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, 22 December 2020

1. Introduction

This document is the report of the audit of December 3, 2020 carried out for the Organization of Estuary Producers (OP Estuaire) concerning the correct application of the specifications of the SEG (Sustainable Eel Group) (version 6.0a, December 2019) in view of a labelling. This assessment was carried out for components 1 and 4 of the standard.

The certification concerns the storage site, located in the commune of Beauvoir-sur-Mer in Vendée (France). The storage site depends on the Estuary Producer Organization. The Estuary Producer Organization 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 OP Estuaire created its first storage center in Cordemais, the SAS Estuaire. This center is labelled SEG. All these sites buy glass eels from fishermen, most of whom are members of the OP Estuaire.

The site concerned by this audit, SAS Côtes Vendéennes, is located in Beauvoir-sur-Mer (Le Port du Bec 85230 Beauvoir-sur-Mer). It is recent and started its activity during the 2019-2020 season. The audit, conducted in December 2020, will enable us to assess the facilities and their operation. In 2019, only one SEG-certified fisherman delivered to the site. For the 2020-2021 season, all fishermen delivering to the site will apply for SEG certification (audit in progress).

2. The assessment

The evaluator was Fabien Charrier of the Fish-Pass design office. The audit was carried out in the form of a discussion with Mrs. Collias (Director of the OP Estuaire). The audit was conducted on the basis of the documents presented. They corresponded to last year's activity. A complete visit of the site was also carried out. Ponds were in water with glass eels.

3. Client Contact Details

Client Contact Name	SAS Côtes Vendéennes/ COLLIAS ALEXANDRA
Client Address	2, rue Colbert
Client Email	85100 Les Sables d'Olonne
Client Phone Number	op.estuaires@gmail.com

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)	nc	1	
1.3 The organisation trades in certified responsibly sourced eels	Aspiring	1	0
1.4 Traceability:	**Conditionally responsible**		
1.4.1 Incoming products, separation and segregation		1	1
1.4.2 Outgoing products	Responsible	1	1
1.4.3 Record keeping and documentation	Responsible	1	1
1.5 Biosecurity & welfare – 1.5.2 Eel buying & trading: Biosecurity is present and disease is treated rapidly and appropriate	Responsible	1	1
1.5.3 Eel farming : Biosecurity is present and disease is treated rapidly and appropriate 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
Percentage Responsibility Score:		**86%**	

Finding: For generic requirements, all criteria are responsible but for one of them, this will have to be verified at the end of the season. The provisional score obtained is therefore 86% but this is subject to verification at the end of the season.

Component 4: Eel buying and trading	Auditor's findings	Weighting	Score
4.0 Segregation of certified and uncertified eels	Conditionally responsible	2	2
4.1 The glass eel holding facility is a registered aquaculture production business	Responsible	1	1
4.2 Mortality in storage facility	Responsible	2	2
4.3 Mortality during transport and initial holding if transported to farm	Not applicable		
4.4 Water quality	Responsible	1	1
4.5 Handling and welfare	Aspiring	1	0
4.6 Transport	Responsible	1	1
4.7 The required percentage of glass eels is being used for restocking	Aspiring	2	0
Total		10	7
Percentage Responsibility Score:		**70%**	

Finding: The criteria for separating certified and non-certified eels should be checked at the end of the season. Assuming that this parameter is correctly met, the provisional score is ultimately 70% responsibility criteria.

Summary of assessment and scoring

Component	Not Met	Aspiring	Responsible
1	0	1	6
4	0	3	7
Total	0	4	13
		Total Responsibility Score: =	**77%**

Summary finding:
The SAS Côtes Vendéennes storage site, with a score of 77% and no criteria not met, meets the criteria for SEG certification. However, several criteria (ie. 1.4.1, 4.0) have been validated as responsible under the condition of a verification of their correct application at the end of the season.

5. Recommendations:

1. It is recommended to award a provisional certificate to SAS Côtes Vendéennes. A verification of all specified points will be made at the end of the season. The rating will be reviewed on the basis of these elements as well as the issue or not of a definitive certificate.

1.2 The OP 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.

1.4 Even if the destination of consumption/repopulation appears on all the fishing sheets, the indication of the destination on the inlet-outlet sheets of the fish would facilitate traceability.

