

# Sustainable Eel Group (SEG) Standard Assessment

## Koman's Vishandel B.V.

### Assessment against:

- **Component 1:** Core requirements.
- **Component 4:** Eel buying and trading.
- **Component 7:** Processing, wholesale and retail supplies.

<b>Completed by:</b> Andres Fellenberg van der Molen	<b>On-Site Visit:</b> 13 <sup>th</sup> January 2021	<b>Report date:</b> 19 <sup>th</sup> January 2021
<b>Reviewed and approved by:</b>	<b>Mr. David Bunt</b> Sustainable Eel Group	<b>Certification Body</b> 10 <sup>th</sup> May 2021
This version has had commercially sensitive information removed to meet Data Protection requirements.		

### FINAL REPORT

#### Scope

This document represents the report completed following the 2021 audit carried out under the Sustainable Eel Group (SEG) Standard (Version 6.0a, Dec 2019) for Koman's Vishandel B.V. This assessment has been completed against Components 1, 4 & 7 of the standard

The assessment is of a processor/smoker and trade of Eel located at Den Bels 1, 4782 PG Moerdijk, the Netherlands.



## 1. Introduction

Moerdijk is said to have already existed in 967, and it was an island. Before 1600, the Island of Moerdijk was reclaimed, so that eventually the island became attached to the land. In 1650, the Royale Dijk was constructed, which reclaimed the already formed Hollandsch Diep.

Before 1940, forty families lived from fishing. The Moerdijk fishermen fished with flatboats, equipped with an anchor well and steel rods. Fishing took place on the major rivers and in Zeeland's waters, and after 1945 also on the Westerschelde. Due to the Delta Works, the Moerdijker fishery largely came to an end.

Koman comes from a real fishing family. The company started fishing for freshwater fish and Eel in 1918.

Eel is an essential product for Koman's. They buy the eels from fishers and farms. In Koman's facilities are sorted according to size in 15 tanks, and then processed and transported by refrigerated truck to customers or sold in Koman's store.

The permanent team consists of 30 employees, where 15 are dedicated to Eel. The yearly volume of eels traded by Koman is 541 tons. We are considering the year 2019 as the base year for this audit considering that 2020 was an irregular year due to COVID-19 and the impact this pandemic generated to the HORECA, which are the main clients of Koman's.

During this audit, Mr. Jaco koman was interviewed and he guided the visit and requested to his staff for the auditor's evidence. Mr. Raoul Slabbekoorn participated indirectly in the audit facilitating financial information and documentation.



## 2. The assessment

The assessor was Andres Fellenberg Van der Molen from Green Partner Audits & Consultancy B.V who visited Koman's Vishandel B.V. on 13 January 2021. The audit included interviews with Mr. Jaco Koman who is the owner and manager of the company.

### 2.1 Client Contact Details

Client Contact Name	Director Jaco Koman   Koman's Vishandel B.V.
Client Address	Den Bels 1, 4782 PG Moerdijk
Client Email	[REDACTED]@komanvis.nl
Client Phone Number	0168-[REDACTED]

### 3. 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		Responsible	1	1
1.3	The facility trades in certified responsibly sourced eels		Aspiring	1	0
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	Biosecurity & welfare				
	1.5	Eel buying & trading	Responsible	1	1
	1.5	Wholesale / Retail / Processing	Responsible	1	1
Total				8	7/8
Percentage Responsibility Score				87%	

Component 4: Eel buying and trading		Auditor's findings	Weighting	Score
4.0	Segregation of certified and uncertified eel	Responsible	2	2
4.1	The Glass Eel holding facility is a registered Aquaculture Production Business	N/A	N/A	N/A
4.2	Mortality in storage facility	Aspiring	2	0
4.3	Mortality during transport and initial holding if transported to farm	Aspiring	2	0
4.4	Water quality	Aspiring	1	0
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			11	3
Percentage Responsibility Score			27%	

Component 7: Processing, wholesale and retail supplies			Auditor's findings	Weighting	Score
7.0	Processing, wholesale and retail supplies		Responsible	1	1
Total				1	1
Percentage Responsibility Score				100%	

Summary of assessment and scoring		
Component	Aspiring	Responsible
1	1	7
4	8	3
7	0	1
Total	9	11
Total Responsibility Score	11 / 20 = 55%	

### 4. Auditor conclusions

- **Component 1 General Requirements:** Koman's Vishandel B.V. has scored 7 of 8 scored for Component 1, it should be considered **RESPONSIBLE** under the SEG standard.
- **Component 4 Eel buying and trading:** Koman's Vishandel B.V has scored 3 of 11 scored for Component 4, it should be considered **ASPIRING** under the SEG standard.
- **Component 7 Processing, wholesale and retail supplies:** Koman's Vishandel B.V has scored 1 of 1 scored for Component 7, it should be considered **RESPONSIBLE** under the SEG standard.

- With an overall Responsibility score of 55%, Koman's Vishandel B.V can be considered as **RESPONSIBLE** under the SEG standard and suitable for certification.

## 5. Recommendations:

It is recommended that the following improvements are implemented before the next audit:

1. Ensure at least 50% of the eels purchased are SEG certified to achieve the Responsible indicator.
2. Create and compile all documentation necessary to demonstrate the compliance against the SEG standard.
3. Create a system of registration to trace the mortality of Eel accurately.
4. Implement simple procedures and measurements tools to check water quality, including a register log.
5. Establish a file per supplier specifying company information, location, products that supply to the company and any certification this supplier has, including SEG, MSC, ISO's, local or national recognitions etc.
6. Record the total number of kilograms of eels delivered to Koman by each supplier.
7. Record all social activities where the company is involved, including awareness and staff training about SEG.
8. Add the SEG logo to Koman's printing and stationery, particularly to the paper where the invoices are printed.

## 6. Next Audit

After the audit, the client was assessed against the risk assessment set out in the methodology, set out in the table below.

Questions	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	<b>All other scenarios</b>	<b>Standard Surveillance</b>	

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

As the client has been seen to fall into the Standard Surveillance bracket, the next audit will be due in 30th January 2023 (in 2 years' time) and shall be an on-site audit.



Andres Fellenberg Van der Molen  
Accredited SEG Assessor

## 7. The Assessment

The tables below give the assessment for each of the criteria in the standard and a rationale for the scores given above.

