

Assessment against SEG Standard: Component 1: Core requirements
Component 2: Glass eel fishing

Completed by
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14 - 15 December 2020

Final

Reviewed and Approved by Certification Body:
David Bunt, Sustainable Eel Group, 5 January 2021

1) Introduction

This document represents the report carried out following the audit of 14 and 15 December 2020, carried out within the framework of the SEG (Sustainable Eel Group) standard (version 6.0a, December 2019) with a group of fishermen operating on Seudre river and Brouage marsh between towns of Royan and Rochefort, France. Among these fishermen, 5 are already SEG certified (SEG 0062), one fisherman bought back a boat that belonged to a SEG certified fisherman, and 4 are new fishermen. The fishermen concerned by this certification sell their glass eels directly to traders at the landing port. So, this is an extension of the original SEG0062 Seudre fishery.

The company Civelle Durable organized this audit and the group of fishermen will be called "Pêcheurs Seudre/Brouage". This assessment was carried out only in relation to components 1 and 2 of the standard.

On the Seudre, 5 fishermen work upstream of the estuary near the port of l'Eguille. They use a fishing technique without motorization while remaining anchored on a dead body, with 2 rectangular nets of 7m² maximum (2.4m wide x 2.9m high) on either side of the boat. The nets filter only the current formed by the tide. Fishing is carried out exclusively at night and at rising tide. The 3 other fishermen of La Seudre work on the downstream part of the estuary at the ports of Chaillivette and Tremblade. The two nets are also 7m² but they are pushed by the motorization of the boat.

On the sector of the marsh of Brouage, 2 fishermen work in the Havre de Brouage. They also use a fishing technique without motorization while remaining anchored on a dead body. The 2 nets used are circular with a diameter of 1.2 m each for a filtering surface of 1.13 m². The nets filter only the current formed by the tide.

Between the different fishermen, the mesh sizes of the entrances and intermediaries can vary. However, the end mesh size is for all of them less than or equal to 1000 µm.

10 fishermen are concerned by the audit and therefore 4 boarding were carried out. In addition, a visit of one of the two fishermen operating on the Brouage marsh was carried out. Even though he was not fishing, he was able to show the fishing gear and explain his technique.

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The following professional fishermen are concerned by this process of SEG certification, for a control audit for some (6) and for an application for certification for others (4)

[names not published at present – awaiting permission]

2) The assessment

The evaluator was Fabien Charrier of the Fish-Pass design office. The visit took place on December 14-15.

The fishermen audited were the following: XXXXX. During the tide, transshipments were carried out between the boats. The auditor stayed about 1 hour with each of the fishermen. An interview was made with XXX, who was not fishing, but who showed his equipment and explained his fishing technique.

3) Client Contact Details

The company Civelle Durable requested this audit. The resource person is therefore the director of this structure.

Nom/Entreprise	Civelle Durable / Benoit Chambon
Adresse postale	La Fromigère, 17250 Sainte-Gemme
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4) Results of the assessment

The outcome of this assessment is as follows:

Component 1: General Requirements	Auditor's findings	Weighting	Score
1.1 Commitment to Legality	Responsible	1	1
1.2 Contribution to eel conservation projects (bonus)	N/A	N/A	N/A
1.3 The organisation trades in certified responsibly sourced eels	N/A Responsible	N/A 1	N/A 1
1.4 Traceability:			
1.4.1 Incoming products, separation and segregation	Responsible	1	1
1.4.2 Outgoing products	Responsible	1	1
1.4.3 Record keeping and documentation	Responsible	1	1
1.5.1 Biosecurity & welfare – Biosecurity measures are adopted	Responsible	1	1
Total		6	6
Percentage Responsibility Score:		100%	

Finding: The fishery meets the generic requirements and can be considered **responsible** for this component.

Component 2: Glass eel fishing	Auditor's findings	Weighting	Score
2.1 Eel fishing is in a catchment that is meeting its escapement targets	Aspiring	2	0
2.2 There is good progress with the applicant's responsibilities in the eel management plan for the river or district	Responsible	2	2
2.3 The fishery is well managed	Responsible	1	1
2.4 Mortality during fishing is minimised	Aspiring	2	0
2.5 The fishery has negligible impacts on by-catch species	Responsible	1	1
2.6 The fishery has negligible impacts on rare or other protected species	Responsible	1	1
2.7 The fishery has negligible impacts on habitats	Responsible	1	1
2.8 Transport	Responsible	1	1
2.9 Bonus score: fishermen donate a proportion of their catch for a local positive contribution	N/A	N/A	N/A
Total		11	7
Percentage Responsibility Score:		64%	

Finding: The fishery meets part of the criteria of the elver component (64%) but is considered **responsible** under the SEG standard.

