

Sustainable Eel Group (SEG) Standard Assessment

Vishandel Klooster 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: 23 September 2021	Report date: 30 September 2021
Reviewed and approved by:	Mr. David Bunt Sustainable Eel Group	Certification Body 21 October 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 Vishandel Klooster 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 Trompet 4, 1601 MK Enkhuizen, the Netherlands.



1. Introduction

Enkhuizen is a municipality and a city in the Netherlands, in the province of North Holland and the region of West-Frisia. It received city rights in 1355. In the mid-17th century, Enkhuizen was at the peak of its power and was one of the most important harbor cities in the Netherlands. It gained power and influence – together with the city of Hoorn – as a member of the Dutch East India Company (VOC). However, due to a variety of reasons, notably the silting up of the harbor, Enkhuizen lost its position to Amsterdam. The closure of the Zuiderzee in 1932 provided a reasonable living for the eel and zander fishermen. The population increased rapidly after World War II, and an era of recovery began. Various large and small companies developed.

The Enkhuizer who appears on all products is Gerrit Klooster, born in 1877. In 1898 he started as an independent fisherman in the former Zuiderzee. He fished mainly for herring, flounder and anchovy. In 1903 he bought a large "Wieringer aak" with which he collected fish from his fellow fishermen and used it to search for markets in Amsterdam, Huizen and Spakenburg. This was the beginning of the trade.

In 1922 he set up his own smokehouse behind his house in the centre of Enkhuizen. His sons Cornelis and Gerrit then joined the business. In addition to smoking herring, eel became a new product. This was partly due to the closure of the Zuiderzee in 1932. As herring had disappeared, eel became the main product. The sales area was mainly Amsterdam, Rotterdam and various fairs.

After Cornelis and Gerrit, the company was continued by Gerrit's sons, Gerrit and Timon Klooster. In addition to the existing work, they started filleting eel on a small scale. This activity grew every year. The silver eels from the IJsselmeer, which were fished on a large scale in September and October, were used for this purpose. In the late 1980s and early 1990s, the first farmed eels were offered on the market. The company, which had been joined by the fourth Gerrit in 1986, concentrated heavily on this aspect at that time. This was often done in cooperation with the Nijvis group, with which the company has since merged.

Vishandel Klooster BV is a company that deals exclusively in the purchase, smoking, filleting and sale of fish products. In 1997, Klooster moved out of the city centre to a newly built business building in the IJsselmeer, which was expanded in 2000. In 2014 they expanded again and moved to the Trompet in Enkhuizen. Klooster BV employs 105 permanent staff. The smoking of eel, salmon, trout, herring and mackerel is traditionally done over wood and fire, and the filleting is done by hand to ensure constant product quality. All these products are hot-smoked. This gives them a specific and distinctive taste.

The yearly volume of eels traded by Klooster is 551 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.

During this audit, Mr. Jasper de Haan and Mr. Gerrit Klooster were interviewed, and Mr De Haan guided the visit and requested his staff for the auditor's evidence.



2. The assessment

The assessor was Andres Fellenberg Van der Molen from Green Partner Audits & Consultancy B.V who visited Vishandel Klooster B.V. on 23th of September 2021. The audit included the interview with Mr. Jasper de Haan who is part of the management of the company.

2.1 Client Contact Details

Client Contact Name	Jasper de Haan Quality Manager Vishandel Klooster B.V.
Client Address	Trompet 4, 1601MK Enkhuizen, the Netherlands
Client Email	██████████@vishandelklooster.nl
Client Phone Number	+31 0228 31 ██████████

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				62%	

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	5/9
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:** Vishandel Klooster B.V. has scored 62% for Component 1, it should be considered **RESPONSIBLE** under the SEG standard.
- **Component 4 Eel buying and trading:** Vishandel Klooster B.V. has scored 56% for Component 4, it should be considered **RESPONSIBLE** under the SEG standard.
- **Component 7 Processing, wholesale and retail supplies:** Vishandel Klooster B.V. has scored 100% for Component 7, it should be considered **RESPONSIBLE** under the SEG standard.
- **With an overall Responsibility score of 61%,** Vishandel Klooster B.V. can be considered as **RESPONSIBLE** under the SEG standard and suitable for certification.