<b>Component 1 – Generic requirements</b>	
<b>Criterion 1.1: Commitment to legality</b>	
<b>Responsible indicators</b>	For at least the past two years: the organisation has not been found guilty for any offences relating to eel fishing or trading.
<b>Aspiring indicators</b>	For at least the past 12 months: the organisation has not been found guilty for any offences relating to eel fishing or trading.
<b>Discussion</b>	The client declared at the time of the assessment that there had not been any legal proceeding against the company under assessment in the past 2 years and that there were no ongoing investigations either.
<b>Score</b>	<b>Responsible</b>
<b>Criterion 1.2: Contribution to Eel Conservation Projects. (Optional bonus score)</b>	
<b>Responsible indicators</b>	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.
<b>Aspiring indicators</b>	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.
<b>Discussion</b>	The company's profits are paid into DUPAN on a range of 5-7%. This is a yearly contribution. Once a month it is reported to DUPAN how much has been sold. €1 per kgs of fillets and €0.50 per kgs of round eels are then paid to DUPAN. Next to this contribution Koman visit schools with "live" eels to show to children and create awareness among the community. Koman's plays a social role in the community sponsoring the local football team, the Christmas market and the Carnaval period.
<b>Score</b>	<b>Responsible</b>
<b>Criterion 1.3: The organisation trades in certified responsibly sourced Eel</b>	
<b>Responsible indicators</b>	The organisation trades in at least 50% (by number) of certified responsibly sourced Eel and has the documentation to demonstrate that.
<b>Aspiring indicators</b>	The organisation trades in 10 – 49.9% (by number) of certified responsibly sourced Eel and has the documentation to demonstrate that.
<b>Discussion</b>	All live eels, 541 tons are sourced from 51 suppliers including Fishers, Farming and Trading from different countries around Europe only. From these 51 suppliers, 12 are SEG suppliers, which means from the 541 tons, 257 tons are from SEG suppliers. 47.5% of Koman's Eel are certified as a trustworthy source. <i>Refer to Reference 1:1   Evidence 01</i>
<b>Score</b>	<b>Aspiring</b>
<b>Criterion 1.4: Traceability</b>	
<b>1.4.1: Traceability - Incoming product, separation and segregation</b>	
<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• Certified and uncertified eel products can be clearly and easily traced back to their source.</li> <li>• Where a fishery or buyer, an electronic tele-declaration system is used</li> <li>• It operates a clear system which ensures that the product remains separated at all stages from arrival to dispatch from non-certified eel products.</li> <li>• The organisation ensures that any products wishing to make a claim as certified do not contain any non-certified eel-based ingredients.</li> <li>• If resolved through mass- or number- balance calculations, the margin of error does not exceed 2%</li> </ul>

<b>Aspiring indicators</b>	<ul style="list-style-type: none"> <li>• Certified and uncertified eel products can be traced back to their source.</li> <li>• 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</li> <li>• 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</li> <li>• 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.</li> </ul>
<b>Discussion</b>	<p>Products are purchased and sold very quickly, according to the information available the period can fluctuate from 1 day up to 2 weeks. Product is segregated and can be traced back to the source following an internal control from the order, arrival, and invoicing. There is a mixture of SEG and non-SEG, but all eels can be traced through their year documentation back to 7 years following dutch regulations. Each batch of eels remains separated by each other to avoid mixing the source. The facilities count with 15 tanks for storage and 5 for sorting. This process manually managed. The company use the system MINOX to administrate clients and suppliers.</p> <p><i>Refer to Reference 1:2   Evidence 01 and Evidence 02</i></p>
<b>Score</b>	<b>Responsible</b>
<b>1.4.2: Traceability - Outgoing product</b>	
<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• Where a fishery or buyer, an electronic tele-declaration system is used</li> <li>• Documentation is well maintained with a maximum of 2% error in the following:</li> <li>• 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</li> <li>• 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"> <li>- Includes an appropriate batch code</li> <li>- Includes a record of the quantity (no. &amp; weight) of product and to whom it was sold</li> </ul> </li> </ul>
<b>Aspiring indicators</b>	<ul style="list-style-type: none"> <li>• 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):</li> <li>• 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</li> <li>• 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"> <li>- Includes an appropriate batch code</li> <li>- Includes a record of the quantity (no. &amp; weight) of product and to whom it was sold</li> </ul> </li> </ul>
<b>Discussion</b>	<p>Koman uses a correct batch coding for labelling and invoicing of the product, including the order number, batch identification and trace numbers requested by Dutch authorities.</p> <p><i>Refer to Reference 1:3   Evidence 01</i></p>
<b>Score</b>	<b>Responsible</b>
<b>1.4.3: Traceability - Record keeping and documentation</b>	
<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>• 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</li> <li>• If a fisherman or buyer, a tele-declaration system is used to report catches and trade</li> <li>• The organisation operates a system that also allows for the completion of a batch reconciliation of eel product by weight over a given period.</li> <li>• The organisation maintains records for a minimum of three (3) years.</li> </ul>
<b>Aspiring indicators</b>	<p>The above requirements are met except that:</p> <ul style="list-style-type: none"> <li>• Records have been maintained for less than three (3) years</li> </ul>

	<ul style="list-style-type: none"> <li>If a fisherman or trader, a tele-declaration system is planned to be used to report catches and trade in the next season</li> </ul>
<b>Discussion</b>	<p>Koman maintains records for seven years to date in accordance with Dutch regulation. Eels received from a SEG source are also accompanied by batch numbering from the supplier, and a declaration which identifies the fishermen and quantities of fish purchased to form the batch.</p> <p><i>Refer to Reference 1:4   Evidence 01 and Evidence 02</i></p>
<b>Score</b>	<b>Responsible</b>

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

#### Eel Fishing: Biosecurity measures are adopted

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>The fishery conducts good biosecurity measures such as the disinfection and drying of nets and equipment between each fishing in different waters. OR:</li> <li>The fishermen only operate in the same river or estuary, with no risk of transferring diseases or alien species between catchments</li> </ul>
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#### Eel buying & trading: Biosecurity is present and disease is treated rapidly and appropriately