Summary of assessment and scoring

Component	Not Met	Aspiring	Responsible
1	0	0	6
2	0	4	7
Total	0	4	13
Total Responsibility Score: =			76%

Summary finding:

With a score on the responsibility criteria of 76%, the fishery Seudre/Brouage has reached the level required to be considered **responsible** and meets the criteria for **certification by the SEG standard**.

5) Recommendations:

Fish-Pass makes the following recommendations with respect to the Seudre/Brouage fishery:

2.4: It is recommended that fishermen leave all nets in the water during the fishing action to avoid injury to glass eels.

6) Next Audit

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 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	No Audit	Remote Audit	No 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

Standard Surveillance is recommended. The next Audit should be scheduled for December 2022.

7) The Assessment

The tables below give the standard and a rationale for the scores given above.

Component 1 – Generic requirements (Weighting : 1 for each criterion)	
Criterion 1.1: Commitment to legality	
Responsible indicators	For at least the past two years: the organisation has not been found guilty for any offences relating to eel fishing or trading.
Aspiring indicators	For at least the past 12 months: the organisation has not been found guilty for any offences relating to eel fishing or trading.
Discussion	The five fishermen have no recent prosecutions, legal proceedings pending, and all are signing an agreement to say they will abide by the terms of the fishery and the SEG standard. The criterion is therefore met.
Score	Responsible

Criterion 1.2: Contribution to Eel Conservation Projects. (Optional bonus score) (The intention is for this to be mandatory from summer 2020)	
Responsible indicators	The organisation donates at least 2% of its profits or at least 20% of its corporate responsibility programme to projects that make a positive contribution to eel conservation or population enhancement, such as Eel Stewardship Funds, River Restoration projects, conservation and education projects.
Aspiring indicators	The organisation donates 1 – 1.99% of its profits or 10 - 20% of its corporate responsibility programme to projects that make a positive contribution to eel conservation or population enhancement, such as Eel Stewardship Funds, River Restoration projects, conservation and education projects.
Discussion	N/A
Score	N/A

Criterion 1.3: The 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 fishery has been SEG certified for the past 2 years and has been trading in 100% SEG certified eel in that time
Score	Responsible

Criterion 1.4: Traceability	
1.4.1: Traceability - Incoming product, separation and segregation	
Responsible indicators	<ul style="list-style-type: none"> • Certified and uncertified eel products can be clearly and easily traced back to their source. • Where a fishery or buyer, an electronic tele-declaration system is used. • It operates a clear system which ensures that the product remains separated at all stages from arrival to dispatch from non-certified eel products. • The organisation ensures that any products wishing to make a claim as certified do not contain any non-certified eel-based ingredients. • If resolved through mass- or number- balance calculations, the margin of error does not exceed 2%.
Aspiring indicators	<ul style="list-style-type: none"> • Certified and uncertified eel products can be traced back to their source. • 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 year 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 2800 pieces per 1 kg of glass eels is applied.
Discussion	<p>All fishers audited use teledeclaration. This system allows them to report their catches via SMS directly to the Fishery Committee. A computerized database allows the fishermen's quota to be monitored finely and to avoid exceeding the authorized quotas.</p> <p>Each fishing day is declared on paper via fishing sheets in triplicate: one for the administration (France Agrimer), one for the fisherman and the last one is kept by the fisherman.</p> <p>This criterion is therefore met.</p>
Score	Responsible

1.4.2: Traceability - Outgoing product	
Responsible indicators	<ul style="list-style-type: none"> • Where a fishery or buyer, an electronic tele-declaration system is used • Documentation is well maintained with a maximum of 2% error in the following: • The organisation correctly uses batch-coding for labelling certified product, which can be on the packaging for the product, or included in the documentation (e.g. invoice) with the assignment • All product to be sold as certified by an organisation is accompanied by an invoice which meets the following criteria: <ul style="list-style-type: none"> - Includes an appropriate batch code - Includes a record of the quantity (no. & weight) of product and to whom it was sold
Aspiring indicators	<ul style="list-style-type: none"> • Documentation is well maintained. If resolved through mass- or number- balance calculations, the margin of error does not exceed 5% in the following (or if a farm, the 2800 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: <ul style="list-style-type: none"> - Includes an appropriate batch code. - Includes a record of the quantity (no. & weight) of product and to whom it was sold.

