

Sustainable Eel Group (SEG) Standard Assessment

Rijpelaar B.V.

Assessment against:

- **Component 1:** Core requirements.
- **Component 4:** Eel buying and trading.
- **Component 5:** Eel farming
- **Component 7:** Processing, wholesale and retail supplies.

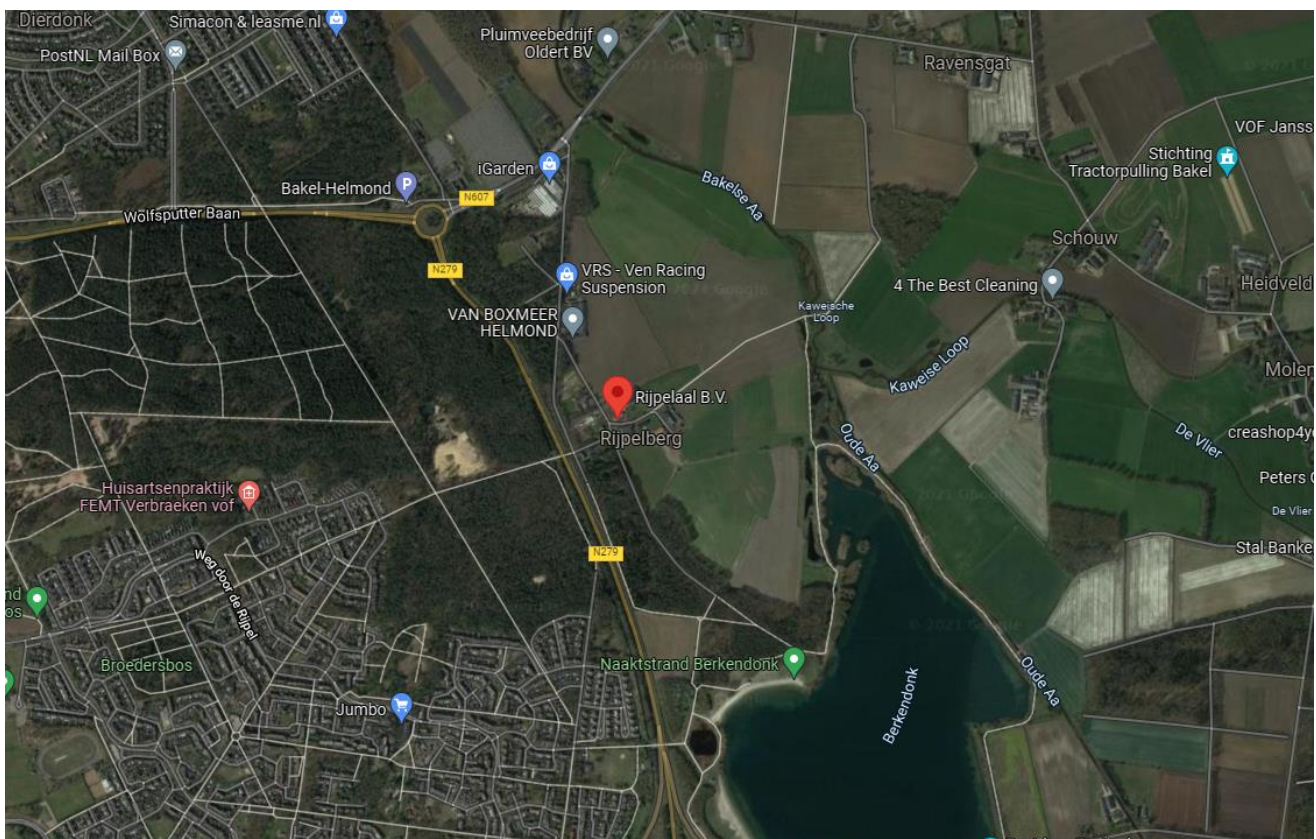
Completed by: Andres Fellenberg van der Molen	On-Site Visit: 30 September 2021	Report date: 8 October 2021
Reviewed and approved by:	Mr. David Bunt Sustainable Eel Group	Certification Body 30 December 2021
This version has had commercially sensitive information removed to meet Data Protection requirements.		

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 Rijpelaar B.V. This assessment has been conducted against Components 1, 4, 5 & 7 of the standard.

The assessment is of a processor/smoker and trade of eel located at Rijpelberg 5, 5703 KD MK Helmond, the Netherlands.



1. Introduction

Rijpelaal is located in the city of Helmond. Helmond is a municipality and a town in the Metropoolregio Eindhoven of the province of North Brabant in the southern Netherlands. The name 'Helmond' can be traced back to a combination of Hel, which means "low-lying", and Mond, which would refer to a higher ground, secure place.