4.2 Concerning the mortality aspect of glass eels, all fishermen delivering to the storage site keep the glass eels at home in a fish tank for a minimum period of 48 hours before delivery. However, the study by Le Roux and Guigue (2002) showed in particular that it is in the period of 2 to 3 days after fishing that the main mortalities are observed. Therefore, we recommend that each fishermen keep a mortality record that can be related to the quantity of glass eels caught and to a defined period (for example, one or more fishing logbooks). The mortality logs should be presented at the next control audit. Mortality can thus be evaluated over the entire storage area.

4.5 For the next audit, it is also recommended that a written fish handling protocol be implemented.

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[1] pass for a Component in its previous audit?	Enhanced Surveillance	**Go to Q3**
3	Does the client only buy and sell product (does not physically handle it?)	Minimum Surveillance	**Go to Q4**
4	All other scenarios	Standard Surveillance	

	Certification Audit	Year 1	Year 2	Year 3	Year 4 Recertification Audit
Minimum Surveillance	On-Site Audit	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

Following the audit, standard monitoring is recommended. The next monitoring audit should be carried out 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.

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	In the first year of operation, the organization was not convicted of any offences. For the restocking operations, a control by the OFB was carried out and no problems were found.
Score	Responsible

Criterion 1.2: Contribution to Eel Conservation Projects. (Optional bonus score)	
Responsible indicators	The organisation donates at least 2% of its profits or at least 20% of its corporate responsibility programme to projects that make a positive contribution to eel conservation or population enhancement, such as Eel Stewardship Funds, River Restoration projects, conservation and education projects.
Aspiring indicators	The organisation donates 1 – 1.99% of its profits or 10 - 20% of its corporate responsibility programme to projects that make a positive contribution to eel conservation or population enhancement, such as Eel Stewardship Funds, River Restoration projects, conservation and education projects.
Discussion	Not applicable
Score	Not applicable

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	During the 2019-2020 season, only one SEG-certified fisherman (SEG 0082 certificate) delivered to the storage center. The quantity of SEG-certified glass eels is thus 14.3% for the 2019-2020 season.
Score	Aspiring

Criterion 1.4: Traceability	
1.4.1: Traceability - Incoming product, separation and segregation	
Responsible indicators	• Certified and uncertified eel products can be clearly and easily traced back to their source. • Where a fishery or buyer, an electronic tele-declaration system is used. • It operates a clear system which ensures that the product remains separated at all stages from arrival to dispatch from non-certified eel products. • The organisation ensures that any products wishing to make a claim as certified do not contain any non-certified eel-based ingredients. • If resolved through mass- or number- balance calculations, the margin of error does not exceed 2%.
Aspiring indicators	• Certified and uncertified eel products can be traced back to their source. • If segregation is not possible, there are clear and auditable records of the numbers of certified and uncertified eels entering the organisation at each facility. • It can demonstrate through auditable records that the number of certified eels exiting the organisation in a ear did not exceed the number that entered. • If resolved through mass- or number- balance calculations, the margin of error does not exceed 5% or if a farm, the 2800 pieces per 1 kg of glass eels is applied.
Discussion	All fishermen who are members of the structure use the electronic declaration (Télécapêche) and the purchases are declared via Visiomer. Even if the consumption/restocking destination appears on all the fishing sheets, the indication of the destination on the fish entry/exit sheets would facilitate traceability. For the 2019-2020 season, only one fisherman delivering to the structure was SEG certified. Given the small proportion of glass eels involved, the fisherman's SEG glass eels were not separated from the others. However, the records allow verification of the quantities entered and exited for this fisher. For the 2020-2021 season, the majority of fishermen delivering to the storage center requested SEG approval. A verification of the documents will be planned at the end of the season to verify the implementation of the traceability of certified products.
Score	Conditionally responsible: To be evaluated at the end of the season.

