

**Assessment against SEG Standard:** Component 1: Core requirements  
Component 4: Eel buying and trading

**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 is the report of the audit of 7 December 2020 carried out for the Producer Organisation (PO) Estuary concerning the correct application of the SEG (Sustainable Eel Group) specifications (version 6.0a, December 2019) with a view to labelling. This assessment was carried out for components 1 and 4 of the standard.

The certification concerns the storage site located in the municipality of Saint-Gilles-Croix-de-Vie in France and named "SAS la Gillocrucienne". The storage site depends on the Estuary Producer Organisation. The Estuary Producer Organisation is based in Les Sables d'Olonne and was created in 2013 by a group of fishermen from the Pays de la Loire region. In 2017, the PO created its first storage centre in Cordemais, SAS Estuaires. This centre has the SEG label. There is also, since last year, the SAS côte vendéenne in Beauvoir sur Mer, which applied for certification this year. All these sites buy glass eels from fishermen, mostly members of the Estuary PO, but also from non-member fishermen.

The site concerned by this audit is the third storage centre of the estuary OP and is located in Saint-Gilles-Croix-de-Vie (Criée de Saint Gilles Croix de Vie - Quai Marcel Bernard - 85800 Saint-Gilles-Croix-De-Vie). It is brand new and the 2020-2021 season is the first year of operation. The audit carried out in December 2020 will enable us to judge the installations and what is planned, but a verification of many elements will have to be carried out at the end of the season to validate the procedure. A total of 15 basins are planned on the site.

## 2) The assessment

The assessor was Nicolas Belhamiti for Fish-Pass. The audit was carried out in the form of a discussion with Mrs Collias (Director of the Estuary OP). A complete visit of the site was carried out. Some tanks were in water with few elvers, the season being at the beginning. As previously mentioned, this is the first year of activity of this storage centre. A subsequent verification of all documents will be made at the end of the season. The audit carried out in December 2020 will only judge the facilities and the way in which the operation is theoretically planned.

## 3) Client Contact Details

<b>Client Contact Name</b>	OP ESTUAIRES / COLIAS ALEXANDRA
<b>Client Address</b>	2, rue Colbert 85100 Les Sables d'Olonne
<b>Client Email</b>	op.estuaires@gmail.com
<b>Client Phone Number</b>	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		
1.3 The organisation trades in certified responsibly sourced eels	<b>Conditionally responsible</b>	1	1
1.4 Traceability:	<b>Conditionally responsible</b>		
1.4.1 Incoming products, separation and segregation		1	1
1.4.2 Outgoing products		1	1
1.4.3 Record keeping and documentation		1	1
1.5 Biosecurity & welfare –	Aspiring		
1.5.2 Eel buying & trading: Biosecurity is present and disease is treated rapidly and appropriate		1	0
1.5.4 Restocking : The risk of restocked eels introducing disease into wild populations has been assessed and is minimal	Responsible	1	1
Total		7	6
<b>Percentage Responsibility Score:</b>		<b>86%</b>	

**Finding:** For the generic requirements, 6 out of 7 criteria are responsible but for 4 of them, this will have to be checked at the end of the season (indicated "Conditionally responsible"). **The provisional score provided is therefore 86%, but this is subject to further verification.**

Component 4: Eel buying and trading	Auditor's findings	Weighting	Score
4.0 Segregation of certified and uncertified eels	<b>Conditionally responsible</b>	2	2
4.1 The glass eel holding facility is a registered aquaculture production business	Responsible	1	1
4.2 Mortality in storage facility	Conditional Aspiring	1	0
4.3 Mortality during transport and initial holding if transported to farm	Conditional Aspiring	1	0
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	Conditional Aspiring	1	0
Total		9	5
<b>Percentage Responsibility Score:</b>		<b>56%</b>	

**Finding:** Many criteria could not be evaluated because this structure is brand new and there was no storage last season. These criteria have been classified as "Conditionally Sensitised" and will be re-evaluated at the end of the season. Of the criteria scored, 1 will need to be checked at the end of the season. The provisional score is 56% of responsibility criteria but will probably change at the end of the season.