<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>The use of chemicals follows legal requirements of the appropriate EU regulations and of the country concerned.</li> <li>The facility has the appropriate permissions to operate from the relevant licensing authority</li> <li>An effective and documented biosecurity plan is in place and there is evidence that it is being followed.</li> <li>Records are available showing regular monitoring of health and possible signs of stress according to the facility's plan (including the completion of microscope parasite checks) and daily mortality is recorded.</li> <li>Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility.</li> </ul>
<b>Aspiring indicators</b>	<ul style="list-style-type: none"> <li>The use of chemicals follows legal requirements of the appropriate EU regulations and of the country concerned.</li> <li>The facility has the appropriate permissions to operate from the relevant authority</li> <li>An effective and documented biosecurity plan is in place and there is evidence that it is being followed.</li> <li>Eels are regularly monitored for health and possible signs of stress (although this might not be documented) and daily mortality is recorded.</li> <li>Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility.</li> </ul>
<b>Discussion</b>	<p>Koman does not perform fishing, only buying &amp; trading. Trading is based on "live" Eel and not in Glass eel. The company follow all regulations established by Dutch authorities to operate, including usage of chemicals, environment, biosecurity. Mortality and health of the Eel are regularly monitored, although this might not be documented. Koman's operations do not apply any medicine to the eels.</p>
<b>Score</b>	<b>Responsible</b>

#### Eel farming: Biosecurity is present and disease is treated rapidly and appropriately

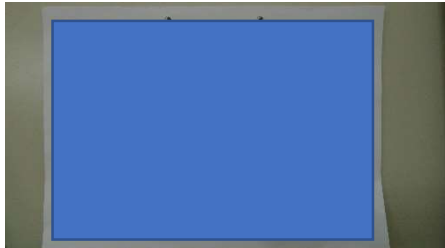


<b>Responsible indicators</b>	<ul style="list-style-type: none"> <li>The facility has the appropriate permissions to operate from the relevant authority.</li> <li>The use of chemicals follows legal requirements of the EU and of the country concerned</li> <li>An effective and documented biosecurity plan is in place and there is evidence that it is being followed.</li> <li>Daily records are available showing monitoring of fish health and signs of stress and daily mortality is recorded</li> <li>Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility</li> </ul>
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	<ul style="list-style-type: none"> <li>• UV is used at an appropriate level and separation between tanks</li> </ul>
Aspiring indicators	<ul style="list-style-type: none"> <li>• The facility has the appropriate permissions to operate from the relevant licensing authority</li> <li>• The use of chemicals follows legal requirements of the EU and of the country concerned.</li> <li>• An effective and documented biosecurity plan is in place and there is evidence that it is being followed.</li> <li>• Eels are regularly inspected for disease (although this may not be documented) and daily mortality is recorded.</li> <li>• Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility.</li> </ul>
Discussion	Not Applicable
Score	Not Applicable
<b>Restocking: The risk of restocked eels introducing disease into wild populations has been assessed and is minimal</b>	
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	Not Applicable
Score	Not Applicable
<b>Wholesale / Retail / Processing: Hygiene Plans are followed and there are rare examples of infection</b>	
Responsible indicators	Food processing hygiene plans are followed
Discussion	Koman's counts with an effective HCCP in place, and constant monitoring via an independent external company; NORMEC QUALITY. Dutch authorities request HCCP. The company has all permissions to operate. <i>Refer to Reference 1:5/Evidence 01 and Evidence 02</i>
Score	Responsible
<b>Component 4 - Eel buying and trading</b>	
<b>Criterion 4.0: Segregation of certified and uncetified eels</b>	
<b>Weighting: 2</b>	
Responsible indicators	Certified and non-certified are kept separated, from point of collection through holding to sale and onward transport
No Aspiring indicators	
Discussion	Eel is kept separate in different batch in different tanks. The eels are not mixed on between SEG and Non-SEG from the point of collection, holding to sale and transport. Sufficient evidence on site. <i>Refer to reference 4:1   Evidence 01</i>
Score	Responsible
<b>Criterion 4.1: The Glass Eel holding facility is a registered Aquaculture Production Business</b>	
<b>Weighting: 1</b>	
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	Not Applicable   Koman does not hold Glass eel in the facilities
Score	Not Applicable
<b>Criterion 4.2: Mortality in storage facility</b>	
<b>Weighting: 2</b>	
Responsible indicators	Mortality rate over the season is less than 2% on average.

