



Code: SEG0072

Assessment against SEG Standard:

Component 1: Core requirements

Component 2: Glass eel fishing

Completed by

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March 10th 2021

Final

Reviewed and Approved by Certification Body:

David Bunt, Sustainable Eel Group, 21 April 2021

1) Introduction

This document represents the report produced following the control audit carried out the 10th March 2021 under the SEG (Sustainable Eel Group) standard (version 6.0a, December 2019) with a group of 9 fishermen operating on the Douve and Taute rivers in Normandy. The fishermen concerned by this certification have a fish tank at home where the glass eels are placed, generally for a minimum of 48 hours before being sold to the fish merchants. These tanks are declared and legal, but complicate the monitoring of fishing mortality.

This audit follows on from the initial audit carried out in March 2019 by Mr Senechal, which led to the award of SEG certification. The "Comité Régional des Pêches Maritimes de Normandie" (CRPMEM Normandie) organised this audit and the fishermen's group will be called "Normandy fishermen". This assessment was carried out only in relation to components 1 and 2 of the SEG standard.

All the fishermen operate in a restricted sector, namely the Douve, the Taute and the Carentan to the sea canal downstream from the confluence of these two rivers.

9 fishermen are concerned by the audit and therefore 3 boardings were carried out. For administrative reasons, only two fishermen were audited, but the other fishermen were operating at the same location at the time of the audit and the practices could be observed and are similar between the different fishermen.

In this sector, all fishermen use similar gear. The opening is 1.5 m wide and 1.2 m long. The total length of the net is about 4 m. The mesh size is degressive to end in a codend with a mesh size of 1 mm or less.

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

NAME	FIRST NAME	SHIP	SEG STATUS
LECAPELAIN	Jean Jacques	LA GALERE III	SEG 0072
LEROSIER	Jérôme	JULOIT II	SEG 0072
MEDARD	Patrick	LE PITCHICO II	SEG 0072
NEEL	Philippe	L'UTAH BEACH	SEG 0072
ROBIOLLE	Denis	LE PICK	SEG 0072
VAUTIER	Martial	LIAMILA	SEG 0072
Fisherman not wishing his name to		be published	SEG 0072
HEBERT	Stéphan	COLIBRI	SEG 0072
LEPLEUX	Jessy	SEVENTIES	SEG 0072







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2) The assessment

The assessor was Nicolas Belhamiti for Fish-Pass. The visit took place on the tide of 10 March 2021, on board two vessels. Thus, the fishermen audited were Mr. Medard Patrick and Mr. Vautier Martial.

3) Client Contact Details

The CRPMRM Normandy requested this control audit.

Name/Compagny	CRPMEM Normandie / Muriel Sicard
Postal address	9 Quai Général Lawton Collins, 50100 Cherbourg-en-Cotentin
email address	muriel.sicard@comite-peches-normandie.fr
Phone number	02 33 44 35 82

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 Respo	1009	%	

Finding: The fishery with a score of 100% meets the generic requirements and can be considered **responsible** for this component.

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







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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%	6

Finding: With a score of 64%, the fishery meets the requirements of component 2 for elver fishing and is 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	4	13
Total Responsibility Score: = 11/16		76%	

Summary finding:

With a score on the responsibility criteria of 76%, the fishery "Normandy" has reached the level required to be considered **responsible** and meets the criteria for **certification by the SEG standard**.

5) Recommendations:

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

- 1. With a score on the responsibility criteria of 76%, the fishery has reached the level required to be considered responsible and meets the criteria to confirm certification by the SEG standard following the control audit.
- 2. The fishery should consider how to make a positive contribution to eel conservation projects (criteria 1.2 and 2.9) and implement them by the next evaluation.
- 3. Regarding criterion 2.4, several things need to be improved. Average fishing speeds are higher than what the SEG standard requires, but less than what is recommended in the "Good Practice Guide for the elver fishing industry". In addition, no monitoring of mortality in home tanks is carried out. However, the practices observed during boarding seem to be in line with responsible elver fishing. We make the following recommendations that should be applied before the next audit:
 - a. Speeds should be reduced as much as possible, especially when the fisherman is going against the current.
 - b. The majority of the fishermen audited have a home tank that they use to store elvers for at least 48 hours. However, for the majority, no mortality monitoring is carried out on these tanks. We recommend that from the 2021-2022 season onwards, fishermen keep a home mortality logbook that they can provide to the auditor during the next audit. It should be possible to link mortality to a period and a quantity of elvers caught (fishing log). For better readability, it is preferable that elvers' trips during sales are also indicated. An example of this would be:







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Date	Quantity added to the tank (g)	Mortality (g)	Quantity leaving the 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.

