



Assessment against SEG Standard:

Component 1: Core requirements Component 2: Glass eel fishing

Completed by

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Final

Reviewed and Approved by Certification Body: David Bunt, Sustainable Eel Group, 18 December 2020

1) Introduction

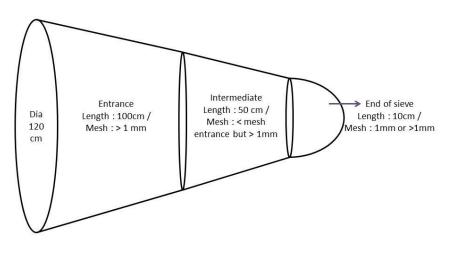
This document represents the report carried out following the audit of December 2020 carried out within the framework of the SEG (Sustainable Eel Group) standard (version 6.0a, December 2019) with a group of fishermen operating in the Bay of Bourgneuf, in several sectors. The fishermen concerned by this certification deliver their glass eels to various neighbouring trading sites.

It was the Estuaries Producers' Organisation (PO) that organised this audit, although some fishermen are not members of the PO. The fishermen's group will therefore be called "Pêcheurs Baie de Bourgneuf". This assessment was only carried out in relation to components 1 and 2 of the standard. It should also be pointed out that all fishermen have a home tank where elvers are placed, usually at least 48 hours before being sold to the traders. These tanks are declared and legal, but make it difficult to monitor fishing mortality.

The certification concerns fishing on different sectors of the Bay of Bourgneuf, namely the Port du Collet in Les Moutiers-en-Retz (44760), the Port of Pornic (44210) and Fromentine in La Barre-de-Monts (85550). There is also a fisherman operating in Noirmoutier (85330).

<u>8 fishermen</u> are concerned by the audit on 3 different sites and therefore a sample of **<u>4 boardings were made</u>**.

In this sector, all the fishermen use the same models of fishing gear. Namely, sieves with a circular opening of 120 cm in diameter and a length, generally, of 160cm. The mesh size is degressive with often 3 different meshes. The terminal part of the sieve is called the "sieve bottom" and on this short section the mesh is very fine, to avoid injuring the elvers that are found there. The following diagram shows the type of sieve used:









The following fishermen are concerned for this assessment:

First Name	Last Name	Area
BATARD	Patrice	Fromentine
ECHARDOUR	Fabien	Fromentine
POTIER	Sandy	Fromentine
ADRIEN	Richard	Noirmoutier
BOUCHEREAU	Lionel	Port du Collet
GAUTIER	Billy	Port du Collet
BAUD	Hervé	Port du Collet
POUVREAU	Franck	Port de Pornic

2) The assessment

The evaluators were Fabien Charrier and Nicolas Belhamiti for Fish-Pass. The visit took place on the tides on the 3rd and the 4th of December 2020.

In order to have a good representativeness of the fishing areas, boarding was carried out as follows:

- 2 embarkations in the Port du Collet sector with Mr Baud and Mr Gautier during the daytime tide on the 3rd of December 2020;
- One boarding in the sector of the Port of Pornic with Mr Pouvreau during the tide on the 4th of December 2020;
- A boarding in the Fromentine sector with Mr Echardour during the tide on the 4th of December 2020.

3) Client Contact Details

It was the Estuary PO that requested this audit. The resource person is therefore the director of the Estuary PO.

Client Contact Name	OP ESTUAIRES / COLIAS ALEXANDRA
Client Address 2, rue Colbert	
	85100 Les Sables d'Olonne
Client Email	op.estuaires@gmail.com
Client Phone Number	00 33 2 51 96 15 67







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	N/A	N/A
1.4 Traceability:			
1.4.1 Incoming products, separation and segregation	Responsible	1	1
1.4.2 Outgoing products	Responsible	1	1
1.4.3 Record keeping and documentation	Responsible	1	1
1.5.1 Biosecurity & welfare – Biosecurity measures are adopted	Responsible	1	1
	Total	5	5
Percentage Respor	sibility Score:	1009	6

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	Awareness	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	Awareness	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%			0

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







Summary of assessment and scoring

Component	Not Met	Aspiring	Responsible
1	0	0	5
2	0	4	7
Total	0	4	12
	Total Responsibility	Score: = 12 / 16 =	75%

Summary finding:

The "Baie de Bourgneuf" fishery has achieved an overall Responsibility Score of 75%.