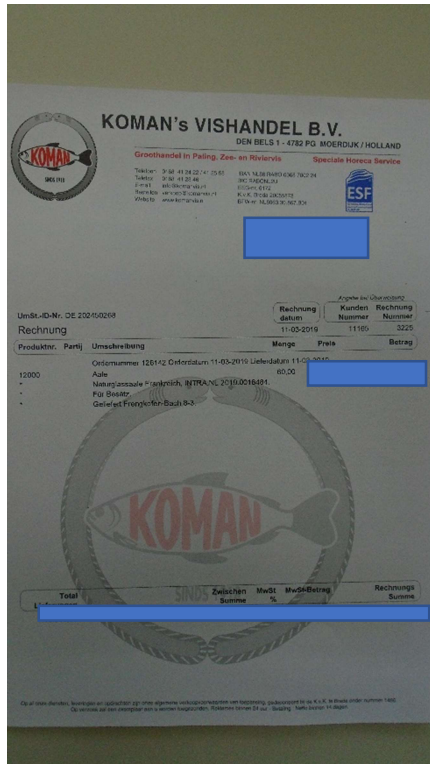
<b>Aspiring indicators</b>	Mortality rate over the season is less than or equal to 5% on average but greater than or equal to 2%
<b>Discussion</b>	Following the information provided by Mr. Koman the mortality is almost zero, but there is not an effective way of registration of mortality implemented that can be audited or controlled. These create a level of uncertainty for the auditor. The criteria is defined as Aspiring purely based on the trust given to Mr. Koman in this matter. Anyway, the waste container was revised, and there is not evidence of disposed of eels. <i>Refer to reference 4:2   Evidence 01</i>
<b>Score</b>	<b>Aspiring</b>
<b>Criterion 4.3: Mortality during transport and initial holding if transported to farm</b>	
<b>Weighting: 2</b>	
<b>Responsible indicators</b>	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
<b>Aspiring indicators</b>	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.
<b>Discussion</b>	According to the verbal evidence explained and presented on site, the mortality during transport is 0% from the suppliers to Koman's facilities and from Koman's facilities to the buyer. Once again, the auditor faces uncertainty due to the gap of documentation and evidence in this matter. The criteria is defined as Aspiring purely based on the trust given to Mr. Koman in this matter. 47.5% of the total eel are from certified suppliers.
<b>Score</b>	<b>Aspiring</b>
<b>Criterion 4.4: Water quality</b>	
<b>Weighting: 1</b>	
<b>Responsible indicators</b>	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
<b>Aspiring indicators</b>	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
<b>Discussion</b>	The water quality is maintained purely by experience from Koman's staff. Only Iron is controlled periodically because large amounts of Iron promote algae's growth, which can block sunlight and disrupt habitats. Extensive algae presence lowers water freshness and promotes stagnation. Full yearly control of the quality water is done by an external company just ones a year, but there are no procedures to control the entire water quality internally. Logs are not available to demonstrate regular monitoring. The facilities do not show any issues regarding water quality. The tanks count with running fresh water always. The facilities do not affect the water usage of the local community. <i>Refer to reference 4:4   Evidence 01</i>
<b>Score</b>	<b>Aspiring</b>
<b>Criterion 4.5: Handling and welfare</b>	
<b>Weighting: 1</b>	
<b>Responsible indicators</b>	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.
<b>Aspiring indicators</b>	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.
<b>Discussion</b>	Koman's facilities are optimised as much as they can to avoid handling to avoid injuries. There more to be done, but this means to implement automatised systems. The full handling was controlled without presenting any substantial evidence of gaps in handling and welfare. <i>Refer to reference 4:5 / Evidence 01</i>
<b>Score</b>	<b>Aspiring</b>
<b>Criterion 4.6: Transport</b>	
<b>Weighting: 1</b>	
<b>Responsible indicators</b>	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
<b>Discussion</b>	The evidence presented on the site demonstrates the maximin time of transport is not above 24 hrs, meeting all legal requirements in this matter. Handling is minimum, minimising time and stress. The vehicles are equipt with cooling systems following all Dutch and European regulations in this matter. <i>Refer to reference 4:6 / Evidence 01</i>
<b>Score</b>	<b>Responsible</b>
<b>Criterion 4.7: The required percentage of glass eels is being used for restocking</b>	
<b>Weighting: 2</b>	
<b>Responsible indicators</b>	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.
<b>Aspiring indicators</b>	The buyer can provide documented evidence that they <u>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 restocking will occur in the forthcoming season.
<b>Discussion</b>	Koman has substantial documented evidence that it has made available restocking of glass eels to the maximum level possible within the Netherlands' constraints. But there no evidence that demonstrate the buyer is doing the restocking for the primary purpose of conservation / escapement. <i>Refer to reference 4:7 / Evidence 01</i>
<b>Score</b>	<b>Aspiring</b>
<b>Component 7 – Processing, wholesale and retail supplies</b>	
<b>Discussion</b>	Koman's facilities considering processing wholesales and retails supplies present high quality of operations, complying with all dutch regulations related to health, security, and labour. Labelling and packaging products present the products' sustainability effort, which is displayed to the public and clients. They are passionate about assisting the recovery of the Eel and ensuring Compliance <i>Refer to reference 7:0 / Evidence 01</i>
<b>Score</b>	<b>Responsible</b>