After Helmond was granted city rights around the year 1232, the textile industry, in particular, developed at a rapid pace. Later on, the metal industry also flourished in the city. Helmond was an active centre of trade and industry as far back as the middle ages. The most important manifestation of Helmond's past is undoubtedly the castle.

In 1987 Johan Meulendijks took the first step to establish his eel farm. With the knowledge he had acquired during his training in fish farming and with a farmer's mind, he mastered the trade, creating his eel farming system, where he managed to farm at least 5-6 tonnes of eel per year.

To smoke and sell the eel himself, Johan apprenticed with Dries van den Berg to smoke eel. After a while, eel smoking became his passion, and he decided to build his smokehouse. After experimenting for at least ten years, it was time for Johan to take his business a step further, and this is when the company received its official name: Rijpelaal. A reference to Rijpelberg Street, where Johan started his eel farm in the late 1980s.

Johan perfected his original idea and expanded it to a larger scale, perfecting his ingenious water recirculation system, in which he uses only spring water with the correct values to cultivate his eels.

Within 20 years, Rijpelaal became a professional processing company supplying restaurants, supermarkets and wholesalers. In 2007, his son Paul Meulendijks joined the company and assisted his father in farming. In the meantime, Johan became a board member of the Local Restaurants and Regional Products association. Johan's creativity does not end here, as in 2013, the Aalstunner, a device for respectfully killing eels, was officially recognised by the Dutch authorities.

The growing number of customers and recreational traffic led to the company's next big step, constructing an eel pavilion and an eel shop. From this moment on, Rijpelaal is also a popular stop for locals or tourists. Rijpelaal continued to grow, and in response to this growth, the hatchery was expanded and completely renovated in 2016. This led to a doubling of the eel farming capacity from 90,000 kilos to no less than 175,000 kilos per year!

Here again, the ingenuity of the Meulendijks family comes to the fore, where they created a wastewater reuse system to recover energy via a heat exchanger and heat pump, which means that both the hatchery and the shop no longer need gas to cover the need for heat, making Rijpelaal an example to follow.

The farm purchases glass eels, which are placed in hatchery units. As the eels grow, they are moved to the fingerling development section and then to the grow-out sections until they reach the weight set by market demand.

All tanks are rectangular and deep, which allows for space optimisation. The tanks are supplied with a well water pumping system, and the feeding of the eels is automated.

Rijpelaal also smokes part of its eel production, which involves slaughtering the eels. The removal of the slime, the gutting is primarily carried out manually, and the smoking is carried out in a traditional manner. The product is then normally vacuum-packed and boxed for distribution or sale with fresh products through the company shop.



2. The assessment

The assessor was Andres Fellenberg Van der Molen from Green Partner Audits & Consultancy B.V who visited Rijpeaal B.V. on 29th of September 2021. The audit included the interview with the owner Mr. Paul Meulendijks and Mrs Freya Welten, who is part of the company's management.

2.1 Client Contact Details

Client Contact Name	Paul Meulendijks Owner Freya Welten Management Rijpeaal B.V.
Client Address	Rijpelberg 5, 5703 KD Helmond, The Netherlands
Client Email	
Client Phone Number	+31 0492

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	Responsible	1	1
	1.4.2	Outgoing products	Responsible	1	1
	1.4.3	Record keeping and documentation	Responsible	1	1
1.5	Biosecurity & welfare				
	1.5	Eel buying & trading	Responsible	1	1
	1.5	Wholesale / Retail / Processing	Responsible	1	1
Total				8	8/8
Percentage Responsibility Score				100%	

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	Responsible	2	2
4.2	Mortality in storage facility	Aspiring	2	0
4.3	Mortality during transport and initial holding if transported to farm	Responsible	2	2
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			13	11/13
Percentage Responsibility Score			84%	

Component 5: Eel farming			Auditor's findings	Weighting	Score
5.1	The total mortality rate during the culture process is low		Responsible	2	2
5.2	The fish meal/oil ingredients in the feed come from a responsible source		Responsible	2	2
5.3	Feed is used as efficiently as possible		Responsible	2	2
5.4	Water quality		Responsible	2	2
5.5	There are minimal ecological impacts from effluent discharge		Responsible	1	1

5.6	Grading, slaughter and transportation are carried out with respect to welfare	Responsible	1	1
5.7	The farm provides eel for restocking	Responsible	1	1
5.8	Eels for restocking are not graded out slow-growers	Responsible	1	1
Total			12	12/12
Percentage Responsibility Score			100%	

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	0	8
4	2	11
5	0	12
7	0	1
Total	2	12
Total Responsibility Score		32/34 = 94%

