SEG Standard Assessment – Gurruchaga Maree SAS

Assessment against:

Component 1: Core requirements
Component 4: Eel buying and trading
Component 5: Eel farming

Original completed by

Alex Senechal & Thomas Bourner (Control Union Pesca Ltd)

Updated by

Tim Huntington (Tim Huntington & Associates Ltd)

7 May 2020

Final

Introduction

This document represents an updated version of the report completed following the 2019 audit carried out under the Sustainable Eel Group (SEG) Standard (Version 6.0, June 2018) against Gurruchaga Maree SAS (completed against Components 1, 4, & 5 of the Standard only). It has been updated against the revised SEG Standard V6.0a, December 2019.

The assessment is of the buyer and farmer Gurruchaga Maree located in Hendaye in southern France. This facility receives glass eels from the company's other facility in Charron which has also recently been under assessment under Version 6.0 of the SEG standard. The Hendaye facility acts as the head office for the Gurruchaga Maree company which is itself part of the wider Aquaculture Nijvis Group. The facility receives glass eels which it either stocks before sale to other farms, or which it retains and grows on to fingerling size before onward sale. In addition, the facility is able to temporarily stock small quantities of yellow or silver eel, separately and externally from the main business as a brokering system. This is thanks to the company's aquaculture facility entitlements which permit other businesses to use the facility for the transfer of live aquatic animals. The Facility deals in both SEG and non-SEG certified eels at the same time and was in the process of expansion of the facilities to house an additional 3 systems at the time of the audit. The facility receives SEG certified glass eels from most of the SEG certified fisheries in France.

1. The assessment

The original assessors were Alex Senechal & Thomas Bourner of Control Union Pesca Ltd, who visited the Hendaye facility on the 29th May 2019. The audit included interviews with Mr Jerome Gurruchaga (Owner) and Office Manager Nathalie Immeln. The audit included a tour and explanation of the entire site followed by a review of the paper and electronic records for the facility. The update has been carried out as a desk study by Tim Huntington in April 2020 to accommodate the changes in the revised standard, in particular the need to consider the audit at organisation rather than facility level.

2. Client Contact Details

Client Contact Name	Jerome Gurruchaga (President)
Client Address	88, Route de la Corniche, Quartier Haicabia, 64700 HENDAYE
Client Email	gurrmaree@wanadoo.fr; jeromegurruchaga@yahoo.fr
Client Phone Number	+33 559566891

3. Results of the assessment

The outcome of this assessment is as follows:

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

The Gurruchaga Maree organisation has scored the following for Component 1: General Requirements.

Component 1: General Requirements	**Auditor's findings**	**Weighting**	**Score**
1.1 Commitment to Legality	Responsible	1	1
1.2 Contribution to eel conservation projects	Not Scored	N/A	N/A
1.3 The facility trades in certified responsibly sourced eels	Aspiring	1	0
1.4 Traceability:			
1.4.1 Incoming products, separation and segregation	Responsible	1	1
1.4.2 Outgoing products	Aspiring	1	0
1.4.3 Record keeping and documentation	Responsible	1	1
1.5 Biosecurity & welfare –			
1.5.2	Responsible	1	1
1.5.3	Responsible	1	1
1.5.4	Responsible	1	1
Total		**8**	**6**
Percentage Responsibility Score:		**75%**	

It therefore **should** be considered **to have achieved these requirements of** the SEG standard.

The organisation has scored the following for Component 4, Eel buying and trading:

Component 4: Eel buying and trading	Auditor's findings	Weighting	Score
4.0 Segregation of certified and uncertified eels	Responsible	2	2
4.1 The glass eel holding facility is a registered aquaculture production business	Responsible	1	1
4.2 Mortality in storage facility	Responsible	2	2
4.3 Mortality during transport and initial holding if transported to farm	Responsible	2	2
4.4 Water quality	Responsible	1	1
4.5 Handling and welfare	Aspiring	1	0
4.6 Transport	Responsible	1	1
4.7 The required percentage of glass eels is being used for restocking	Aspiring	2	0
	Total	**12**	**9/12**
Percentage Responsibility Score:		**75%**	

It therefore **should** be considered **to have achieved these requirements of** the SEG standard.