## 8. On-site Evidence per Component

Component 1																																																																																																																																																																																																																																																																																																																								
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1:1	<table><tr><th colspan="2">SUPPLIERS LIVE EEL</th><th colspan="2">2019</th></tr><tr><th>TRADING</th><th>Country</th><th>Quantity</th><th>Kilograms</th><th>Comments</th></tr><tr><td>1</td><td>FR</td><td>145.00</td><td>Kg</td><td>None</td></tr><tr><td>2</td><td>FR</td><td>3,845.00</td><td>Kg</td><td>None</td></tr><tr><td>3</td><td>UK</td><td>12,441.00</td><td>Kg</td><td>None</td></tr><tr><td>4</td><td>UK</td><td>8,527.00</td><td>Kg</td><td>SEG-0067</td></tr><tr><td>5</td><td>UK</td><td>455.00</td><td>Kg</td><td>None</td></tr><tr><td>6</td><td>DE</td><td>1,684.00</td><td>Kg</td><td>None</td></tr><tr><td>7</td><td>NL</td><td>1,865.00</td><td>Kg</td><td>SEG-0040</td></tr><tr><td>8</td><td>NL</td><td>9,652.00</td><td>Kg</td><td>None</td></tr><tr><td>9</td><td>NL</td><td>0.00</td><td>Kg</td><td>None</td></tr><tr><td>10</td><td>NL</td><td>0.00</td><td>Kg</td><td>None</td></tr><tr><td>11</td><td>NL</td><td>0.00</td><td>Kg</td><td>SEG-0047</td></tr><tr><td>12</td><td>ES</td><td>2,350.00</td><td>Kg</td><td>None</td></tr><tr><td>13</td><td>ES</td><td>1,573.00</td><td>Kg</td><td>None</td></tr><tr><td>14</td><td>IT</td><td>8,455.00</td><td>Kg</td><td>None</td></tr><tr><td>15</td><td>GR</td><td>9,325.00</td><td>Kg</td><td>None</td></tr><tr><td>16</td><td>PL</td><td>0.00</td><td>Kg</td><td>None</td></tr><tr><td>17</td><td>DE</td><td>3,837.00</td><td>Kg</td><td>None</td></tr><tr><td colspan="2">Tot</td><td>65,215.00</td><td>Kg</td><td></td></tr><tr><th></th><th>Country</th><th>Quantity</th><th>Kilograms</th><th>Comments</th></tr><tr><td>1</td><td>NL</td><td>8,103.00</td><td>Kg</td><td>SEG-0077</td></tr><tr><td>2</td><td>NL</td><td>34,334.00</td><td>Kg</td><td>SEG-0074</td></tr><tr><td>3</td><td>NL</td><td>16,401.00</td><td>Kg</td><td>SEG-0075</td></tr><tr><td>4</td><td>NL</td><td>87,523.00</td><td>Kg</td><td>SEG-0076</td></tr><tr><td>5</td><td>NL</td><td>10,500.00</td><td>Kg</td><td>SEG-0078</td></tr><tr><td>6</td><td>NL</td><td>10,152.00</td><td>Kg</td><td>SEG-0059</td></tr><tr><td>7</td><td>NL</td><td>3,197.00</td><td>Kg</td><td>SEG-0032</td></tr><tr><td>8</td><td>ES</td><td>23,020.00</td><td>Kg</td><td>None</td></tr><tr><td>9</td><td>IT</td><td>3,000.00</td><td>Kg</td><td>None</td></tr><tr><td>10</td><td>IT</td><td>2,310.00</td><td>Kg</td><td>None</td></tr><tr><td>11</td><td>LT</td><td>18,190.00</td><td>Kg</td><td>None</td></tr><tr><td>12</td><td>PL</td><td>34,335.00</td><td>Kg</td><td>None</td></tr><tr><td>13</td><td>EE</td><td>21,560.00</td><td>Kg</td><td>None</td></tr><tr><td>14</td><td>LT</td><td>21,031.00</td><td>Kg</td><td>None</td></tr><tr><td>15</td><td>LT</td><td>0.00</td><td>Kg</td><td>None</td></tr><tr><td>16</td><td>NL</td><td>48,319.00</td><td>Kg</td><td>SEG-0076</td></tr><tr><td>17</td><td>DE</td><td>20,380.00</td><td>Kg</td><td>SEG-0068</td></tr><tr><td>18</td><td>GR</td><td>0.00</td><td>Kg</td><td>None</td></tr><tr><td>19</td><td>NL</td><td>30,000.00</td><td>Kg</td><td>None</td></tr><tr><td>20</td><td>NL</td><td>23,375.00</td><td>Kg</td><td>None</td></tr><tr><td colspan="2">Tot</td><td>456,375.00</td><td>Kg</td><td></td></tr><tr><th></th><th>Country</th><th>Quantity</th><th>Kilograms</th><th>Comments</th></tr><tr><td>1</td><td>NL</td><td>3,835.00</td><td>Kg</td><td>None</td></tr><tr><td>2</td><td>NL</td><td>1,093.00</td><td>Kg</td><td>None</td></tr><tr><td>3</td><td>NL</td><td>0.00</td><td>Kg</td><td>None</td></tr><tr><td>4</td><td>NL</td><td>0.00</td><td>Kg</td><td>None</td></tr><tr><td>5</td><td>NL</td><td>4,073.00</td><td>Kg</td><td>None</td></tr><tr><td>6</td><td>NL</td><td>2,253.00</td><td>Kg</td><td>None</td></tr><tr><td>7</td><td>NL</td><td>340.00</td><td>Kg</td><td>None</td></tr><tr><td>8</td><td>NL</td><td>3,118.00</td><td>Kg</td><td>None</td></tr><tr><td>9</td><td>NL</td><td>182.00</td><td>Kg</td><td>None</td></tr><tr><td>10</td><td>NL</td><td>250.00</td><td>Kg</td><td>None</td></tr><tr><td>11</td><td>NL</td><td>250.00</td><td>Kg</td><td>None</td></tr><tr><td>12</td><td>NL</td><td>1,426.00</td><td>Kg</td><td>None</td></tr><tr><td>13</td><td>NL</td><td>1,037.00</td><td>Kg</td><td>None</td></tr><tr><td>14</td><td>NL</td><td>200.00</td><td>Kg</td><td>None</td></tr><tr><td colspan="2">Tot</td><td>18,141.00</td><td>Kg</td><td></td></tr><tr><td colspan="2">Total</td><td>51</td><td>541,000</td><td>541,000</td></tr><tr><td colspan="2"></td><td colspan="2">Kg. Est Report</td><td>0 Difference</td></tr><tr><td colspan="2">SEG Supplier</td><td>256.836</td><td>47.47</td><td>%</td></tr><tr><td colspan="2"></td><td colspan="2">Kg. Est Report</td><td>Responsible Est.</td></tr></table>	SUPPLIERS LIVE EEL		2019		TRADING	Country	Quantity	Kilograms	Comments	1	FR	145.00	Kg	None	2	FR	3,845.00	Kg	None	3	UK	12,441.00	Kg	None	4	UK	8,527.00	Kg	SEG-0067	5	UK	455.00	Kg	None	6	DE	1,684.00	Kg	None	7	NL	1,865.00	Kg	SEG-0040	8	NL	9,652.00	Kg	None	9	NL	0.00	Kg	None	10	NL	0.00	Kg	None	11	NL	0.00	Kg	SEG-0047	12	ES	2,350.00	Kg	None	13	ES	1,573.00	Kg	None	14	IT	8,455.00	Kg	None	15	GR	9,325.00	Kg	None	16	PL	0.00	Kg	None	17	DE	3,837.00	Kg	None	Tot		65,215.00	Kg			Country	Quantity	Kilograms	Comments	1	NL	8,103.00	Kg	SEG-0077	2	NL	34,334.00	Kg	SEG-0074	3	NL	16,401.00	Kg	SEG-0075	4	NL	87,523.00	Kg	SEG-0076	5	NL	10,500.00	Kg	SEG-0078	6	NL	10,152.00	Kg	SEG-0059	7	NL	3,197.00	Kg	SEG-0032	8	ES	23,020.00	Kg	None	9	IT	3,000.00	Kg	None	10	IT	2,310.00	Kg	None	11	LT	18,190.00	Kg	None	12	PL	34,335.00	Kg	None	13	EE	21,560.00	Kg	None	14	LT	21,031.00	Kg	None	15	LT	0.00	Kg	None	16	NL	48,319.00	Kg	SEG-0076	17	DE	20,380.00	Kg	SEG-0068	18	GR	0.00	Kg	None	19	NL	30,000.00	Kg	None	20	NL	23,375.00	Kg	None	Tot		456,375.00	Kg			Country	Quantity	Kilograms	Comments	1	NL	3,835.00	Kg	None	2	NL	1,093.00	Kg	None	3	NL	0.00	Kg	None	4	NL	0.00	Kg	None	5	NL	4,073.00	Kg	None	6	NL	2,253.00	Kg	None	7	NL	340.00	Kg	None	8	NL	3,118.00	Kg	None	9	NL	182.00	Kg	None	10	NL	250.00	Kg	None	11	NL	250.00	Kg	None	12	NL	1,426.00	Kg	None	13	NL	1,037.00	Kg	None	14	NL	200.00	Kg	None	Tot		18,141.00	Kg		Total		51	541,000	541,000			Kg. Est Report		0 Difference	SEG Supplier		256.836	47.47	%			Kg. Est Report		Responsible Est.		47.50 % of SEG Suppliers
SUPPLIERS LIVE EEL		2019																																																																																																																																																																																																																																																																																																																						
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2	FR	3,845.00	Kg	None																																																																																																																																																																																																																																																																																																																				
3	UK	12,441.00	Kg	None																																																																																																																																																																																																																																																																																																																				
4	UK	8,527.00	Kg	SEG-0067																																																																																																																																																																																																																																																																																																																				
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11	NL	0.00	Kg	SEG-0047																																																																																																																																																																																																																																																																																																																				
12	ES	2,350.00	Kg	None																																																																																																																																																																																																																																																																																																																				
13	ES	1,573.00	Kg	None																																																																																																																																																																																																																																																																																																																				
14	IT	8,455.00	Kg	None																																																																																																																																																																																																																																																																																																																				
15	GR	9,325.00	Kg	None																																																																																																																																																																																																																																																																																																																				
16	PL	0.00	Kg	None																																																																																																																																																																																																																																																																																																																				
17	DE	3,837.00	Kg	None																																																																																																																																																																																																																																																																																																																				
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2	NL	34,334.00	Kg	SEG-0074																																																																																																																																																																																																																																																																																																																				
3	NL	16,401.00	Kg	SEG-0075																																																																																																																																																																																																																																																																																																																				
4	NL	87,523.00	Kg	SEG-0076																																																																																																																																																																																																																																																																																																																				
5	NL	10,500.00	Kg	SEG-0078																																																																																																																																																																																																																																																																																																																				
6	NL	10,152.00	Kg	SEG-0059																																																																																																																																																																																																																																																																																																																				
7	NL	3,197.00	Kg	SEG-0032																																																																																																																																																																																																																																																																																																																				
8	ES	23,020.00	Kg	None																																																																																																																																																																																																																																																																																																																				
9	IT	3,000.00	Kg	None																																																																																																																																																																																																																																																																																																																				
10	IT	2,310.00	Kg	None																																																																																																																																																																																																																																																																																																																				
11	LT	18,190.00	Kg	None																																																																																																																																																																																																																																																																																																																				
12	PL	34,335.00	Kg	None																																																																																																																																																																																																																																																																																																																				
13	EE	21,560.00	Kg	None																																																																																																																																																																																																																																																																																																																				
14	LT	21,031.00	Kg	None																																																																																																																																																																																																																																																																																																																				
15	LT	0.00	Kg	None																																																																																																																																																																																																																																																																																																																				
16	NL	48,319.00	Kg	SEG-0076																																																																																																																																																																																																																																																																																																																				
17	DE	20,380.00	Kg	SEG-0068																																																																																																																																																																																																																																																																																																																				
18	GR	0.00	Kg	None																																																																																																																																																																																																																																																																																																																				
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20	NL	23,375.00	Kg	None																																																																																																																																																																																																																																																																																																																				
Tot		456,375.00	Kg																																																																																																																																																																																																																																																																																																																					
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1	NL	3,835.00	Kg	None																																																																																																																																																																																																																																																																																																																				
2	NL	1,093.00	Kg	None																																																																																																																																																																																																																																																																																																																				
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5	NL	4,073.00	Kg	None																																																																																																																																																																																																																																																																																																																				
6	NL	2,253.00	Kg	None																																																																																																																																																																																																																																																																																																																				
7	NL	340.00	Kg	None																																																																																																																																																																																																																																																																																																																				
8	NL	3,118.00	Kg	None																																																																																																																																																																																																																																																																																																																				
9	NL	182.00	Kg	None																																																																																																																																																																																																																																																																																																																				
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12	NL	1,426.00	Kg	None																																																																																																																																																																																																																																																																																																																				
13	NL	1,037.00	Kg	None																																																																																																																																																																																																																																																																																																																				
14	NL	200.00	Kg	None																																																																																																																																																																																																																																																																																																																				
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		Kg. Est Report		Responsible Est.																																																																																																																																																																																																																																																																																																																				
1:2			20 tanks available. Each batch is managed separately and not mixed to avoid cross-contamination among the eels. Koman can define the source per batch and tank.																																																																																																																																																																																																																																																																																																																					