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Discussion	As in the previous point, this audit concerns only fishermen and they use a system of electronic tele-declaration and fishing form. The criterion is therefore met.
Score	Responsible

1.4.3: Traceability - Record keeping and documentation

Responsible indicators	<ul style="list-style-type: none"> The organisation operates a system that allows the tracking and tracing of all eel from purchase to sale and including any steps in between. In the case of live eels this should include the ability to track each batch delivered to a buyer to be connected back to a water, a time period (maximum duration one month) and specific fisherman/vessel. If a fisherman or buyer, a tele-declaration system is used to report catches and trade. The organisation operates a system that also allows for the completion of a batch reconciliation of eel product by weight over a given period. The organisation maintains records for a minimum of three (3) years.
Aspiring indicators	The above requirements are met except that: <ul style="list-style-type: none"> Records have been maintained for less than three (3) years If a fisherman or trader, a tele-declaration system is planned to be used to report catches and trade in the next season
Discussion	The fishermen all use an electronic tele-declaration system and fishing forms. These data are kept by the administrative authorities for more than 3 years. The criterion is therefore met.
Score	Responsible

Criterion 1.5: Biosecurity & welfare – Eel and eel products are provided with minimal risk of diseases, parasites and alien species
1.5.1 Eel Fishing: Biosecurity measures are adopted

Responsible indicators	<ul style="list-style-type: none"> The fishery conducts good biosecurity measures such as the disinfection and drying of nets and equipment between each fishing in different waters. OR The fishermen only operate in the same river or estuary, with no risk of transferring diseases or alien species between catchments.
Discussion	All fishermen stay the whole glass eels season on the same estuary near their home port. It is then not possible to move possible diseases or exotic species. The criterion is therefore met.
Score	Responsible

Summary scores for Component 1	
Not met	0
Aspiring	0
Not applicable	2
Responsible	6
Total possible	6
% Responsibility (Responsible / Total possible)	100%

Component 2 - Glass eel fishing	
Criterion 2.1: Eel fishing is in a catchment that is meeting its escapement targets	
Weighting: 2	
Sustainable Indicator (2 x responsible Indicator Score)	There are good data which show to the satisfaction of the fisheries authority that the EU silver eel 40% escapement target (40% B0) is being achieved for the river or in the eel management district.
Responsible indicators	There are good data which show to the satisfaction of the fisheries authority that at least 70% of the Bbest target for silver eel escapement is being met in the river or eel management district.
Aspiring indicators	Eel fishing is in a place accepted by the fishery authority as providing a positive contribution to the eel stock or, the river or RBD is meeting 40% - <70% of the Bbest target.
Discussion	<p>The information available on this subject (Report of the Eel Management Plan in France, 2018) shows that, for the moment, the objective of 40% of the B0 or 70% of the BBEST is not achieved, both in the concerned Management Unit (MU) (GDC) and in the other French MUs. Moreover, we do not have precise information by catchment area to judge this criterion more precisely.</p> <p>However, all the actions provided for in the French Eel Management Plan (PGA) have been implemented and the rebuilding of the eel stock requires long-term action. The effects of the measures taken in recent years are not observable for the moment. The actions carried out by the fishing sector are detailed in the following criterion.</p> <p>Considering all this, the criterion is not met but significant efforts have been made since the establishment of the Eel Management Plan, in particular by professional fishermen.</p>
Score	Aspiring

Criterion 2.2: There is good progress with the applicant's responsibilities in the Eel Management Plan for the river or District	
Weighting: 2	
Responsible indicators	There is credible progress with at least 75% of the actions relating to the fishery for the implementation of the Eel Management Plan for the river or eel management district.
Aspiring indicators	There is credible progress with at least 50% of the actions relating to the fishery for the implementation of the Eel Management Plan for the river or eel management district.
Discussion	<p>Professional fisheries stakeholders have implemented the majority of actions related to the EMP.</p> <p>So, the exploitation rate of glass eel stock has decreased significantly since the reference period. This rate has been relatively stable in recent years and fluctuates around the management target.</p> <p>The allocation of glass eel fishing licences has decreased by 57% between 2006 and 2018.</p> <p>The ratio of the fishing quota 40% consumption and 60% restocking is unchanged since 2013. However, the target of 60% glass eels for restocking in Europe has never been reached, but the profession is getting closer to this target over the years. Reaching this objective is dependent on the European market, which is not the responsibility of professional fishermen.</p> <p>The overall catch quota has decreased for the 2020-2021 season to a total of 57.5</p>

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	tonnes, a reduction of 11.5% compared to the previous season. Finally, France allocates between 5 and 10% of annual catches to French restocking operations, 5.8% in 2018. In view of all these elements, it can be considered that this criterion has been met.
Score	Responsible