The organisation has scored the following for Component 5, Eel farming:

Component 5: Eel farming	Auditor's findings	Weighting	Score
5.0 Segregation of certified and uncertified eels	Aspiring	2	0
5.1 The total mortality rate during the culture is low	Responsible	2	2
5.2 The fish meal/oil ingredients in the feed come from a responsible source	Aspiring	1	0
5.3 Feed is used as efficiently as possible	Aspiring	1	0
5.4 Water Quality	Responsible	1	1
5.5 There are minimal ecological impact from effluent discharge	Responsible	1	1
5.6 Grading, slaughter and transportation are carried out with respect to welfare	Responsible	1	1
5.7 The farm provides eel for restocking	Responsible	2	2
5.8 The farm provides eel for are not graded out slow-growers	Responsible	2	2
	Total	**13**	**9/13**
Percentage Responsibility Score:		**69%**	

It therefore **should** be considered **to have achieved these requirements of** the SEG standard.

4. Summary of assessment and scoring

Component	Not Achieved	Aspiring (No score)	Responsible (Score)	Max Score Possible
1	0	2	6	**8**
4	0	3	9	**12**
5	0	4	9	**13**
Total	**0**	**9**	**24**	**33**
Total Responsibility Score:			**24 / 33 =**	**73 %**

Based on the above summary results:

1. No criteria have not been achieved
2. The overall responsibility score at 73% is greater than 50%

It is therefore recommended that the facility can be regarded as having achieved the SEG Standard, Version 6.0a.

5. Recommendations

1.3 – In order to achieve the responsible indicator requirements of the standard it is recommended that the organisation aims to trade in at least 50% SEG certified eels.

1.4.1 – In order to achieve the responsible indicator requirements of this component for the farm, it is recommended that the Hendaye site is able to ensure that all incoming product to the farm which is to be sold as SEG certified is able to remain separated from all non-SEG product. At present this is not completed, and it was expressed that this is not currently a possibility for the facility.

1.4.2 – In order to achieve the responsible indicator requirements of the standard, it is recommended that the facility ensure SEG and non-SEG certified eels are clearly differentiated on invoices in the future.

4.5 – In order to achieve the responsible indicator requirements of the standard, it is recommended that the facility provide a documented handling procedure for glass eels and eels at the facility.

4.7 – In order to achieve the responsible indicator requirement of the standard, it is recommended that the facility aims to ensure that a minimum of 60% of the glass eels sold for restocking each year.

6. Next Audit

At the completion of the audit the client was assessed against the risk assessment set out in the Methodology. This is set out in the table below.

Question	Performance of the Client at Audit	Yes	No
1	Has the client been part of any external investigation which may be of concern to SEG AND/OR been suspended from any other certification standard?	Enhanced Surveillance	**Go to Q2**
2	Has the client received a borderline[1] pass for a Component in its previous audit?	Enhanced Surveillance	**Go to Q3**
3	Does the client only buy and sell product (does not physically handle it?)	Minimum Surveillance	**Go to Q4**
4	All other scenarios	Standard Surveillance	

	Certification Audit	Year 1	Year 2	Year 3	Year 4 Recertification Audit
Minimum Surveillance	On-Site Audit	Remote Audit	Remote Audit	Remote Audit	On-Site Audit
Standard Surveillance	On-Site Audit	No Audit	On-Site Audit	No Audit	On-Site Audit
Enhanced Surveillance	On-Site Audit	On-Site Audit	On-Site Audit	On-Site Audit	On-Site Audit

Discussion

There was an investigation in January 2019 into a report of an offence dated November 2013, prosecuted in April 2016 and which the company is still appealing against. This was investigated by SEG via independent assessor, MacAlister-Elliott & Partners (MEP). The investigation had to assume that the conviction still stood (as it was still under appeal), however, the breach was found to be a minor, technical offence, and therefore a 'minor non conformance', therefore having no grounds to suspend certification. As (1) the offence and prosecution dates are more than 2 years old and (2) the previous investigation found this to be a minor non-conformance, the answer to Question 1 above is assessed as 'No'.