4. Auditor conclusions

- **Component 1 General Requirements:** Rijpeaal B.V. has scored 100% for Component 1; it should be considered **RESPONSIBLE** under the SEG standard.
- **Component 4 Eel buying and trading:** Rijpeaal B.V. has scored 84% for Component 4; it should be considered **RESPONSIBLE** under the SEG standard.
- **Component 5 Eel farming:** Rijpeaal B.V. has scored 100% for Component 4; it should be considered **RESPONSIBLE** under the SEG standard.
- **Component 7 Processing, wholesale and retail supplies:** Rijpeaal B.V. has scored 100% for Component 7; it should be considered **RESPONSIBLE** under the SEG standard.
- **With an overall Responsibility score of 94%,** Vishandel Rijpeaal 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 September 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	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, Rijpeaal is actively involved in the community, contributing to sports and social activities. Rijpeaal 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	<p>The total amount of glass eels purchased in 2020 was 674 kg. Rijpeaal has only two suppliers: [redacted] both SEG suppliers, present sufficient evidence that 63% of the glass eel is responsible. In conclusion, we can define that in 2020 63% of the eel supplied to Rijpeaal is responsible or certified as a reliable source. The supplier in 2021 is limited to one SEG supplier, [redacted] from France.</p> <div data-bbox="512 1630 1257 1935" data-label="Image">  </div> <p>Refer to evidence 1:1</p>
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>All eels owned by Rijpelaar are certified and come from only two SEG suppliers. Therefore, the requirement of separation between SEG and non-SEG is not taken into account; only the separation per supplier is considered. The glass eel from the suppliers is already mixed anyway because neither of the two suppliers delivers a 100% responsible source. Still, Rijpelaar shout pushes their suppliers to supply 100% SEG Eels only. When keeping suppliers with mixed eels separate, the percentage of responsible eels from them must be provided too. The eels that are processed are easy to trace due to the tracking and documentation of SEG suppliers. The control system that is presented by the company was controlled on-site during this 2021 audit. The eel farming system is divided into different tanks of different sizes, which allows the separation of the different year classes that the company already has. The eels can be traced through the documentation for up to 7 years, according to Dutch regulations.</p> <p><i>Refer to Criterion 1.3</i> <i>Refer to Evidence 1:1</i></p>
Score	Responsible
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>Rijpelaal 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. At the same time, Rijpelaal only has SEG suppliers at the 'real or true' responsible eel level of 63%, demonstrating Rijpelaal's commitment to sustainable practices and the protection of eel. Rijpelaal's suppliers deliver complete documentation per batch, including the INTRA code and full traceability from the catch of the glass eel, including the names of the fishermen and their vessels.</p> <p><i>Refer to Evidence 1:3</i></p>
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	<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>Rijpelaal keeps records for seven years to date, following Dutch regulations. The batch numbering of the supplier also accompanies eels received from an SEG source. Each sale of processed and unprocessed eels 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, Rijpelaal 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
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Eel buying & trading: Biosecurity is present and disease is treated rapidly and appropriately

