

Sustainable Eel Group (SEG) Standard Assessment

Palingrokerij Vlug B.V.

Assessment against:

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

Completed by: Andres Fellenberg van der Molen	On-Site Visit: 16 September 2021	Report date: 27 September 2021
Reviewed and approved by:	Mr. David Bunt Sustainable Eel Group	Certification Body 4 October 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 Palingrokerij Vlug 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 Dulleweg 30, 1721 PM Broek op Langedijk, The Netherlands.



1. Introduction

The town where Palingrokerij Vlug is located is more than 1000 years old. Between Oudkarspel and Vroonen there used to be a marshy area full of lakes and pools, with a few small trees here and there. The sea occasionally flowed in there. Owner Count Dirk II († 988) gave the area as a gift to the monastery St. Adelbert at Egmond. Probably by order of the monks from that monastery, a 7.5 kilometre long dyke was built between Vroonen and Oudkarspel a thousand years ago. Opinions differ as to whether the dyke was intended as a dam or as a road link to Schagen. In any case, the dyke was a reason for more people to settle in this area. This is how the village of Broek op Langedijk came into existence in the year 1063.

Palingrokerij Vlug has a 125 year old tradition. In 1894, the fisherman Arie Vlug settled in a house with a shed in Broek op Langedijk. The fishing business he started there soon became a household name in Europe. The tumultuous history of the family business adds lustre to this milestone. Harsh winters, wars and regulations regularly endangered the fish trade. The first setback came in 1932 with the closure of the Zuiderzee. This meant the end of the saltwater fish trade for the company. So eel was the only remaining option. Smoking and filleting of eel became the core business of the company. In 2012, the company was the first Dutch eel smokehouse to receive the SEG certificate, as well as implementing necessary measures at the right time to combat climate change.

At Vlug, all products are processed in a traditional way: For years, Vlug has been supplying high-quality eel in the Netherlands and European market.

The permanent team consists of 12 employees. The yearly volume of eels traded by Vlug is 110 ton. We are considering the year 2019 as the base year for this audit taking into account that 2020 was an irregular year due to COVID-19 and the impact this pandemic generated to the HORECA (Hotel, Restaurants & Cafe) which are the main clients of Vlug.

During this audit, Mr. Marc, Wilko and Arie Vlug were interviewed and Mr Marc Vlug guided the visit and requested to his staff for the auditor's evidence. In addition, Mr. Arie Vlug participated directly in the audit facilitating the history of the company.



2. The assessment

The assessor was Andres Fellenberg Van der Molen from Green Partner Audits & Consultancy B.V who visited Palingrokerij Vlug B.V. on 16th of September 2021. The audit included the interview with Mr. Marc Vlug who is the part of the owners and managing director of the company.

2.1 Client Contact Details

Client Contact Name	Director Marc Vlug Palingrokerij Vlug B.V.
Client Address	Dulleweg 30, 1721PM Broek op Langedijk, the Netherlands
Client Email	
Client Phone Number	+31 0226

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	Aspiring	1	0
	1.4.2	Outgoing products	Aspiring	1	0
	1.4.3	Record keeping and documentation	Responsible	1	1
1.5	Biosecurity & welfare				
	1.5	Eel buying & trading	Responsible	1	1
	1.5	Wholesale / Retail / Processing	Responsible	1	1
Total				8	5/8
Percentage Responsibility Score				63%	

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	Responsible	1	1
4.5	Handling and welfare	Responsible	1	1
4.6	Transport	Responsible	1	1
4.7	The required percentage of glass eels is being used for restocking	N/A	N/A	N/A
Total			9	5
Percentage Responsibility Score			56%	

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	3	5
4	4	5
7	0	1
Total	7	11
Total Responsibility Score		11/18 = 61%

