

Sustainable Eel Group (SEG) Standard Assessment

Holland Paling B.V.

Assessment against:

- **Component 1:** Core requirements.
- **Component 7:** Processing, wholesale and retail supplies.

Completed by: Andres Fellenberg van der Molen	On-Site Visit: 28 th August 2021	Report date: 10 September 2021
Reviewed and approved by:	Mr. David Bunt Sustainable Eel Group	Certification Body 21 September 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 Holland Paling B.V. This assessment has been completed against Components 1, & 7 of the standard.

The assessment is of a smoker only located at Spaarndammerdijk 101A, 2063JX Spaardam, the Netherlands with 7 staff members dedicated to eel only.

During the last assessment in 2019, component 4 was present as part of the scope. From 2020 Holland Paling B.V. no longer trades or buys live eel, which means that component 4 is not applicable in this assessment.



1. Introduction

Spaarndam is a small village in the province of North Holland, the Netherlands, on the Spaarne river and the IJ lake. The oldest part of the village, on the western side of the Spaarne, belongs to the municipality of Haarlem; the newer part on the eastern side is a part of the municipality of Haarlemmermeer. The village is built around a dam in the river, which is also the division line of the two municipalities. Spaarndam has always been strongly connected to water.

Spaarndam was created around a dam where the river Spaarne flows into the IJ. This dam was built here by count Floris V of Holland in 1285. The village collected toll at this dam, and people made their living from fishing. From 1812 to 1927, the western part of Spaarndam was an independent municipality.

Holland Paling was established in 1983 by eel trading company Joh. Kuijten BV and the brothers Simon and Ton Balm. Both companies have a long history, dating back to 1919 and 1832 respectively. At that time, Palingrokerij Balm was still located at the Taanplaats. Holland Paling is one of the few traditional smokehouses that still smokes exclusively on oak wood.

During this audit, Mrs. Sophie Kuijten was interviewed, and she guided the visit and requested to staff for the auditor's evidence. In addition, Mr. Erik Kuijten participated directly in the audit, facilitating technical information about the internal processes.



2. The assessment

The assessor was Andres Fellenberg Van der Molen from Green Partner Audits & Consultancy B.V., who visited Holland Paling B.V. on August 28th 2021. The audit included interviews with Mrs Sophie Kuijten, who is part of the company's management, and Mr Erik Kuijten as the Production Manager.

2.1 Client Contact Details

Client Contact Name	Sophie Kuijten Holland Paling B.V
Client Address	Spaarndammerdijk 101A, 2063JX Spaardam, The Netherlands
Client Email	[redacted]@hollandpaling.nl
Client Phone Number	+31 023 [redacted]

3. Results of the assessment

The outcome of this assessment is as follows;

Component 1: General Requirements		Auditor's findings	Weighting	Score
1.1	Commitment to Legality	Responsible	1	1
1.2	Contribution to eel conservation projects	Responsible	1	1
1.3	The facility trades in certified responsibly sourced eels	Responsible	1	1
1.4	Traceability			
	1.4.1 Incoming products, separation and segregation	Aspiring	1	0
	1.4.2 Outgoing products	Responsible	1	1
	1.4.3 Record keeping and documentation	Responsible	1	1
1.5	Biosecurity & welfare			
	1.5 Wholesale / Retail / Processing	Responsible	1	1
Total			7	6/7
Percentage Responsibility Score			85.7%	

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

Summary of assessment and scoring		
Component	Aspiring	Responsible
1	1	6
7	0	1
Total	1	7
Total Responsibility Score	7/8 = 87.5%	

4. Auditor conclusions

- **Component 1 General Requirements:** Holland Paling B.V. has scored 85.7% for Component 1, it should be considered **RESPONSIBLE** under the SEG standard.
- **Component 7 Processing, wholesale and retail supplies:** Holland Paling B.V. has scored 1 of 1 for Component 7, and should be considered **RESPONSIBLE** under the SEG standard.
- **With an overall Responsibility score of 87.5%,** Holland 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. Create and compile all documentation necessary to demonstrate compliance against the SEG standard.
2. 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.

