

## Eel Assessment – Normandy Glass Eel Fishery

### Assessment against:

Component 1: Core requirements

Component 2: Glass eel fishing

**Completed by**  
Alex Senechal

3<sup>rd</sup> March 2019

**FINAL**

### Introduction

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

The assessment is of a glass eel fishery located in Normandy based on the Douve, Taute and l'Orne rivers. There are 6 fishermen wishing to become SEG certified. The following details are provided by the CRPMEM de Normandie to identify them and their vessels.

NOM	Prénom	Matricule	Nom Navire 1	Immat 1
LECAPELAIN	Jean Jacques	71U0625	LA GALERE III	907,445
LEROSIER	Jérôme	93C0835	JULOIT II	711,332
MEDARD	Patrick	99X0833	LE PITCHICO II	922,464
NEEL	Philippe	78T1280	L'UTAH BEACH	922,449
PERREE	Dominique	89B0768	EDELWEISS	907,446
ROBIOLLE	Denis	87B0942	L'HERBE D'OR II	925,653
ROBIOLLE	Denis	87B0942	LE PICK	724,410
VAUTIER	Martial	09M4840	LIAMILA	930,533

The fishery is based with vessels launching from the Ecluse de Haut Dicq at Carentan and going either directly northwest into La Douve or southeast into La Taute. In addition to this there is one fisher who also has a second vessel which fishes in Caen at the end of the season which is situated in the middle of town on the “l'Orne” river. While the fishery only comprises 6 active fishermen, each has a considerable individual quota allowance due to an impeccable track record of declaring all landings for over 20 years.

This proved to be vital when the national quota system was brought in as a form of management for the eel. The Normandy fishery is the last to be active in France each year, due to its late start each season and should be considered to be a small but important fishery due to the number of vessels all working within close proximity to one another. Fishing is not rushed, nor is it competitive as each has their own quota and therefore vessels openly communicate with each other while fishing to say which side is better on the night.

## 1. The assessment

The assessor was Alex Senechal of MacAlister Elliott & Partners Ltd, who visited Normandy on the 3<sup>rd</sup> and 4<sup>th</sup> March 2019. The audit included interviews with Mr Denis Robiolle, Ms Lucile Aumont and Ms Catherine Paul. The assessment of the 6 vessels outlined above wishing to be certified under the SEG standard.

## 2. Client Contact Details

<b>Client Contact Name</b>	Lucile Aumont
<b>Client Address</b>	CRPMEM de Normandie, 9 quai Lawton Collins, 5010 CHERBOURG, France
<b>Client Email</b>	<a href="mailto:lucile.aumont@comite-peches-normandie.fr">lucile.aumont@comite-peches-normandie.fr</a>
<b>Client Phone Number</b>	02 33 44 83 83

## 3. Results of the assessment

The outcome of this assessment is as follows;

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

That the Normandy Glass Eel fishery has scored the following for Component 1: General Requirements and therefore **should** be considered **RESPONSIBLE** under the SEG standard.

<b>Component 1: General Requirements</b>	Auditor's findings	Weighting	Score
1.1 Commitment to Legality	Aspiring	1	0
1.2 Contribution to eel conservation projects	N/A	1	N/A
1.3 The facility trades in certified responsibly sourced eels	Responsible	1	1
1.4 Traceability:			
1.4.1 Incoming products, separation and segregation	Responsible Responsible	1 1	1 1

1.4.2 Outgoing products	Responsible	1	1
1.4.3 Record keeping and documentation			
1.5 Biosecurity & welfare – 1.5.	Responsible	1	1
Total		6	5/6
Percentage Responsibility Score:		83%	

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

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

### Summary of assessment and scoring

<b>Component</b>	<b>Aspiring</b>	<b>Responsible</b>
1	1	5
2	2	9
<b>Total</b>	<b>3</b>	<b>14</b>
<b>Total Responsibility Score</b>		<b>82%</b>

### Recommendations:

1.1 It is recommended that all fishermen ensure no further infractions occur to ensure that they are able to retain certification. Should an individual be found guilty of an offence, the SEG panel may consider suspending the individual from the certified list rather than suspending the group.

#### 4. Next Audit

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

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

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

**As the client has been seen to fall into the Standard Surveillance bracket, the next audit will be due by March 2021 (in 2years' time) and shall be an On-Site audit.**

<sup>1</sup> 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.

<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	In the last 12 months, there have not been any infringements with regards to glass eel fishing, holding, transportation or sale. Prior to this there was a declaration by the fishermen, that one had under estimated the quantity on his paperwork prior to transportation from the landing site to the vivier by under 100g and another that he had not filled in his fiche de peche with the car registration number before transportation.
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	The fishers have not yet been certified at the time of the audit, however, the aim is that they would all sell their catches to a SEG certified buyer so that all fish caught will hopefully remain SEG certified if the fishery is certified following this auditing process.

