

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

Completed by
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Final Version

Reviewed and Approved by Certification Body:
David Bunt, Sustainable Eel Group, 14 January 2021

1. Introduction

This document is the report of the audit of 6th January 2021 carried out for GURRUCHAGA Marée on the new storage site of Bourcefranc, 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 only in relation to components 1 and 4 of the standard.

The certification concerns a storage site located in the commune of Bourcefranc-le-Chapus (17560) in France. This is the first season of this storage site which depends on the company Gurruchaga Marée, based in Hendaye (SEG certified). This fish farm will mainly work with fishermen from the Charente, some of whom have started the SEG certification process. The glass eels are harvested directly from the fish tanker truck when the boats are unloaded.

2. The assessment

The evaluator was Nicolas Belhamiti of the Fish-Pass engineering company. The audit was carried out in the form of a discussion with Mr. Aguerre (site manager). The audit was conducted on the basis of the documents presented and a full site visit was also carried out. The documents relating to traceability and the quantity of SEG fish could not be judged because this is the site's first season of activity. It is planned to come back at the end of the season to judge these elements. The audit carried out in January 2021 judged only the installations and the way in which the operation is planned.

3. Client Contact Details

Client Contact Name	Gurruchaga Marée/ Site de Bourcefranc (Bruno Aguerre)
Client Address	Route de Daire, 17560, Bourcefranc-le-Chapus
Client Email	gurrumaree@wanadoo.fr
Client Phone Number	06 12 42 95 37

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)	NA	NA	NA
1.3 The organisation trades in certified responsibly sourced eels	Conditionally aspiring	1	0
1.4 Traceability:			
1.4.1 Incoming products, separation and segregation	Conditionally responsible	1	1
1.4.2 Outgoing products	Conditionally aspiring	1	0
1.4.3 Record keeping and documentation	Conditionally 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
1.5.4 Restocking : The risk of restocked eels introducing disease into wild populations has been assessed and is minimal	Responsible	1	1
Total		7	5
Percentage Responsibility Score:		71%	

Finding: For Component 1, a generic requirement, the score is 71% leading to a Responsible assessment.

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	Conditionally aspiring	2	0
4.3 Mortality during transport and initial holding if transported to farm	Responsible	2	2
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	Conditionally aspiring	2	0
Total		12	7
Percentage Responsibility Score:		58%	

Finding: The Bourcefranc storage site for Gurruchaga Marée obtained a score of 58% for component 4 and can therefore be considered responsible according to the SEG specifications.

Summary of assessment and scoring

Component	Not Met	Aspiring	Responsible
1	0	2	5
4	0	5	7
Total	0	7	12
Total Responsibility Score: = 12/19			63%

Summary finding:

The Bourcefranc storage site, with a score of 63% 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 the other sites managed by Gurruchaga Marée operate. It will therefore be necessary to check all these points at the end of the season.

5. Recommendations:

1. Fish-Pass recommends that a provisional certificate be issued at the Bourcefranc site. A verification of all the points specified "Conditionally responsible" and "Conditionally aware" will be done at the end of the season and the note will be reviewed as well as the issuance or not of a final certificate.
2. Gurruchaga Marée should consider how to make a positive contribution to eel conservation projects (criteria 1.2) and ensure that these are implemented by the next evaluation.
3. From what has been seen, the following recommendations can already be implemented :
 - a. 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 should be well identified and the certificate number(s) of the fishermen who contributed to the batch should be added.
 - b. Concerning handling and welfare (criterion 4.5), the practices are good but a written protocol summarising these practices is missing.
 - c.

6. Next Audit

Question	Performance of the Client at Audit	Yes	No
1	Has the client been part of any external investigation which may be of concern to SEG AND/OR been suspended from any other certification standard?	Enhanced Surveillance	Go to Q2
2	Has the client received a borderline pass for a Component in its previous audit?	Enhanced Surveillance	Go to Q3
3	Does the client only buy and sell product (does not physically handle it?)	Minimum Surveillance	Go to Q4
4	All other scenarios	Standard Surveillance	

	Certification Audit	Year 1	Year 2	Year 3	Year 4 Recertification Audit
Minimum Surveillance	On-Site Audit	No Audit	Remote Audit	No Audit	On-Site Audit
Standard Surveillance	On-Site Audit	No Audit	On-Site Audit	No Audit	On-Site Audit
Enhanced Surveillance	On-Site Audit	On-Site Audit	On-Site Audit	On-Site Audit	On-Site Audit

Based on the audit results, standard monitoring is recommended and the next audit should take place in January 2023.