It is now time to rationalise the assessment of the whole of the Gurruchaga Maree (GM) organisation to bring it into line with the updated SEG standard (V6.0a). Therefore, when the assessment takes place for the remaining GM sites at Charron and Epargnes, **due in the 2020/21 season, all sites and the whole organisation should be re-assessed as one.**

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

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

Component 1 – Generic requirements	
Criterion 1.1: Commitment to legality	
Responsible indicators	For at least the past two years: the organisation has not been found guilty for any offences relating to eel fishing or trading.
Aspiring indicators	For at least the past 12 months: the organisation has not been found guilty for any offences relating to eel fishing or trading.
Discussion	There is an ongoing open court case in relation to a historic allegation dating back to 2013. This is outside of the two-year period. The allegations have **not** been upheld and the court case is now against the local authorities in relation to the unsubstantiated reputation damage caused. An internet search provided no further evidence of offences and no reported incidents that the auditors are aware of. The client declared that there were no other offences which the business had been found guilty of in the last 24 months.
Score	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	Not scored at this audit.
Score	Not scored

Criterion 1.3: The organisation 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 organisation trades in 10 – 49.9% (by number) of certified responsibly sourced eel and has the documentation to demonstrate that.
Discussion	The proportion of SEG-certified eels across all stages over the last three seasons is between around 25% and 32% (see table below).
Score	Aspiring Indicator

Site name	17/18 season			18 / 19 season			19 / 20 season		
	SEG certified (kg)	Other (kg)	Total (kg)	SEG certified (kg)	Other (kg)	Total (kg)	SEG certified (kg)	Other (kg)	Total (kg)
HENDAYE	312	1,805	2,117		2,576	2,576		3,128	3,128
EPARGNES	-	1,974	1,974		2,493	2,493		3,050	3,050
CHARRON	3,813	8,932	12,745	5,062	6,566	11,628	6,876	9,309	16,185
TOTAL (KG)	**4,125**	**12,711**	**16,836**	**5,062**	**11,635**	**16,697**	**6,876**	**14,492**	**22,363**
TOTAL (%)	**24.50%**	**75.50%**	**100%**	**30.32%**	**69.68%**	**100%**	**32.18%**	**67.82%**	**100%**

Criterion 1.4: Traceability	
1.4.1: Traceability - Incoming product, separation and segregation	
Responsible indicators	• 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	• Certified and uncertified eel products can be traced back to their source. • If segregation is not possible, there are clear and auditable records of the numbers of certified and uncertified eels entering the organisation at each facility • It can demonstrate through auditable records that the number of certified eels exiting the organisation in a ear did not exceed the number that entered • If resolved through mass- or number- balance calculations, the margin of error does not exceed 5% or if a farm, the 2,800 pieces per 1 kg of glass eels is applied.
Discussion	Eels arriving at the Hendaye facility come in two forms, either direct delivery by local fishermen or from fisheries to the north. The local fish are not certified as the local fisheries have not been audited. However, some of the fish arriving from further north are from certified sources and therefore are required to remain separated from non-certified fish. This is possible in the glass eel tanks of the facility, of which there are 10 and with the vehicles which the company have and use. All direct purchases of fish at the facility are electronically declared within 24 hours of arrival through the national system and any fish transported to the facility from other

	facilities are also declared on the national system with all relevant paperwork retained for the fish present on site. Glass eels sold on are accompanied with details of the fishers they are from so that traceability can be demonstrated. Glass eels entering the farming section of the facility for on-growing are not kept separated after the first grading due to space restrictions and therefore any eels departing from the on-growing part of the facility should be considered as Non-SEG at present.
Score	Responsible indicator

1.4.2: Traceability - Outgoing product	
Responsible indicators	• 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: - Includes an appropriate batch code - Includes a record of the quantity (no. & weight) of product and to whom it was sold
Aspiring indicators	• Documentation is well maintained. If resolved through mass- or number- balance calculations, the margin of error does not exceed 5% in the following (or if a farm, the 2,800 pieces per 1 kg of glass eels is applied): • 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: - Includes an appropriate batch code - Includes a record of the quantity (no. & weight) of product and to whom it was sold
Discussion	SEG was not clearly identified on the invoices observed (SEG and non-SEG both on the same invoice with SEG listed at the top). This was raised with the Office Manager Nathalie Immeln to ensure that future invoicing was properly laid out to limit any ambiguity on this matter. These are accompanied by EU Trace documentation which identifies; the seller, buyer, transportation details, expected delivery dates and times and quantity of eels to be transported. This document is only applicable when transporting eels across EU borders, for example from France to The Netherlands. Batch numbering was used on invoices and the weight of eels clearly marked.
Score	Aspiring indicator
1.4.3: Traceability - Record keeping and documentation	
Responsible indicators	• 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	The above requirements are met except that: • 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	Records are kept for at least 6 years for the glass eels and 4 years for the on-growing eels. Trade is recorded electronically on the national system and water parameters and mortality figures are in the site computer system for at least the last 3 years.
Score	Responsible indicator