4. Auditor conclusions

- **Component 1 General Requirements:** Palingrokerij Vlug B.V. has scored 63% for Component 1, it should be considered **RESPONSIBLE** under the SEG standard.
- **Component 4 Eel buying and trading:** Palingrokerij Vlug B.V. has scored 56% for Component 4, it should be considered **RESPONSIBLE** under the SEG standard.
- **Component 7 Processing, wholesale and retail supplies:** Palingrokerij Vlug B.V. has scored 100% for Component 7, it should be considered **RESPONSIBLE** under the SEG standard.
- **With an overall Responsibility score of 61%,** Palingrokerij Vlug 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. Create and compile all documentation necessary to demonstrate the compliance against the SEG standard.
2. Create a system of registration to trace the mortality of eel accurately.
3. 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.
4. Record all social activities where the company is involved, including awareness and staff training about SEG.
5. Palingrokerij Vlug B.V. buys eels from SEG suppliers only, but these suppliers do not have a 100% level of eel traceability, thus creating a level of uncertainty. It was recommended to request all SEG suppliers to only supply to Palingrokerij Vlug B.V. with eel from SEG aquaculture to eliminate the uncertainty gap created, or to ensure that the quantities of SEG sourced eel are clearly documented.
6. Add the SEG logo to Vlug'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	All other scenarios	Standard Surveillance	

	Certification Audit	Year 1	Year 2	Year 3	Year 4 Recertification Audit
Minimum Surveillance	On-Site Audit	Remote Audit	Remote Audit	Remote 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

As the client has been seen to fall into the Standard Surveillance bracket, the next audit will be due in September 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.

above:

Component 1 – Generic requirements																																																							
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 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.																																																						
Score	Responsible																																																						
Criterion 1.2: Contribution to Eel Conservation Projects. (Optional bonus score)																																																							
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	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. In addition to its financial contributions, Vlug is actively involved in the community, being part of the history of the town by contributing to sports and social activities. Vlug also participates in NeVePaling Nederlandse Vereniging van Ealinghandelaren (Dutch eel traders' association).																																																						
Score	Responsible																																																						
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	<p>All live eels in 2019, 4 ton. are sourced from 4 suppliers, including Farming and Trading from The Netherlands. Of these 4 suppliers, 4 are SEG suppliers, but from this 4 suppliers non of the trade are 100% responsible eel. In conclusion, we can define in 2019 only 29% of eel provided to Vlug's from SEG suppliers are responsible or certified as trustworthy source. The percentage per is provided via the last SEG Audit to the suppliers.</p> <table><tr><th colspan="2">TRADING</th><th>Country</th><th>Quantity</th><th>Kilograms</th><th>SEG %</th><th>Comments</th></tr><tr><td>1</td><td rowspan="4"></td><td>NL</td><td rowspan="4"></td><td>Kg.</td><td>11%</td><td>SEG</td></tr><tr><td>2</td><td>NL</td><td>Kg.</td><td>20%</td><td>SEG</td></tr><tr><td>3</td><td>NL</td><td>Kg.</td><td>10%</td><td>SEG</td></tr><tr><td>4</td><td>NL</td><td>Kg.</td><td>73%</td><td>SEG</td></tr><tr><td colspan="2">Total</td><td>4</td><td></td><td>Kg.</td><td>28,50%</td><td></td></tr></table> <table><tr><td>Total</td><td>4</td><td colspan="2"></td></tr><tr><td></td><td></td><td>Kg. Eel Reported</td><td>0</td></tr><tr><td></td><td></td><td>Difference</td><td></td></tr></table> <table><tr><td>SEG Supplier</td><td></td><td>28,50 %</td></tr><tr><td>29%</td><td>Kg. Eel Reported</td><td>Responsible Eel</td></tr></table> <p>Refer to evidence 1:1</p>	TRADING		Country	Quantity	Kilograms	SEG %	Comments	1		NL		Kg.	11%	SEG	2	NL	Kg.	20%	SEG	3	NL	Kg.	10%	SEG	4	NL	Kg.	73%	SEG	Total		4		Kg.	28,50%		Total	4					Kg. Eel Reported	0			Difference		SEG Supplier		28,50 %	29%	Kg. Eel Reported	Responsible Eel
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Score	Aspiring
Criterion 1.4: Traceability	
1.4.1: Traceability - Incoming product, separation and segregation	
Responsible indicators	<ul style="list-style-type: none"> • Certified and uncertified eel products can be clearly and easily traced back to their source. • Where a fishery or buyer, an electronic tele-declaration system is used • It operates a clear system which ensures that the product remains separated at all stages from arrival to dispatch from non-certified eel products. • The organisation ensures that any products wishing to make a claim as certified do not contain any non-certified eel-based ingredients. • If resolved through mass- or number- balance calculations, the margin of error does not exceed 2%
Aspiring indicators	<ul style="list-style-type: none"> • Certified and uncertified eel products can be traced back to their source. • If segregation is not possible, there are clear and auditable records of the numbers of certified and uncertified eels entering the organisation at each facility • It can demonstrate through auditable records that the number of certified eels exiting the organisation in a year did not exceed the number that entered • If resolved through mass- or number- balance calculations, the margin of error does not exceed 5% or if a farm, the 2800 pieces per 1 kg of glass eels is applied.
Discussion	<p>Eel are bought and sold very quickly according to the information available, the period can fluctuate from 1 day to less than a week. The products are separated and can be traced back to the origin following an internal control from order, arrival and invoicing. All eels can be traced through documentation up to 7 years back according to Dutch regulations. Each eel batch remains separate from each other to avoid mixing of the source. In 2019, each eel source was only supplied by SEG certified companies, but there is a level of uncertainty in the level of traceability that SEG certified suppliers provide to Vlug.</p> <p><i>Refer to Criterion 1.3 The organisation trades in certified responsibly sourced eel</i></p> <p><i>Refer to Evidence 1:1</i></p>
Score	Aspiring
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: • The organisation correctly uses batch-coding for labelling certified product, which can be on the packaging for the product, or included in the documentation (e.g. invoice) with the assignment • All product to be sold as certified by an organisation is accompanied by an invoice which meets the following criteria: <ul style="list-style-type: none"> - Includes an appropriate batch code - Includes a record of the quantity (no. & weight) of product and to whom it was sold
Aspiring indicators	<ul style="list-style-type: none"> • Documentation is well maintained. If resolved through mass- or number- balance calculations, the margin of error does not exceed 5% in the following (or if a farm, the 2800 pieces per 1 kg of glass eels is applied): • The organisation correctly uses batch-coding for labelling certified product, which can be on the packaging for the product, or included in the documentation (e.g. invoice) with the assignment • All products to be sold as certified by an organisation are accompanied by an invoice which meets the following criteria: <ul style="list-style-type: none"> - Includes an appropriate batch code - Includes a record of the quantity (no. & weight) of product and to whom it was sold
Discussion	<p>Vlug uses correct and accurate batch coding for product labelling and invoicing, which includes the order number, batch identification and traceability numbers requested by the Dutch authorities and customers, but at the same time Vlug also lacks information from SEG suppliers on the level of</p>