5) Recommendations:

The following recommendations are made for the "Baie de Bourgneuf" fishery:

- 1. With a score on the responsibility criteria of 75%, the fishery has reached the level required to be considered responsible and meets the criteria for certification by the SEG standard.
- 2. The fishery should consider how to make a positive contribution to eel conservation projects (criteria 1.2 and 2.9) and to have implemented those by the time of the next assessment.
- 3. Concerning criterion 2.4, several things need to be improved. Average fishing speeds are higher than what the SEG standard requires, but less than what is recommended in the France Good Practice Guide. Moreover, no monitoring of mortality in home tanks is carried out. However, the practices observed on board appear to be consistent with responsible glass eel fishing, as no mortality was observed on board. We make the following recommendations that should be applied until the control audit:
 - a. Speeds should be reduced as much as possible, especially when the fisherman goes against the current.
 - b. All the fishermen audited have a home tank which they use to store elvers for a minimum of 48 hours. However, no mortality monitoring is carried out on these tanks. We recommend that from the 2020-2021 season onwards, fishermen keep a home mortality logbook that they can provide to the auditor during the control audit. It should be possible to link mortality to a period and a quantity of elvers caught (fishing log). For better readability, it is preferable that elvers' trips during sales are also indicated. An example of this would be :

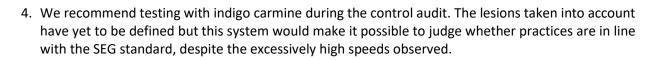
Date	Quantity added to the tank (g)	Mortality (g)	Quantity leaving the fish tank (g)
04/01/2021	1890	0	0
05/01/2021	910	10	0
06/01/2021	0	5	0
07/01/2021	500	20	0
08/01/2021	0	0	3260

The exit weight may not necessarily correspond to the weight fished + mortality. This may be due to weight loss and weighing accuracy.

c. Each ship has a fish tank on board. However, the practices for collecting glass eels from them differ. Sometimes a very fine-mesh net (less than 1mm) is present in the tank and allows the fish to be retrieved with almost no handling. If there is no net, the elvers are collected after emptying the tank with a shovel and a plastic brush. This last technique subjects the glass eels to more handling. It would be preferable for all fishermen to place a very fine-meshed net (0.9mm or less) inside the fish tank.







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 S	urveillance

	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

The next interim audit should therefore be by December 2022.

7) The Assessment

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

Component 1	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	Three of the four fishermen have no legal proceedings pending. For one of the fishermen, the authorities carried out a check on his vessel when only his seamen were present. It was a routine check and the fisherman should have been present. The fact that fishing is carried out in his absence is prohibited, but this does not constitute illegal trafficking of eels. The criterion is therefore met.		
Score	Responsible		



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Criterion 1.2:	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	N/A		
Score	N/A		

Criterion 1.3:	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	N/A	
Score	N/A	

Criterion 1.4:	Criterion 1.4: Traceability		
1.4.1: Traceab	ility - 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 2800 pieces per 1 kg of glass eels is applied. 		
Discussion	All the fishermen audited use the electronic filing system "Télécapêche". This system allows computerised banking and direct access to both COREPEM, which represents		







	all the fishermen of the UGA Loire - Côtiers Vendéens - Sèvre Niortaise (LCVS), and the PO. This makes it possible to monitor the fishermen's quota finely and to avoid exceeding the authorised quotas. The fishermen also fill in fishing forms (or fishing log) which are systematically sent to France Agrimer or to the Delegation for Sea and Coast for Loire-Atlantique fishermen. Each fishing day is declared on paper with 3 copies: 1 for the administrative authorities, 1 for the fishermen and the last one is kept by the fisherman. This criterion has therefore been met.
Score	Responsible

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 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: Includes an appropriate batch code. Includes a record of the quantity (no. & weight) of product and to whom it was sold.
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	 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	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	 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	On the different sites, no fishermen change their fishing location during the season. It is therefore not possible to move any 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	5
Total possible	5
% Responsibility (Responsible / Total possible)	100%