Responsible indicators	<ul style="list-style-type: none"> The use of chemicals follows legal requirements of the appropriate EU regulations and of the country concerned. The facility has the appropriate permissions to operate from the relevant licensing authority An effective and documented biosecurity plan is in place and there is evidence that it is being followed. Records are available showing regular monitoring of health and possible signs of stress according to the facility's plan (including the completion of microscope parasite checks) and daily mortality is recorded. Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility.
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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	<p>The company's staff is regularly trained in hygiene and sanitation, as this is a legal requirement. Regarding the use of chemicals, the company only uses Bac Cid 100 for disinfection processes only. Rijpelaal has all the relevant permits and licences to operate as a company in accordance with the provisions of the Dutch authorities for the cultivation, processing and sale of fishery products. The company holds permit number 3744 issued by the Dutch Food Standards Agency. Since 2018, Rijpelaal has eliminated all use of medication and has focused on maintaining the health of the eels by guaranteeing an excellent level of water quality. In the remote case, that medication is required for the eels; this is defined via veterinary approval.</p>
Score	Responsible
Eel farming: Biosecurity is present and disease is treated rapidly and appropriately	
Responsible indicators	<ul style="list-style-type: none"> • The facility has the appropriate permissions to operate from the relevant authority. • The use of chemicals follows legal requirements of the EU and of the country concerned • An effective and documented biosecurity plan is in place and there is evidence that it is being followed. • Daily records are available showing monitoring of fish health and signs of stress and daily mortality is recorded • Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility • UV is used at an appropriate level and separation between tanks
Aspiring indicators	<ul style="list-style-type: none"> • The facility has the appropriate permissions to operate from the relevant licensing authority • The use of chemicals follows legal requirements of the EU and of the country concerned. • An effective and documented biosecurity plan is in place and there is evidence that it is being followed. • Eels are regularly inspected for disease (although this may not be documented) and daily mortality is recorded. • Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility.
Discussion	<p>The company's staff is regularly trained in hygiene and sanitation, as this is a legal requirement. As far as the use of chemicals is concerned, the company only uses Bac Cid 100 for disinfection processes. Rijpelaal has all the relevant permits and licences to operate as a company following the provisions of the Dutch authorities for the cultivation, processing and sale of fish products. The company holds permit number 3744 issued by the Dutch Food Standards Agency. Since 2018, Rijpelaal has eliminated all use of medicines and has focused on maintaining the health of the eels by ensuring an excellent level of water quality. In the unlikely event that medication is required for the eels, this is defined through veterinary approval. The company has a detailed daily record showing the monitoring of the health of the eels, including signs of stress and daily mortality. Rijpelaal does not have a UV system on-site, but the level of water used, and the dedication and control available on site was monitored during this 2021 audit, so the need for UV can be ruled out.</p>
Score	Responsible
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	The eels are under control concerning diseases; therefore, this is a part of the daily work process. The eels must pass the internal restocking control before they leave the Rijpelall premises. This process is directly controlled by Mr. Paul Meulendijks, without his control the eels do not leave Rijpelaal. Considering that the eels come from a known source already controlled by SEG, it is possible to establish their traceability in case of disease.
Score	Responsible
Wholesale / Retail / Processing: Hygiene Plans are followed and there are rare examples of infection	
Responsible indicators	Food processing hygiene plans are followed
Discussion	Rijpeaal 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 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	The process of separation of SEG and non SEG eels is not applicable for Rijpelaal, as they only work with two suppliers who are SEG and have a level of 63% glass eel responsible. However, the company's internal procedure provides the separation of eels per batch delivered per supplier. Still, Rijpelaal shout pushes their suppliers to supply 100% SEG Eels only in the future to improve the current 63%. <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	Rijpelaal is a company registered under the chamber of commerce of The Netherlands number 63265753, which establishes its registration as a fish processor under SBI number code 1020 following the policy and regulations set by national and EU Common Fisheries Policy (CFP) and rules for aquaculture.
Score	Responsible
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	According to the information provided by Mrs Welten, mortality is 2.1%, weekly presenting an effective form of control based on two methodologies. It is important to note that the percentage of mortality is decreasing every year. There are four main factors for this decrease:

	<ol style="list-style-type: none"> 1. Heat exchangers to keep the water temperature constant. 2. Reduction of the risk of glass bubble disease and CO2 stress. 3. Adjustments of the blowing system 4. Change of biomedica material in the upflow filters with a larger surface area.
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	The Glass eels purchased are sourced from 100% SEG-certified suppliers, and the eels leaving Rijpeelaal are 63% SEG-certified.
Score	Responsible
Criterion 4.4: Water quality	
Weighting: 1	
Responsible indicators	<p>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)</p> <p>Water quality management procedures are in place including regular monitoring of relevant parameters which shows that water quality is always high and stable</p> <p>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</p>
Aspiring indicators	<p>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)</p> <p>The facility has a minimum of a back-up generator and oxygen supply</p>
Discussion	<p>Water quality plays an essential role at Rijpeelaal, as water control has made it possible to eliminate diseases and to avoid supplying the eels with medicines. The water at Rijpeelaal comes from a 400 metre deep well, which has the characteristic that it does not need to be handled in order to be used for the aquaculture of eels.</p> <p>The water is constantly monitored, and ammonia, solids, pH, and oxygen levels are checked regularly. The use of "well" water does not constitute a risk to the local water supply, and Rijpeelaal has the appropriate permits related to groundwater rights.</p> <p><i>Refer to Evidence 4:2</i></p>
Score	Responsible
Criterion 4.5: Handling and welfare	
Weighting: 1	
Responsible indicators	<p>Systems are in place and the facility is designed to keep handling to an absolute minimum</p> <p>Documented procedures are in place for handling, and handling, where necessary, is careful</p> <p>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)</p> <p>Eels are moved without being allowed to dry out.</p>
Aspiring indicators	<p>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</p> <p>Handling, where necessary, is carefully planned and executed</p> <p>The infrastructure has been optimised as far as possible to avoid injuries</p> <p>Nets are small-mesh (1mm maximum)</p> <p>Eels are moved without being allowed to dry out.</p>
Discussion	<p>Rijpeelaal's facilities are optimised as much as possible to avoid handling to prevent injuries. More is always possible, but this means implementing more automated systems when handling the eels.</p>