Criterion 1.5: Biosecurity & welfare – Eel and eel products are provided with minimal risk of diseases, parasites and alien species	
1.5.2 Eel buying & trading: Biosecurity is present and disease is treated rapidly and appropriately	
Responsible indicators	• The use of chemicals follows legal requirements of the appropriate EU regulations and of the country concerned. • The facility has the appropriate permissions to operate from the relevant licensing authority • An effective and documented biosecurity plan is in place and there is evidence that it is being followed. • Records are available showing regular monitoring of health and possible signs of stress according to the facility's plan (including the completion of microscope parasite checks) and daily mortality is recorded. • Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility.
Aspiring indicators	• The use of chemicals follows legal requirements of the appropriate EU regulations and of the country concerned. • The facility has the appropriate permissions to operate from the relevant authority • An effective and documented biosecurity plan is in place and there is evidence that it is being followed. • Eels are regularly monitored for health and possible signs of stress (although this might not be documented) and daily mortality is recorded. • Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility.
Discussion	The facility has an impressive record of maintaining cleanliness and ensuring that diseases present in wild populations are limited when sales of eels are made. This is achieved by regular cleaning following a set routine and strict chemical and salt use. Caustic soda is used for the disinfection of the facility and its vehicles. In addition to this, salt is the only other compound used at the facility. 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. No medicines are used at the facility which is demonstrated by the presence of certain viruses causing mortality at predictable time intervals from their arrival at the facility These occur under controlled environments, are treated by cooling of the water, stopping of feeding, lowering of pH and increasing of salt content. Eels are continually monitored by staff for signs of stress, unusual behaviour or mortality. Biosecurity procedures are in place, but documentation could not be produced during the audit. However, the facility is monitored and certified by the French Zoo Sanitation Department which monitors the biosecurity of the facility and a HACCP plan is in place for the facility as well as a hygiene plan which denotes the cleaning of the viviers and weighing area for glass eels arriving at the facility. The facility does not have anything called a biosecurity plan in place however, they do have HACCP in place which covers a lot of the same topics which was also confirmed by their vet.
Score	Responsible indicator
1.5.3 Eel farming: Biosecurity is present and disease is treated rapidly and appropriately	

Responsible indicators	• The facility has the appropriate permissions to operate from the relevant authority. • The use of chemicals follows legal requirements of the EU and of the country concerned • An effective and documented biosecurity plan is in place and there is evidence that it is being followed. • Daily records are available showing monitoring of fish health and signs of stress and daily mortality is recorded • Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility • UV is used at an appropriate level and separation between tanks
Aspiring indicators	• The facility has the appropriate permissions to operate from the relevant licensing authority • The use of chemicals follows legal requirements of the EU and of the country concerned. • An effective and documented biosecurity plan is in place and there is evidence that it is being followed. • Eels are regularly inspected for disease (although this may not be documented) and daily mortality is recorded. • Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility.
Discussion	The above in 1.5.2 is equally relevant for the farm section of the facility. Mortality at the facility is recorded daily for each of the systems. UV is present for each system with 4 x 400W strip lights.
Score	Responsible indicator

Component 4 - Eel buying and trading

Criterion 4.0: Segregation of certified and uncertified eels

Weighting: 2

Responsible indicators	Certified and non-certified are kept separated, from point of collection through holding to sale and onward transport
Aspiring indicators	None
Discussion	Certified and non-certified eels purchased and traded are kept in separate containment units throughout the cycle.
Score	Responsible indicator

Criterion 4.1: The Glass eel holding facility is a registered Aquaculture Production Business	
Weighting: 1	
Responsible indicators	The Glass eel holding facility is a registered Aquaculture Production Business
Aspiring indicators	The facility is not a registered Aquaculture Production Business, but has credible plans to register within the next 6 months
Discussion	The Hendaye site is a registered facility with the Sanitary Water Department and submits evidence of such every time eels are transported from the facility in order to gain EU Trace documents.
Score	Responsible indicator
Criterion 4.2: Mortality in storage facility	
Weighting: 2	
Responsible indicators	Mortality rate over the season is less than 2% on average.
Aspiring indicators	Mortality rate over the season is less than or equal to 5% on average but greater than or equal to 2%
Discussion	Mortality from 11th Nov-9th Apr for the 2017/8 season of glass eels was calculated as 1.4% while from the 15th Nov – 5th Apr for the 2018/19 season of glass eels, the mortality was calculated as 1.6%
Score	Responsible indicator

