conservation / escapement, OR the buyer can provide documented evidence that it has made available glass eels to the maximum level possible within the constraints of the implementation of the EMP in that country OR that the buyer can provide credible evidence that re-stocking will occur in the forthcoming season.
red score indicator	The buyer does not make or has no evidence to show that he has made the required target percentage of its glass eels available for restocking in the last year.
Discussion	Documented evidence was provided to indicate the percentage of glass eels sold for restocking. For the year 2015/16 the restocking to sale % was 54% for restocking and 46% for sale. Restocking was in the order of 8930Kg for the year with eels going to a number of EU countries including several of Comité Régional des Pêches Maritimes et des Elevages Marins. The requirement for restocking is of 60% of the eels taken from fisheries, therefore there has been a marked increase in the quantity being restocked from 25% at the last audit visit and it would be expected that an amber indicator would be scored for this principle.
Score	An amber score indicator is awarded

3. Component 4 - Cultured Eel

1. The total mortality rate during the culture process is low (See note 14 and note 9)
Weighting: 2

green score indicator	The Percentage Mortality Rate (See note 14 for formula) of eels in culture is less than or equal to 10% on average in the current and previous year OR as an average of the previous five years (See note 9 regarding first week mortality)
amber score indicator	The Percentage Mortality Rate (See note 14 for formula) of eels in culture is between 10 and 15% on average in the current and previous years OR as an average of the previous five years. (See note 9 regarding first week mortality)
red score indicator	The Percentage Mortality Rate (See note 14 for formula) of eels in culture is greater than or equal to 15% on average in the current and previous year OR as an average of the previous five years. (See note 9 regarding first week mortality)
Discussion	The eel farm has only been open since 2014 providing mortality figures for the 2014/15 and 2015/16 seasons. Eels at the farm will stay in there for on average 70-80 days until they are sold on as fingerlings. Therefore, based on guidance note 14, the first two seasons saw 1.6% and 5.3% mortality for 2014/15 and 2015/16 respectively. The average for the past 2 years is therefore 3.45% based on the assumption that there are about 3000 glass eels to every 1kg of eels introduced to the farm at the start of the cultivation process.
Score	A Green score indicator is awarded
2. The fish meal/oil ingredients in the feed come from a sustainable source (See Note 15 and 16)	
Weighting: 1	
green score indicator	Fish meal/oil in the feed (including juvenile feeds) comes from a fishery where the stock is at or above a target or precautionary reference point (for example is certified by a standard which is aligned with the FAO Code of Conduct for Responsible Fishing).
amber score indicator	Fish meal/oil in the feed (including juvenile feeds) does not come from a fishery where the stock is at or above a target or precautionary reference point (for example is certified by a standard which is aligned with the FAO Code of Conduct for Responsible Fishing) but the product does come from fish waste from processing that would otherwise be discarded.
red score indicator	One or more of the sources of fish meal/oil in the feed (including juvenile feeds) is from a depleted stock with no rebuilding plan in place AND/OR the product comes from fish waste from processing that would otherwise be discarded.
Discussion	Gurruchaga provided evidence of the feed which is used at the facility including purchase notes. Gurruchaga has three suppliers of feed for the Hendaye farm: Frozen Cod Roe for the first week of Glass Eel growth from G.Kraan. Information was provided by Gurruchaga to indicate roe was from sustainable North Sea cod catches, however this could not be verified based on the information provided. Pelleted feed is from Biomar. The sustainability of feed produced by Biomar has previously been checked by SEG Auditors during a visit to the Biomar Factory in Denmark where evidence was produced to substantiate the claim (www.fishsource.com). Other feed is produced by Skretting France. The sustainability of the raw materials used in the production of this feed has been verified with the producer and the auditor is satisfied that there is no use of fish from the IUCN red list among others. Feeding is on timed basis, however this is monitored manually at every feeding

	time. Feed is given every other hour. Should biological indicators show concerns feeding would be reduced until the issue is resolved. Based on the information provided and sourced, it is advised that an amber score indicator should be awarded here.
Score	An amber score indicator is awarded
3. Feed is used as efficiently as possible (See note 17)	
Weighting: 1	
green score indicator	The average feed conversion ratios in the farm are as follows: glass eel to fingerlings: 1.1 or less fingerlings to 200g: 1.6 or less large eels: 2.0 or less
amber score indicator	The average feed conversion ratios in the farm are as follows: glass eel to fingerlings: 1.3 or less fingerlings to 200g: 1.8 or less large eels: 2.2 or less
red score indicator	The average feed conversion ratios in the farm are as follows: glass eel to fingerlings: greater than 1.3 fingerlings to 200g: greater than 1.8 large eels: greater than 2.2
Discussion	The quantity of feed given to each system is recorded hourly during the day and input into farm database to calculate constant input into systems and weights of eels when graded. The FCR for glass eel to sale size figures were provided for the farm from 2013-2016 as being, 1.54, 1.35, 1.38 and 1.33. It should be noted that these figures were calculated for the farm as a whole and that point of sale is less than 200g but greater than a fingerling.
Score	A green score indicator is awarded
4. Water quality	
Weighting: 1	
green score indicator	A system is in place that is expected to keep key water quality parameters within suitable tolerances for healthy eel survival (e.g. Ammonia, Suspended Solids, pH, Oxygen) AND water quality management procedures are in place including regular monitoring of relevant parameters which shows that water quality is always high and stable AND water quality monitoring is linked to an alarm-based system in the event of a sudden drop in water quality AND the facility operates a back-up system to ensure that water quality will not adversely affect survival rates in the case of a power supply failure.
amber score indicator	A system is in place that is expected to keep key water quality parameters within suitable tolerances (e.g. Ammonia, Suspended Solids, pH, Oxygen) AND water quality management procedures are in place and there is regular monitoring of relevant parameters which shows that water quality is always high and stable.
red score indicator	No water quality monitoring occurs AND/OR water quality is not held regularly at levels which are considered suitable for healthy eel survival.
Discussion	Each of the 6 systems has a separate water feed from the mains which provides 500L of fresh water per hour to the systems. There is an automated system which continuously monitors, the pH and oxygen levels and has an alarm system which notifies three mobile phones if there is an issue which would cause risk to the eels