1:3



**KOMAN's VISHANDEL B.V.**  
DEN BELS 1 - 4782 PG MOERDIJK / HOLLAND  
Groothandel in Paling, Zee- en Riviervis Specialite Morena Service

Telefoon: 0198 41 24 22 - 41 25 41 FAX: 0198 41 24 22  
Tweede: 0198 41 27 48 FAX: 0198 41 27 48  
E-mail: info@koman.nl KVK: 190430307  
Bank: 44790020000000000000 K.V.K. 190430307  
IBAN: NL04790020000000000000 BTW-nr: NL000000000

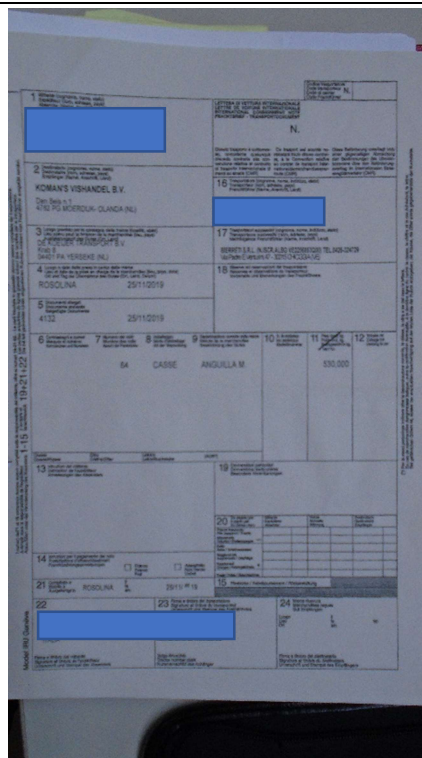
Unbruikbaar: 06 202100208  
Rechnung  
Rechnungsnummer: 120142 Orderdatum: 11-03-2019 Lieferdatum: 11-03-2019  
Rechnung  
Rechnungsdatum: 11-03-2019  
Rechnungsnummer: 11189  
Rechnungsnummer: 3225

Produkt Nr.	Partij	Umschreibung	Menge	Preis	Betrag
12000		Aale	60,00		
+		Nettoergansaufe 11-03-2019, BTW-nr. 2019.0016451			
+		Pap. Beutel			
+		Geliefert: Freylich/Bach 9-3			
<b>Total</b>					
<b>Zwischen Summe</b>					
<b>MwSt %</b>					
<b>MwSt-Betrag</b>					
<b>Rechnungs Summe</b>					

Op al onze producten, behalve op onze eigen producten, is een garantie van 12 maanden van toepassing. De garantie is uitsluitend van toepassing op de producten die u heeft besteld. De garantie is uitsluitend van toepassing op de producten die u heeft besteld. De garantie is uitsluitend van toepassing op de producten die u heeft besteld.