## Summary of assessment and scoring

Component	Not Met	Aspiring	Responsible
1	0	1	5
4	0	4	6
Total	0	5	11
<b>Total Responsibility Score: = 11/16</b>			<b>69%</b>

### Summary finding:

The storage site of SAS La Gillocrucienne with a score of 69% and no criteria not met **meets the criteria for obtaining SEG certification**. However, many criteria were not judged and others were judged with regard to the way in which the other sites managed by OP Estuaires operate. **It will therefore be necessary to check all these points at the end of the season.**

### 5) Recommendations:

1. Fish-Pass recommends issuing a **provisional certificate to SAS La Gillocrucienne**. A check of all the points specified as "Conditionally responsible" will be made at the end of the season and the score will be reviewed as well as the issue or not of a definitive certificate.
2. The OP should consider how to make a positive contribution to eel conservation projects (criteria 1.2) and to have implemented those by the time of the next assessment.
3. From what has been seen the following recommendations can already be applied :
  - a. Concerning criterion 1.5.2, biosafety practices are good and daily monitoring is planned. Mortality will be recorded but not visual monitoring of the basins. We recommend setting up a visual basin monitoring binder to indicate for each basin whether or not a problem has occurred and what has been put in place to solve the biosecurity problem.
  - b. About criterion 4.5, practices for handling glass eels are good, but there are no written procedures to follow. Writing such a procedure would help to achieve the responsibility indicator.

### 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	<b>Go to Q2</b>
2	Has the client received a borderline pass for a Component in its previous audit?	Enhanced Surveillance	<b>Go to Q3</b>
3	Does the client only buy and sell product (does not physically handle it?)	Minimum Surveillance	<b>Go to Q4</b>
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

Based on the results of the audit, standard monitoring is recommended and the next audit will be due in December 2022.

## 7) The Assessment

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 (Weighting : 1 for each criterion)</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.
<b>Discussion</b>	This is the site's first year of activity and the site manager is the OP. To our knowledge, the OP is not involved in any legal matter relating to eel activity. This criterion is therefore met.
<b>Score</b>	Responsible

<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.
<b>Discussion</b>	N/A
<b>Score</b>	N/A

Criterion 1.3: The organisation trades in certified responsibly sourced eel	
<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 organisation trades in 10 – 49.9% (by number) of certified responsibly sourced eel and has the documentation to demonstrate that.
<b>Discussion</b>	11 fishermen are members of the structure and pass the SEG certification this year. Theoretically they will be the main suppliers of glass eels to the structure and therefore there should be more than 50% of eels coming from certified sources. This remains to be verified at the end of the season, however.
<b>Score</b>	Conditionally responsible

Criterion 1.4: Traceability	
1.4.1: Traceability - Incoming product, separation and segregation	
<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>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.</li> <li>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.</li> <li>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.</li> </ul>
<b>Discussion</b>	<p>All the fishermen who are members of the structure use electronic tele-declaration and purchases are declared via Visiomer.</p> <p>Currently 11 fishermen are expected to stock their fish. There are 11 basins and it is therefore planned to allocate 1 basin to each fisherman. This will allow very good traceability.</p> <p>The 4 other basins will be used by fishermen outside the structure, with a separation SEG / Non SEG.</p> <p>All this will have to be checked at the end of the season.</p>
<b>Score</b>	Conditionally responsible

1.4.2: Traceability - Outgoing product	
<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:</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 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>
<b>Aspiring indicators</b>	<ul style="list-style-type: none"> <li>• 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):</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:               <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>
<b>Discussion</b>	<p>The PO already manages two other storage sites. One is SEG certified, the other is in the process of being certified. In view of the data collected during the audit of the Beauvoir-Sur-Mer site, we assume that the traceability of outgoing products will be carried out in the same way.</p> <p>If this is the case, the criterion would be met. However, the documents will have to be checked at the end of the season.</p>
<b>Score</b>	Conditionally responsible

1.4.3: Traceability - Record keeping and documentation	
<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>
<b>Discussion</b>	<p>As with the previous criterion, we assume that record keeping and documentation will be equivalent to the other two PO sites. If this is the case the criterion will be met. An examination will be carried out at the end of the season.</p>
<b>Score</b>	Conditionally responsible

