

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

Completed by
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17th 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 within the framework of the SEG (Sustainable Eel Group) standard (version 6.0a, December 2019) at the Bretagne Sud fisheries. It concerns four fishermen, but only two assiduous practices in this fishery. The fishermen concerned by this certification carry out storage at their homes. The collector comes to collect the glass eels about once a week.

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

During the previous audit, the fishery was made up of the same fishermen. The present certification concerns a renewal. These fishermen practice itinerant fishing, wave fishing or hand sifting without a boat. They do not have a single fishing site, but move around in several sectors that they know. Given the fact that only 2 of the 4 fishermen seriously practice this type of fishing and the constraints of the fishermen's location, one meeting was held in the fieldwork as a representative sample of this group.

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

First Name	Last Name	Vessel	SEG
OLIVIER	BOHIC	MAX MAR 2	0065
STEPHANE	LE LEUCH	PENKALET	0065
GAEL	LEFEVRE	LAMIPOLE	0065
LOIC	LEYLDE	REFUGE	0065

2. The assessment

The evaluator was Fabien Charrier for Fish-Pass. The visit took place on the tide of the 17th February 2021 in the morning on the beach of the town of Guidel with Mr. Olivier Bohic.

3. Client Contact Details

It was the CRPMEM Bretagne 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	33 7 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	Responsible	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 fishing 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 Sud" 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 Sud" fishery.

For the next audit, in view of the logistical difficulties in bringing the fishermen together, we recommend at the very least the audit of Mr Le Leuch Stéphane, the second fisherman among the four who assiduously fish glass eels.

With regard to criterion 2.4, the monitoring of mortality in home fish tanks is not recorded. However, the practices observed during fishing appear to be in line with responsible glass eel fishing, as no mortality was observed. We recommend that from the 2020-2021 season onwards, fishermen 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 tank (g)	Mortality (g) or Number of individuals (N)	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

The exit weight may not necessarily correspond to the weight fished + mortality. This may be due to weight loss and weighing accuracy.

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 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	
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 audited fisherman had no eel fishing violations in 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 at this audit, but 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	The fishermen concerned already have the SEG 0065 certificate. This means that 100% of the glass eels come from responsible sources. 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 2%.

	exceed 5% or if a farm, the 2800 pieces per 1 kg of glass eels is applied.
Discussion	Fishermen in the fishery use the "Télécapêche" remote reporting system. It allows them to follow the fishermen's quota day by day and to avoid exceeding the authorised quotas. A report summarising the consumption of 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	<p>As for criterion 1.4.1, this audit concerns only fishermen and all of them use electronic reporting.</p> <p>The criterion is therefore met.</p>
Score	Responsible

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

1.5.1 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>The fishermen carry out itinerant fishing, in several different places during the season. They have several gears at their disposal, one for wave fishing, the other for hand net fishing. The nets are dried between each tide.</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 <u>UGAs</u>. 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 (PGA in french) have been 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 PGA, 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 have implemented the majority of actions related to the PGA.</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</p>

	<p>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 elver 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 compendium (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 • 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 used for wave fishing was in the shape of a semi-circle 1.2 m wide, 0.60 m high and 1.3 m long. The mesh size was 1.3 mm for the entrance and reserve of the net and 1 mm for the bottom sieve. This mesh size therefore complies with the SEG standard.</p> <p>Fishing time in the waves is about 5 min. The fisherman regularly looks at the bottom of the net to see how much has been caught so that he can adjust his fishing time. As soon as he considers the catch to be large enough, he comes to empty his net.</p> <p>After each haul, glass eels are placed on a reject sieve above a plastic box which allows the glass eels to pass through and reject the by-catch and plant residues. The fisherman stores his glass eels in a slightly dampened tidal box as indicated in the Guide to Good Practices for glass eel fishing in France.</p> <p>As the fishermen are on foot, the speed of movement is zero. They use the water movement created by the waves to catch eels.</p> <p>The fishermen store their glass eels in a fish tank at home. This fish 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 fisherman does not use a fish tank during fishing and could not provide any recorded mortality data. Taking these elements into account, the fisherman obtains an aspiring score.</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 by-catch during the tide was grey mullet and stickleback.</p> <p>The by-catch was 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	<p>No vulnerable, threatened or endangered species have been identified in the catches.</p> <p>All species are released very quickly.</p> <p>The criterion has therefore been met.</p>
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	<p>Wave glass eels fishing is carried out on the sand. The gear is moved manually and does not damage the substrate. In addition, the fishing area is located on the foreshore in the waves, which by their force naturally induce significant displacement and movement of sand and pebbles.</p> <p>This criterion has therefore been met.</p>
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 is used as an authorisation for transport in France.</p> <p>Fishermen use the same means of transport, i.e. a plastic or polystyrene crate. They transport this crate to the lorry where the catch is weighed, generally 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%