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.

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, Klooster is actively involved in the community, being part of the history of the town by contributing to sports and social activities. Klooster also participates in NeVePaling (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	All live eels in 2019 amounted to [REDACTED] nes, of which came from 9 suppliers, including Farming and Trading from the Netherlands and Germany. Of these nine suppliers, 5 are SEG suppliers, but of these five suppliers, only one providing 100% responsible eel. In conclusion, we can define that in 2019 only 29% of the eel supplied to Klooster is responsible or certified as a reliable source. [REDACTED]. t

	<table><tr><td colspan="6">SEG</td></tr><tr><td colspan="2">SUPPLIERS LIVE EEL</td><td colspan="4">2019</td></tr><tr><td colspan="2">TRADING FARMING</td><td>Country</td><td>Quantity</td><td>Kilograms</td><td>SEG %</td><td>Comments</td></tr><tr><td>1</td><td>Albe</td><td>DE</td><td>8.608,00</td><td>Kg.</td><td>0%</td><td>NO SEG in 2019</td></tr><tr><td>2</td><td>Dil</td><td>NL</td><td>11.781,00</td><td>Kg.</td><td>100%</td><td>SEG-0016</td></tr><tr><td>3</td><td>Emsland</td><td>DE</td><td>228.299,00</td><td>Kg.</td><td>0%</td><td>NO SEG in 2019</td></tr><tr><td>4</td><td>Gotting</td><td>NL</td><td>4.316,00</td><td>Kg.</td><td>0%</td><td>NO SEG in 2029</td></tr><tr><td>5</td><td>Groesbeek</td><td>NL</td><td>41.618,00</td><td>Kg.</td><td>14%</td><td>SEG-0026</td></tr><tr><td>6</td><td>Koman</td><td>NL</td><td>44.413,00</td><td>Kg.</td><td>47%</td><td>SEG-0017</td></tr><tr><td>7</td><td>Koolen</td><td>NL</td><td>160.930,00</td><td>Kg.</td><td>35%</td><td>SEG-0076</td></tr><tr><td>8</td><td>Rijpelaal</td><td>NL</td><td>43.489,00</td><td>Kg.</td><td>69%</td><td>SEG-0077</td></tr><tr><td>9</td><td>Van Wijk</td><td>NL</td><td>8.089,00</td><td>Kg.</td><td>0%</td><td>NO-SEG</td></tr><tr><td colspan="2">Total</td><td>9</td><td>551.543,00</td><td>Kg.</td><td>29,44%</td><td>55,56%</td></tr><tr><td>Total</td><td>9</td><td>551.543</td><td>551.543</td><td colspan="3"></td></tr><tr><td colspan="2"></td><td>Kg. Eel Reported</td><td>0</td><td colspan="3">Difference</td></tr><tr><td colspan="2">SEG Suppliers</td><td>162.399</td><td>29,44</td><td colspan="3">%</td></tr><tr><td colspan="2">55,56%</td><td>Kg. Eel Reported</td><td colspan="4">Responsible Eel</td></tr></table>						SEG						SUPPLIERS LIVE EEL		2019				TRADING FARMING		Country	Quantity	Kilograms	SEG %	Comments	1	Albe	DE	8.608,00	Kg.	0%	NO SEG in 2019	2	Dil	NL	11.781,00	Kg.	100%	SEG-0016	3	Emsland	DE	228.299,00	Kg.	0%	NO SEG in 2019	4	Gotting	NL	4.316,00	Kg.	0%	NO SEG in 2029	5	Groesbeek	NL	41.618,00	Kg.	14%	SEG-0026	6	Koman	NL	44.413,00	Kg.	47%	SEG-0017	7	Koolen	NL	160.930,00	Kg.	35%	SEG-0076	8	Rijpelaal	NL	43.489,00	Kg.	69%	SEG-0077	9	Van Wijk	NL	8.089,00	Kg.	0%	NO-SEG	Total		9	551.543,00	Kg.	29,44%	55,56%	Total	9	551.543	551.543						Kg. Eel Reported	0	Difference			SEG Suppliers		162.399	29,44	%			55,56%		Kg. Eel Reported	Responsible Eel			
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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 an ear did not exceed the number that entered• If resolved through mass- or number- balance calculations, the margin of error does not exceed 5% or if a farm, the 2800 pieces per 1 kg of glass eels is applied.																																																																																																																										
Discussion	<p>Eels are bought and sold very quickly; according to available information, the period can fluctuate from 1 day to less than a week. Each eel bath remains separate from the others to avoid mixing up the origin. The products are segregated and can be traced back to the source following a precise internal control from order, arrival and invoicing. The company has comprehensive documentation throughout the entire process, from receipt to dispatch, with Navision-generated batch codes being linked and appearing on the final label/packaging. This is considered "internal traceability records", which is optimal. In 2019, each source of eel was only supplied by 6 SEG certified companies, but there is a level of uncertainty in the level of traceability that SEG certified suppliers provide to Klooster.</p> <p>Eels can be traced back through documentation up to 7 years according to Dutch regulations. Refer to Criterion 1.3 The organisation trades in certified responsibly sourced eel Refer to Evidence 1:1</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>Klooster uses correct and accurate batch coding for product labelling and invoicing, including the order number, batch identification and traceability numbers required by the Dutch authorities and customers, but at the same time Klooster lacks information from SEG suppliers on the level of 'real or true' responsible eel.</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>Klooster keeps records for seven years to date, in accordance with Dutch regulations. Eels received from a SEG source are also accompanied by the batch numbering of the supplier, but this does not necessarily mean that it can be guaranteed that the eel comes from a responsible source. Considering the criteria itself, and considering the records and on-site evidence, Klooster does have a solid level of 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	Klooster 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, although this may not be documented. No medication is applied to the eels in Klooster'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	Klooster 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 Klooster's facilities as adequately managed. <i>Refer to Evidence 7:1</i>
Score	Responsible