	<p>'real or true' responsible eel. Vlug is considering that the eel delivered by its SEG suppliers is 100% responsible, but in reality this is not the case. For this reason it is not possible to define this criterion as Responsible, as it is up to Vlug to demand more information on the eel delivered, and at the same time the information accompanying the eel leaving Vlug's premises.</p> <p><i>Refer to Evidence 1:3</i></p>
Score	Aspiring
1.4.3: Traceability - Record keeping and documentation	
Responsible indicators	<ul style="list-style-type: none"> The organisation operates a system that allows the tracking and tracing of all eel from purchase to sale and including any steps in between. In the case of live eels this should include the ability to track each batch delivered to a buyer to be connected back to a water, a time period (maximum duration one month) and specific fisherman/vessel If a fisherman or buyer, a tele-declaration system is used to report catches and trade The organisation operates a system that also allows for the completion of a batch reconciliation of eel product by weight over a given period. The organisation maintains records for a minimum of three (3) years.
Aspiring indicators	<p>The above requirements are met except that:</p> <ul style="list-style-type: none"> Records have been maintained for less than three (3) years If a fisherman or trader, a tele-declaration system is planned to be used to report catches and trade in the next season
Discussion	<p>Vlug maintains records for seven years to date in accordance with Dutch regulations. Eels received from a SEG source are also accompanied by the supplier's batch numbering, but this does not necessarily mean that it can be guaranteed that the eel comes from a responsible source. Considering the criterion itself, considering the records, Vlug does have a robust level implemented.</p> <p><i>Refer to Evidence 1:4</i></p>
Score	Responsible

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

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
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Eel buying & trading: Biosecurity is present and disease is treated rapidly and appropriately