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	
<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>The use of chemicals follows legal requirements of the appropriate EU regulations and of the country concerned.</li> <li>The facility has the appropriate permissions to operate from the relevant licensing authority.</li> <li>An effective and documented biosecurity plan is in place and there is evidence that it is being followed.</li> <li>Records are available showing regular monitoring of health and a possible sign of stress according to the facility's plan (including the completion of microscope parasite checks) and daily mortality is recorded.</li> <li>Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility.</li> </ul>
<b>Aspiring indicators</b>	<ul style="list-style-type: none"> <li>The use of chemicals follows legal requirements of the appropriate EU regulations and of the country concerned.</li> <li>The facility has the appropriate permissions to operate from the relevant authority</li> <li>An effective and documented biosecurity plan is in place and there is evidence that it is being followed.</li> <li>Eels are regularly monitored for health and possible signs of stress (although this might not be documented) and daily mortality is recorded.</li> <li>Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility.</li> </ul>
<b>Discussion</b>	<p>The installation has all the authorisations.</p> <p>The only chemical product used is AGRIGERM 1510, a universal disinfectant.</p> <p>A biosecurity plan has been presented to the DDPP and is currently being modified. It should be consulted at the end of the season.</p> <p>Daily mortality will be recorded per basin (and therefore theoretically per fisherman).</p> <p>Oxygen and temperature are monitored via probes and recorded on computer.</p> <p>Other physico-chemical parameters are not monitored but a visual check will be carried out every day by a person hired during the season.</p> <p>Regular water renewal is planned. If necessary, a change of basin is carried out.</p> <p>The exposed practices are in accordance with the standard of the SEG and a regular monitoring of the basins will be carried out. However, it is not planned to record the monitoring of the tanks, apart from mortality. So, the responsible indicator is not met.</p>
<b>Score</b>	Aspiring

1.5.4 Restocking: The risk of restocked eels introducing disease into wild populations has been assessed and is minimal	
<b>Responsible indicators</b>	Eels are tested before restocking and found to be free of disease AND/OR eels are from a known source which is tested on at least an annual basis and known to be free of disease.
<b>Aspiring indicators</b>	Eels are tested before restocking when first sourced from a new area, and periodically (at least annually) thereafter to ensure they are free from disease.
<b>Discussion</b>	Each batch of glass eels intended for restocking will be tested.

<b>Score</b>	Responsible
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Summary scores for component 1	
Not Met	0
Not applicable	1
Aspiring	1
Responsible	2
Conditionally responsible	4
Total possible	7
<b>% Responsibility (Responsible / Total possible)</b>	<b>86%</b>

Component 4 - Eel buying and trading	
<b>Criterion 4.0: Segregation of certified and uncertified eels</b>	
<b>Weighting: 2</b>	
<b>Responsible indicators</b>	Certified and non-certified are kept separated, from point of collection through holding to sale and onward transport.
<b>Aspiring indicators</b>	None.
<b>Discussion</b>	It is planned to separate SEG-certified glass eels from other glass eels. This should be checked at the end of the season.
<b>Score</b>	Conditionally responsible

Criterion 4.1: The Glass eel holding facility is a registered Aquaculture Production Business	
<b>Weighting: 1</b>	
<b>Responsible indicators</b>	The Glass eel holding facility is a registered Aquaculture Production Business.
<b>Aspiring indicators</b>	The facility is not a registered Aquaculture Production Business, but has credible plans to register within the next 6 months.
<b>Discussion</b>	The company has an aquaculture zoosanitary approval: FR 85 222 002 CE.
<b>Score</b>	Responsible

Criterion 4.2: Mortality in storage facility	
<b>Weighting: 2</b>	
<b>Responsible indicators</b>	Mortality rate over the season is less than 2% on average.



<b>Aspiring indicators</b>	Mortality rate over the season is less than or equal to 5% on average but greater than or equal to 2%.
<b>Discussion</b>	This criterion will have to be judged at the end of the season. In the meantime, it is classified as a sensitive indicator.
<b>Score</b>	Conditional: Aspiring

### Criterion 4.3: Mortality during transport and initial holding if transported to farm

<b>Weighting: 2</b>	
<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• Buyers source at least 90% of their eels from certified suppliers. <b>OR</b></li> <li>• Mortality during transport and for the first week at the farm is less than 2% on average.</li> </ul>
<b>Aspiring indicators</b>	<ul style="list-style-type: none"> <li>• Buyers source 50% - 89.9% of their eels from certified suppliers. <b>OR</b></li> <li>• 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.</li> </ul>
<b>Discussion</b>	This criterion will have to be judged at the end of the season. In the meantime, it is classified as a sensitive indicator.
<b>Score</b>	Conditional: Aspiring