Koman's invoice specifying batch, order, and codes to the client.

1:4

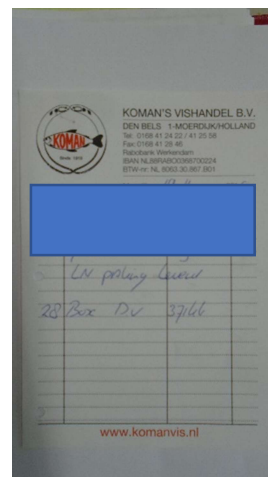


**KOMAN's VISHANDEL B.V.**  
DEN BELS 1 - 4782 PG MOERDIJK / HOLLAND

1. Order number: 120142  
2. Order date: 11-03-2019  
3. Delivery date: 11-03-2019  
4. Invoice number: 11189  
5. Invoice date: 11-03-2019  
6. Invoice number: 3225

Produkt Nr.	Partij	Umschreibung	Menge	Preis	Betrag
12000		Aale	60,00		
+		Nettoergansaufe 11-03-2019, BTW-nr. 2019.0016451			
+		Pap. Beutel			
+		Geliefert: Freylich/Bach 9-3			
<b>Total</b>					
<b>Zwischen Summe</b>					
<b>MwSt %</b>					
<b>MwSt-Betrag</b>					
<b>Rechnungs Summe</b>					

Op al onze producten, behalve op onze eigen producten, is een garantie van 12 maanden van toepassing. De garantie is uitsluitend van toepassing op de producten die u heeft besteld. De garantie is uitsluitend van toepassing op de producten die u heeft besteld. De garantie is uitsluitend van toepassing op de producten die u heeft besteld.

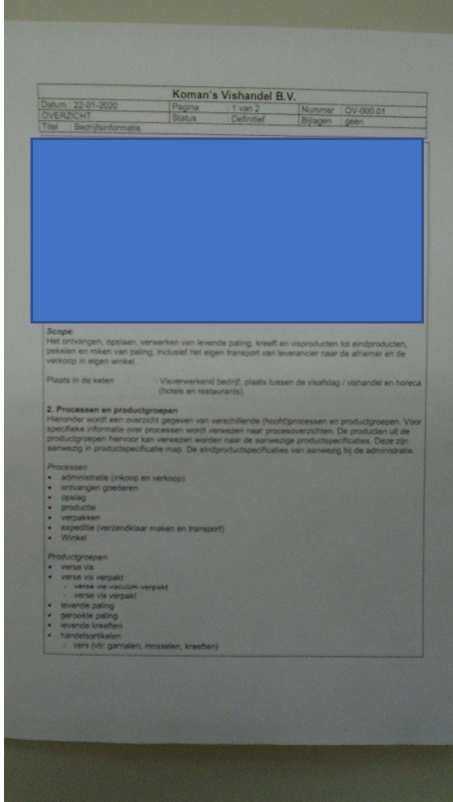
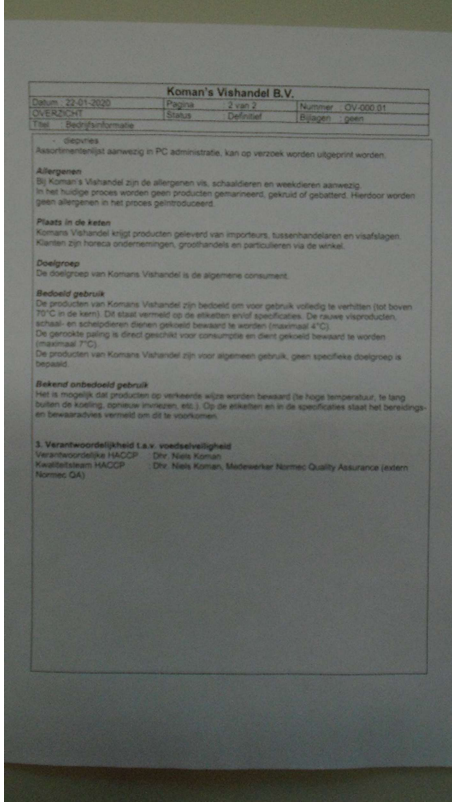
**KOMAN's VISHANDEL B.V.**  
DEN BELS 1 - 4782 PG MOERDIJK / HOLLAND  
Telefoon: 0198 41 24 22 - 41 25 41 FAX: 0198 41 24 22  
Tweede: 0198 41 27 48 FAX: 0198 41 27 48  
E-mail: info@koman.nl KVK: 190430307  
Bank: 44790020000000000000 K.V.K. 190430307  
IBAN: NL04790020000000000000 BTW-nr: NL000000000

Unbruikbaar: 06 202100208  
Rechnung  
Rechnungsnummer: 120142 Orderdatum: 11-03-2019 Lieferdatum: 11-03-2019  
Rechnung  
Rechnungsdatum: 11-03-2019  
Rechnungsnummer: 11189  
Rechnungsnummer: 3225

Produkt Nr.	Partij	Umschreibung	Menge	Preis	Betrag
12000		Aale	60,00		
+		Nettoergansaufe 11-03-2019, BTW-nr. 2019.0016451			
+		Pap. Beutel			
+		Geliefert: Freylich/Bach 9-3			
<b>Total</b>					
<b>Zwischen Summe</b>					
<b>MwSt %</b>					
<b>MwSt-Betrag</b>					
<b>Rechnungs Summe</b>					



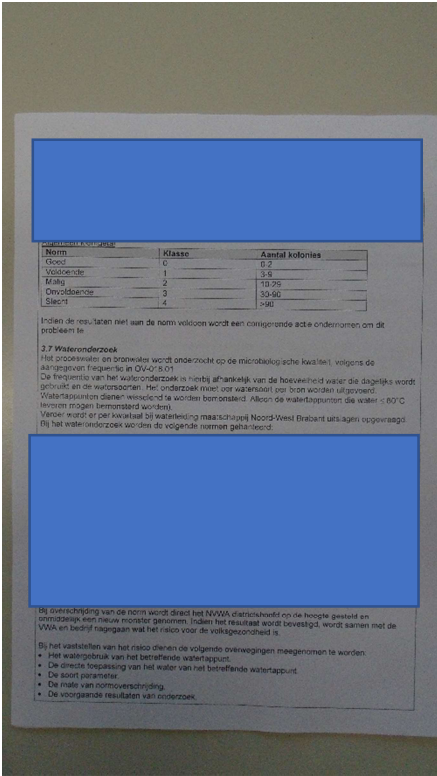


Op al onze producten, behalve op onze eigen producten, is een garantie van 12 maanden van toepassing. De garantie is uitsluitend van toepassing op de producten die u heeft besteld. De garantie is uitsluitend van toepassing op de producten die u heeft besteld. De garantie is uitsluitend van toepassing op de producten die u heeft besteld.