4. We recommend testing with indigo carmine during the next audit. The lesions taken into account remain to be defined but this system would allow us to judge whether the practices are in accordance with the SEG standard, despite the excessively high speeds observed.

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

Standard monitoring is recommended. The next audit should take place in March 2023 for the recertification of Normandy fishermen.







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7) The Assessment

The tables below give the outcomes of the assessment against each of the criteria of Components 1 and 2 of the standard, providing a rationale for the scores given above.

Component 1	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	There are no ongoing legal proceedings against any of the Normandy fishermen. In addition, all fishermen sign an agreement certifying that they respect the conditions of the SEG standard, which includes the commitment to legality. The criterion is therefore met.		
Score	Responsible		

	Contribution to Eel Conservation Projects. (Optional bonus score) (The intention is for this bry 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	N/A
Score	N/A

Criterion 1.3:	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 control audit was carried out on 9 fishermen, 7 of whom were already SEG certified since 2019. Thus, the fishery concerned was already marketing 78% of SEG-certified glass eels to a certified wholesaler. The criterion is therefore met		
Score	Responsible		







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Criterion 1.4: Traceability		
1.4.1: Traceal	bility - Incoming product, separation and segregation	
Responsible indicators	 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	 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 ear 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	All the Normandy fishermen use the electronic declaration system. This system enables them to declare their catches via sms directly to the regional fisheries committee. A computerised database makes it possible to track the fishermen's quota finely and to avoid exceeding the authorised quotas. Each day's fishing is also declared on paper via fishing forms in 3 copies: 1 for the administration (France Agrimer), 1 for the wholesaler and the last one is kept by the fisherman. This criterion has therefore been met	
Score	Responsible	

1.4.2:	Traceabili	ty - Ou	tgo	ing pr	od	uct	١
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Responsible indicators

- 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:
- Includes an appropriate batch code
- Includes a record of the quantity (no. & weight) of product and to whom it was sold

Aspiring indicators

- 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:
- Includes an appropriate batch code.







	- Includes a record of the quantity (no. & weight) of product and to whom it was sold.
Discussion	As in the previous point, this audit concerns only fishermen and they use a system of electronic tele-declaration and fishing form. The criterion is therefore met.
Score	Responsible

1.4.3: Traceal	bility - Record keeping and documentation
Responsible indicators	 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	 The above requirements are met except that: 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	The fishermen all use an electronic tele-declaration system and fishing forms. These data are kept by the administrative authorities for more than 3 years. The criterion is therefore met.
Score	Responsible

Criterion 1.5: parasites and	Biosecurity & welfare – Eel and eel products are provided with minimal risk of diseases, alien species
1.5.1 Eel Fishir	ng: Biosecurity measures are adopted
Responsible indicators	 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	The fishermen operate in a very small area, between the Douve, the Taute and the Canal from Carentan to the Sea. These waters are directly connected and we therefore consider that fishing is carried out in a single sector. As a result, there are no biosecurity risks. The criterion is therefore met.
Score	Responsible

Summary scores for Component 1	
Not met	0
Not applicable	1
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	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 B0 or 70% of the BBEST is not achieved, both in the relevant Management Unit (GDC) and in the other French Management Units. Moreover, we do not have precise information by watershed to make a more detailed assessment of this criterion. However, all the actions planned in France's Eel Management Plan (EMP) 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. Considering all this, the criterion is not met, but significant efforts have been made since the establishment of the EMP, particularly by professional fishermen.	
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	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	Professional fisheries stakeholders have implemented the majority of actions related to the EMP.		
	So, 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.		
	The allocation of glass eel fishing licences has decreased by 57% between 2006 and 2018.		







Score	Responsible
	operations, 5.8% in 2018. The Normandy fishery has allocated 7.5% of its total catch in 2020 for French restocking. In view of all these elements, it can be considered that this criterion has been met.
	Finally, France allocates between 5 and 10% of annual catches to French restocking
	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.
	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.