	held in the tanks. The facility has a backup system which is automatically activated if there is a power cut for more than 20 seconds. This system includes power generation through a 400kW external generator which is tested and run for between 20 and 60 minutes every Friday to maintain and check the system. There is also and separated liquid oxygen tank linked for automatic use should the system loose power which has an allowance of 12 hours for the entire facility.
Score	A Green score indicator is awarded
5. There are no ecological impacts from effluent discharge	
Weighting: 1	
green score indicator	Effluent discharge is regularly tested by the farm AND Effluent discharge complies with all local and national requirements AND has not been found to be non-compliant in the past 5 years.
amber score indicator	Effluent discharge is regularly tested by the farm AND/OR has been found to be non-compliant on 1 occasion in the past 5 years.
red score indicator	Effluent discharge is regularly tested by the farm AND/OR effluent discharge does not comply with all local and national requirements AND/OR has been found to be non-compliant on 2 or more occasions in the past 5 years.
Discussion	All water from each of the systems at the Hendaye farm and vivier facility are replaced every hour with a feed of 500L of clean mains water. Water from the facility's systems are being returned to mains sewers. Water bills for the whole facility were provided by the client for verification. Water used by the facility from June 2015-February 2016 amounted to 25127 m^2. Regular checks are made by local authorities
Score	A Green score indicator is awarded
6. Biosecurity is present and disease is treated rapidly and appropriately	
Weighting: 1	
green score indicator	The farm operates an effective and documented biosecurity plan for the prevention and protection of fish AND daily records are available showing regular monitoring of fish health and signs of stress AND records are maintained in relation to the name, administrator, amount, dates and reason for use of any medicines and/or chemicals used in the facility AND the use of chemicals follows legal requirements of the EU and of the country concerned.
amber score indicator	The farm follows bio-security measures (although this may not be documented) AND eels are regularly inspected for disease (although this may not be documented) AND records are maintained in relation to the name, administrator, amount, dates and reason for use of any medicines and/or chemicals used in the facility AND the use of chemicals follows legal requirements of the EU and of the country concerned.
red score indicator	The farm has no bio-security measures in place AND/OR eels are not inspected regularly for disease AND/OR no records are maintained with regards to the use of medicines and/or chemicals AND/OR legal requirements of the EU and country concerned are not met for the use of medicines or chemicals.
Discussion	The matter of biosecurity was discussed with Gurruchaga when conducting the audit. No documented bio-security procedure was produced during the visit. However, it was explained that the water is treated to have a lower the pH (4.5-5), and that staff are experience in identifying problems if they were to arise.

	Should this occur, water temperature would be lowered and salt levels increased until "normal" biological levels were restored in the effected system. Each system currently uses 12.5 kg of salt per day on average. No chemicals or medicines are currently used at all during the holding process but any use would be approved by a veterinarian first. The use of a flow through system with clean (originally chlorinated) mains water reduced the risk of the introduction of biosecurity risks. Hourly logs are maintained of water conditions for each system and electronic monitoring is in constant use 24/7. Each growing tank and associated pipes are cleaned each time the tanks are emptied for grading of the eels by weight. All grading is done using through pipes to reduce risk of biosecurity risks through introduction of disease by use of nets and unnecessary handling of eels. Written documentation of the biosecurity procedure was provided by the client post visit which identified procedures for cleaning of the facility and records of cleaning were also presented. After each tank is emptied for packaging and sale of the eels the system in treated with 35Kg of caustic soda and left for 24 hours to ensure that a pH of above 11.5 is maintained and all biological material is destroyed in all pipes, filters and other inaccessible areas.
Score	A Green score indicator is awarded
7. Grading, Slaughter and Transportation are carried out with respect to welfare (See note 18)	
Weighting: 1	
green score indicator	Grading is completed in an efficient manner AND slaughter is completed by a method that provides an instant death or renders them insensible to pain AND procedures are in place to ensure transportation provides suitable conditions for fish welfare.
red score indicator	Grading is not seen to be completed in an efficient manner AND/OR slaughter is completed by a method other than one that provides an instant death or renders them insensible to pain instantaneously AND/OR transportation does not provide suitable conditions for fish welfare.
Discussion	All grading is done by automated machinery which is fed by flow pipes taking eels directly from growing tanks to sorting machine. Eels are counted at each grading and separated by weight. This is repeated for each growing tank individually. No slaughter is carried out at the facility as eels are sold below slaughter size. Animal welfare is seen by all staff as paramount to ensure that the product which they sell on is of the highest quality. Conditions for transport are always optimised and monitored with journey times calculated and respected to ensure good transport conditions for eels. Eels are cooled before transportation live.
Score	A Green score indicator is awarded
8. The farm provides eel for restocking (See note 19)	

