

Assessment against SEG Standard: Component 1: Core requirements
Component 2: Glass eel fishing

Completed by
Fabien Charrier

18th February 2021

Version 1.1

Reviewed and Approved by Certification Body:
David Bunt, Sustainable Eel Group, 5 March 2021

1. Introduction

This document represents the report completed following the February 2021 audit carried out under the SEG (Sustainable Eel Group) standard (version 6.0a, December 2019) at the North Brittany fishery operating in the Bay of Mont-Saint-Michel and on the Rance River. The 2 fishermen concerned by this certification carry out storage at their homes. The fish wholesaler comes to collect the glass eels about once a week.

The Regional Committee for Sea Fisheries and Marine Farming in Brittany (CPMREM Bretagne in french) organised this audit. The fishermen's group will be called "Pêcherie Bretagne Nord". This assessment was only carried out in relation to components 1 and 2 of the standard.

At the time of the previous audit, the fishery consisted of a single fisherman. The present certification concerns a renewal for him. Since the last audit, a second fisherman has joined the fishery. This is the first fisherman's son. They have several boats, one located in Rance and one in the Bay of Mont-Saint-Michel. They often fish together on the same boat as on the day of the audit. **Thus, only one boarding was carried out.**

The following professional fishermen are concerned by this SEG certification process.

First Name	Last Name	Vessel	SEG
ALAIN	LAURENTI	JULMADA III	0062
JULIEN	LAURENTI	BAGATELLE	New

2. The assessment

The evaluator was Fabien Charrier for Fish-Pass. The visit took place on the tide of 18th February 2021 in the Bay of Mont Saint Michel. The boarding was done with the 2 fishermen Mr Lorenti Alain and Mr Lorenti Julien.

3. Client Contact Details

It was the CRPMEM of Brittany which requested this audit. The resource person is Mr Guillaume LE PRIELLEC.

Client Contact Name	CRPMEM de Bretagne / LE PRIELLEC Guillaume
Client Address	1 Square René Cassin, 35700 Rennes
Client Email	glepriellec@bretagne-peches.org
Client Phone Number	0033 2 97 50 07 90

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	N/A	N/A
1.3 The organisation trades in certified responsibly sourced eels	Responsible	1	1
1.4 Traceability:			
1.4.1 Incoming products, separation and segregation	Responsible	1	1
1.4.2 Outgoing products	Responsible	1	1
1.4.3 Record keeping and documentation	Responsible	1	1
1.5.1 Biosecurity & welfare – Biosecurity measures are adopted	Responsible	1	1
Total		6	6
Percentage Responsibility Score:		100%	

Finding: The fishery achieves a score of 100% for Component 1 : General Requirements.

Component 2: Glass eel fishing	Auditor's findings	Weighting	Score
2.1 Eel fishing is in a catchment that is meeting its escapement targets	Aspiring	2	0
2.2 There is good progress with the applicant's responsibilities in the eel management plan for the river or district	Responsible	2	2
2.3 The fishery is well managed	Responsible	1	1
2.4 Mortality during fishing is minimised	Aspiring	2	0
2.5 The fishery has negligible impacts on by-catch species	Aspiring	1	1
2.6 The fishery has negligible impacts on rare or other protected species	Responsible	1	1
2.7 The fishery has negligible impacts on habitats	Responsible	1	1
2.8 Transport	Responsible	1	1
2.9 Bonus score: fishermen donate a proportion of their catch for a local positive contribution	N/A	N/A	N/A
Total		11	7
Percentage Responsibility Score:		64%	

Finding: The fishery meets part of the criteria of the glass eel component (64%) and can be considered responsible under the SEG standard.

Summary of assessment and scoring

Component	Not Met	Aspiring	Responsible
1	0	0	6
2	0	4	7
Total	0	5	13
Total Responsibility Score: = 13/17			77%

Summary finding:

The "Bretagne Nord" fishery has achieved a score of 77% in terms of responsibility criteria and meets the criteria for renewal of certification for the SEG standard.

5. Recommendations:

Fish-Pass makes the following recommendations in relation to the "Bretagne Nord" fishery:

Concerning criterion 2.4 :

1. The fishing gear did not comply during the audit on the boat used. The compliant gear was on their other boat. New gear was ordered the next day (order form provided). During the next audit, particular attention will be given to this point and no tolerance will be applied in case of deviation.
2. Moreover, the monitoring of mortality in home fish tanks is not recorded. However, the practices observed on board appear to be in line with responsible elver fishing, as no mortality was observed on board. We recommend that from the 2020-2021 season onwards, fishermen should keep a logbook of home pond mortalities that they can provide to the auditor during the control audit. It should be possible to link mortality to a period and a quantity of glass eels caught (fishing log). An example of this would be :

Date	Quantity added to the fish tank (g)	Mortality (g)	Quantity leaving the fish tank (g)
04/01/2021	1890	0	0
05/01/2021	910	10	0
06/01/2021	0	5	0
07/01/2021	500	20	0
08/01/2021	0	0	3260

3. Criteria 1.2 and 2.9 – by the next audit the fishery should have considered and implemented how to make a positive contribution to eel conservation projects.