### Criterion 4.4: Water quality

<b>Weighting: 1</b>	
<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• 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).</li> <li>• Water quality management procedures are in place including regular monitoring of relevant parameters which shows that water quality is always high and stable.</li> <li>• 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.</li> </ul>
<b>Aspiring indicators</b>	<ul style="list-style-type: none"> <li>• 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).</li> <li>• The facility has a minimum of a back-up generator and oxygen supply.</li> </ul>
<b>Discussion</b>	<p>The water used is drinking water. When a new basin is put in water, it is waited 24 hours before placing elvers in it.</p> <p>In each basin there is a sensor to measure the oxygen level and temperature. Oxygenation of the basin is done by continuously adding pressurised air. If the safety threshold is exceeded (less than 70% oxygen saturation), solenoid valves are activated and oxygen is added automatically until saturation reaches 95%. The water temperature is regulated by the outside air, whose temperature is kept constant at 7°C. An alarm goes off and warns the anglers if the oxygen level drops below 50% or if the water temperature reaches the thresholds of 3°C or 12°C.</p> <p>The oxygen and temperature conditions are automatically recorded on a computer server. The history of these conditions can be consulted per basin on a computer.</p> <p>A visual monitoring of the basins must also be carried out every day and the water is renewed if necessary.</p> <p>An emergency generator is present and takes over automatically in a power cut.</p>
<b>Score</b>	Responsible

Criterion 4.5: Handling and welfare	
<b>Weighting: 1</b>	
<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• Systems are in place and the facility is designed to keep handling to an absolute minimum.</li> <li>• Documented procedures are in place for handling, and handling, where necessary, is careful.</li> <li>• 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).</li> <li>• Eels are moved without being allowed to dry out.</li> </ul>
<b>Aspiring indicators</b>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Handling, where necessary, is carefully planned and executed.</li> <li>• The infrastructure has been optimised as far as possible to avoid injuries.</li> <li>• Nets are small-mesh (1mm maximum).</li> <li>• Eels are moved without being allowed to dry out.</li> </ul>
<b>Discussion</b>	<p>The installation was carried out to reduce fish handling to a minimum. Fine mesh grids are present in the tanks to prevent them from being sucked in by the water circulation.</p> <p>When purchasing the elvers, a stainless steel cone is used to drain the elvers. It is intended that the elvers are taken out of the basin only to condition them for sale. However, there may be a change of basin if the physicochemical conditions have deteriorated.</p> <p>When the elvers are handled, a gutter and hose system is used. The tank have a slight slope and when the valve is open, the water and the elvers are discharged through a gutter which is extended by a hose. This hose reaches a fine mesh sieve and the elvers are then packed in the polystyrene bins for transport. This means that no netting is used. The transport truck can be parked a few metres away from the basins.</p> <p>The nets are only used for dead elvers.</p> <p>Despite good practice, there is no written protocol available, which is necessary to meet the responsible criterion.</p>
<b>Score</b>	Aspiring

Criterion 4.6: Transport	
<b>Weighting: 1</b>	
<b>Responsible indicators</b>	<ul style="list-style-type: none"> <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> <li>• The operator holds the relevant transport authorisations.</li> </ul>
<b>Discussion</b>	<p>This structure does not deliver live fish itself. Either the customer picks up the glass eels or they use an approved transporter.</p> <p>In case of delivery to France, a Delivery Note is issued. In case of sales abroad, it is planned to use the teleprocedure TRACES (TRAdE Control and Expert System).</p> <p>Packaging is carried out in polystyrene crates with a maximum load of 5kg, distributed on 3 trays. A bottle of frozen water is placed inside the case, without touching the fish. The elvers are kept wet and oxygen is added before closing the box. The box is then sealed</p>

	with adhesive tape at the joint between the lid and the box. The criterion is therefore met.
<b>Score</b>	Responsible

Criterion 4.7: The required percentage of glass eels is being used for restocking	
<b>Weighting: 2</b>	
<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>The buyer can provide documented evidence that <u>they have sold</u> at least 60% for restocking the required target percentage of its glass eels from the last season for the primary purpose of conservation / escapement.</li> <li>The eels for restocking are representative of the stock – slow growers are not selected.</li> </ul>
<b>Aspiring indicators</b>	<ul style="list-style-type: none"> <li>The buyer can provide documented evidence that <u>they have reserved or made available at least 60%</u> of the required target percentage of its glass eels from the latest season available for the primary purpose of conservation / escapement, <b>OR</b></li> <li>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 <b>OR</b></li> <li>The buyer can provide credible evidence that re-stocking will occur in the forthcoming season.</li> <li>The eels for restocking are representative of the stock – slow growers are not selected.</li> </ul>
<b>Discussion</b>	This criterion will have to be judged at the end of the season. In the meantime, it is classified as a sensitive indicator.
<b>Score</b>	Conditional: Aspiring

Summary scores for component 4	
Not Met	0
Conditionnal aspiring	3
Aspiring	1
Responsible	3
Conditionally responsible	2
Total possible	9
<b>% Responsibility (Responsible / Total possible)</b>	<b>56%</b>