Criterion 4.3: Mortality during transport and initial holding if transported to farm	
Weighting: 2	
Responsible indicators	• Buyers source at least 90% of their eels from certified suppliers OR • Mortality during transport and for the first week at the farm is less than 2% on average
Aspiring indicators	• Buyers source 50% - 89.9% of their eels from certified suppliers OR • 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.
Discussion	The mortality of glass eels after the first week following transportation to a farm was checked with 2 of Gurruchaga's clients. These were picked at random and responded with the following percentages. The first expressed that of the 396kg of glass eels received, 3.5kg had died following transportation. This is equivalent to 0.88% mortality in the first week. The second farm contacted indicated that of the 623kg received, 6.1 kg had died following transportation within the first week. This is equivalent to 0.98% mortality.
Score	Responsible indicator
Criterion 4.4: Water quality	
Weighting: 1	
Responsible indicators	• 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) • Water quality management procedures are in place including regular monitoring of relevant parameters which shows that water quality is always high and stable • The facility operates a back-up system to ensure that water quality will not adversely affect survival rates in the case of an equipment failure
Aspiring indicators	• 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) • The facility has a minimum of a back-up generator and oxygen supply
Discussion	There is an automated system which continuously monitors, the pH, Temperature and dissolved oxygen levels. There is a separate system for each of the water filtration systems at the facility, all of which will set off an alarm system should parameter go outside of the optimal levels set. This alarm is audible and goes off in the residence on the site. Should the alarm on the units by the system not be turned off within 3 minutes, a telephone alert is sent to Mr Gurruchaga to alert him of the issues detected. A backup system is present at the facility which is automatically activated if there is a power cut for more than 20 seconds. This system includes power generation which can cover the full requirements of the site for up to 42 hours. Power cuts have occurred less than 5 times since the company has been at the site and each time lasted less than 30 minutes. The generator tested and run for between 20 and 60 minutes every week 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. This is never allowed to drop below 30% capacity in case of an event.
Score	Responsible Indicator
Criterion 4.5: Handling and welfare	
Weighting: 1	

Responsible indicators	• Systems are in place and the facility is designed to keep handling to an absolute minimum • Documented procedures are in place for handling, and handling, where necessary, is careful • 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) • Eels are moved without being allowed to dry out.
Aspiring indicators	• 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 • Handling, where necessary, is carefully planned and executed • The infrastructure has been optimised as far as possible to avoid injuries • Nets are small-mesh (1mm maximum) • Eels are moved without being allowed to dry out.
Discussion	The facility has been designed to limit handling of eels at all stages possible. This includes efficient pipe and channel systems for emptying tanks, rinsing fish while cooling them down, weighing and packaging. Eels are never permitted to dry out at any stage of handling, from receipt at the facility, through initial weighing and later during packaging. Nets are only used to remove any mortality and the funnels to sieve glass eels arriving from fishermen are made of a 0.8mm stainless mesh. Documented procedures for the handling of eels at the facility were not presented therefore a responsible indicator cannot be provided.
Score	Aspiring indicator
Criterion 4.6: Transport	
Weighting: 1	
Responsible indicators	• 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 • The operator holds the relevant transport authorisations
Discussion	The facility is responsible for the collection and delivery of live glass eels from other sites in France and to sites throughout Europe. It therefore is used to developing transportation plans for the delivery of live fish to these locations and has the required transport authorisations from the French authorities and the EU to undertake these types of transportations. The company owns a number of specialised vehicles which are able to maintain optimal water conditions during journeys of up to 48 hours including temperature and dissolved oxygen concentrations to limit stress to the animals. Packing for non vivier transportation is done at the facility, this is a very controlled and precise operation where eels are cooled before weighing, placing in specially designed polystyrene transportation boxes with the addition of injected oxygen and individual cooling per box before transportation in refrigerated vehicles. Relevant transportation documents are also kept with the vehicles and eels at all times for regular inspection by the national authorities.
Score	Responsible indicator
Criterion 4.7: The required percentage of glass eels is being used for restocking	