3. Holland Paling B.V. buys already processed eels from SEG suppliers, but these suppliers do not have a 100% level of eel traceability, thus creating a level of uncertainty. It was recommended to request SEG suppliers to only supply Holland Paling with eel from SEG aquaculture to eliminate the incentive gap created, or to ensure that the quantities of SEG sourced eel are clearly understood, documented and presented.
4. Record all social activities where the company is involved, including awareness and staff training about SEG.
5. Add the SEG logo to Holland paling'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 August 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. In addition to its financial contributions, Holland Paling B.V. is actively involved in the community, being part of the city's history by contributing to sports and social activities. Holland paling B.V. also participates in the NeVePaling Nederlandse Vereniging van Ealinghandelaren (Dutch eel traders' association). It is important to mention that, for years, the polder water from the outlet of the Rijnland polder attracted eels from the North Sea Canal to Spaarndam. But the eels would then stop in front of the Spaarndam polder water pumping station and could not get through. This changed in the summer of 2020. Now the one that allows migratory eels to pass from salt water to fresh water has been opened. <i>Refer to Evidence 1:0</i> <i>Refer to Evidence 7:1</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	The sample year is 2019, in which Holland Paling B.V. purchased 51 tonnes from a Dutch supplier. Holland Paling has only 2 suppliers, and both are SEG certified. In conclusion, we can define in 2019-2020, that 50% of the eel purchased by Holland paling B.V. is responsible and from a reliable source. The 50% is established due to the level of certified stock reported by one of the suppliers to SEG. <i>Refer to Evidence 1:1</i>

	<table><tr><td colspan="2">Holland Paling's</td></tr><tr><td>SUPPLIERS LIVE EEL</td><td>2019</td></tr><tr><td>TRADING</td><td>Country</td><td>Quantity</td><td>Kilograms</td><td>SEG %</td><td>Comments</td></tr><tr><td>1</td><td></td><td>NL</td><td>0,00</td><td>Kg.</td><td>SEG</td></tr><tr><td>2</td><td></td><td>NL</td><td>51.489,00</td><td>Kg.</td><td>50% SEG</td></tr><tr><td>Total</td><td>2</td><td></td><td>51.489,00</td><td>Kg.</td><td></td></tr><tr><td>FARMING</td><td>Country</td><td>Quantity</td><td>Kilograms</td><td>SEG %</td><td>Comments</td></tr><tr><td>1</td><td>None</td><td>XX</td><td>0,00</td><td>Kg.</td><td>None</td></tr><tr><td>Total</td><td>0</td><td></td><td>0,00</td><td>Kg.</td><td></td></tr><tr><td>FISHERS</td><td>Country</td><td>Quantity</td><td>Kilograms</td><td>SEG%</td><td>Comments</td></tr><tr><td>1</td><td>None</td><td>XX</td><td>0,00</td><td>Kg.</td><td>None</td></tr><tr><td>Total</td><td>0</td><td></td><td>0,00</td><td>Kg.</td><td></td></tr><tr><td>Total</td><td>2</td><td>51.489</td><td>51.489</td><td></td><td></td></tr><tr><td></td><td></td><td>Kg. Eel Reported</td><td>0</td><td>Difference</td><td></td></tr><tr><td></td><td>SEG Supplier</td><td>25.745</td><td>50,00</td><td>%</td><td></td></tr><tr><td></td><td>50%</td><td>Kg. Eel Reported</td><td>Responsible Eel</td><td></td><td></td></tr></table>						Holland Paling's		SUPPLIERS LIVE EEL	2019	TRADING	Country	Quantity	Kilograms	SEG %	Comments	1		NL	0,00	Kg.	SEG	2		NL	51.489,00	Kg.	50% SEG	Total	2		51.489,00	Kg.		FARMING	Country	Quantity	Kilograms	SEG %	Comments	1	None	XX	0,00	Kg.	None	Total	0		0,00	Kg.		FISHERS	Country	Quantity	Kilograms	SEG%	Comments	1	None	XX	0,00	Kg.	None	Total	0		0,00	Kg.		Total	2	51.489	51.489					Kg. Eel Reported	0	Difference			SEG Supplier	25.745	50,00	%			50%	Kg. Eel Reported	Responsible Eel		
Holland Paling's																																																																																														
SUPPLIERS LIVE EEL	2019																																																																																													
TRADING	Country	Quantity	Kilograms	SEG %	Comments																																																																																									
1		NL	0,00	Kg.	SEG																																																																																									
2		NL	51.489,00	Kg.	50% SEG																																																																																									
Total	2		51.489,00	Kg.																																																																																										
FARMING	Country	Quantity	Kilograms	SEG %	Comments																																																																																									
1	None	XX	0,00	Kg.	None																																																																																									
Total	0		0,00	Kg.																																																																																										
FISHERS	Country	Quantity	Kilograms	SEG%	Comments																																																																																									
1	None	XX	0,00	Kg.	None																																																																																									
Total	0		0,00	Kg.																																																																																										
Total	2	51.489	51.489																																																																																											
		Kg. Eel Reported	0	Difference																																																																																										
	SEG Supplier	25.745	50,00	%																																																																																										
	50%	Kg. Eel Reported	Responsible Eel																																																																																											
Score	Responsible																																																																																													
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>Products are purchased and sold very quickly according to the information available, and the period can fluctuate from 1 day up to 1 week. Product is segregated and can be traced back to the source following an internal control from the order, arrival and invoicing. All eels can be traced through their documentation back to 7 years following dutch regulations. Each source of eel is in 2019-2020 50% SEG Certified, but it is not clear the way to trace back the source. The suppliers is currently not providing the exact source and the level of “Responsible eel”. The facilities do not count with tanks for storage.</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	Holland paling B.V. uses a correct batch coding for labelling and invoicing of the product, including the order number, batch identification and trace numbers requested by Dutch authorities. <i>Refer to Evidence 1:2</i>
Score	Responsible
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	The above requirements are met except that: <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	Holland paling B.V. maintains records for seven years to date following Dutch regulation. Eels received from a SEG source are also accompanied by batch numbering from the supplier. <i>Refer to Evidence 1:3</i>
Score	Responsible