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	This is the first year of this site, so no infringements have been detected. The company Gurruchaga Marée, on which the site depends, has no proceedings in progress or past over the last 24 months. The criterion has therefore been met.
Score	Responsible

Criterion 1.2: Contribution to Eel Conservation Projects. (Optional bonus score) (The intention is for this to be mandatory from summer 2020)	
Responsible indicators	The organisation donates at least 2% of its profits or at least 20% of its corporate responsibility programme to projects that make a positive contribution to eel conservation or population enhancement, such as Eel Stewardship Funds, River Restoration projects, conservation and education projects.
Aspiring indicators	The organisation donates 1 – 1.99% of its profits or 10 - 20% of its corporate responsibility programme to projects that make a positive contribution to eel conservation or population enhancement, such as Eel Stewardship Funds, River Restoration projects, conservation and education projects.
Discussion	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	This criterion will have to be judged at the end of the season. In the meantime, it is classified as an aspiring indicator.
Score	Conditionally aspiring

Criterion 1.4: Traceability									
1.4.1: Traceability - Incoming product, separation and segregation									
Responsible indicators	<ul style="list-style-type: none"> • Certified and uncertified eel products can be clearly and easily traced back to their source. • Where a fishery or buyer, an electronic tele-declaration system is used. • It operates a clear system which ensures that the product remains separated at all stages from arrival to dispatch from non-certified eel products. • The organisation ensures that any products wishing to make a claim as certified do not contain any non-certified eel-based ingredients. • If resolved through mass- or number- balance calculations, the margin of error does not exceed 2%. 								
Aspiring indicators	<ul style="list-style-type: none"> • Certified and uncertified eel products can be traced back to their source. • If segregation is not possible, there are clear and auditable records of the numbers of certified and uncertified eels entering the organisation at each facility. • It can demonstrate through auditable records that the number of certified eels exiting the organisation in a year did not exceed the number that entered. • If resolved through mass- or number- balance calculations, the margin of error does not exceed 5% or if a farm, the 2800 pieces per 1 kg of glass eels is applied. 								
Discussion	<p>In the plant, there are two series of two completely independent basins. The separation of the different batches is foreseen as follows:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th colspan="2">Series 1, SEG fish</th> <th colspan="2">Series 2, Non-SEG fish</th> </tr> </thead> <tbody> <tr> <td>Consumption</td> <td>Restocking</td> <td>Consumption</td> <td>Restocking</td> </tr> </tbody> </table> <p>All purchases made by Gurruchaga Marée are declared via Visiomer by the Hendaye site (SEG certified). The traceability system that will be used is similar to the other Gurruchaga Marée sites and appears to comply with SEG requirements. All this will have to be checked at the end of the season but this criterion can be considered responsible pending verification.</p>	Series 1, SEG fish		Series 2, Non-SEG fish		Consumption	Restocking	Consumption	Restocking
Series 1, SEG fish		Series 2, Non-SEG fish							
Consumption	Restocking	Consumption	Restocking						
Score	Conditionally responsible								

1.4.2: Traceability - Outgoing product	
Responsible indicators	<ul style="list-style-type: none"> • Where a fishery or buyer, an electronic tele-declaration system is used • Documentation is well maintained with a maximum of 2% error in the following: • The organisation correctly uses batch-coding for labelling certified product, which can be on the packaging for the product, or included in the documentation (e.g. invoice) with the assignment • All product to be sold as certified by an organisation is accompanied by an invoice which meets the following criteria: <ul style="list-style-type: none"> - Includes an appropriate batch code - Includes a record of the quantity (no. & weight) of product and to whom it was sold
Aspiring indicators	<ul style="list-style-type: none"> • Documentation is well maintained. If resolved through mass- or number- balance calculations, the margin of error does not exceed 5% in the following (or if a farm, the 2800 pieces per 1 kg of glass eels is applied): • The organisation correctly uses batch-coding for labelling certified product, which can be on the packaging for the product, or included in the documentation (e.g. invoice) with the assignment. • All products to be sold as certified by an organisation are accompanied by an invoice which meets the following criteria: <ul style="list-style-type: none"> - Includes an appropriate batch code. - Includes a record of the quantity (no. & weight) of product and to whom it was sold.
Discussion	<p>All the elvers will be transported to the other sites of Gurruchaga Marée, mainly Hendaye, except in the case of the French restocking.</p> <p>On the other sites of Gurruchaga Marée, the traceability system is organised as follows :</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 ponds, the exit voucher should have a lower weight by subtracting the mortality quantified on the batch.</p> <p>All transport vouchers are complete with batch codes and product quantities. SEG lots are well identified but sometimes the fishermen's SEG number is missing.</p> <p>In view of these elements it is possible to consider this criterion of conditionally aspiring. If this site wishes to meet the responsibility criterion, it will be necessary to indicate the mortality of the batch on the exit voucher and to be careful to specify the certificate numbers of the fishermen concerned for the SEG batches.</p>
Score	Conditionally aspiring

