

Sustainable Eel Group (SEG) Standard Assessment

Spakenburg Paling 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: 14 October 2021	Report date: 01 November 2021
Reviewed and approved by:	Mr. David Bunt Sustainable Eel Group	Certification Body 29 December 2021

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 Spakenburg Paling B.V. This assessment has been conducted against Components 1, 4, & 7 of the standard.

The assessment is of a processor/smoker and trade of eel located at Haringweg 10, 3751 BH Bunschoten-Spakenburg, the Netherlands.



1. Introduction

Spakenburg is a village in the municipality of Bunschoten in the Dutch province of Utrecht. It is located on Lake Eemmeer and in the Eemland north of Amersfoort. Traditionally, Spakenburg was a significant fishing village situated on the Zuiderzee until the construction of the Afsluitdijk. Since then, the fishing fleet has shrunk, but fish processing and trade still play an important role in the local economy.

In Spakenburg, archaeological finds were made from 1300-1350. It is not sure whether there was already an authentic village then. The name Spakenburg appeared for the first time in the 15th century.

The harbours of Spakenburg are inextricably linked to the development of the village. For centuries, it lay on the sometimes turbulent Zuiderzee and had to endure many floods. For that reason, houses were initially built high up against the dike. This is where the fishing boats were moored to earn their living. Around 1892 the village had about 200 fishing boats. Due to the growth of the fishing fleet, a second harbour had to be built in 1886 (the Nieuwe Haven).

The Koelewijn family has been fishing for generations; the first records date from around 1426. So it is not surprising that eel blood flows through Alex Koelewijn's veins. By going back to the basics of smoking with wood, fire and love, together with buying only the best eel, he raised the quality to great heights. Even today, the eel is still smoked in the traditional way at Spakenburg Paling.

Spakenburg Paling B.V. was founded on 30 September 1992 by brothers Peter and Alex Koelewijn. They started trading in live eel with literally zero customers and started producing smoked eel and filleted smoked eel.

In 2018 a start was made with a completely new company building where hygiene and sustainability are highest. Energy and water-saving measures have been implemented down to the smallest detail. The result is a modern building where traditional smoking is over a crackling wood fire.



2. The assessment

The assessor was Andres Fellenberg Van der Molen from Green Partner Audits & Consultancy B.V who visited Spakenburg Paling B.V. on 14th of October 2021. The audit included the interview with the owner Mr. Alex Koelewijn.

2.1 Client Contact Details

Client Contact Name	Alex Koelewijn Owner Spakenburg Paling B.V.
Client Address	Haringweg 10, 3751 BH Bunschoten-Spakenburg, The Netherlands
Client Email	
Client Phone Number	+31 033

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	Not Applicable	0	0
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	Responsible	2	2
Total			11	7/11
Percentage Responsibility Score			64%	

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	7
7	0	1

Total	7	13
Total Responsibility Score		13/20 = 65%

4. Auditor conclusions

- **Component 1 General Requirements:** Spakenburg Paling B.V. has scored 62.5% for Component 1; it should be considered **RESPONSIBLE** under the SEG standard.
- **Component 4 Eel buying and trading:** Spakenburg Paling B.V. has scored 63.6% for Component 4; it should be considered **RESPONSIBLE** under the SEG standard.
- **Component 7 Processing, wholesale and retail supplies:** Spakenburg Paling B.V. has scored 100% for Component 7; it should be considered **RESPONSIBLE** under the SEG standard.
- **With an overall Responsibility score of 65%,** Spakenburg Paling 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.
- 2.
- 3.
- 4.

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 October 2023 (in 2 years) 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.

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	At the time of the assessment, the client declared that there had not been any legal proceeding against the company under <u>assessment</u> in the past two 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 7-10%. 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, Spakenburg Eel B.V. is actively involved in the community, contributing to sports and social activities. Spakenburg Eel B.V. also participates in NeVePaling (Dutch eel traders' association). <i>Refer to evidence 1:1:1</i>
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	

	<table border="1"> <tr> <td colspan="2">SEG</td></tr> <tr> <td>SUPPLIERS LIVE EEL</td><td>2020</td></tr> <tr> <td>TRADING FARMING</td><td>Country</td><td>Quantity</td><td>Kilograms</td><td>SEG %</td><td>Comments</td></tr> <tr> <td colspan="6" style="background-color: #d4edda;"></td></tr> </table>	SEG		SUPPLIERS LIVE EEL	2020	TRADING FARMING	Country	Quantity	Kilograms	SEG %	Comments						
SEG																	
SUPPLIERS LIVE EEL	2020																
TRADING FARMING	Country	Quantity	Kilograms	SEG %	Comments												
	Refer to evidence 1:1																
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																	
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	
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>Spakenburg keeps records for seven years to date, following Dutch regulations. The batch numbering of the supplier also accompanies eels received from an SEG source only. Each sale of processed eel is given a batch number defined by the company, specifying weight and size. A copy of this record is sent to the customer, while the original is kept for the company's internal records. Considering the records and on-site evidence, Spakenburg has solid record-keeping, documentation, and internal traceability in place.</p> <p><i>Refer to Evidence 1:4</i></p>
Score	Responsible