<table>
<tr><td colspan="2">Weighting: 2</td></tr>
<tr><td>Responsible indicators</td><td>• The buyer can provide documented evidence that they have sold at least 60% for restocking the required target percentage of its glass eels from the last season for the primary purpose of conservation / escapement.
• The eels for restocking are representative of the stock – slow growers are not selected</td></tr>
<tr><td>Aspiring indicators</td><td>• The buyer can provide documented evidence that they have reserved or made available at least 60% of 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
• The buyer can provide credible evidence that re-stocking will occur in the forthcoming season.
• The eels for restocking are representative of the stock – slow growers are not selected</td></tr>
<tr><td>Discussion</td><td>The restocking rates for the last three seasons are shown in the table below:
<table>
<tr><th rowspan="2">Destination</th><th colspan="2">Season 2017-2018</th><th colspan="2">Season 2018-2019</th><th colspan="2">Season 2019-2020</th></tr>
<tr><th>Vol. (kg)</th><th>%</th><th>Vol. (kg)</th><th>%</th><th>Vol. (kg)</th><th>%</th></tr>
<tr><td>Consumption</td><td>7,718.81</td><td>45.8%</td><td>7,776.80</td><td>46.6%</td><td>10,674.90</td><td>49.9%</td></tr>
<tr><td>Re-stocking</td><td>9,117.26</td><td>54.2%</td><td>8,920.67</td><td>53.4%</td><td>10,716.17</td><td>50.1%</td></tr>
<tr><td>TOTAL</td><td>16,836.07</td><td>100.0%</td><td>16,697.47</td><td>100.0%</td><td>21,391.07</td><td>100.0%</td></tr>
</table>
The target of 60% has not been achieved in any of the past 3 seasons. However, the regulations in France constrain this: (1) there is not sufficient market in Europe to demand 60% glass eels for restocking, (2) French authorities set quotas for fisherman for restocking and consumption and (3) buyers are obliged to sell in the proportions that they bought – which are set by the fishermen, set by the authorities. This meets the Aspiring indicator.

Eels for restocking are sold on as Glass eels and therefore there is no grading out before sale.</td></tr>
<tr><td>Score</td><td>Aspiring indicator</td></tr>
</table>

Component 5 – Eel farming

Criterion 5.0: Segregation of certified and uncertified eels

Weighting: 2

Responsible indicators	• Certified and non-certified are kept separated, from point of collection through holding to sale and onward transport
Aspiring indicators	• Through mass-balance calculations (by number), the organisation can prove that no more than the same percentage of certified eels were output as were input, whilst taking mortality into consideration. A formula of 2,800 pieces per 1 kg of glass eels can be applied
Discussion	Once eels reach between 7 and 12 g they are counted to ensure that for every 100 kg of eels entering SEG certification, 280,000 certified eels and sold, thus meeting the 2,800 individuals per 1 kg.
Score	Aspiring indicator

Criterion 5.1: The total mortality rate during the culture process is low

Weighting: 2

Responsible indicators	• The Percentage Mortality Rate 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 • An accurate daily log is maintained of the number and causes of mortality
Aspiring indicators	• The Percentage Mortality Rate 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. • An accurate daily log is maintained of the number of mortalities
Discussion	The mortality rates are as follows:

Eels stage	2017		2018		2019	
	Total purchased (kg)	Total mortalities (kg)	Total purchased (kg)	Total mortalities (kg)	Total purchased (kg)	Total mortalities (kg)
Glass eels	3,189.00	23.38	3,279.00	31.71	2,864.90	74.50
Yellow & silver eels	56,273.00	608.00	65,197.00	1,178.00	63,073.00	638.00
TOTAL (VOLUME KG)	**59,462.00**	**631.38**	**68,476.00**	**1,209.71**	**65,937.90**	**712.50**
TOTAL MORTALITIES (%)		**1.06%**		**1.77%**		**1.08%**

The mortality rates are recorded every day and noted on the computer system for each water filtration system. They are frozen and then sent for destruction. A record is kept when they are collected.