Criterion 2.3: The fishery is well managed
Weighting: 1

Responsible indicators	<ul style="list-style-type: none"> • Fishers are licensed and provide catch and effort data via a tele-declaration system. • Data on catch and effort are collected and analysed regularly by the fishery authority (at least annually at the end of the season). • There is a data set for at least the last 5 years that is considered by the fishery authority to be accurate, useful for statistical purposes and provide a comprehensive picture of the glass eel fishery under assessment. • Enforcement is in place throughout the fishing area and there is no evidence of systematic non-compliance.
Aspiring indicators	<ul style="list-style-type: none"> • Fishers are licensed and provide catch and effort data. • Data on catch and effort are collected and analysed regularly by the fishery authority (at least annually at the end of the season). • There is a data set for at least the last 3 years that is considered by the fishery authority to be accurate and provide enough information on the glass eel fishery under assessment for management and to track annual trends in glass eel arrival. • There is no evidence of systematic non-compliance.
Discussion	<p>All fishermen have a license and proceed to the electronic declaration in addition to the declaration by the fishing form.</p> <p>The figures relating to the fishery are monitored throughout the season by the Fishery Committee to know the exact consumption of the quota and thus avoid a preventive closure. These data are obtained through electronic reporting.</p> <p>The official data come from the fishing forms sent by the fishermen to the administrative authorities. Thus, the Direction des Pêches Maritimes et de l'Aquaculture (DPMA) collects and compiles these data. During the glass eels fishing season, the DPMA distributes a table every week to report on the consumption of quotas in the different EMU. In May-June, when the season is over, the DPMA distributes a statistical compendium (quota consumption, market price, number of spawners, etc.) per EMU. There is a reliable data set of more than 5 years.</p> <p>This criterion has therefore been met.</p>
Score	Responsible

Criterion 2.4: Mortality during fishing is minimised
Weighting: 2

Responsible indicators	<ul style="list-style-type: none"> • Fishing is by hand-held nets and has effective nearby holding facilities OR • Fishing from vessels meets the following criteria: <ol style="list-style-type: none"> i) fishing is at slow speed (no more than 1 knot relative to water); ii) haul duration is on average no longer than 20 minutes, with the maximum duration not more than 30 minutes; iii) mesh size of cod end no greater than 1mm; iv) rest of the net designed such that glass eels do not become trapped or abraded; v) vivier tank on board and in use;
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	<ul style="list-style-type: none"> vi) fishermen maintain accurate daily records of mortality. OR • Fishermen can demonstrate that the mortality rate of the catch over the duration of holding in the storage facility is less than 4% for each batch captured. OR • Fishing methods (in France) meet the criteria in Category 1 of the France Good Practice Guide. OR • The Carmin Indigo or similar test indicates that mortality averages less than 4%.
<p>Aspiring indicators</p>	<ul style="list-style-type: none"> • Fishing from vessels meets the following criteria: <ul style="list-style-type: none"> i) fishing is at slow speed (no more than 1.5 knots relative to water); ii) maximum haul duration no longer than 30 minutes; iii) mesh size of cod end no greater than 1mm; iv) rest of the net designed such that glass eels do not become trapped or abraded; v) vivier tank on board and in use; vi) fishermen maintain accurate daily records of mortality. OR • Fishermen can demonstrate that the mortality rate of the catch over the duration of holding in the storage facility is between 4% and 8% for each batch captured. OR • Fishing methods (in France) meet the criteria in Category 2 of the France Good Practice Guide. OR • The Carmin Indigo or similar test indicates that mortality averages between 4% and 8%.
<p>Discussion</p>	<p>The practices on boats audited differed in the type of gear between Brouage marsh and La Seudre, or in the fishing technique: pushed sieve or stationary fishing. However, each vessel uses 2 nets.</p> <p>Thus, on the Seudre, nets used are rectangular in shape, for a maximum area of 7 m² each, i.e. approximately 2.4 m x 2.9 m. The width and height may vary slightly between fishermen. The length of the gear varies between 5 and 8 m depending on the fishermen. The gears have a decreasing mesh size with 2 mm at the entrance and 1 mm at the end of the gear, which strongly limits glass eels injuries due to fishing. On Brouage, nets used are circular with a diameter of 1.2 meters for a length of about 4 meters. The mesh size is also degressive starting at 2 mm and ending at 0.9 mm.</p> <p>The duration of the tows is relatively variable and depends mainly on the dirtiness of the water. The dirtier the water, the shorter the strokes will be. For example, on the Seudre, the tows have a duration of 10 to 20 minutes. On Brouage, the strokes last from 5 to 15 minutes.</p> <p>For stationary fishermen (7), the speed is zero. For fishermen with a push net, the speed varies from 0.5 to 1 knots in relation to the water.</p> <p>No glass eels were observed trapped in any part other than the sieve bottom.</p> <p>The catches were all passed through one or two sieves depending on the fishermen, in order to separate the glass-eels from the by-catch. All by-catches are released quickly. No immediate mortality was observed.</p> <p>Among the fishermen audited, three fishermen have a live-well tank (vivier) on board. The water used is middle water, with a water recirculation system for two of the fishermen. These 3 fishermen use a fine mesh pocket in the live-well tank to limit the handling of glass eels. The 2 other fishermen store directly in polystyrene boxes. This is not in accordance with point V) of this criterion. However, this storage technique is authorized in the Guide des bonnes pratiques de la pêche à la civelle en France.</p> <p>After the tide, the fishermen sell the glass eels directly to the trader at the port of landing.</p> <p>In this way, most of the criteria are met, except for the presence of the fish tank on all boats. In addition, it was observed for two fishermen, a fishing action of several minutes with the tip of the fishing gear still on the boat. This may have the consequence of keeping the glass eels in a part of the gear where the mesh size is greater than 1mm, which may</p>