Weighting: 2	
green score indicator	The farm can provide documented evidence that 10% or more of the farms (See Note 19 for calculation) annual eel production (by piece) has been released for restocking for the purpose of conservation / escapement.
amber score indicator	The farm can provide documented evidence that it makes 10 % of their annual eel production (by piece) available for restocking for the primary purpose of conservation / escapement AND/OR for new clients, the farm can demonstrate that they have bookings for re-stocking in the following year at more than 10% of the predicted annual eel production (by piece) for the purpose of conservation / escapement.
red score indicator	The farm does not make or has no evidence to show that it has made any eels available for restocking in the last year.
Discussion	Restocking is done directly from the glass eels stored at the facility. The farm is only responsible for the onward sale of eels which have reached fingerling size. This is equivalent to the same period (70-80 days) which other farms sell eels on after a quarantine period. It is therefore suggested that the restocking numbers provided for the glass eel buyer section of the facility are taken into consideration when addressing this point and that in total the percentage of eels which are sold on from the facility which are for restocking is counted as 54% as stated in point 7 of component 3.
Score	A Green score indicator is awarded

1. 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	The Hendaye facility operates a strict system of logging each of the purchases of glass eels made within 24 hours of purchase on a national database. This system is audited by French authorities regularly to ensure compliance with national traceability legislation regarding the purchase of fish. For the year of assessment no eels from a SEG certified fishery had been bought by Gurruchaga so far. The issue of purchase and storage of SEG and non-SEG eels was discussed with Gurruchaga and considered in principle 2 below (Separation and Segregation). Gurruchaga has glass eel holding facilities along the coast which then bring eels to the Hendaye facility. Of these holding facilities, the Arzal facility is currently being reserved to hold only SEG glass eels when they become available. Plans are that in 2017 a new holding facility will be constructed in Saint Brevins les Pins for SEG glass eels only.
Score	A Green score indicator is awarded

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	Gurruchaga has glass eel holding facilities along the coast which then bring eels to the Hendaye facility. Of these holding facilities, the Arzal facility is currently being reserved to hold only SEG glass eels when they become available (none so far for 2016/17 season by time of audit). Plans are that in 2017 a new holding facility will be constructed in Saint Brevins les Pins for SEG glass eels only. On arrival at the Hendaye facility, the glass eel viviers are split into two systems, each fed by separate water and pipe systems allowing product to be kept fully separated. As previously stated no SEG certified glass eels are at the facility during the visit, however, Gurruchaga and staff have been made aware that any SEG eels should be kept separate at all time and that failure to do so would lead to a suspension of the certificate.
Score	A Green score indicator is awarded
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. All product to be sold as certified by an organisation meets the following criteria: • Any product labelling shall be accompanied by the 'SES' logo. • Products shall be accompanied by an invoice which: ▪ 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	The above requirements are met except that: ▪ Products have O not been correctly labelled through the invoice
red indicator	Products or product invoices have been labelled as SES with the words SES

	or the SES Eco label despite not being completely derived from a certified source.
Discussion	Currently no product is being sold as SES by the fishery and so a green score is automatically provided here. The client has expressed that there is not currently demand for certified product and that he does not wish to label any product with the SEG label.
Score	A Green score indicator is awarded
4. – Record keeping and documentation (See Note 23)	
green score indicator	▪ The organisation operates a system that allows the tracking and tracing of all eel from purchase to sale and including any steps in between. In the case of live eels this should include the ability to track each eel in each batch delivered to a buyer to be connected back to a water, a time period (maximum duration one month) and specific fisherman/vessel. ▪ The organisation operates a system that also allows for the completion of a batch reconciliation of eel product by weight over a given period. ▪ The organisation maintains records for a minimum of three (3) years.
orange score indicator	The above requirements are met except that records have been maintained for less than three (3) years
red score indicator	The organisation's tracking and tracing system shows evidence that certified and non-certified product have become mixed AND/OR batch reconciliation records are unable to confirm that outgoing quantities are in line with incoming quantities.
Discussion	There is a comprehensive and clear traceability trail for all eels and documentation was provided to prove this from purchased glass eels to final invoices (through date and/or batch codes) of eels sold on both as glass eels and grown on fingerlings. Records are available for at least three years including archived records (often more).
Score	A Green score indicator is awarded

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