

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

Completed by
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Version 1.1

Reviewed and Approved by Certification Body:
David Bunt, Sustainable Eel Group, 17 December 2020

1. Introduction

This document is the report of the audit of 24 November 2020 carried out for GURRUCHAGA Marée/Les Vignes Marines concerning the correct application of the specifications of the SEG (Sustainable Eel Group) (version 6.0a, December 2019) in order to receive the SEG assessment. This assessment was only carried out in relation to components 1 and 4 of the standard.

The certification concerns the storage site, located in the municipality of Guérande in France. The storage site depends on the company “Gurruchaga marée” based in Hendaye (SEG certified) but is located on the premises of the company Les vignes Marines. Les Vignes Marines is a mussel company producing Label Rouge mussels. The site is managed by Mr. Florian Brochard, director of the company Les Vignes Marines. The activity concerning glass eel is recent and started in December 2019. The site is managed as a service for the company Gurruchaga Marée. This site works with fishermen from the Vilaine and Loire rivers, part of which is SEG-labelled (certificate SEG-0082 and SEG-0060). For the fishermen of Vilaine, the fish is collected at a statutory collection point by a fish tanker truck. For fishermen from the Loire, the fish is brought to the storage site by each of the fishermen.

2. The assessment

The assessor was Fabien Charrier from Fish-Pass company, the audit was carried out in the form of a discussion with Mr. Brochard (site manager). 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. However, as the fishing season had not yet started on the Loire and Vilaine rivers, no glass eels were present on the site.

3. Client Contact Details

Client Contact Name	Gurruchaga Marée/Les Vignes Marines
Client Address	8 Leniphen, 44350 Guérande
Client Email	gurrumaree@wanadoo.fr
Client Phone Number	05 59 56 68 91/ 09 60 44 57 69

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	Aspiring	1	0
1.4 Traceability:			
1.4.1 Incoming products, separation and segregation	Aspiring	1	0
1.4.2 Outgoing products	Aspiring	1	0
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	4
Percentage Responsibility Score:		57%	

Conclusion:

For Component 1: Generic Requirement the score is 57% leading to a Responsible Assessment.

Component 4: Eel buying and trading	Auditor's findings	Weighting	Score
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	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		12	9/12
Percentage Responsibility Score:		75%	

Conclusion: The Gurruchaga Maree/Les Vignes Marines storage site achieved a score of 75% 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		3	4
4		3	9
Total		6	13
Total Responsibility Score: =13/19			69%

Summary finding:

The storage facility of Gurruchaga marée/Les vignes marines in Guerande has achieved the SEG Standard, with a total responsibility score of 69%.

5. Recommendations:

The audit was carried out before the glass eels season started. For the next audit, it would be appropriate to plan a date when the activity will have started. This will allow us to verify the good practices visually. This year a visit will be planned to check them.

1.4.1

For the next audit, particularly for fishermen in the Loire, it is essential that all glass eels caught under SEG certification are clearly identified when they enter the storage site for glass eels intended for restocking. Actually, for restocking, a part of glass eels from fishermen SEG certified from Loire glass are not classified on entry and exit. In this case, the fisherman's certification is not valued. Even if the documents provided allow for good traceability, the management could probably be optimised with, for example, one folder for entries and another for exits.

1.4.2

It would also be advisable to deduct the mortality of different batches on documents for outgoing products.

4.5

Finally, to complete the existing documents, a protocol should be drawn up summarising the good practices implemented for fish handling.

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

Based on the results of the audit, standard monitoring is recommended.

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	No infractions have been found regarding the storage site. Mr. Brochard explains that he was inspected by the gendarmerie and the OFB during the collection on the Vilaine and that everything was in order.
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 Audited

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	According to the data, the site trades 47.4% elvers from SEG fishermen. It is likely that this proportion is higher. Indeed, for glass eels intended for restocking from the Loire, the origin SEG was not noted.
Score	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>The installations present two series of fish tanks, all numbered. One part of the tanks is reserved for SEG-certified fish, the other for non-SEG-certified fish.</p> <p>The registers are complete with transport vouchers, entry and exit sheets with identification of the batches and their storage tank. The documents enable the traceability of SEG qualified products to be tracked as they enter and leave the warehouse.</p> <p>Purchases are tele-declared on the administration site (Visiomer) by the Hendaye centre (SEG certified).</p> <p>On the registers, the number of certified eels leaving the organisation did not exceed the number entering.</p> <p>For restocking, glass eels caught by SEG fishermen are not classified on entry and exit. In this case, the fisherman's certification is not valued</p>
Score	Aspiring

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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: <ul style="list-style-type: none"> • 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 glass eels are transported to the other sites of Gurruchaga Marée. All transport vouchers are complete with batch codes and product quantities. Sales are declared to the administration in accordance with French regulations. This declaration is made 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, considering the mortality occurring in fish tanks, the exit voucher should have a lower weight by subtracting the mortality quantified on the batch.</p>
Score	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	<p>The storage site has been in operation for 1 year and has all the papers for this year of activity.</p> <p>All product traceability data is entered in files and on computer software. It is possible to easily reconstitute the origin and weight of glass eels constituting a batch.</p> <p>All the physico-chemical monitoring of the water is recorded in a binder.</p> <p>The purchase of glass eels is tele-declared on the FranceAgrimer website (Visiomer). Sales are declared to the administration in accordance with French regulations.</p>
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	<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 tanks, trucks and premises is carried out regularly and recorded.</p> <p>Mortality is regularly recorded and registered.</p>

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	Glass eels are handled as little as possible to limit stress. Temperature, pH and oxygen parameters are monitored and recorded. The water temperature is regulated to avoid variations. No medication is used.
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 is tested
Score	Responsible

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	All fish notified SEG at the entrance are placed in specific fish tanks. The collection in fish tank trucks is only done on the Vilaine river where all fishermen are SEG. At the start, a transport voucher is made for each batch specifying whether the fish is SEG or not.
Score	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 aquaculture zoosanitary approval: FR 44 069 156 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 was estimated from the records at 0.74%.
Score	Responsible

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 storage sites of the company GURRUCHAGA marée (Charron) and (Hendaye).</p> <p>After contacting Albe eel farm, the average mortality observed after transport from Gurruchaga Marée was 1.6%.</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	The water used is tap water. There is a system to continuously monitor temperature, oxygen and pH with the presence of an alarm in case of problems. Oxygen diffusers are present in each pool. The parameters are regularly recorded in a file.

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	An emergency generator is present and takes over automatically in the event of a power cut.
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 was designed to handle the fish as less as possible. The transport truck can be parked a few metres from the basins.</p> <p>For the purchase of the glass eels, the sieve is made of stainless steel with a fine mesh. The glass eels are transported in fine-mesh containers.</p> <p>Fine mesh grids are present in the tanks to prevent it from being sucked up by the water circulation.</p> <p>The glass eels are collected by emptying them through a pipe at the bottom of the tank. The nets are only used for dead glass eels.</p> <p>Despite good practices, there is no written protocol available as recommended.</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	The fish from the Vilaine are collected via a small fish tanker with an oxygen supply.

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	<p>All glass eels are shipped in a live-truck with an oxygen supply to the other storage sites of the Gurruchaga company.</p> <p>All batches have transport vouchers.</p> <p>The staff has an accreditation for the transport of live animals.</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	<p>For season 2019-2020, the Guérande site purchased 49.5% glass eels for restocking. The whole Gurruchaga Marée organisation sold 50.1 % of glass eels for restocking operation.</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>
Score	Aspiring