Criterion 2.3:	The fishery is well managed
Weighting: 1	
Responsible indicators	 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	 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	All fishermen have a licence and carry out the electronic filing in addition to the declaration by the fishing form. Fishing figures are monitored throughout the season by the Fisheries Committee to know the exact consumption of the quota to avoid a preventive closure. The official data come from the fishing sheets sent by fishermen to the administrative authorities. Thus, the Directorate of Maritime Fisheries and Aquaculture (DPMA in french) collects and compiles these data. During the elver fishing season, the DPMA distributes 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 wholesalers, etc.) per UGA. There is a set of reliable data for more than 5 years. This criterion has therefore been met.
Score	Responsible







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Criterion 2.4: Mortality during fishing is minimised

Weighting: 2

Responsible indicators

- Fishing is by hand-held nets and has effective nearby holding facilities OR
- Fishing from vessels meets the following criteria:
- 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

- Fishing from vessels meets the following criteria:
- 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

The practices observed on the audited vessels and the vessels observed are very similar. The sieves used are rectangular in shape (1.5 m by 1.2 m), with a total length of approximately 4 m. The mesh size is degressive and ends in a sieve bottom with a mesh size of less than or equal to 1 mm, which makes it possible to greatly limit the injuries to glass eels caused by fishing. No glass eels were observed trapped in any part other than the codend.

All the vessels have a water tank on board, equipped with a bubbler and possibly a water recirculation system. In the tank are placed 3 plastic baskets with very fine mesh allowing the glass eels to be recovered at the end of the fishing without manipulation.

The captured fish are first placed in a bin on which at least 3 degressive mesh screens are installed to separate the elvers from the by-catch and to release them very quickly. The glass eels were then placed in one of the baskets in the water tank.

The duration of each haul was between 10 and 15 minutes.

The average speeds observed were higher than required by the standard, in the order of 2.1 to 2.2 knots. However, these speeds are below that recommended in the "Guide des Bonnes Pratiques de France" and remain moderate.

After the tide, fishermen take the glass eels home to place them in a tank for a minimum of 48 hours in slightly salty water (as close as possible to environmental conditions). Professionals estimate that mortality during this stage is low, but no real monitoring of mortality is carried out.

Thus, many criteria are met, but fishermen do not keep mortality logs and speeds are too high compared to SEG requirements. However, the speeds observed remain low with an engine





Score	page 4 of the document) to be implemented by the next audit. Therefore, an aspiring score is recommended for this criterion. Aspiring
	We recommend that an aspiring criterion be assigned with several recommendations (part 5,
	duration of the strokes is low, less than or equal to 15 minutes.
	power in line with the standard (90hp). Professionals can hardly go slower. In addition, the

Criterion 2.5: The fishery has negligible impacts on by-catch species			
Weighting: 1			
Responsible indicators	 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	 The fishery has low-level impacts on by-catch. By-catch is returned to the water alive as gently and rapidly as possible. 		
Discussion	The by-catches encountered are the following: stickleback, Thinlip grey mullet, European flounder and lampreys. These species, caught in small numbers, return quickly to the water and without any major impacts being observed. The criterion is therefore met.		
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	Among the species caught, the presence of lampreys (species not determined) was noted in the sieves. Sea and river lampreys are classified as endangered and vulnerable species in France respectively and are present in this sector. However, the system used by fishermen for by-catches (multiple sieves) allows these vulnerable species to be released very quickly. When they were taken on board, the lampreys caught did not show any injuries and did not seem to be affected by the capture. We therefore consider that the fishing action has no impact on these species. The criterion is therefore 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	The practices observed are mainly carried out in open water and therefore far from the bottom. Although it may happen that some fishermen fish more at the edge, they keep a reasonable height in relation to the benthos so as not to touch it. This criterion has therefore been met.		
Score	Responsible		

Criterion 2.8: Transport			
Weighting: 1			
Responsible indicators	 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	The fishing form filled in at the end of the tide is the authorisation for transport in France. All fishermen use the same method of transport, namely a plastic or polystyrene box (or bucket). The glass eels are taken out of the basket in the fish tank and placed in this box immediately. Then they transport this box from the boat to the truck where the catch is weighed, without transferring the container (the tare is known). The eels are left in the open air for the time of transport from the port to the fisherman's fish tank. This transport time is generally short and during transport the eels are kept moist and cool (air temperature in winter). This system allows for the least handling of elvers and this fish does not seem to suffer from this way of operating. The criterion is therefore met.		
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	N/A			
Score	N/A			







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