Responsible indicators	<ul style="list-style-type: none"> The use of chemicals follows legal requirements of the appropriate EU regulations and of the country concerned. The facility has the appropriate permissions to operate from the relevant licensing authority An effective and documented biosecurity plan is in place and there is evidence that it is being followed. Records are available showing regular monitoring of health and possible signs of stress according to the facility's plan (including the completion of microscope parasite checks) and daily mortality is recorded. Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility.
Aspiring indicators	<ul style="list-style-type: none"> The use of chemicals follows legal requirements of the appropriate EU regulations and of the country concerned. The facility has the appropriate permissions to operate from the relevant authority An effective and documented biosecurity plan is in place and there is evidence that it is being followed.

	<ul style="list-style-type: none"> Eels are regularly monitored for health and possible signs of stress (although this might not be documented) and daily mortality is recorded. Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility.
Discussion	Vlug performs buying & 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. Vlug's operations do not apply any medicine to the eels.
Score	Responsible
Eel farming: Biosecurity is present and disease is treated rapidly and appropriately	
Responsible indicators	<ul style="list-style-type: none"> The facility has the appropriate permissions to operate from the relevant authority. The use of chemicals follows legal requirements of the EU and of the country concerned An effective and documented biosecurity plan is in place and there is evidence that it is being followed. Daily records are available showing monitoring of fish health and signs of stress and daily mortality is recorded Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility UV is used at an appropriate level and separation between tanks
Aspiring indicators	<ul style="list-style-type: none"> The facility has the appropriate permissions to operate from the relevant licensing authority The use of chemicals follows legal requirements of the EU and of the country concerned. An effective and documented biosecurity plan is in place and there is evidence that it is being followed. Eels are regularly inspected for disease (although this may not be documented) and daily mortality is recorded. Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility.
Discussion	Not Applicable
Score	Not Applicable
Restocking: The risk of restocked eels introducing disease into wild populations has been assessed and is minimal	
Responsible indicators	Eels are tested before restocking and found to be free of disease AND/OR eels are from a known source which is tested on at least an annual basis and known to be free of disease.
Aspiring indicators	Eels are tested before restocking when first sourced from a new area, and periodically (at least annually) thereafter to ensure they are free from disease.
Discussion	Not Applicable
Score	Not Applicable
Wholesale / Retail / Processing: Hygiene Plans are followed and there are rare examples of infection	
Responsible indicators	Food processing hygiene plans are followed
Discussion	Vlug counts with an effective HCCP in place and constant monitoring via an independent external company. Dutch authorities request HCCP. The company has all permissions to operate, and visually is easy to define Vlug's facilities as adequately managed.
Score	Responsible
Component 4 - Eel buying and trading	
Criterion 4.0: Segregation of certified and uncertified eels	
Weighting: 2	
Responsible indicators	Certified and non-certified are kept separated, from point of collection through holding to sale and onward transport

No Aspiring indicators	
Discussion	Eel is kept separate in different batches in different tanks. Eels are not mixed. Vlug counts only with SEG suppliers, this means the point of collection, handling to sale and transport are also audited by SEG. But it is important to mention and emphasise that the SEG suppliers' batches are probably already mixed, as this point creates uncertainty and Vlug is outside this control. There is sufficient evidence on site demonstrating the control of the eel all time. <i>Refer to Evidence 4:1</i>
Score	Responsible
Criterion 4.1: The Glass Eel holding facility is a registered Aquaculture Production Business	
Weighting: 1	
Responsible indicators	The Glass Eel holding facility is a registered Aquaculture Production Business
Aspiring indicators	The facility is not a registered Aquaculture Production Business, but has credible plans to register within the next 6 months
Discussion	Not Applicable Vlug does not hold Glass eel in the facilities
Score	Not Applicable
Criterion 4.2: Mortality in storage facility	
Weighting: 2	
Responsible indicators	Mortality rate over the season is less than 2% on average.
Aspiring indicators	Mortality rate over the season is less than or equal to 5% on average but greater than or equal to 2%
Discussion	Following the information provided by Mr. Marc Vlug 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. Vlug in this matter.
Score	Aspiring
Criterion 4.3: Mortality during transport and initial holding if transported to farm	
Weighting: 2	
Responsible indicators	Buyers source at least 90% of their eels from certified suppliers OR Mortality during transport and for the first week at the farm is less than 2% on average
Aspiring indicators	Buyers source 50% - 89.9% of their eels from certified suppliers OR Mortality during transport and for the first week at the farm is less than or equal to 3% on average but greater than or equal to 2% on average.
Discussion	According to the verbal evidence explained and presented on-site, the mortality during transport is 0.01 % from the suppliers to Vlug's facilities and from Vlug'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. Vlug in this matter.
Score	Aspiring
Criterion 4.4: Water quality	
Weighting: 1	
Responsible indicators	A system is in place that is expected to keep key water quality parameters within suitable tolerances for healthy eel survival (e.g. Ammonia, Suspended Solids, pH, Oxygen) Water quality management procedures are in place including regular monitoring of relevant parameters which shows that water quality is always high and stable The facility operates a back-up system to ensure that water quality will not adversely affect survival rates in the case of an equipment failure
Aspiring indicators	A system is in place that is expected to keep key water quality parameters within suitable tolerances for healthy eel survival (e.g. Ammonia, Suspended Solids, pH, Oxygen) The facility has a minimum of a back-up generator and oxygen supply