Score	Pass: Responsible indicator
<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>Teleca-peche is used as the normal electronic declaration system by the fishermen under assessment. This is done in addition to the paper declarations which the fishermen continue to submit to meet national requirements for declaration. Eels from individual fishermen remain separated until the buyer is present to collect the catches from each individual here by it is the responsibility of the individual to keep SEG and any other non-SEG eels separated for eels to remain certified.</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> <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> </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:</li> <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> <li>• 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</li> </ul> <p>- Includes a record of the quantity (no. &amp; weight) of product and to whom it was sold</p>
Discussion	Tele-declaration is used for any sales of glass eels from the fishermen to the buyers and registered with Visiomer by the buyer. Declarations are done on paper by the fishermen only.
Score	Pass: Responsible indicator
<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	<p>The local authority keeps a full record of all catch declarations through the electronic system and paper system. In addition, it is responsible for keeping full records of the vessel licences when issued. Trade is also recorded through the tele-declaration system so that sales transactions are notified to the authorities at the earliest to enable traceability of glass eels.</p> <p>Records are kept by the fishermen for all declarations for an extended period of time. Many have this for more than 15 years presently.</p>
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>1.5.1 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>
<b>Discussion</b>	The fishery is mostly in only one body of water although technically called two separate rivers. Fishing in Caen by the single vessels uses a different vessel and therefore separate set of fishing gear. There is therefore no risk of transferring diseases or alien species between catchments.
<b>Score</b>	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> (worth 2 x Responsible Indicator Score)	There are good data which show to the satisfaction of the fisheries authority that the EU silver eel 40% escapement target (40% B0) is being achieved for the river or in the eel management district.
<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, due to the low level of silver eel fishing in the region and the high numbers of glass eels which have been released into the regions rivers since the restocking commenced properly in 2013, glass eel fishers have in the last 2 years noticed a marked increase in the number of yellow and silver eels which they see in their nets when fishing for glass eels. 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 the river systems above critical points where they would not otherwise have be guaranteed to pass due to a lack of appropriate fish pass.
<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 of the number of glass eel fishermen from 32 licences in 2006 and there are now 10 with only 6 who are actually fishing. There is now a plan in place to only renew licences now that it is at 10, therefore it is not possible to increase fishing effort in the future. All restocking targets have been met by the region since restocking efforts commenced in 2013 and there has been a reduction in mortality from causes other than fishing thanks to the efforts made in conjunction with the water framework directive. It is suggested in the reports that all tasks set out in the management plans have either been completed or remain ongoing 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>	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 Comite Regional. Data for fish landings from the fishery exists for more than 5 years and the retention of such records is one of the reasons that the fishermen in the region have managed to retain such high individual quotas per fisherman.
<b>Score</b>	Pass: Responsible indicator
<b>Criterion 2.4: Mortality during fishing is minimised</b>	
<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>	All criteria mentioned above for fishing from a vessel are met by the vessels under assessment. Fishing was observed to be at slow speed with a fine (1mm) trawl cod end and a net which does not damage eels by snagging or trapping them in other sections of the net. Mortality was checked with the buyer of eels from the fishermen. This averaged 0.7% and is likely to be so low due to the stocking of fish by individuals in their own viviers prior to collection by the buyer with any mortality being due to transportation stress most likely.
<b>Score</b>	Pass: Responsible indicator

#### 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>	The fishery has negligible effect on bycatch which is mostly of small bass, sprats and other estuarine species. These were seen during the fishing observations in small quantities, were sorted out from retained glass eels without contact and are returned to the water alive for the most part. This is possible due to the relatively short trawl times (generally less than 10 minutes) and very limited handling of the catch.
<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>	Based on searches for the rivers worked by the fishermen under assessment, there is no risk of negative impact on any rare or otherwise protected species by the fishing activity present here.
<b>Score</b>	Pass: Responsible indicator

#### Criterion 2.7: The fishery has negligible impacts on habitats

**Weighting: 1**

<b>Responsible indicators</b>	The fishing gear does not cause any damage to the benthos.
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<b>Aspiring indicators</b>	Damage to the benthos by gear is limited or minimal.
<b>Discussion</b>	Fishing gear is never intended to come into contact with the benthos. Discussions with the fishermen have identified that on rare occasions, the gear does touch the benthos causing issues for the skipper as the gear may become damaged and will definitely become muddied. As such this is avoided whenever possible but cannot always be. It is not expected that the light contact on heavily silted benthos in the area fished will cause any damage to the benthos.
<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>	Transport by the fishermen evaluated here is only for a short distance from the fishing vessel to the vivier tanks at their homes. There is no need for additional transportation plans at this level, however, transportation documents are filled in before leaving the landing site in their vans to comply with national regulations. Eels are kept cool and humid during the transportation to limit the risk of drying out and are not in a sealed container, so therefore have an adequate supply of oxygen throughout the short journeys.
<b>Score</b>	Pass: Responsible indicator.