Assessment against SEG Standard: Component 1: Core requirements
Component 4: Eel buying and trading

Completed by
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15th December 2020

Final

Reviewed and Approved by Certification Body:
David Bunt, Sustainable Eel Group, 28 January 2021

1. Introduction

This document constitutes the report of the audit of the 15th of December 2020 carried out for the company Civelle Durable, France concerning the application of the SEG (Sustainable Eel Group) standard specifications (version 6.0a, December 2019). This is a control audit for the SEG-0020 certificate. This assessment was carried out in relation to components 1 and 4 of the standard.

The certification concerns the storage site, located in the commune of Sainte-Gemme in France. The site is managed by Mr. Benoit Chambon, director of the structure. The site started its elver trading activity in 2012. It is a subsidiary of the company UK Glass eels headed by Mr. Peter Wood. The sustainable elver storage site was awarded the SEG label in 2018 (certificate SEG-0020). Mr. Chambon works with 20 fishermen from the Gironde and Seudre regions who have been awarded the SEG label (certificate SEG- 0062 and SEG-0063) and 4 fishermen who are in the process of being certified. For all the fishermen, Civelle Durable takes care of the collection of glass eels directly at the landing point.

2. The assessment

The evaluator was Fabien Charrier for the Fish-Pass design office. The audit was carried out in the form of a discussion with Mr. Chambon (site director). The audit was conducted on the basis of the documents presented corresponding to the last two years of activity. A complete visit of the site was also carried out.

3. Client Contact Details

Client Contact Name	Civelle Durable
Client Address	La Fromigère, 17250 Sainte-Gemme
Client Email	civelledurablefrance@gmail.com
Client Phone Number	06 26 71 57 63

4. 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 (bonus)	N/A		
1.3 The organisation 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 –			
1.5.2 Eel buying & trading: Biosecurity is present and disease is treated rapidly and appropriate	Responsible	1	1
1.5.3 Eel farming : Biosecurity is present and disease is treated rapidly and appropriate			
1.5.4 Restocking : The risk of restocked eels introducing disease into wild populations has been assessed and is minimal	Responsible	1	1
Total		7	7
Percentage Responsibility Score:		**100%**	

Finding: Conclusion: For Component 1: Generic Requirement: The score is 100% leading to a Responsible Assessment.

Component 4: Eel buying and trading	Auditor's findings	Weighting	Score
4.0 Segregation of certified and uncertified eels	Responsible	2	2
4.1 The glass eel holding facility is a registered aquaculture production business	Responsible	1	1
4.2 Mortality in storage facility	Aspiring	2	0
4.3 Mortality during transport and initial holding if transported to farm	Responsible	2	
4.4 Water quality	Responsible	1	1
4.5 Handling and welfare	Aspiring	1	0
4.6 Transport	Responsible	1	1
4.7 The required percentage of glass eels is being used for restocking	Aspiring	2	0
Total		12	7
Percentage Responsibility Score:		**58%**	

Finding: Civelle Durable storage site obtained a score of 58% for component 4 and can therefore be considered responsible according to the SEG specifications.

Summary of assessment and scoring

Component	Not Met	Aspiring	Responsible
1	0	0	7
4	0	5	7
Total	0	5	14
Total Responsibility Score: = 14/19			**74%**

Summary finding: Civelle Durable storage site with a score of 74% and meets the criteria for SEG certification.

5. Recommendations:

1.2: The company should consider how to contribute to Eel Conservation Projects by the next audit.

1.4.1 Even if documents provided allow a good traceability, it would be relevant to indicate the SEG certification on the transport voucher. Similarly, the documents relating to the cleaning of the trucks should be stored in a binder at the end of each season.

4.5 To complement the existing documents, a protocol should be writing to summarise the good practices implemented for the handling of fish.

6. Next Audit

Question	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	No Audit	Remote Audit	No 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

Based on the results of the audit, standard monitoring is recommended.

7. The Assessment

The tables below give the results of the assessment against each of the criteria in the standard and the rationale for the scores given above.