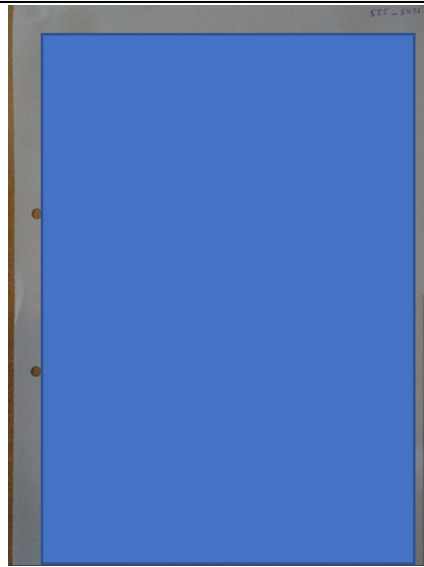

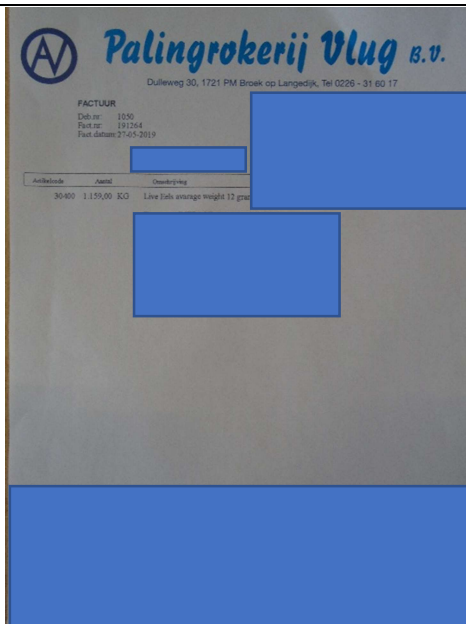
Discussion	The water quality is high and maintained in a professional and modern way, including the experience from Vlug's staff. Vlug's facilities are not located next or close to water sources where. An external company does complete regular controls of the quality water, and there are procedures to control the entire water quality internally daily. The facilities do not show any issues regarding water quality. The tanks count with a recirculated filtered water system. Therefore, the facilities do not affect the water usage of the local community. <i>Refer to Evidence 4:2</i>
Score	Responsible
Criterion 4.5: Handling and welfare	
Weighting: 1	
Responsible indicators	Systems are in place and the facility is designed to keep handling to an absolute minimum Documented procedures are in place for handling, and handling, where necessary, is careful The infrastructure is designed to avoid injuries, and so that the use of nets is rarely necessary. When used, nets are small-mesh (1mm maximum) Eels are moved without being allowed to dry out.
Aspiring indicators	The facility may not be optimally designed, but systems are in place to avoid handling as much as possible within the constraints of the facility Handling, where necessary, is carefully planned and executed The infrastructure has been optimised as far as possible to avoid injuries Nets are small-mesh (1mm maximum) Eels are moved without being allowed to dry out.
Discussion	Vlug's facilities are optimised as much as they can to avoid handling to avoid injuries. It is always possible to do more, but this means implementing automated systems that will change the traditional respectful way of handling eels for already five generations. The complete handling was controlled by the auditor without presenting any substantial evidence of gaps in handling and welfare. <i>Refer to Evidence 4:3</i>
Score	Responsible
Criterion 4.6: Transport	
Weighting: 1	
Responsible indicators	There is a Transport Plan in place to minimise travel time – this meets the Transport requirements for vertebrates Packing is done in a way that minimises handling, time and stress Eels are kept cool and wet with an adequate supply of oxygen The operator holds the relevant transport authorisations
Discussion	The evidence presented on the site demonstrates the maximum 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 equipped with appropriate systems following all Dutch and European regulations in this matter. <i>Refer to Evidence 4:4</i>
Score	Responsible
Criterion 4.7: The required percentage of glass eels is being used for restocking	
Weighting: 2	
Responsible indicators	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.
Aspiring indicators	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.