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	increase the risk of meshing. It also reduces the length of the fishing gear and may therefore increase the water pressure in the gear as well as the risk of abrasion. An aspiring score is therefore recommended given the absence of a fish tank for some fishermen and the small problems observed during fishing.
Score	Aspiring

Criterion 2.5: The fishery has negligible impacts on by-catch species
Weighting: 1

Responsible indicators	<ul style="list-style-type: none"> • The fishery has a negligible impact on by-catch. • By-catch is returned to the water alive as gently and rapidly as possible.
Aspiring indicators	<ul style="list-style-type: none"> • The fishery has low-level impacts on by-catch. • By-catch is returned to the water alive as gently and rapidly as possible.
Discussion	The most common by-catches encountered are as follows: Sprat, Eel, Spotted goby, Thinlip grey mullet, Stickleback, Silverside fish, Sea bass, Sand goby, Nilsson's Pipefish and White shrimp. These species, caught in low numbers, return to the water quickly and without major impacts. The criterion has therefore been met.
Score	Responsible

Criterion 2.6: The fishery has negligible impacts on rare or other protected species
Weighting: 1

Responsible indicators	The fishery has no direct interactions resulting in mortality or injuries with other species that are considered vulnerable, threatened, endangered or are protected under national or international law.
Aspiring indicators	Interactions, resulting in mortality or injury, with other species that are considered vulnerable, threatened, endangered, or are protected under national or international law, are rare and have no overall measurable impact on the population.
Discussion	Among the species caught, the presence of yellow eels was observed in the sieves. The fishermen take care to put them back in the water. We did not observe the presence of other vulnerable or protected species on board. The criterion is therefore met..
Score	Responsible

Criterion 2.7: The fishery has negligible impacts on habitats
Weighting: 1

Responsible indicators	The fishing gear does not cause any damage to the benthos.
Aspiring indicators	Damage to the benthos by gear is limited or minimal.

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Discussion	<p>On the Seudre, stationary fishermen have their gears that can touch the substrate at the beginning of the tide due to the shallower depth. However, given the lack of movement of the boat, this does not cause damage to the benthos.</p> <p>Other fishermen catch glass eels in open water without touching the bottom.</p> <p>This criterion is therefore met.</p>
Score	Responsible

Criterion 2.8: Transport	
Weighting: 1	
Responsible indicators	<ul style="list-style-type: none"> The operator holds the relevant transport authorisations. There is a Transport Plan in place to minimise travel time – this meets the Transport requirements for vertebrates. Packing is done in a way that minimises handling, time and stress. Eels are kept cool and wet with an adequate supply of oxygen.
Discussion	<p>The fishing form is filled in at the end of the tide. All fishermen sell directly to the fish wholesaler in the port of landing.</p> <p>All fishermen use a plastic or polystyrene boxes to land glass eels.</p> <p>The criterion is therefore met.</p>
Score	Responsible

Criterion 2.9: Bonus Score: Fishermen donate a proportion of their catch for a local positive contribution	
Weighting: 1	
Responsible indicators	<p>Fishermen have donated an average of at least 5% of their catch in the past 2 years to local stocking programmes, e.g. translocating over barriers to aid upstream migration and recruitment in the catchment, or have credible plans in place to do so next season (note that this is separate from any planned restocking to meet the 60% target).</p>
Discussion	N/A
Score	N/A

Summary scores for Component 2	
Not met	0
Not applicable	1
Aspiring	4
Responsible	7
Total possible	11
% Responsibility (Responsible / Total possible)	64%