Component 4 - Eel buying and trading

Criterion 4.0: Segregation of certified and uncetified 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. Klooster has only 55% SEG suppliers, which means that the point of collection, handling until sale and transport are also SEG audited. E [REDACTED] [REDACTED] <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 Klooster 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	Klooster's water source is delivered by PWN, which means that it is drinking water for human consumption. PWN is a drinking water company and nature manager in one. Every year they supply 110 billion litres of pure drinking water to more than 800,000 households, businesses, and institutions in Noord-Holland. At the same time, by order of the province of Noord-Holland, they provide professional nature management for over 7,500 hectares of nature in the dune areas. The water used by Klooster is neither filtered nor reused, and a constant flow of drinking water is maintained to supply the tanks where the eels are kept. Since the water is municipal water and the flow is constant, there is no need for Klooster to monitor the quality of the water, as it is treated before it enters Klooster's premises. <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	Klooster's facilities are optimised as much as possible to avoid handling in order to prevent injuries. More is always possible, but this means implementing more automated systems when handling the eels. The entire handling was checked by the auditor without presenting any substantial evidence of deficiencies in handling and eel welfare. We have to add the construction of the new Klooster's facilities. <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	Klooster does handle glass eels, and glass eels do not reach Klooster's facilities. Klooster 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	Klooster'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. Klooster understands and demonstrates the intent to meet the three pillars of sustainability. <i>Refer to Evidence 7:0</i>
Score	Responsible