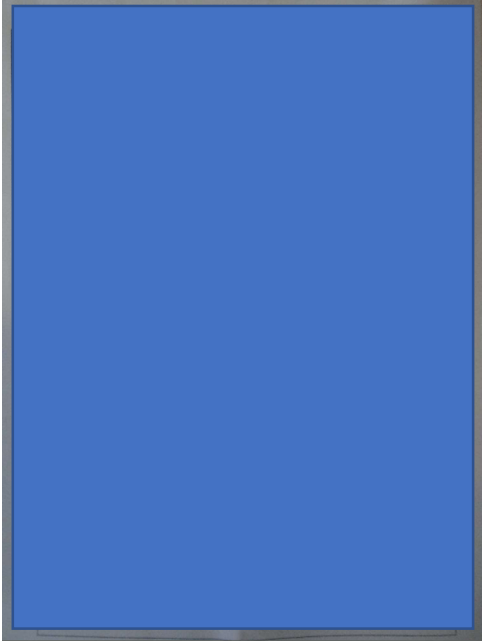

Discussion	Vlug does handle glass eels, but the glass eels do not reach Vlug's facilities. Vlug has evidence that it has made available restocking of glass eels within the Netherlands' in coworking with partners in the Eel sector in the region.
Score	Not Applicable

Component 7 – Processing, wholesale and retail supplies






Discussion	Vlug'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. Vlug's understand and demonstrate the attempt to comply with the three pillars of sustainability. <i>Refer to Evidence 7:0</i>
Score	Responsible

8. On-site Evidence per Component

Component 1							Description
Evidence	Evidence		Evidence				
1:1	TRADING		Country	Quantity	Kilograms	SEG %	Comments
	1		NL		Kg.	11%	SEG
	2		NL		Kg.	20%	SEG
	3		NL		Kg.	10%	SEG
	4		NL		Kg.	73%	SEG
	Total 4				Kg.	28,50%	
Total 4							
		Kg. Eel Reported	0	Difference			
SEG Supplier			28,50 %				
29%		Kg. Eel Reported	Responsible Eel				
1:2							24 tanks available. Each batch is managed separately and not mixed to avoid cross-contamination among the eels. Vlug can define the source per batch and time of the eel per tank.
1:3							Vlug's invoices and delivery orders specifying batch, order and codes to the client.

1:4			Receive documentation batch, and electronic and manual documentation available on site.
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Component 4			
Reference	Evidence 01	Evidence 02	Description
4:1			There are 24 separate tanks. In each tank are not mixed eel. Each tank represents isolated and individual batches from the supplier.

			
<p>4:2</p>	 	 	<p>On-site control by the auditor, controlling water temperature and water conditions. The tanks show running water always. The company performs once a quarter a total check of the water quality by the external company Remon, registered and authorised Dutch company under register 02052371.</p>

4:3







Vlug's facilities
optimised as much
as possible.

4:4



Part of the float of
vehicles from Vlug.

Component 7			
Reference	Evidence	Evidence	Description
7:1	 	  	<p>Store, packaging, retail and operations in general present a high level of performance and commitment. The eel message is given to clients in general.</p>