

**Assessment against SEG Standard:** Component 1: Core requirements  
Component 4: Purchase and trade of eels

**Completed by**  
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**Final Version**

Reviewed and Approved by Certification Body:  
David Bunt, Sustainable Eel Group, 10 January 2021

## 1) Introduction

This document represents the report of the audit of 05 January 2021 carried out for GURRUCHAGA Marée on the storage site of Epargnes, at Mr Jacky Arteau, concerning the application of the specifications of the SEG (Sustainable Eel Group) Standard (version 6.0a, December 2019). This assessment was carried out in relation to components 1 and 4 of the standard.

The certification concerns a storage site located in Epargnes (17120) in France. The storage site is the property of Mr Jacky Arteau who has a lease agreement with the company Gurruchaga Marée, based in Hendaye (SEG certified), since January 2019. Mr Arteau's fish tanks have been in existence for 15 years. This site works mainly with fishermen from the Gironde region, part of which is SEG certified and another part in the process of being certified. The elvers are harvested directly from the fish tanker truck when Mr Arteau unloads the boats.

## 2) The assessment

The evaluator was Nicolas Belhamiti for the engineering office Fish-Pass. The audit was carried out in the form of a discussion with Mr. Arteau (site manager). The audit was conducted on the basis of documents presented. They correspond to the activity of the past and current year. A full site visit was also carried out.

## 3) Client Contact Details

<b>Name/Compagny</b>	Gurruchaga Marée / Site d'Epargnes
<b>Postal address</b>	5 Rue du Fief des Plantes, 17120, EPARGNES
<b>Email address</b>	gurrumaree@wanadoo.fr
<b>Phone number</b>	06 73 81 17 99

#### 4) Results of the assessment

The outcome of this assessment is as follows:

<b>Component 1: General Requirements</b>	<b>Auditor's findings</b>	<b>Weighting</b>	<b>Score</b>
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	Aspiring	1	0
1.4 Traceability:			
1.4.1 Incoming products, separation and segregation	Responsible	1	1
1.4.2 Outgoing products	Aspiring	1	0
1.4.3 Record keeping and documentation	Responsible	1	1
1.5 Biosecurity and well-being:			
1.5.2 Eel purchase and trade: biosecurity is present, and disease is treated promptly and appropriately	Responsible	1	1
1.5.4 Restocking: The risk of restocking eels introducing diseases into wild populations has been assessed and is minimal.	Responsible	1	1
<b>Total</b>		<b>7</b>	<b>5</b>
<b>Percentage Responsibility Score:</b>		<b>71%</b>	

**Finding:** For component 1, the score is 71%, achieving a Responsible assessment.

<b>Component 4: Eel buying and trading</b>	<b>Auditor's findings</b>	<b>Weighting</b>	<b>Score</b>
4.0 Segregation of certified and uncertified eels	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	Responsible	2	2
4.4 Water quality	Aspiring	1	0
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
<b>Total</b>		<b>12</b>	<b>8</b>
<b>Percentage Responsibility Score:</b>		<b>67%</b>	

**Finding:** The storage site achieved a score of 67% for component 4 and can therefore be considered responsible according to the SEG standard criteria.

**Summary of assessment and scoring**

Component	Not Met	Aspiring	Responsible
1	0	2	5
4	0	4	8
<b>Total</b>	<b>0</b>	<b>6</b>	<b>13</b>
<b>Total Responsibility Score: = 13/19</b>			<b>68%</b>

**Summary finding:**

With a score of 68%, the savings storage site of Epargnes for Gurruchaga Marée meets the criteria for achieving SEG certification.

**5) Recommendations:**

1. With a responsibility criteria score of 68%, the storage site has achieved the level required to be considered responsible and meets the criteria for certification by the SEG standard.
2. With regard to criterion 1.4.2 (outgoing products), it would be desirable to deduct or at least indicate the mortality associated with the batches on the outgoing vouchers or transport vouchers. This would allow precise traceability of each batch. Also, SEG batches are well identified but the certificate number(s) of the fishermen who contributed to the batch should be added.
3. Concerning criterion 4.4 (water quality). In order to achieve the responsibility criterion, regular monitoring of the physico-chemical parameters of the basins (ammonia, pH, etc.) should be set up.
4. Concerning handling and welfare (criterion 4.5), the practices are good but a written protocol summarising these practices is missing.

**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.

## 7) The Assessment

The tables below detail the reasons for the ratings given above for each component.

Component 1 – Generic requirements (Weighting : 1 for each criterion)	
Criterion 1.1: Commitment to legality	
<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>	No infractions have been found regarding the storage site. Mr. Arteau was checked several times and everything was in order. The criterion has therefore been met.
<b>Score</b>	Responsible

Criterion 1.2: Contribution to Eel Conservation Projects. (Optional bonus score) (The intention is for this to be mandatory from summer 2020)	
<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>	The Epargnes site has been buying SEG certified eels only since the beginning of this season 2020-2021. The share of SEG fish since the beginning of the season and until 5th January 2021 was 26.5%. This percentage is expected to increase as several fishermen who sell at this site are in the process of certification. The aspiring criterion is reached.
<b>Score</b>	Aspiring

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>In the facility, one part of the ponds is reserved for SEG-certified fish, the other for non-SEG fish.</p> <p>The registers are complete with transport vouchers, entry and exit sheets with identification of the batches and their storage tank. Documents make it possible to follow the traceability of the products at their entry and exit.</p> <p>Purchases are declared on the administration website (Visiomer) by the Hendaye site (SEG certified).</p> <p>On the registers, the number of certified eels leaving the organisation does not exceed the number entering it. For the year 2019-2020 there were no SEG fish but a slight difference (0.87%) was present between the entries and exits of glass eels.</p> <p>Although a slight difference was noticed for the 2019-2020 season, no difference was noted for SEG fish in the 2020-2021 season.</p> <p>This criterion has therefore been met.</p>
<b>Score</b>	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:               <ul style="list-style-type: none"> <li>• The organisation correctly uses batch-coding for labelling certified product, which can be on the packaging for the product, or included in the documentation (e.g. invoice) with the assignment</li> </ul> </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>