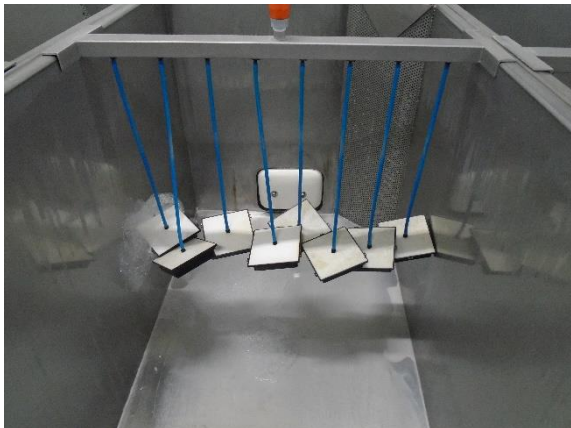

Criterion 1.5: Biosecurity & welfare – Eel and eel products are provided with minimal risk of diseases, parasites and alien species	
Eel Fishing: Biosecurity measures are adopted	
Responsible indicators	<ul style="list-style-type: none"> • The fishery conducts good biosecurity measures such as the disinfection 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
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. • 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	Spakenburg carries out the purchase and trade. The trade is based on 'live' eel and not glass eel. The company follows all the rules set by the Dutch authorities to operate, including the use of chemicals, environment, and biosecurity. The only chemical present is "buffered vinegar", which is used in processing as an aid to reduce listeria. Eel mortality and health are monitored regularly. Medication is not applied to the eels in Spakenburg's operations.
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.






	<ul style="list-style-type: none"> 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	Spakenburg 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 Rijpeaal'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 separately in different batches in different tanks. The eels are not mixed. Spakenburg has [REDACTED] suppliers, which means that the point of collection, handling until sale and transport are also SEG audited. But it is important to mention and highlight that out of the 100% of the batches from Spakenburg's SEG suppliers, a high percentage of the eels are already mixed from the origin itself. [REDACTED] However, there is sufficient evidence on site always to demonstrate the control of the eel. <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 Spakenburg 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%



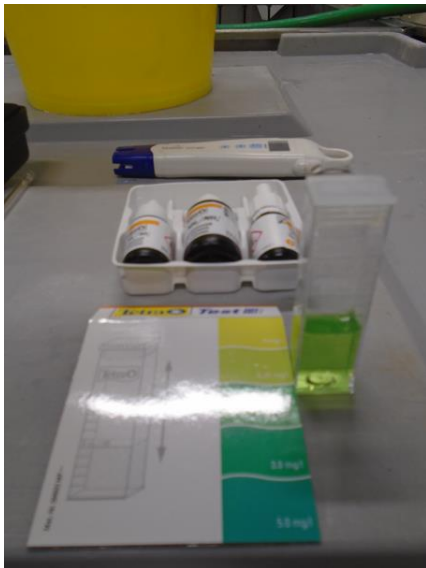
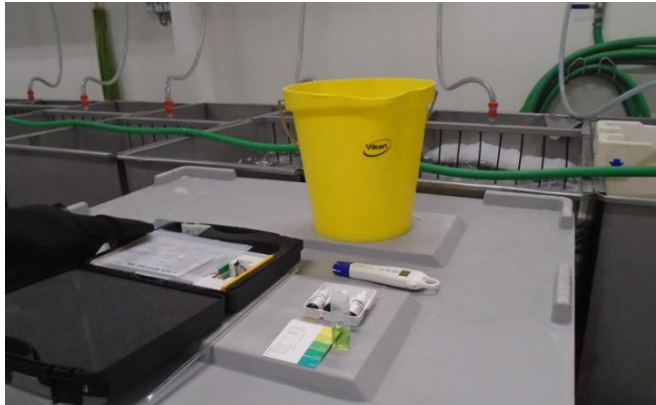
Discussion	
Score	Aspiring
Criterion 4.3: Mortality during transport and initial holding if transported to farm	
Weighting: 2	
Responsible indicators	Buyers source at least 90% of their eels from certified suppliers OR Mortality during transport and for the first week at the farm is less than 2% on average
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	
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	Water quality plays an essential role at Spakenburg. The water is constantly monitored, and ammonia, solids, pH, and oxygen levels are checked regularly. We have to constate the level of TAN (NH ₃ / NH ₄ ⁺) as 0.25 mg/ltrs, which is not extreme, but it can be better. <i>Refer to Evidence 4:2</i> <i>Refer to Suggestions</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	Spakenburg's facilities are optimised as much as possible to avoid handling to prevent injuries. More is always possible, but good automated systems when handling the eels are already implemented. The auditor checked the entire handling without presenting any substantial evidence of deficiencies in handling and eel welfare. <i>Refer to Evidence 4:3</i>