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

Wholesale / Retail / Processing: Hygiene Plans are followed and there are rare examples of infection


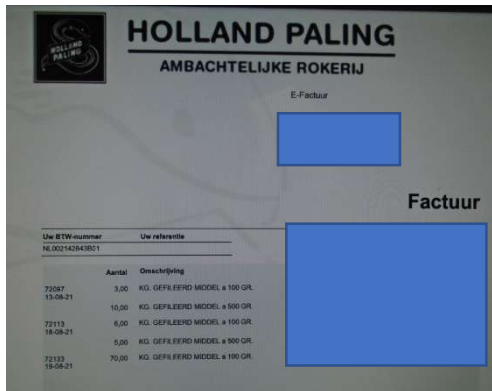
Responsible indicators	Food processing hygiene plans are followed
Discussion	Holland paling B.V. counts with an effective HCCP in place and constant monitoring via an independent external company. Dutch authorities request HCCP. The company has all permissions to operate, and visually is easy to define Holland Paling B.V. facilities as adequately managed. <i>Refer to Evidence 1:4</i>
Score	Responsible

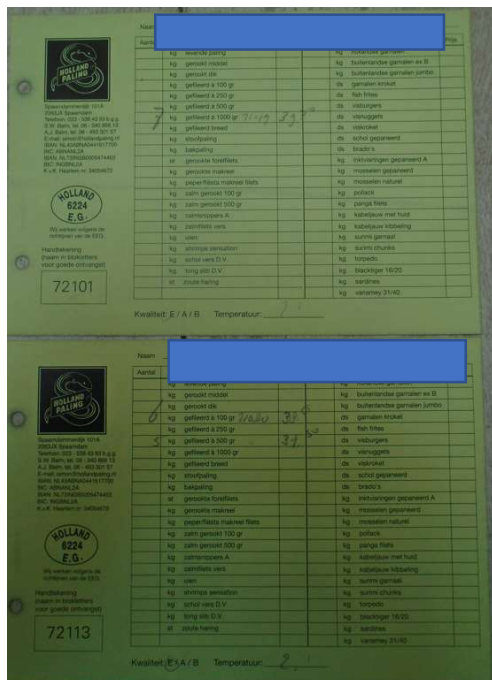
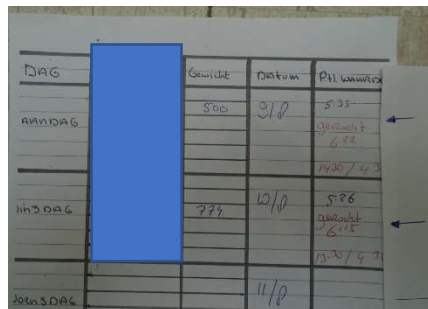
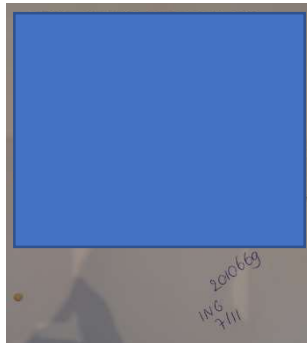
Component 7 – Processing, wholesale and retail supplies	
Discussion	<p>Holland Paling B.V. facilities considering processing wholesales and retails supplies present high quality of operations, complying with all dutch regulations related to health, security and labour. Labelling and packaging products 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. Holland Paling B.V. supports the local community, demonstration the attempt to comply with the three pillars of sustainability.</p> <p><i>Refer to Evidence 1:0</i></p> <p><i>Refer to Evidence 1:4</i></p> <p><i>Refer to Evidence 7:1</i></p>
Score	Responsible