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

The next control audit should take place by February 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	The 2 fishermen audited have had no eel fishing offences 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	Unaudited, but this should be considered and implemented by the next audit
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	Of the 2 fishermen concerned, 1 already had the SEG 0062 certificate. One new fisherman has joined the fishery since the last audit. Thus 50% of the glass eels come from responsible sources and 100% of the glass eels will be responsible at the end of the audit. This criterion has therefore been met
Score	Responsible

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	The 2 fishermen audited use the "Télécapêche" tele-declaration system. It allows backed up and to follow the fishermen's quota day by day and avoid exceeding the authorised quotas. A bulletin summarising the consumption of the quotas is thus sent to the authorities every day. Fishermen also fill in fishing forms (or fishing log) which are systematically sent to France Agrimer. Each fishing day is declared on paper with 3 copies: 1 for the administrative authorities, 1 for the fishermen and the last one is kept by the fisherman. The responsible criterion is therefore met
Score	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: <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): <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 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	As for the previous point, this audit concerns only fishermen who all use electronic reporting. The criterion is therefore met.
Score	Responsible

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 for criterion 1.4.1, this audit concerns only fishermen and all of them use electronic reporting. The criterion is therefore fulfilled.
Score	Responsible

Criterion 1.5: Biosecurity & welfare – Eel and eel products are provided with minimal risk of diseases, parasites and alien species

1.5.1 Eel Fishing: Biosecurity measures are adopted	
Responsible indicators	<ul style="list-style-type: none"> The fishery conducts good biosecurity measures such as the disinfection and drying of nets and equipment between each fishing in different waters. OR The fishermen only operate in the same river or estuary, with no risk of transferring diseases or alien species between catchments.
Discussion	<p>Fishermen fish in several localities, particularly in Rance and the Bay of Mont-Saint-Michel. However, the boat used and the gear are specific to each site. There is therefore no risk of transferring diseases or exotic species between catches.</p> <p>The criterion is therefore met.</p>
Score	Responsible

Summary scores for Component 1	
Not applicable	1
Not met	0
Aspiring	0
Responsible	6
Total possible	6
% Responsibility (Responsible / Total possible)	100%

Component 2 - Glass eel fishing	
Criterion 2.1: Eel fishing is in a catchment that is meeting its escapement targets	
Weighting: 2	
Sustainable Indicator	There are good data which show to the satisfaction of the fisheries authority that the EU silver eel 40% escapement target (40% B0) is being achieved for the river or in the eel management district.
Responsible indicators	There are good data which show to the satisfaction of the fisheries authority that at least 70% of the Bbest target for silver eel escapement is being met in the river or eel management district.
Aspiring indicators	Eel fishing is in a place accepted by the fishery authority as providing a positive contribution to the eel stock or, the river or RBD is meeting 40% - <70% of the Bbest target.
Discussion	<p>The information available on this subject (Report of the Eel Management Plan in France, 2018) shows that, for the moment, the objective of 40% of the BO or 70% of the BBEST is not achieved, both in the relevant UGA (BRE) and in the other French UGAs. Moreover, we do not have precise information by catchment area to make a more detailed assessment of this criterion.</p> <p>However, all the actions provided for in France's Eel Management Plan (EMP) have been</p>

	<p>implemented and the rebuilding of the eel stock requires long-term action. The effects of the measures taken in recent years are not observable for the moment. The actions taken by the fisheries sector are detailed in the following criterion.</p> <p>Considering all this, the criterion is not met but significant efforts have been made since the establishment of the EMP, in particular by professional fishermen.</p>
Score	Aspiring

Criterion 2.2: There is good progress with the applicant’s responsibilities in the Eel Management Plan for the river or District