Component 2 - Glass eel fishing		
Criterion 2.1:	Criterion 2.1: Eel fishing is in a catchment that is meeting its escapement targets	
Weighting: 2		
Sustainable Indicator (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.	
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	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 relevant Management Unit (LCVS) and in the other French Management Units. Moreover, we do not have precise information by catchment area to make a more detailed assessment of this criterion. However, all the actions planned in France's Eel Management Plan (EMP) 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 taken by the fisheries sector are detailed in the following criterion. Considering all this, the criterion is not met but significant efforts have been made since the establishment of the EMP, in particular by professional fishermen.	
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	There is credible progress with at least 75% of the actions relating to the fishery for
indicators	the implementation of the Eel Management Plan for the river or eel management
	district.
Aspiring	There is credible progress with at least 50% of the actions relating to the fishery for
indicators	the implementation of the Eel Management Plan for the river or eel management
	district.
Discussion	Professional fisheries stakeholders have implemented the majority of actions
	related to the EMP.
	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.
	The allocation of glass eel fishing licences has decreased by 57% between 2006
	and 2018.
	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.
	The overall catch quota has decreased for the 2020-2021 season to a total of
	57.5 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	 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	 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	All fishermen have a licence and carry out the electronic filing in addition to the declaration by the fishing form. Fishing figures are monitored throughout the season by COREPEM and the PO in order to know the exact consumption of the quota to avoid a preventive closure. These data are obtained thanks to "Télécapêche" which has been compulsory for 5 years. This data is a very efficient management tool. The official data come from the fishing sheets (or fishing log) sent by fishermen to the administrative authorities. Thus, the Directorate of Maritime Fisheries and Aquaculture (DPMA in french) collects and compiles these data. During the elver fishing season, the DPMA circulates a table every week to report on the consumption of quotas in the various UGAs. In May-June, when the season is over, the DPMA distributes a statistical compendium (quota consumption, market price, number of fishers, etc.) per UGA. There is a set of reliable data for more than 5 years.
Score	Responsible







Criterion 2.4:	Mortality during fishing is minimised
Weighting: 2	
Responsible indicators	 Fishing is by hand-held nets and has effective nearby holding facilities OR Fishing from vessels meets the following criteria: 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; 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%.
Aspiring indicators	 Fishing from vessels meets the following criteria: 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%.
Discussion	 On all the fishing sites, the practices are close by. Thus the results below concern Collet, Pornic and Fromentine. The sieves used are identical between the sites. Namely gear with an inlet diameter of 120cm. The total length of the net is 160cm and is made up of 3 different sections : The inlet which is 100cm long with the largest mesh (>1mm). The intermediate part which is 50cm long with a finer mesh but larger than 1mm. The sieve bottom, which is 10cm long with a mesh size of 1mm or less. No glass eels were observed trapped in any part other than the sieve bottom, which has a very fine mesh. All vessels have a water tank on board. There is a water recirculation or bubbling in the fish tank during the tide. On the water tank there is a reject sieve that allows elvers to pass through and quickly discard by-catch that is still alive. No fishermen keep a daily record of mortality, either during fishing or for the fish tank that is present in their home. However, no mortality has been observed during fishing. The duration of a haul does not exceed 10 minutes and rarely more than 5 minutes. Average speeds are higher than what is required in the standard, in the order of 2 to







	2.5 knots. However, these speeds are lower than what is recommended in the France
	Good Practice Guide.
	Thus, many criteria are met, but fishermen do not keep a mortality logbook and speeds are slightly too high compared to the SEG requirements. However, the speeds observed remain low at low engine speeds. Professionals can hardly go slower. Moreover, the duration of the hauls is very low, often around 5 minutes and always less than 10 minutes. The low fishing time seems to compensate for the slightly high speed.
	We recommend assigning an aspiring criterion with several recommendations (part
	5, page 4 of the document) to be applied by the time of the control audit.
Score	Aspiring

Criterion 2.5: The fishery has negligible impacts on by-catch species		
Weighting: 1	Weighting: 1	
Responsible indicators	 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	 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 during the different tides concern the following species: Goby minutus and spotted goby, Thinlip grey mullet, Bleak, Stickleback, Sandeel, Silverside fish, White shrimp, Grey shrimp. These species return to the water quickly and without any major impacts observed. 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	We did not observe the presence of vulnerable or protected species on board. The criterion has therefore been 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.
Discussion	Glass eel fishing consists of filtering the water, without touching the benthos. If it happens that the sieve touches the benthos it will be accidental and will lead to an unwanted loss of time and fishing efficiency. This criterion is therefore met.
Score	Responsible

Criterion 2.8: Transport		
Weighting: 1		
Responsible indicators	 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	 The fishing form filled in at the end of the tide serves as an authorisation for transport in France. All fishermen use the same means of transport, i.e. a plastic or polystyrene crate. The elvers are taken out of the fish tank and placed in this crate immediately. Then they transport this crate from the boat to the truck where the catch is weighed, usually without transferring the container (the tare is known). The eels are left out in the open air for the duration of the transport from the port to the fisherman's or fish wholesaler's tank. This transport time is generally short and during transport the eels are kept moist and fresh (air temperature in winter). With the exception of sites where the fisherman picks up eels on landing, which is rare on the UGA LCVS, all fishermen operate in this way. This is the least amount of handling of elvers and this fish seems not to suffer from this way of operating. 	
Score	Responsible	

Criterion 2.9: contribution	Bonus Score: Fishermen donate a proportion of their catch for a local positive
Weighting: 1	
Responsible indicators	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).
Discussion	N/A
Score	N/A







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