	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	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	Rijpelaal's transport process from aquaculture to customers is minimum. Customers usually come with their own vehicles to pick up the eel, and Rijpelaal makes it easy for them to load the vehicles in the most efficient and effective way without damaging the eels welfare. In the case that Rijpelaal transports its own eels, and again as the auditor was informed, this occurs very occasionally; the transport does not exceed 24 hours., 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.
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	Rijpelaal has sufficient evidence with which it has demonstrated that at least 60% has been sold to restock the required target percentage of its glass eels from last season for the primary purpose of conservation/escapement. This evidence is shown in the source document with the respective INTRA codes.
Score	Responsible
Component 5 - Eel farming	
Criterion 5.1: The total mortality rate during the culture process is low	
Weighting: 2	
Responsible indicators	The Percentage Mortality Rate of eels in culture is less than or equal to 10% on average in the current and previous year OR as an average of the previous five years An accurate daily log is maintained of the number and causes of mortality
Aspiring indicators	The Percentage Mortality Rate of eels in culture is between 10 and 15% on average in the current and previous years OR as an average of the previous five years. An accurate daily log is maintained of the number of mortalities
Discussion	Rijpelaal recorded mortality per tank manually and recorded on a daily basis per dead eel. The company has created a registration process based on two categories: CAT1 by dead eel and CAT2 by weight. Considering that the life cycle process of the eel in aquaculture before consumption is two years, it can be defined for this audit that the mortality rate reaches 4.25%, which means a substantial improvement in the 2019 mortality rate. This is due to the factors presented in criterion 4.2.
Score	Responsible

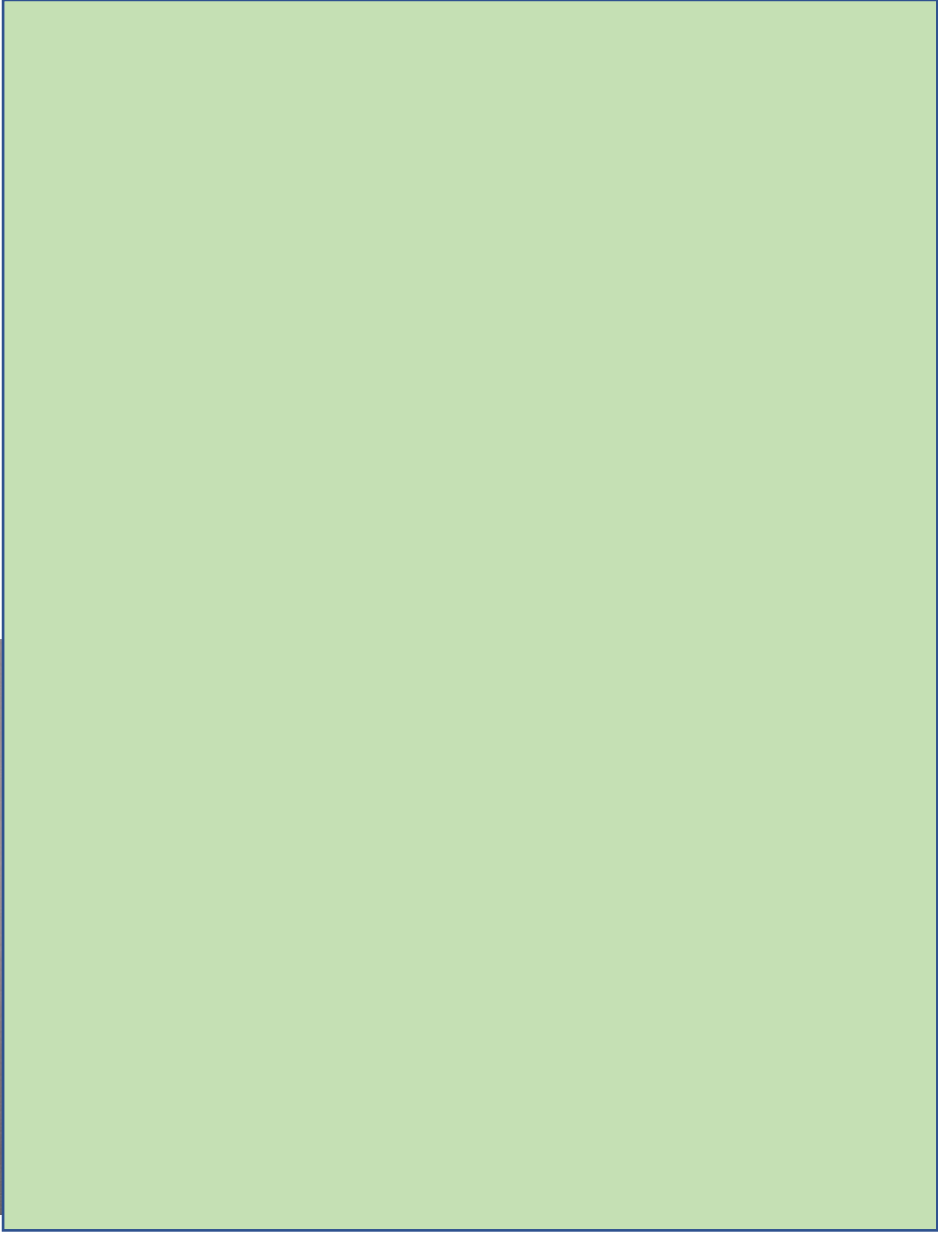
Criterion 5.2: The fish meal/oil ingredients in the feed come from a responsible source	
Weighting: 1	
Responsible indicators	Fish meal/oil in the feed (including juvenile feeds) is certified by IFFO or MSC or shown in some other way to be from responsible or sustainable sources
Aspiring indicators	Fish meal/oil in the feed (including juvenile feeds) is not certified by IFFO or MSC or shown to be from responsible sources, but there are credible plans to move to such a supplier within 2 years
Discussion	<div></div> <p><i>Refer to Evidence 5:1</i></p>
Score	Responsible
Criterion 5.3: Feed is used as efficiently as possible	
Weighting: 1	
Responsible indicators	<p>The average feed conversion ratios in the farm are as follows:</p> <ul style="list-style-type: none"> Glass eel to fingerlings: 1.1 or less Fingerlings to 200g: 1.6 or less Large eels: 2.0 or less
Aspiring indicators	<p>The average feed conversion ratios in the farm are as follows:</p> <ul style="list-style-type: none"> Glass eel to fingerlings: 1.3 or less Fingerlings to 200g: 1.8 or less Large eels: 2.2 or less
Discussion	<p>The feeding of the eels at Rijpelaal is crucial for the health of the eels and the commercial success of the company, which is why a lot of emphases is placed on an exact control of the feeding. The staff is trained for this function which is handled directly by Mr. Paul, who closely supervises this process to ensure that there is no feed wastage. The feeding process is carried out in different ways depending on the growth cycle of the glass eel. The first part of the cycle starts with glass eel tanks which are supplied with an automated system that is filled daily by hand and activated three times a day. The medium and large tanks use pendulum feeders, which are activated depending on the eel activity in the tanks. FCR figures were calculated for each of the size ranges identified in the standard as 1.0 - 1.2 for Glass eel to fingerlings and 1.3 - 1.5 for eels up to 200g and larger eels. Larger eels, which can exceed 1200 grams, have a higher FCR as stipulated in the reports, as they typically have a higher FCR, of course, than eels grown to 800g.</p> <p><i>Refer to Evidence 5:1</i></p>
Score	Responsible
Criterion 5.4: Water quality	
Weighting: 1	
Responsible indicators	<ul style="list-style-type: none"> 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 Water quality monitoring is linked to an alarm-based system in the event of a sudden drop in water quality The facility operates a back-up system to ensure that water quality will not adversely affect survival rates in the case of a power supply failure.