Weighting: 2	
Responsible indicators	There is credible progress with at least 75% of the actions relating to the fishery for the implementation of the Eel Management Plan for the river or eel management district.
Aspiring indicators	There is credible progress with at least 50% of the actions relating to the fishery for the implementation of the Eel Management Plan for the river or eel management district.
Discussion	<p>Professional fisheries stakeholders have implemented the majority of actions related to the EMP.</p> <p>For example, the exploitation rate of glass eel stock has decreased significantly since the reference period. This rate has been relatively stable in recent years and fluctuates around the management target.</p> <p>The allocation of glass eel fishing licences has decreased by 57% between 2006 and 2018.</p> <p>The ratio of the fishing quota 40% consumption and 60% restocking is unchanged since 2013. However, the target of 60% glass eels for restocking in Europe has never been reached, but the profession is getting closer to this target over the years. Reaching this objective is dependent on the European market, which is not the responsibility of professional fishermen.</p> <p>The overall catch quota has decreased for the 2020-2021 season by a total of 57.5 tonnes, a reduction of 11.5% compared to the previous season.</p> <p>Finally, France allocates between 5 and 10% of annual catches to French restocking operations, 5.8% in 2018.</p> <p>In view of all these elements, it can be considered that this criterion has been met.</p>
Score	Responsible

Criterion 2.3: The fishery is well managed

Weighting: 1	
Responsible indicators	<ul style="list-style-type: none"> • Fishers are licensed and provide catch and effort data via a tele-declaration system. • Data on catch and effort are collected and analysed regularly by the fishery authority (at least annually at the end of the season). • There is a data set for at least the last 5 years that is considered by the fishery authority to be accurate, useful for statistical purposes and provide a comprehensive picture of the glass eel fishery under assessment. • Enforcement is in place throughout the fishing area and there is no evidence of systematic non-compliance.

Aspiring indicators	<ul style="list-style-type: none"> • Fishers are licensed and provide catch and effort data. • Data on catch and effort are collected and analysed regularly by the fishery authority (at least annually at the end of the season). • There is a data set for at least the last 3 years that is considered by the fishery authority to be accurate and provide enough information on the glass eel fishery under assessment for management and to track annual trends in glass eel arrival. • There is no evidence of systematic non-compliance.
Discussion	<p>Fishermen have a licence and proceed to the tele-declaration via "Télécapêche" in addition to the declaration by the fishing form.</p> <p>Fishing figures are monitored every day by the CRPMEM in order to know the exact state of consumption of the quota so as to avoid a preventive closure. These data are obtained thanks to "Télécapêche", which has been compulsory in Brittany since 2013. A bulletin summarising catches and quota consumption is sent to the authorities every day.</p> <p>The official data comes from the fishing sheets (or fishing log) sent by fishermen to the administrative authorities. The Directorate of Maritime Fisheries and Aquaculture (DPMA) collects and compiles these data. During the glass eel fishing season, the DPMA circulates a table every week to report on the consumption of quotas in the various UGAs. In May-June, when the season is over, the DPMA distributes a statistical compilation (quota consumption, market price, number of fishers, etc.) per UGA. There is a set of reliable data for more than 5 years.</p> <p>This criterion has therefore been met.</p>
Score	Responsible

Criterion 2.4: Mortality during fishing is minimised

Weighting: 2

Responsible indicators	<ul style="list-style-type: none"> • Fishing is by hand-held nets and has effective nearby holding facilities OR • Fishing from vessels meets the following criteria: <ul style="list-style-type: none"> i) fishing is at slow speed (no more than 1 knot relative to water); ii) haul duration is on average no longer than 20 minutes, with the maximum duration not more than 30 minutes; iii) mesh size of cod end no greater than 1mm; iv) rest of the net designed such that glass eels do not become trapped or abraded; v) vivier tank on board and in use; vi) fishermen maintain accurate daily records of mortality. OR • Fishermen can demonstrate that the mortality rate of the catch over the duration of holding in the storage facility is less than 4% for each batch captured. OR • Fishing methods (in France) meet the criteria in Category 1 of the France Good Practice Guide. OR • The Carmin Indigo or similar test indicates that mortality averages less than 4%.
Aspiring indicators	<ul style="list-style-type: none"> • Fishing from vessels meets the following criteria: <ul style="list-style-type: none"> i) fishing is at slow speed (no more than 1.5 knots relative to water); ii) maximum haul duration no longer than 30 minutes; iii) mesh size of cod end no greater than 1mm; iv) rest of the net designed such that glass eels do not become trapped or abraded; v) vivier tank on board and in use; vi) fishermen maintain accurate daily records of mortality. OR • Fishermen can demonstrate that the mortality rate of the catch over the duration of holding in the storage facility is between 4% and 8% for each batch captured. OR