1.4.3: Traceability - Record keeping and documentation	
Responsible indicators	<ul style="list-style-type: none"> The organisation operates a system that allows the tracking and tracing of all eel from purchase to sale and including any steps in between. In the case of live eels this should include the ability to track each batch delivered to a buyer to be connected back to a water, a time period (maximum duration one month) and specific fisherman/vessel. If a fisherman or buyer, a tele-declaration system is used to report catches and trade. The organisation operates a system that also allows for the completion of a batch reconciliation of eel product by weight over a given period. The organisation maintains records for a minimum of three (3) years.
Aspiring indicators	<p>The above requirements are met except that:</p> <ul style="list-style-type: none"> Records have been maintained for less than three (3) years If a fisherman or trader, a tele-declaration system is planned to be used to report catches and trade in the next season
Discussion	As the previous criteria, we assume that record keeping and documentation will be equivalent to other Gurruchaga Marée sites. If this is the case the criterion will be met. An audit will be carried out at the end of the season.
Score	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	
Responsible indicators	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> 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	<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 registered 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>
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	Each batch of glass eels intended for restocking will be tested, as is the case for all Gurruchaga Marée sites.
Score	Responsible

Summary scores for Component 1	
Not met	0
Not affected	1
Aspiring	0
Conditionally aspiring	2
Responsible	3
Conditionally responsible	2
Total possible	7
% Responsibility (Responsible / Total possible)	71%

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	SEG-certified glass eels are to be kept well separated from other glass eels. This should be checked at the end of the season.
Score	Conditionally responsible

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 170 58 800 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	This criterion will have to be judged at the end of the season. In the meantime, it is classified as an aspiring indicator.
Score	Conditionally aspiring

Criterion 4.3: Mortality during transport and initial holding if transported to farm	
Weighting: 2	
Responsible indicators	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	<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 has therefore been met.</p>
Score	Responsible

Criterion 4.4: Water quality

Weighting: 1

Responsible indicators	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	<p>The water used is drinking water.</p> <p>The water is continuously bubbled, recirculated and renewed (depending on the biomass present in the basins).</p> <p>The temperature of the water is automatically controlled by means of a probe and a cooling system with coils. An alarm is triggered if the water temperature is too high.</p> <p>In the event of a power failure, an emergency unit automatically takes over and water recirculation and bubbling is resumed. An oxygen bottle is connected and can be manually activated if necessary.</p> <p>Regular monitoring (once or twice a week) is carried out and recorded for the following parameters: Nitrate, pH, Ammonia, Nitrite.</p> <p>The practices observed are good and recorded.</p> <p>The criterion has therefore been met.</p>
Score	Responsible

Criterion 4.5: Handling and welfare	
Weighting: 1	
Responsible indicators	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> 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	<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 basin.</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 aspiring criterion is reached.</p>
Score	Aspiring

Criterion 4.6: Transport	
Weighting: 1	
Responsible indicators	<ul style="list-style-type: none"> 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	<p>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>
Score	Responsible

Criterion 4.7: The required percentage of glass eels is being used for restocking	
Weighting: 2	
Responsible indicators	<ul style="list-style-type: none"> 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. The eels for restocking are representative of the stock – slow growers are not selected.
Aspiring indicators	<ul style="list-style-type: none"> 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, 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	This criterion will have to be judged at the end of the season. In the meantime, it is classified as an aspiring indicator.
Score	Conditionally aspiring

Summary scores for Component 4	
Not met	0
Conditionally aspiring	4
Aspiring	1
Responsible	5
Conditionally responsible	2
Total possible	12
% Responsibility (Responsible / Total possible)	58%