8. On-site Evidence per Component

Component 1																																																																																																																							
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1:1	<div><table><tr><td colspan="6">SEG</td></tr><tr><td colspan="2">SUPPLIERS LIVE EEL</td><td colspan="4">2019</td></tr><tr><td colspan="2">TRADING FARMING</td><td>Country</td><td>Quantity</td><td>Kilograms</td><td>SEG %</td><td>Comments</td></tr><tr><td>1</td><td>Albe</td><td>DE</td><td>8.608,00</td><td>Kg.</td><td>0%</td><td>NO SEG in 2019</td></tr><tr><td>2</td><td>Dil</td><td>NL</td><td>11.781,00</td><td>Kg.</td><td>100%</td><td>SEG-0016</td></tr><tr><td>3</td><td>Emsland</td><td>DE</td><td>228.299,00</td><td>Kg.</td><td>0%</td><td>NO SEG in 2019</td></tr><tr><td>4</td><td>Gotting</td><td>NL</td><td>4.316,00</td><td>Kg.</td><td>0%</td><td>NO SEG in 2029</td></tr><tr><td>5</td><td>Groesbeek</td><td>NL</td><td>41.618,00</td><td>Kg.</td><td>14%</td><td>SEG-0026</td></tr><tr><td>6</td><td>Koman</td><td>NL</td><td>44.413,00</td><td>Kg.</td><td>47%</td><td>SEG-0017</td></tr><tr><td>7</td><td>Koolen</td><td>NL</td><td>160.930,00</td><td>Kg.</td><td>35%</td><td>SEG-0076</td></tr><tr><td>8</td><td>Rijpelaal</td><td>NL</td><td>43.489,00</td><td>Kg.</td><td>69%</td><td>SEG-0077</td></tr><tr><td>9</td><td>Van Wijk</td><td>NL</td><td>8.089,00</td><td>Kg.</td><td>0%</td><td>NO-SEG</td></tr><tr><td colspan="2">Total</td><td>9</td><td>551.543,00</td><td>Kg.</td><td>29,44%</td><td>55,56%</td></tr><tr><td>Total</td><td>9</td><td>551.543</td><td>551.543</td><td colspan="3"></td></tr><tr><td colspan="2"></td><td>Kg. Eel Reported</td><td>0</td><td colspan="3">Difference</td></tr><tr><td colspan="2">SEG Suppliers</td><td>162.399</td><td>29,44</td><td colspan="3">%</td></tr><tr><td colspan="2">55,56%</td><td>Kg. Eel Reported</td><td colspan="4">Responsible Eel</td></tr></table></div>	SEG						SUPPLIERS LIVE EEL		2019				TRADING FARMING		Country	Quantity	Kilograms	SEG %	Comments	1	Albe	DE	8.608,00	Kg.	0%	NO SEG in 2019	2	Dil	NL	11.781,00	Kg.	100%	SEG-0016	3	Emsland	DE	228.299,00	Kg.	0%	NO SEG in 2019	4	Gotting	NL	4.316,00	Kg.	0%	NO SEG in 2029	5	Groesbeek	NL	41.618,00	Kg.	14%	SEG-0026	6	Koman	NL	44.413,00	Kg.	47%	SEG-0017	7	Koolen	NL	160.930,00	Kg.	35%	SEG-0076	8	Rijpelaal	NL	43.489,00	Kg.	69%	SEG-0077	9	Van Wijk	NL	8.089,00	Kg.	0%	NO-SEG	Total		9	551.543,00	Kg.	29,44%	55,56%	Total	9	551.543	551.543						Kg. Eel Reported	0	Difference			SEG Suppliers		162.399	29,44	%			55,56%		Kg. Eel Reported	Responsible Eel				55% of SEG Suppliers Sample year 2019 29% responsible eel
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1:2			8 tanks available. Each batch is managed separately and not mixed to avoid cross-contamination among the eels. Klooster can define the source per batch and time of the eel per tank.																																																																																																																				

1:3	 	<p>Invoices to Klooster and delivery orders specifying batch, order and codes, including internal registers and internal traceability.</p>
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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 eight separate tanks. In each tank are not mixed eels. Each tank represents isolated and individual batches from the supplier.
4:2			The tanks show running water always. The water is drink water provided by PWN.



4:3



Klooster's facilities optimised as much as possible.




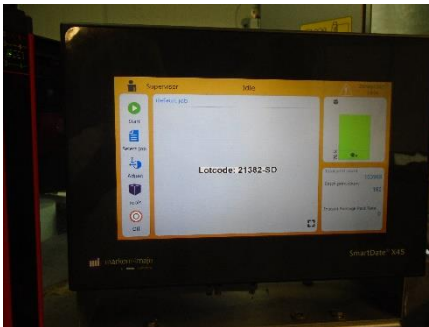



4:4



Part of the
float of
vehicles from
Klooster.



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