Component 1 – Generic requirements (Weighting : 1 for each criterion)	
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	No infringements have been found regarding the storage site. Mr. Chambon explained that he had been checked by Maritime Affairs and the OFB on several occasions and everything was in order.
Score	Responsible

Criterion 1.2: Contribution to Eel Conservation Projects. (Optional bonus score) (The intention is for this to be mandatory from summer 2020)	
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	Not applicable
Score	Not applicable

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	For the 2018-2019 season, the company Civelle Durable has traded 47.5% SEG-certified glass eels. In particular, it has purchased a large quantity of glass eels from other non-certified wholesalers. Given the mixed quality of glass eels purchased from other wholesalers, Civelle Durable has decided to stop purchasing from other wholesalers during the 2019-2020 season. For the 2019-2020 season, Civelle Durable has purchased glass eels only from SEG-certified fishermen. Thus, 100% of the glass eels purchased were SEG-certified. For the 2020-2021 season, Civelle Durable is working with 20 fishermen with the SEG label (SEG- 0062 and SEG-0063 certificates) and 4 fishermen in the process of being certified.
Score	Responsible

Criterion 1.4: Traceability	
1.4.1: Traceability - Incoming product, separation and segregation	
Responsible indicators	• 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	• 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	The truck that collects both certified and uncertified glass eels has a fish tank with a separation. The installations have two series of 8 tanks, all numbered. One part of the tanks is reserved for SEG-certified fish, the other for non-SEG-certified fish. A unique transport voucher is created for each purchase. This number is the basis for traceability. Each time glass eels are received, the transport voucher number is associated with a tank, which makes it possible to track the quantity of glass eels. Documents enable the traceability of SEG-qualified products to be traced on their entry and exit. It would be relevant to indicate on the transport voucher whether the fish are SEG or not. On the records, the number of certified eels leaving the organisation does not exceed the number entering. Purchases are electronically declared on the administration site (Visiomer) every 24 hours.
Score	Responsible

1.4.2: Traceability - Outgoing product	
Responsible indicators	• 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: - Includes an appropriate batch code - Includes a record of the quantity (no. & weight) of product and to whom it was sold
Aspiring indicators	• 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: - Includes an appropriate batch code. - Includes a record of the quantity (no. & weight) of product and to whom it was sold.
Discussion	On computer, for each lot sold, a table recapitulates for each purchase, the date, the angler, the weight and the fishing record number. For sales outside France, a TRACES certificate is issued by the administration (ADPP) as well as a CITES export certificate.
Score	Responsible

1.4.3: Traceability - Record keeping and documentation	
Responsible indicators	• 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: • 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	The storage site has all the papers for the last three years of activity. All product traceability data is stored in files and on computer software. It is possible to easily reconstitute the origin and weight of glass eels constituting a batch. All the physico-chemical monitoring of the water is recorded on a daily basis. The cleaning operations (basins, trucks) are also recorded. The purchase of glass eels is electronically declared on the France Agrimer site. Sales are subject to certificates.
Score	Responsible

Criterion 1.5: Biosecurity & welfare – Eel and eel products are provided with minimal risk of diseases, parasites and alien species	
1.5.2 Eel buying & trading: Biosecurity is present and disease is treated rapidly and appropriately	
Responsible indicators	• 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 a possible sign 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	• 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	The facility has all the authorisations and is monitored by a veterinarian. A biosecurity plan is present and documented. The cleaning of the basins and trucks is carried out regularly and recorded. There is also a rodent control plan. A specific universal disinfectant for aquaculture is used for the equipment. Basins are regularly disinfected with hydrochloric acid + neutralizer after emptying. A Virkon foot bath is present at the entrance to the elver storage area. Mortality is regularly recorded and registered. The glass eels are handled as little as possible to limit stress. Temperature and oxygen parameters are monitored and recorded. The water temperature is regulated to avoid variations. No medication is used.
Score	Responsible

1.5.4 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	Each batch of glass eels for restocking is tested for parasitology.
Score	Responsible

Summary scores for Component 1	
Not met	0
Not applicable	1
Aspiring	0
Responsible	7
Conditionally responsible	0
Total possible	7
% Responsibility (Responsible / Total possible)	**100%**