Score	Responsible indicator

Criterion 5.2: The fish meal/oil ingredients in the feed come from a responsible source	
Weighting: 1	
Responsible indicators	Fish meal/oil in the feed (including juvenile feeds) is certified by IFFO or MSC or shown in some other way to be from responsible or sustainable sources
Aspiring indicators	Fish meal/oil in the feed (including juvenile feeds) is not certified by IFFO or MSC or shown to be from responsible sources, but there are credible plans to move to such a supplier within 2 years
Discussion	The farm uses 0.5 feed from Skretting. Communications with Skretting were opened following another audit to acquire additional information on the sustainability of the feeds supplied. Some information was provided by the company however, no clear information was provided to indicate that the feed was IFFO or MSC certified. Company policy was provided which identified the responsibility criteria for ingredient supply to make the feed, and the company have confirmed that ingredients are sustainably sourced. All other feed is from BioMar (0.8) who were contacted as part of the assessment and declared that: "The marine raw materials in the eel feed are variable in origin. The overall scores for fish meal and fish oil used by BioMar Brande during 2018 was: - 88% of sourced fish meal was IFFO RS compliant - 96% of sourced fish oil was IFFO RS compliant."
Score	Aspiring indicator
Criterion 5.3: Feed is used as efficiently as possible	
Weighting: 1	
Responsible indicators	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
Aspiring indicators	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
Discussion	In 2018 the FCR was 1.3. This is calculated using 62,833kgs of production + 1178kgs of mortality. Input of feed was 80,952.1kgs. 3020kgs original weight. 60991 weight change. In 2017 the FCR is 1.4. This is calculated using 50,805kgs of production + 608kgs of mortality. Input of feed was 69,079kgs. 2,508kgs original weight. 48,905 weight change.
Score	Aspiring Indicator
Criterion 5.4: Water quality	
Weighting: 1	

Responsible indicators	• 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) • Water quality management procedures are in place including regular monitoring of relevant parameters which shows that water quality is always high and stable • Water quality monitoring is linked to an alarm-based system in the event of a sudden drop in water quality • 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.
Aspiring indicators	• A system is in place that is expected to keep key water quality parameters within suitable tolerances (e.g. Ammonia, Suspended Solids, pH, Oxygen) • 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.
Discussion	This is as described above in 4.4
Score	Responsible indicator
Criterion 5.5: There are minimal ecological impacts from effluent discharge	
Weighting: 1	
Responsible indicators	• The system is closed-circuit and has no discharge OR • 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.
Aspiring indicators	• Effluent discharge is regularly tested by the farm AND/OR • Has been found to be non-compliant on no more than 1 occasion in the past 5 years.
Discussion	The water authority has set limits on the quality of water that can be discharged. This includes pH and temperature as well as the volume. The volumes are monitored on a daily basis and the pH and temperature (and ammonium) every 15 days. These were found to fall within the required limits set by the authority.
Score	Responsible indicator
Criterion 5.6: Grading, slaughter and transportation are carried out with respect to welfare	
Weighting: 1	
Responsible indicators	• Grading is completed in an efficient manner • Slaughter is completed by a method that provides an instant death or renders them insensible to pain, i.e. electric stunning or percussive stunning. • Procedures are in place to ensure transportation provides suitable conditions for fish welfare.
Aspiring indicators	• Other, previously acceptable methods of stunning before slaughter are used, e.g. chilling, but there are credible plans in place to invest in the latest methods within the next 2 years
Discussion	No slaughter takes place at the facility as eels are only grown on to fingerling size before being sold to other farms. Grading is done using standard grading machines where by eels are pumped from the tanks to the grading machine which sorts the sizes into stainless boxes which can then be weighed

	before the eels are returned to the tanks. Eels are never allowed to dry out during the process and are handled as little as possible. Procedures are present for the packaging of eels before transportation, including specially made transportation boxes which the company now produce themselves to limit the risk of confusion with other companies.
Score	Responsible indicator
Criterion 5.7: The organisation provides eel for restocking	
Weighting: 2	
Responsible indicators	The organisation can provide documented evidence that 10% or more of the farm's annual eel production (by piece) **has** been provided for restocking for the purpose of conservation / escapement.
Aspiring indicators	The organisation 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.
Discussion	Based on the figures in 4.7, the organisation has provided more than 50% of eels for restocking in each of the last 3 years.
Score	Responsible indicator
Criterion 5.8: Eels for restocking are not graded out slow-growers	
Weighting: 2	
Responsible indicators	The size range and quantities in the eels for restocking reflect 100% that for the age group in the whole farm
Aspiring indicators	The size range and quantities indicate no more than a 25% supplement of those for restocking are from slower growing fish of the same age group.
Discussion	In France all of the restocking is glass eels. There is no growing out and therefore no selection process for picking restocking stock. Eels grown on in the systems are only consumption fish.
Score	Responsible indicator