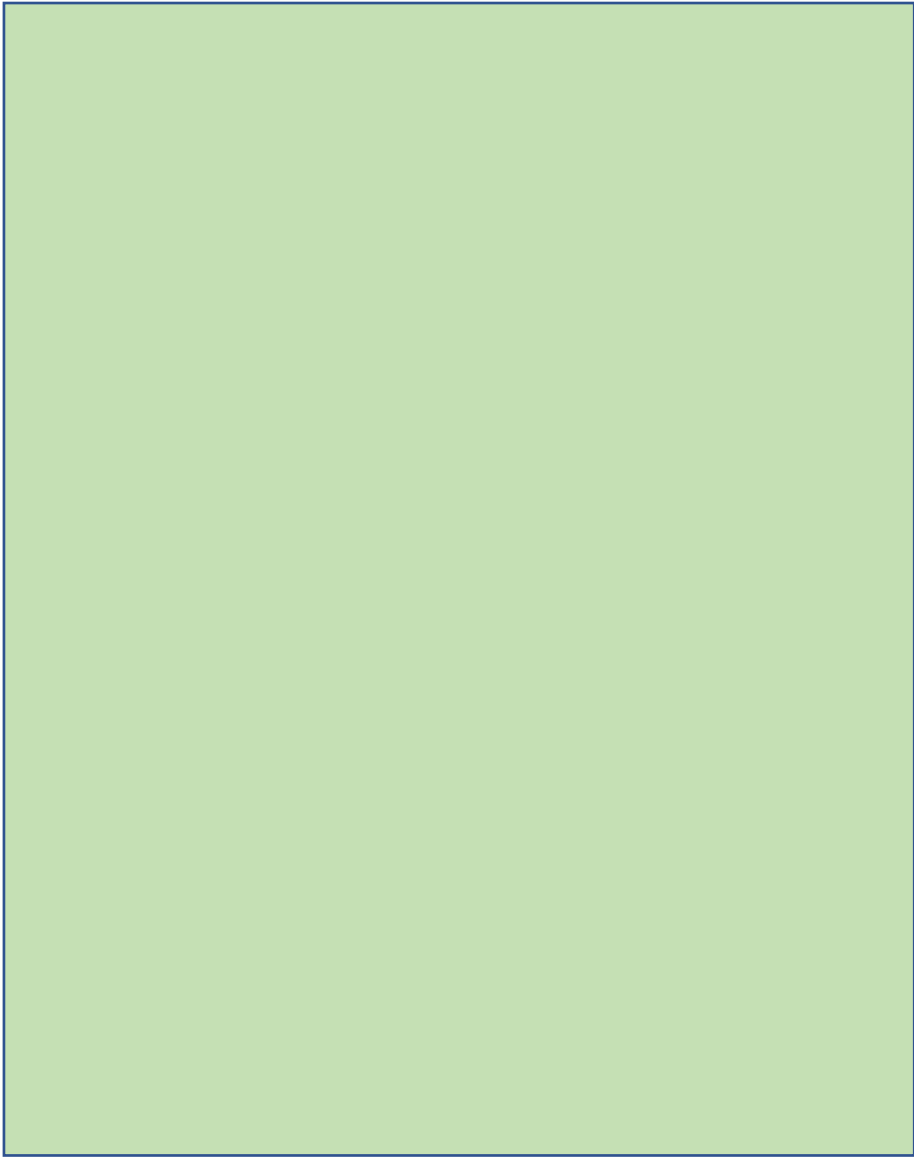
Aspiring indicators	<ul style="list-style-type: none"> A system is in place that is expected to keep key water quality parameters within suitable tolerances (e.g. Ammonia, Suspended Solids, pH, Oxygen) Water quality management procedures are in place and there is regular monitoring of relevant parameters which shows that water quality is always high and stable.
Discussion	<p>Water quality plays an important role at Rijpelaal, as water control has made it possible to eliminate diseases and avoid supplying the eels with medicines. The water at Rijpelaal comes from a 400-metre deep well, which has the characteristic that it does not need to be manipulated or adjusted for use in eel aquaculture. The water is constantly monitored, and the levels of ammonia, solids, pH and oxygen are checked regularly. Water quality monitoring is linked to alarm systems in case of any sudden incidents with regard to water quality. In addition, the entire water circuit is connected to an oil-fired generator to ensure the eels' survival and maintain a constant water cycle in the event of a power failure.</p> <p><i>Refer to Evidence 5:2</i></p>
Score	Responsible
Criterion 5.5: There are minimal ecological impacts from effluent discharge	
Weighting: 1	
Responsible indicators	<ul style="list-style-type: none"> The system is closed-circuit and has no discharge OR Effluent discharge is regularly tested by the farm AND Effluent discharge complies with all local and national requirements AND Has not been found to be non-compliant in the past 5 years.
Aspiring indicators	<ul style="list-style-type: none"> Effluent discharge is regularly tested by the farm AND/OR Has been found to be non-compliant on no more than 1 occasion in the past 5 years.
Discussion	<p>The discharge water management process is something that Mr Johan Meulendijks is very proud of, where not only the effluent generated by the aquaculture process is effectively managed, but also the energy recovery has been added to this, which means that no natural gas is used and the temperature of the water in the tanks is maintained at a constant level. The waste is removed every two years and given to local farmers to fertilise their land. No records have been found to indicate any infringements regarding the quality of the water discharged from the installation. Rijpelaal follows the municipality's plans as stipulated in the Municipal Sewage Plan (GRP).</p> <p><i>Refer to Evidence 5:3</i></p>
Score	Responsible
Criterion 5.6: Grading, slaughter and transportation are carried out with respect to welfare	
Weighting: 1	
Responsible indicators	<ul style="list-style-type: none"> Grading is completed in an efficient manner Slaughter is completed by a method that provides an instant death or renders them insensible to pain, i.e. electric stunning or percussive stunning. Procedures are in place to ensure transportation provides suitable conditions for fish welfare.
Aspiring indicators	<ul style="list-style-type: none"> Other, previously acceptable methods of stunning before slaughter are used, e.g. chilling, but there are credible plans in place to invest in the latest methods within the next 2 years
Discussion	<p>Rijperlaal has a 4-size grading machine. This machine fulfils the function of sorting the eels in an efficient way where the air pump moves the eels. After the sorting process, the eels are put into the slaughtering process, where the machine designed by Mr. Johan Meulendijks in 2013, the Aalstunner, is used. It is a device to kill (stun) eels in a respectful way and was officially recognised by the Dutch authorities according to the current regulations. After the use of the Aalstunner, the process of immersion in hot and then cold water is continued. The eels are then de-scaled and emptied with an automatic machine or by hand, depending on the quantity being processed. This procedure is used to reduce the level of stress and to ensure respect for the eel in its processing to final product. Live eels leaving the Rijpelaal facility via logistical transports, which are almost entirely provided by Rijpelaal's customers.</p>