8. On-site Evidence per Component

Component 1		
Reference		Description
1:0	<p>OPEN DAG HOLLAND PALING</p>  	<p>Holland Paling B.V. is a social enterprise that opens doors for local people and children to understand the importance of eel and keep traditions alive. Holland Paling is proud of its work, which began in 1832.</p>

1:1	<div> <div>Holland Paling's</div> <div>SUPPLIERS LIVE EEL2019</div> <table> <tr> <th>TRADING</th><th>Country</th><th>Quantity</th><th>Kilograms</th><th>SEG %</th><th>Comments</th></tr> <tr> <td>1</td><td>NL</td><td>0,00</td><td>Kg.</td><td></td><td>SEG-</td></tr> <tr> <td>2</td><td>NL</td><td>51.489,00</td><td>Kg.</td><td>50%</td><td>SEG-</td></tr> <tr> <td>Total</td><td>2</td><td>51.489,00</td><td>Kg.</td><td></td><td></td></tr> </table> <table> <tr> <th>FARMING</th><th>Country</th><th>Quantity</th><th>Kilograms</th><th>SEG %</th><th>Comments</th></tr> <tr> <td>1</td><td>XX</td><td>0,00</td><td>Kg.</td><td></td><td>None</td></tr> <tr> <td>Total</td><td>0</td><td>0,00</td><td>Kg.</td><td></td><td></td></tr> </table> <table> <tr> <th>FISHERS</th><th>Country</th><th>Quantity</th><th>Kilograms</th><th>SEG%</th><th>Comments</th></tr> <tr> <td>1</td><td>XX</td><td>0,00</td><td>Kg.</td><td></td><td>None</td></tr> <tr> <td>Total</td><td>0</td><td>0,00</td><td>Kg.</td><td></td><td></td></tr> </table> <table> <tr> <td>Total</td><td>2</td><td>51.489</td><td>51.489</td><td></td><td></td></tr> <tr> <td></td><td>Kg. Eel Reported</td><td>0</td><td>Difference</td><td></td><td></td></tr> <tr> <td>SEG Supplier</td><td>25.745</td><td>50,00</td><td>%</td><td></td><td></td></tr> <tr> <td>50%</td><td>Kg. Eel Reported</td><td>Responsible Eel</td><td></td><td></td><td></td></tr> </table> </div>	TRADING	Country	Quantity	Kilograms	SEG %	Comments	1	NL	0,00	Kg.		SEG-	2	NL	51.489,00	Kg.	50%	SEG-	Total	2	51.489,00	Kg.			FARMING	Country	Quantity	Kilograms	SEG %	Comments	1	XX	0,00	Kg.		None	Total	0	0,00	Kg.			FISHERS	Country	Quantity	Kilograms	SEG%	Comments	1	XX	0,00	Kg.		None	Total	0	0,00	Kg.			Total	2	51.489	51.489				Kg. Eel Reported	0	Difference			SEG Supplier	25.745	50,00	%			50%	Kg. Eel Reported	Responsible Eel				100% of SEG Certified Suppliers, but 50% Responsible eel.
TRADING	Country	Quantity	Kilograms	SEG %	Comments																																																																																	
1	NL	0,00	Kg.		SEG-																																																																																	
2	NL	51.489,00	Kg.	50%	SEG-																																																																																	
Total	2	51.489,00	Kg.																																																																																			
FARMING	Country	Quantity	Kilograms	SEG %	Comments																																																																																	
1	XX	0,00	Kg.		None																																																																																	
Total	0	0,00	Kg.																																																																																			
FISHERS	Country	Quantity	Kilograms	SEG%	Comments																																																																																	
1	XX	0,00	Kg.		None																																																																																	
Total	0	0,00	Kg.																																																																																			
Total	2	51.489	51.489																																																																																			
	Kg. Eel Reported	0	Difference																																																																																			
SEG Supplier	25.745	50,00	%																																																																																			
50%	Kg. Eel Reported	Responsible Eel																																																																																				

1:2	<div>   </div>	Holland Paling invoices and delivery orders specify internal trace numbers and codes to the client.
-----	---	---



1:3	<div>    </div>	Receive documentation batch, and electronic and manual documentation available on site, that proves traceability of each bath from the supplier.
-----	--	--

1:4



The premises are observed to be in good sanitary and safety conditions, where the hygiene measures required by the Dutch environmental authorities are taken.



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