	<ul style="list-style-type: none"> Fishing methods (in France) meet the criteria in Category 2 of the France Good Practice Guide. OR The Carmin Indigo or similar test indicates that mortality averages between 4% and 8%.
Discussion	<p>The fishing gear had an entrance diameter of 120 cm and a total length of 160 cm. The mesh size was identical throughout the 1.3 mm net. This mesh size is therefore larger than the 1mm size required by the SEG. More recent gear, similar to the Arzal fishery, is on their other boat. Following this observation, new gear was ordered the very next day (order form provided). However, no glass eels were observed trapped in the nets.</p> <p>After each haul, glass eels are placed on a sieve above a plastic box that allows the glass eels to pass through and reject by-catches and plant debris. Glass eels are then put into a water tank on board which has an aeration system. The tank is half-filled before fishing begins, and water is then brought in regularly throughout the tide.</p> <p>During the audit, the duration of the hauls varies between 13 and 15 minutes.</p> <p>The speed observed while fishing was between 1.2 and 1.5 knots. It is therefore in line with the aspiring indicator of the standard.</p> <p>The fishermen store their glass eels in a fish tank at home. This tank is official and declared to the administration. They indicate a low mortality rate of around 0.1% without it being possible to verify this in a file.</p> <p>Thus, many criteria are met, but the gears were not in conformity at the time of the audit. Given the good faith of the fishermen and the fact that new gear was ordered the next day, we still recommend that an aware criterion be assigned.</p>
Score	Aspiring

Criterion 2.5: The fishery has negligible impacts on by-catch species

Weighting: 1

Responsible indicators	<ul style="list-style-type: none"> The fishery has a negligible impact on by-catch. By-catch is returned to the water alive as gently and rapidly as possible.
Aspiring indicators	<ul style="list-style-type: none"> The fishery has low-level impacts on by-catch. By-catch is returned to the water alive as gently and rapidly as possible.
Discussion	<p>The most common bycatch during the tide was: sand goby, common goby, grey mullet, flounder and sea bass. Bycatch is released very quickly.</p> <p>The responsible criterion is therefore met.</p>
Score	Responsible

Criterion 2.6: The fishery has negligible impacts on rare or other protected species

Weighting: 1

Responsible indicators	The fishery has no direct interactions resulting in mortality or injuries with other species that are considered vulnerable, threatened, endangered or are protected under national or international law.
Aspiring indicators	Interactions, resulting in mortality or injury, with other species that are considered vulnerable, threatened, endangered, or are protected under national or international law, are rare and have no overall measurable impact on the population.

Discussion	No vulnerable, threatened or endangered species were identified in the catches. Sand and common gobies, on the other hand, are listed in Appendix III of the Bern Convention. However, they appear to be of minor concern on the IUCN Red List. All species are released very quickly. The criterion has therefore been met.
Score	Responsible

Criterion 2.7: The fishery has negligible impacts on habitats	
Weighting: 1	
Responsible indicators	The fishing gear does not cause any damage to the benthos.
Aspiring indicators	Damage to the benthos by gear is limited or minimal.
Discussion	Glass eels are fished on the surface without ever touching the substrate. Indeed, it would risk damaging their nets and clogging them with mud. This criterion is therefore met.
Score	Responsible

Criterion 2.8: Transport	
Weighting: 1	
Responsible indicators	<ul style="list-style-type: none"> • The operator holds the relevant transport authorisations. • 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.
Discussion	<p>The fishing form filled in at the end of the tide serves as an authorisation for transport in France.</p> <p>Fishermen use the same means of transport, i.e. a plastic or polystyrene boxes. Glass eels are taken out of the fish tank and placed in this crate immediately. Then they transport the box from the boat to the truck where the catch is weighed, usually without transferring the container (the tare is known). The eels are left out in the open air for the duration of the transport from the port to the fisherman's tank.</p> <p>This transport time is generally short and during transport the eels are kept moist and fresh (air temperature in winter).</p> <p>Apart from the Vilaine river where the fisherman picks up the eels when they land, the other fishermen in Brittany operate a fish tank at home. The fish seems not to suffer from this way of working.</p> <p>The criterion has therefore been met.</p>
Score	Responsible

Criterion 2.9: Bonus Score: Fishermen donate a proportion of their catch for a local positive contribution

Weighting: 1

Responsible indicators	Fishermen have donated an average of at least 5% of their catch in the past 2 years to local stocking programmes, e.g. translocating over barriers to aid upstream migration and recruitment in the catchment, or have credible plans in place to do so next season (note that this is separate from any planned restocking to meet the 60% target).
Discussion	Not applied, but the fishers should consider how to do this by the next audit
Score	Not applicable

Summary scores for Component 2	
Not applicable	1
Not met	0
Aspiring	4
Responsible	7
Total possible	11
% Responsibility (Responsible / Total possible)	64%