	Rijpeaal never lets the eels go without water or dry out; the eels are separated after grading and lowered in temperature to allow them to 'purge' before the transport they will face. <i>Refer to Evidence 5:4</i>
Score	Responsible
Criterion 5.7: The farm provides eel for restocking	
Weighting: 2	
Responsible indicators	The farm can provide documented evidence that 10% or more of the farm's annual eel production (by piece) has been provided for restocking for the purpose of conservation / escapement.
Aspiring indicators	The farm can provide documented evidence that it makes 10 % of their annual eel production (by piece) available for restocking for the primary purpose of conservation / escapement AND/OR for new clients, the farm can demonstrate that they have bookings for re-stocking in the following year at more than 10% of the predicted annual eel production (by piece) for the purpose of conservation / escapement.
Discussion	In 2020, the purchase of glass eel was 1.887.200 pieces for restocking, which translates to 675 kg. This equates to 18.12% for the year based on the estimated number of pieces brought to Rijpeaal. These 1.887.200 pieces are added to the 612.800 pieces already in the tanks, making a total of 2.500.000 pieces of glass eel, which means a stock of 893 kg. Of this total of 2.500.000, 453.030 pieces were sold in 2020 for restocking. There is sufficient on-site information regarding the quantities and traceability of these purchases which were made from SEG certified suppliers.
Score	Responsible
Criterion 5.8: Eels for restocking are not graded out slow-growers	
Weighting: 2	
Responsible indicators	The size range and quantities in the eels for restocking reflect 100% that for the age group in the whole farm
Aspiring indicators	The size range and quantities indicate no more than a 25% supplement of those for restocking are from slower growing fish of the same age group
Discussion	Eels purchased for restocking do not undergo sorting processes and therefore reflect and represent the exact state of glass eels from where they were caught and are kept separate from eels intended for processing and human consumption. Therefore the size range received and the quantities of eels for restocking reflect 100% that of the age group received, which is unaltered and unmanipulated.
Score	Responsible
Component 7 – Processing, wholesale and retail supplies	
Discussion	Rijpeaal'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 and in their store and restaurant. They are passionate about contributing to eel recovery and ensuring compliance. Rijpeaal 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			
Evidence	Evidence	Evidence	Description
1:1			100% of SEG Suppliers The sample year 2020 63% responsible eel
1:2	   		The company has separate tanks, and each batch is managed separately and is not mixed to avoid cross-contamination between eels. Rijpeaal can define the source per batch and the eel time per tank.