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	All fishermen use Télécapêche and purchases are declared on Visiomer. All transport vouchers are complete with batch codes and product quantities. Invoices clearly show the batch codes and the weight of the glass eels in accordance with the transport vouchers. The mortality of the batch is well indicated and is subtracted between entry and exit.
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 storage site has been in operation for 1 year and has all the papers for this year of activity. All the data relating to the traceability of the products are entered in files and on computer software. It is possible to easily reconstitute the origin and weight of the glass eels constituting a batch. All the physico-chemical controls of the water are recorded in a binder. The purchase of glass eels is recorded on the FranceAgrimer (Visiomer) website.
Score	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	
Responsible indicators	The use of chemicals follows legal requirements of the appropriate EU regulations and of the country concerned. The facility has the appropriate permissions to operate from the relevant licensing authority. An effective and documented biosecurity plan is in place and there is evidence that it is being followed. Records are available showing regular monitoring of health and a possible sign of stress according to the facility's plan (including the completion of microscope parasite checks) and daily mortality is recorded. Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility.
Aspiring indicators	The use of chemicals follows legal requirements of the appropriate EU regulations and of the country concerned. The facility has the appropriate permissions to operate from the relevant authority An effective and documented biosecurity plan is in place and there is evidence that it is being followed. Eels are regularly monitored for health and possible signs of stress (although this might not be documented) and daily mortality is recorded. Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility.
Discussion	The installation has all the authorisations. The only chemical used is AGRIGERM 1510, a universal disinfectant. The basins are cleaned after each emptying. The cleanings are recorded in a file. A biosecurity plan is present on site. The site is monitored by a veterinarian. Mortality is recorded per basin. Oxygen and temperature are monitored by sensors, recorded on computer and on paper once a day. The other physicochemical parameters are not monitored but a visual check is made every day by the site manager. No drugs are used on the site
Score	Responsible

1.5.4 Restocking: The risk of restocked eels introducing disease into wild populations has been assessed and is minimal	
Responsible indicators	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.
Aspiring indicators	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.
Discussion	Lots of glass eels sold directly for a restocking operation in France were tested and were negative to Pseudodactylogyrus sp, Ichthyophtirius multifiliis, Anguillicola crassus. The glass eels were restocked in the same eel management unit where they were caught.
Score	**Responsible**

Summary scores for Component 1	
Not met	**0**
Not applicable	1
Aspiring	1
Responsible	5
Conditionally responsible	1
Total possible	7
% Responsibility (Responsible / Total possible)	**86%**

Component 4 - Eel buying and trading	
Criterion 4.0: Segregation of certified and uncertified eels	
Weighting: 2	
Responsible indicators	Certified and non-certified are kept separated, from point of collection through holding to sale and onward transport.
Aspiring indicators	None.
Discussion	The fishermen deliver the glass eels individually to the storage center, so there is no risk of mixing during collection. Last season, only one fisher delivering to the storage center was SEG. Because of the small proportion of glass eels this represented, the glass eels were not separated. The majority of the fishermen delivering the storage center requested SEG approval this year. Their audit is in progress. The facility has 6 tanks. It is planned to separate the SEG-certified glass eels from the other glass eels. This will have to be checked during the season.
Score	Conditionally responsible: To be evaluated at the end of the season.

Criterion 4.1: The Glass eel holding facility is a registered Aquaculture Production Business	
Weighting: 1	
Responsible indicators	The Glass eel holding facility is a registered Aquaculture Production Business.
Aspiring indicators	The facility is not a registered Aquaculture Production Business, but has credible plans to register within the next 6 months.
Discussion	The company has an aquacultural zoosanitary approval: FR 85 029 002 CE
Score	Responsible

Criterion 4.2: Mortality in storage facility	
Weighting: 2	
Responsible indicators	Mortality rate over the season is less than 2% on average.
Aspiring indicators	Mortality rate over the season is less than or equal to 5% on average but greater than or equal to 2%.
Discussion	The mortality rate at the facility for the 2019-2020 season was estimated at 0.54%, thus meeting the responsible criterion. Dead individuals are destined for rendering. However, all the fishermen store at home in a fish tank for a minimum period of 48 hours before delivering the storage center. The study made by Le Roux and Guigue (2002) showed, in particular, that it is between 2 and 3 days after fishing that the main mortalities are observed. We therefore recommend that each fisher keep a mortality record that can be related to a quantity of glass eels caught and a defined period (e.g. one or more fishing logbooks). The mortality logs should be presented at the next control audit. Mortality can thus be evaluated over the entire storage area.
Score	Responsible

Criterion 4.3: Mortality during transport and initial holding if transported to farm	
Weighting: 2	
Responsible indicators	• Buyers source at least 90% of their eels from certified suppliers. **OR** • Mortality during transport and for the first week at the farm is less than 2% on average.
Aspiring indicators	• Buyers source 50% - 89.9% of their eels from certified suppliers. **OR** • Mortality during transport and for the first week at the farm is less than or equal to 3% on average but greater than or equal to 2% on average.
Discussion	No direct sales have been made to a farm at this time.
Score	Not applicable