Receive documentation batch, signed by Mr. Koman and electronic and manual documentation available on site.

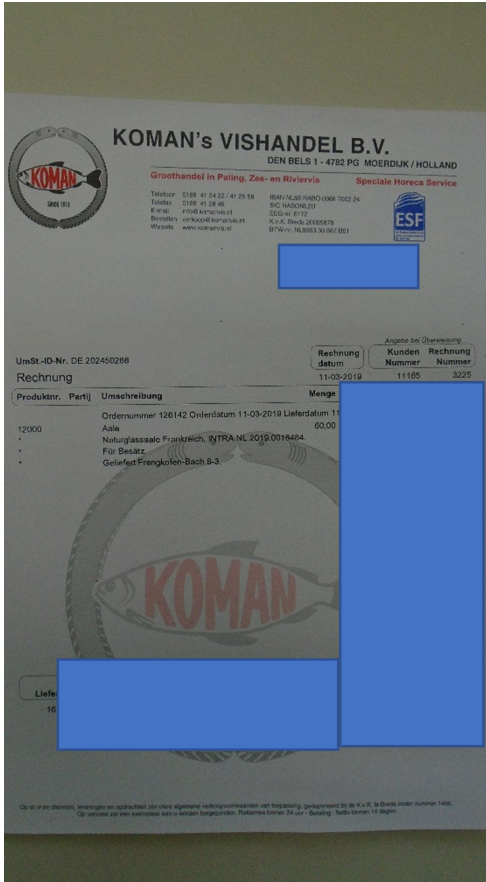
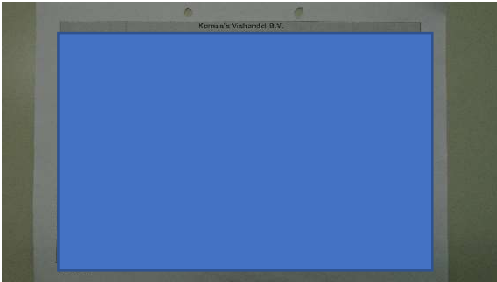
1:5			<p>External company surveillance the appropriate level of HCCP of the company. The company assigned to this task is Normec Quality, a registered and authorised company under dutch registration number 17136146.</p>
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Component 4			
Reference	Evidence 01	Evidence 02	Description
4:1			<p>There are 15 separate tanks. In each tank are not mixed Eel. Each tank represents isolated and individual batches from the supplier.</p>



4:2		No evidence of disposed of Eel.																		
4:4	  <table border="1"> <thead> <tr> <th>Norm</th> <th>Klasse</th> <th>Aantal kolonies</th> </tr> </thead> <tbody> <tr> <td>Roos</td> <td>0</td> <td>0-2</td> </tr> <tr> <td>Vrijbinder</td> <td>1</td> <td>3-5</td> </tr> <tr> <td>Malu</td> <td>2</td> <td>10-25</td> </tr> <tr> <td>Omvaldende</td> <td>3</td> <td>30-60</td> </tr> <tr> <td>Slaet</td> <td>4</td> <td>&gt;60</td> </tr> </tbody> </table> <p>Indien de resultaten niet aan de norm voldoen wordt een consequente actie ondernomen om dit probleem te...</p> <p><b>3.7 Wateronderzoek</b> Het proceswater en bronwater wordt onderzocht op de microbiologische kwaliteit, volgens de algemene frequentie in DV-4/5.01. De frequentie van het wateronderzoek is minstens afhankelijk van de hoeveelheid water die dagelijks wordt gebruikt in de waterdistributie. Het onderzoek moet voor watersoort voor bron worden uitgevoerd. Waterkwaliteit dient voldoende te worden benaderd. Alleen de waterpunten die water &lt; 60°C leveren mogen benaderd worden. Vervolgens wordt er per kwartaal bij waterleiding maatschappij Noord-West Brabant uitslagen opgevraagd. Bij het wateronderzoek worden de volgende normen gehanteerd:</p> <p>Bij overschrijding van de norm wordt direct het NVWA berichtwaardig en de hoogte gesteld en inkomende een nieuw monster genomen. Indien het resultaat wordt bevestigd, wordt samen met de VWA en bedrijf nagegaan wat het risico voor de volkgezondheid is.</p> <p>Bij het vaststellen van het risico dienen de volgende overwegingen meegenomen te worden:</p> <ul style="list-style-type: none"> <li>• Het waterdruk van het betreffende waterpunt.</li> <li>• De directe toepassing van het water van het betreffende waterpunt.</li> <li>• De soort parameter.</li> <li>• De mate van onzuiverheid.</li> <li>• De voorgaande resultaten van onderzoek.</li> </ul>	Norm	Klasse	Aantal kolonies	Roos	0	0-2	Vrijbinder	1	3-5	Malu	2	10-25	Omvaldende	3	30-60	Slaet	4	>60	On-site control by the auditor, controlling water temperature and water conditions. The tanks show running water always. The company perform ones a year a total check of the water quality by the external company MicroCare laboratory and registered and authorised dutch company under register 28109371
Norm	Klasse	Aantal kolonies																		
Roos	0	0-2																		
Vrijbinder	1	3-5																		
Malu	2	10-25																		
Omvaldende	3	30-60																		
Slaet	4	>60																		
4:5	 	Koman's facilities optimised as much as they can.																		

			
4:6			Part of the float of vehicles from Koman's.

4:7			<p>Documentation is available onsite from the supplier of the Glass eel for restocking. The documents define the reception and the destination of the Glass eel.</p>
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Component 7			
Reference	Evidence	Evidence	Description
7:1			<p>Store, packaging, retail, and operations in general present a high level of performance and commitment. This message is given to clients in general.</p>