1:3		Invoices to Rijpeaal and delivery orders specifying batch, order and codes, including internal registers and internal traceability.
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1:4		Receive documentation batch and electronic and manual documentation available on site.
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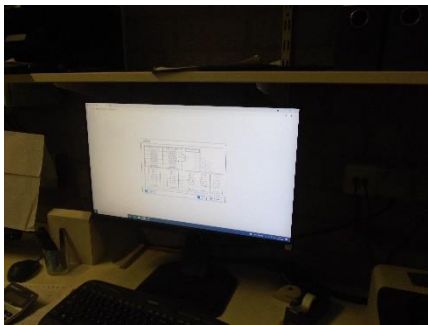



Component 4			
Reference	Evidence 01	Evidence 02	Description
4:1	 	 	<p>The tanks are clearly separated. The eels are not mixed in each tank. Each tank represents individual, isolated batches per supplier.</p>
4:2	  		<p>The water comes from our own well at a depth of 400 metres. The water quality and control are monitored on a daily basis.</p>

4:3



Rijpeaal's facilities are optimised as much as possible.










Component 5			
Reference	Evidence 01	Evidence 02	Description
5:1			The tanks are clearly separated. The eels are not mixed in each tank. Each tank represents individual, isolated batches per supplier.
5:2	  		The water comes from our own well at a depth of 400 metres. The water quality and control are monitored on a daily basis.
5:3			The manure is removed every 2 years and given to local farmers to fertilise their land. A heat recovery system is present.

5:4



Rijpeaal's facilities are optimised as much as possible. Grading, slaughter and transportation are carried out with respect to welfare.

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, and all labour conditions are presented at a high level.</p>