Component 4 - Eel buying and trading

Criterion 4.0: Segregation of certified and uncertified eels	
Weighting: 2	
Responsible indicators	Certified and non-certified are kept separated, from point of collection through holding to sale and onward transport.
Aspiring indicators	None.
Discussion	Most of the glass eels are collected in fish tankers. For areas where there are both certified and non-certified fishermen, a truck equipped with a fish tank with a separation is used. All fish notified by SEG at the entrance are placed in specific, well-identified fish tanks. At the time of sale, the SEG certification is noted on the transport boxes.
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	The company has an aquaculture zoosanitary approval: FR 17 330005 CE
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	Mortality checks are carried out every day. Dead glass eels are frozen and rendered once a year. Mortality is recorded for each pond and monitored on a pro rata basis per fisherman. The average mortality rate over the last three years is 2.26%.
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	After contact with Mr Fordham from Scandinavian Silver Eel (www.silvereel.se), the mortality in his farm is around 0.04% after 3 days. After 9 days, the cumulative mortality is around 0.15%
Score	Responsible

Criterion 4.4: Water quality	
Weighting: 1	
Responsible indicators	• A system is in place that is expected to keep key water quality parameters within suitable tolerances for healthy eel survival (e.g. Ammonia, Suspended Solids, pH, Oxygen). • Water quality management procedures are in place including regular monitoring of relevant parameters which shows that water quality is always high and stable. • The facility operates a back-up system to ensure that water quality will not adversely affect survival rates in the case of an equipment failure.
Aspiring indicators	• A system is in place that is expected to keep key water quality parameters within suitable tolerances for healthy eel survival (e.g. Ammonia, Suspended Solids, pH, Oxygen). • The facility has a minimum of a back-up generator and oxygen supply.
Discussion	The water used is borehole water. The water is slightly salty. The ponds operate in a closed circuit with a UV filter. Part of the water is renewed every day. The ponds are equipped with aerators (2 pumps, one of which is an emergency pump). The water temperature is controlled by a cooling system. Alarms are triggered by telephone in case of oxygen or temperature problems in the system. For oxygen, if necessary a solenoid valve allows the automatic injection of oxygen thanks to diffusers present in each basin. The physico-chemical parameters (temperature, dissolved oxygen and salinity) are monitored and recorded regularly in a file. An emergency generator is present and takes over automatically in the event of a power cut.
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	The installation has been designed to handle glass eels as little as possible. The transport truck can be parked a few metres away from the basins. For the purchase of the glass eels, the sieve is made of stainless steel with a fine mesh. The glass eels are transported in fine-mesh containers. Fine mesh screens are present in the tanks to prevent the glass eels from being sucked in by the water circulation. The glass eels are collected by gravity drainage via a pipe at the bottom of the tank for crating. No net is used. The dead glass eels are recovered via a manual suction system. Despite good practices, there is no written protocol available.
Score	Aspiring

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 staff has an accreditation for the transport of live animals (type 1). Fishes are collected thanks to a small fish tanker truck which has an oxygen supply. Packing is carried out via a gravity fishing system and a regulating valve. The glass eels are transported to the customer either in a fish truck or in a polystyrene box with water and ice. For some destinations, the transport can be done by plane. On arrival, all glass eels have transport vouchers. All glass eels have export certificates for sale.
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 they have sold at least 60% for restocking the required target percentage of its glass eels from the last season for the primary purpose of conservation / escapement. • The eels for restocking are representative of the stock – slow growers are not selected.
Aspiring indicators	• The buyer can provide documented evidence that they have reserved or made available at least 60% 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 re-stocking will occur in the forthcoming season. • The eels for restocking are representative of the stock – slow growers are not selected.

Discussion	Civelle Durable has sold 73.6% glass eels for restocking in the 2018-2019 season and 58% for the 2019-2020 season. This represents an average of 65.8% over the last two years. Since 2010, none of the restocking quotas have been consumed in France due to lack of demand. Civelle Durable supplies glass eels for many restocking projects in Europe.
Score	Aspiring

Summary scores for Component 4	
Not met	0
Not applicable	0
Aspiring	5
Responsible	7
Total possible	12
% Responsibility (Responsible / Total possible)	59 %