Score	Responsible
Criterion 4.6: Transport	
Weighting: 1	
Responsible indicators	<p>There is a Transport Plan in place to minimise travel time – this meets the Transport requirements for vertebrates</p> <p>Packing is done in a way that minimises handling, time and stress</p> <p>Eels are kept cool and wet with an adequate supply of oxygen</p> <p>The operator holds the relevant transport authorisations</p>
Discussion	<p>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. Clients bring and pick up eels. The transport from Spakenburg to clients is minimum.</p>
Score	Responsible
Criterion 4.7: The required percentage of glass eels is being used for restocking	
Weighting: 2	
Responsible indicators	<p>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.</p>
Aspiring indicators	<p>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</p> <p>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</p> <p>The buyer can provide credible evidence that restocking will occur in the forthcoming season.</p>
Discussion	<p>Spakenburg does not handle glass eels, and glass eels do not reach Spakenburg's facilities. Spakenburg 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.</p> <p><i>Refer to evidence 4:7</i></p>
Score	Responsible
Component 7 – Processing, wholesale and retail supplies	
Discussion	<p>Spakenburg's facilities, considering the processing of wholesale and retail supplies, present a high quality of operations, complying with all Dutch regulations related to health, safety, and labour. The labelling and packaging of the products present the sustainability effort of the products, which is shown to the public and customers through their website. They are passionate about contributing to eel recovery and ensuring compliance. Spakenburg understands and demonstrates the intent to meet the three pillars of sustainability.</p> <p><i>Refer to Evidence 7:1</i></p>
Score	Responsible

8. On-site Evidence per Component

Component 1			
Evidence	Evidence	Evidence	Description
1:1			Suppliers The sample responsible eel
1:1:1	<p>paling & duurzaamheid.</p> <p>Wij vinden als producent van paling.nl dat vis en visproducten, dus ook paling, op een maatschappelijk verantwoorde en zo duurzaam mogelijke manier geproduceerd moeten worden zonder de generaties na ons in hun behoefte te schaden.</p>    <p>reactie dupan op ices-advies.</p> <p>Verweer tegen ICES</p> <p>Organisaties die zich inspinnen voor de verbetering van de palingstand, zijn verbaasd over het afgelopen uitgebrachte voorstel van ICES, de internationale raad voor de exploitatie van de zee, om de visserij op paling stop te zetten. Volgens Stichting DUPAN is het juist aan de visserij te danken dat de palingstand de afgelopen 10 jaar licht is toegenomen. Het ICES-advies bevat volgens DUPAN een flink aantal onjuiste uitgangspunten.</p> <p>Over Stichting DUPAN</p> <p>DUPAN is het samenwerkingsverband van palingkwekers (NeVeVi), palingvisserij (netVISwerk) en palinghandelaren (NeVePaling) om het herstel van de palingstand in Nederland te bevorderen. DUPAN beheert het Eel Stewardship Fund® voor Nederland. Naast het herbevolken van Nederlandse wateren met jonge paling, investeert de stichting met dit fonds in het over de dijk naar zee helpen van volwassen palingen en in gericht wetenschappelijk onderzoek.</p>		There is clear message via the webpage about the commitment to sustainability and eel recovery and responsible operations.
1:2			The company has separate tanks, and each batch is managed separately and is not mixed to avoid cross-contamination between eels. Spakenburg can define the source per batch and the eel time per tank.

1:3	 	Spakenburg invoices and delivery orders specifying batch, order and codes, including internal registers and internal traceability.
1:4	  	Receive documentation batch and electronic and manual documentation available on site, but there is no evidence of the precedence of the eel self. Regarding SEG or not SEG and INTRA numbers.

Component 4			
Reference	Evidence 01	Evidence 02	Description
4:1			The tanks are clearly separated. The eels are not mixed in each tank. Each tank represents individual, isolated batches per supplier.
4:2	  		The water is controlled constantly and visually do not show any evidence of low-quality water treatment and processes. The auditor performed an on-site water check. TAN (NH ₃ + NH ₄) Present 0.25 mg/ltr.

<p>4:3</p>		<p>Spakenburg's facilities are optimised as much as possible.</p>
<p>4:7</p>		<p>A genuine commitment to protecting and recovering of the European Eel.</p>

Component 7			
Reference	Evidence	Evidence	Description
7:1	  	  	<p>Store, packaging, operations, in general, present a high level of performance and commitment. The eel message is given to clients in general via the webshop, and all labour conditions are presented at a high level.</p>