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### Gurruchaga Marée / Epargnes

<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>All the elvers are transported to the other sites of Gurruchaga Marée, mainly Hendaye, except in the case of the French restocking.</p> <p>All transport vouchers are complete with batch codes and product quantities. The SEG batches are well identified but the SEG number of the fisherman(s) is not indicated.</p> <p>Sales are declared to the administration by the Hendaye site (SEG certified).</p> <p>On the exit vouchers, the weight of the batch is always the same between entry and exit. However, taking into account the mortality occurring in the ponds, the exit voucher should have a lower weight by subtracting the quantified mortality on the batch.</p> <p>SEG batches should be accompanied by the certificate numbers of the fisherman(s) concerned and the mortality could be indicated on the exit vouchers. In this way, an aspiring criterion is allocated.</p>
<b>Score</b>	Aspiring

#### 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>The storage site has documentation for the last 4 years.</p> <p>Product traceability data is available in well-organised binders and it is easy to retrieve the information and to reconstruct the origin and weight of the glass eels making up a batch.</p>

	The purchase of glass eels is electronically declared on the FranceAgrimer (Visiomer) website in accordance with French legislation.
<b>Score</b>	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 Halamid, a universal disinfectant specific for aquaculture.</p> <p>A biosecurity plan is present and documented. The cleaning of the ponds, lorries and premises is carried out regularly and recorded.</p> <p>Mortality is regularly recorded and consigned and dead glass eels are placed in the freezer and rendered at the end of the season.</p> <p>No medicines are used.</p> <p>The criterion is therefore met.</p>
<b>Score</b>	Responsible

<b>1.5.4 Restocking: The risk of restocked eels introducing disease into wild populations has been assessed and is minimal</b>	
<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.
Discussion	Each batch of glass eels intended for restocking is tested.
<b>Score</b>	Responsible

<b>Summary scores for Component 1</b>	
Not met	0
Not applicable	1
Aspiring	2
Responsible	5
Total possible	7
<b>% Responsibility (Responsible / Total possible)</b>	<b>71%</b>



<b>Component 4 - Eel buying and trading</b>	
<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>	All fish notified SEG at the entrance are placed in specific fish tanks. The collection is done with the help of a truck with two fish tanks, allowing SEG fish to be separated from non-SEG fish. The criterion is therefore met.
<b>Score</b>	Responsible

<b>Criterion 4.1: The Glass eel holding facility is a registered Aquaculture Production Business</b>	
<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 152 001 CE
<b>Score</b>	Responsible

<b>Criterion 4.2: Mortality in storage facility</b>	
<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>	The mortality rate was estimated from the records at 0.87% for the 2019-2020 season and 1.16% for the beginning of the 2020-2021 season. The criterion is therefore met.
<b>Score</b>	Responsible

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>	<p>All glass eels are sent to other Gurruchaga Marée storage sites, mainly the head office in Hendaye.</p> <p>After contacting the eel farm ALBE (Germany), the average mortality after transport from the Hendaye site is 1.6%.</p> <p>The criterion is therefore met.</p>
<b>Score</b>	Responsible

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.</p> <p>The water is continuously bubbled and recirculated.</p> <p>The temperature is monitored daily and if the water is too hot, ice is added to reduce the temperature.</p> <p>In the event of a power cut, oxygen is automatically added to all the basins. This is done until the power is restored.</p> <p>Several emergency power units are present on site.</p> <p>The elvers stay on site for an average of 3-4 days before being sent to Hendaye.</p> <p>The practices observed are good, however there is no regular monitoring of water quality (pH, ammonia etc.). This can be explained by the very short time the elvers spend in these ponds. However, this lack only allows the sensitised criterion to be reached.</p>
<b>Score</b>	Aspiring

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 has been designed to handle elvers as little as possible. The transport truck can be parked a few metres away from the pools.</p> <p>For the purchase of the elvers, the sieve is made of fine mesh stainless steel.</p> <p>The elvers are transported in fine-mesh containers.</p> <p>The elvers are collected by emptying them through a pipe at the bottom of the pool.</p> <p>A plastic net is used to collect the dead elvers.</p> <p>Despite good practices, there is no written protocol available.</p> <p>Thus, only the sensitised criterion is reached.</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>The fish are collected via a fish tanker truck with an oxygen supply.</p> <p>All glass eels are shipped in a live-truck with an oxygen supply to the other Gurruchaga storage sites.</p> <p>All batches have transport vouchers.</p> <p>The staff has an accreditation for the transport of live animals.</p> <p>The criterion is therefore met.</p>
<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>	<p>The Epargnes site has bought 55% elvers for restocking for the 2019-2020 season. The Gurruchaga Marée group marketed 50.1% elvers for restocking during the 2019-2020 season.</p> <p>Since 2010, none of the restocking quotas have been consumed in France due to lack of demand.</p> <p>Gurruchaga Marée supplies glass eels for many restocking projects in France and Europe.</p> <p>In this way, the aspiring criterion is reached.</p>
<b>Score</b>	Aspiring

Summary scores for Component 4	
Not met	0
Not applicable	0
Aspiring	4
Responsible	8
Total possible	12
<b>% Responsibility (Responsible / Total possible)</b>	<b>67%</b>