Criterion 4.4: Water quality	
Weighting: 1	
Responsible indicators	• A system is in place that is expected to keep key water quality parameters within suitable tolerances for healthy eel survival (e.g. Ammonia, Suspended Solids, pH, Oxygen). • Water quality management procedures are in place including regular monitoring of relevant parameters which shows that water quality is always high and stable. • The facility operates a back-up system to ensure that water quality will not adversely affect survival rates in the case of an equipment failure.
Aspiring indicators	• A system is in place that is expected to keep key water quality parameters within suitable tolerances for healthy eel survival (e.g. Ammonia, Suspended Solids, pH, Oxygen). • The facility has a minimum of a back-up generator and oxygen supply.
Discussion	All in all, 6 basins are present in the storage facility. The water used is drinking water. When a new basin is put in water, it is waited 24 hours before placing glass eels in it. The water in the basins is renewed manually by 1/3 of the volume every day. In each basin is present a probe to measure the level of oxygen and temperature. The values are continuously recorded on computer and are entered once a day in the storage monitoring folder. Oxygenation of the basins is done by the continuous addition of pressurised air. If the safety threshold is exceeded (less than 65% oxygen saturation), solenoid valves are activated and oxygen is added automatically. The basins are in a cold room, so the water temperature is regulated by the ambient air, whose temperature is maintained around 7-8°C. An alarm is activated and warns the site managers in case of problems related to temperature or oxygen. A visual monitoring of the basins is carried out every day by the site employee. An emergency generator is present and takes over automatically in case of power failure.
Score	Responsible

Criterion 4.5: Handling and welfare	
Weighting: 1	
Responsible indicators	• Systems are in place and the facility is designed to keep handling to an absolute minimum. • Documented procedures are in place for handling, and handling, where necessary, is careful.

	• The infrastructure is designed to avoid injuries, and so that the use of nets is rarely necessary. When used, nets are small-mesh (1mm maximum). • Eels are moved without being allowed to dry out.
Aspiring indicators	• The facility may not be optimally designed, but systems are in place to avoid handling as much as possible within the constraints of the facility. • Handling, where necessary, is carefully planned and executed. • The infrastructure has been optimised as far as possible to avoid injuries. • Nets are small-mesh (1mm maximum). • Eels are moved without being allowed to dry out.
Discussion	The center is monitored by a veterinarian. Upon arrival in the storage center, the glass eels are placed in a fine mesh stainless steel sieve. The installation has been designed to reduce the handling of the fish as much as possible with bottom emptying systems. The glass eels are collected in fine mesh boxes. Fine mesh strainers are present in the tanks to prevent the glass eels from being sucked in by the water circulation. The transport truck can be parked a few meters away from the basins. Nets with 1 mm mesh are only used for dead glass eels. Despite good practices, there is no written protocol available, which is necessary to meet the criterion.
Score	Aspiring

Criterion 4.6: Transport	
Weighting: 1	
Responsible indicators	• There is a Transport Plan in place to minimise travel time – this meets the Transport requirements for vertebrates. • Packing is done in a way that minimises handling, time and stress. • Eels are kept cool and wet with an adequate supply of oxygen. • The operator holds the relevant transport authorisations.
Discussion	This structure does not deliver live fish itself. Either the customer comes to pick up glass eels (fish tank truck), or they use an approved carrier (transport in crates for restocking). For the restocking operation in which the center participated, the packaging is made of polystyrene crates with a bottle of frozen water placed inside the crate away from the fish. The glass eels are kept wet and oxygen is added before closing the crate.
Score	Responsible

Criterion 4.7: The required percentage of glass eels is being used for restocking	
Weighting: 2	
Responsible indicators	• The buyer can provide documented evidence that they have sold at least 60% for restocking the required target percentage of its glass eels from the last season for the primary purpose of conservation / escapement. • The eels for restocking are representative of the stock – slow growers are not selected.

Aspiring indicators	• The buyer can provide documented evidence that they have reserved or made available at least 60% of the required target percentage of its glass eels from the latest season available for the primary purpose of conservation / escapement, **OR** • The buyer can provide documented evidence that it has made available glass eels to the maximum level possible within the constraints of the implementation of the EMP in that country **OR** • The buyer can provide credible evidence that re-stocking will occur in the forthcoming season. • The eels for restocking are representative of the stock – slow growers are not selected.
Discussion	The storage center purchased 53.5% of fish for restocking in the 2019-2020 season. Since 2010, none of the restocking quotas have been consumed in France due to a lack of demand. The storage center provided glass eels for a restocking project in France in 2020.
Score	Aspiring

Summary scores for Component 4	
Not met	0
Not applicable	1
Aspiring	3
Responsible	5
Conditionally responsible	2
Total possible	10
% Responsibility (Responsible / Total possible)	70%