



Assessment against SEG Standard:

Component 1: Core requirements Component 2: Glass eel fishing

Completed by

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5 January 2022

Version 1

Reviewed and Approved by Certification Body: David Bunt, Sustainable Eel Group, 12 January 2022

1. Introduction

This document represents the report realized following the audit of January 5, 2022 carried out within the framework of the SEG (Sustainable Eel Group) standard (version 6.0a, December 2019) with the fishery of the Arcachon basin.

This audit was carried out at the request of the fish trade company Gurruchaga marée for a group of 6 fishermen, 3 of whom were audited. The group of fishermen will be called "Pêcherie Arcachon". This audit concerns a first certification. This evaluation was carried out only in relation to the components 1 and 2 of the standard.

This fishery, constituted by about twenty fishermen, is located in the Canal des Etangs in the North of the basin of Arcachon on the cities of Lège-Cap Ferret and Arès. These fishermen practice a fixed station fishing. The technique deployed is specific to this fishery and has a patrimonial character. Each fisherman has two small concessions on which he will create a small overhang on the water of one to two meters long made of bags of oyster shells called "pitt". The fishermen have one "pitt" downstream from the fishing area and one upstream. They choose to fish on one or the other according to the tidal coefficients, the flow of the channel, the advance of the migration season... Each fisherman can use two nets. Nets are artisanal and made by the fishermen. They are large elongated nets measuring 1.1 m high, 60 to 70 cm wide and 50 to 70 cm deep. The mesh size of the gears is about 1 mm. The gears are then placed on a stand along the "pitt" with the opening facing downstream. The fishermen position a small gas light on the "pitt" to guide the glass eels. Indeed, the principle of this fishing is based on the fact that the glass eels will go along the banks and use the counter-current and the calm zone formed by the "pitt" to migrate and will thus enter all alone in the fishing gear. The gears are lifted every 5-10 minutes and emptied directly onto a screen over a plastic box. The glass eels are then placed in a basket directly in the river. The fishermen use a wet box transport and carry out a storage in fish tank at home. The fishmonger picks up the glass eels about once a week.









The following professional fishermen are concerned by this SEG certification process.

Last Name	First Name	Vessel
Duvignac	Antoine	JERONIMA
Duvignac	Yann	LE TIKEUR
Fagniot	Délia	VIEUX JOJO
Lamourous	David	AYNA 2
Pautonnier	Anthony	FLECHE BLEUE
Tavares	Alexandre	BIBOU

2. The assessment

The evaluator was Fabien Charrier for Fish-Pass. The visit took place on the tide of February 5, 2022 in the evening with 3 fishermen: Mr. Alexandre Tavares, David Lamourous and Anthony Pautonnier.

3. Client Contact Details

The company Gurruchaga Marée has requested this audit. The resource persons are Mr. Jacky Arteaud and Mr. Jerome Gurruchaga

Client Contact Name	Gurruchaga Marée	
Client Address	88 route de la corniche	
	64700 Hendaye	
Client Email	gurrumaree@wanadoo.fr	
Client Phone Number	06 73 81 17 99	

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	N/A	N/A
1.3 The organisation trades in certified responsibly sourced eels	N/A	N/A	N/A
1.4 Traceability:			





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1 1 1	Incoming and unto concretion and cogregation	Deenensible	1	1
1.4.1	Incoming products, separation and segregation	Responsible	T	L
1.4.2	1.4.2 Outgoing products		1	1
1.4.3	Record keeping and documentation	Responsible	1	1
1.5.1	Biosecurity & welfare – Biosecurity measures are	Responsible	1	1
	adopted		1	1
		Total	5	5
	Percentage Responsibility Score:		100	%

Finding: The fishery achieves a score of 100% for component 1 General requirements.

Component 2: Glass eel fishing	Auditor's findings	Weighting	Score
2.1 Eel fishing is in a catchment that is meeting its escapement targets	Aspiring	2	0
2.2 There is good progress with the applicant's responsibilities in the eel management plan for the river or district	Aspiring	2	0
2.3 The fishery is well managed	Responsible	1	1
2.4 Mortality during fishing is minimised	Responsible	2	2
2.5 The fishery has negligible impacts on by-catch species	Responsible	1	1
2.6 The fishery has negligible impacts on rare or other protected species	Responsible	1	1
2.7 The fishery has negligible impacts on habitats	Responsible	1	1
2.8 Transport	Responsible	1	1
2.9 Bonus score: fishermen donate a proportion of their catch for a local positive contribution	N/A	N/A	N/A
	Total	11	7
Percentage Respon	sibility Score:	64%	0

Finding: The fishery meets part of the criteria of the glass eel fishing component (64%) and can be considered responsible under the SEG standard.

Summary of assessment and scoring

Component	Not Met	Aspiring	Responsible
1	0	0	5
2	0	4	7
Total	0	4	12
Total R	esponsibility Score: =	12/16	75%

Summary finding:

The Arcachon fishery has achieved a score of 71% of responsibility criteria and meets the criteria for certification by the SEG standard.

5. Recommendations:

Fish-Pass makes the following recommendations for the "Arcachon" fishery.







Concerning criterion 2.4, the monitoring of mortality in the home tanks is not recorded. However, the practices observed during the fishery seem to be in agreement with a responsible fishing of glass eel, as no mortality was observed. We recommend that, as soon as possible, fishermen keep a logbook of home mortalities that they can provide to the auditor during the control audit. The mortality should be linked to a period and a quantity of glass eels caught (fishing form). For greater readability it is preferable that the glass eels releases during sales are also indicated. An example:

Date	Quantity added to the tank (g)	Mortality (g) or Number of individuals (N)	Quantity leaving the fish tank (g)
04/01/2021	1890	0	0
05/01/2021	910	10	0
06/01/2021	0	5	0
07/01/2021	500	20	0
08/01/2021	0	0	3260

The exit weight may not necessarily correspond to the weight fished + mortality. This may be due to weight loss and weighing accuracy.

Criteria 1.2 and 2.9 – by the next audit the fishery should have considered and implemented how to make a positive contribution to eel conservation projects.

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 ¹ 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 S	urveillance

	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

The next control audit should take place by January 2024.







7. The Assessment

The tables below detail the reasons for the ratings given above for each component.

Component 1	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	The audited fisherman had no eel fishing violations in the last 24 months. The criterion has therefore been met.		
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	Fishermen do not make donations. It should be considered and implemented by the next audit
Score	Not Applicable

Criterion 1.3:	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 audit only concerns fishermen who have not yet been certified SEG and who therefore do not yet market certified eels. They are therefore not yet concerned by this criterion.		
Score	Not Applicable		





Criterion 1.4: Traceability	
1.4.1: Traceal	bility - 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 ear did not exceed the number that entered. If resolved through mass- or number- balance calculations, the margin of error does not exceed 5% or if a farm, the 2800 pieces per 1 kg of glass eels is applied.
Discussion	Fishermen use the system of electronic tele-declaration by SMS to the Regional Fisheries Committee. It allows a computerized banking and to follow the quota of the fishermen day by day and to avoid exceeding the authorized quotas. The fishermen also fill in fishing sheets which are systematically sent to France Agrimer. Each fishing day is the subject of a paper declaration with 3 copies: 1 for the administrative authorities, 1 for the fishmonger and the last one is kept by the fisherman. The responsible criterion is thus reached
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





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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	As for the previous point, this audit concerns only fishermen who all use electronic reporting. The criterion is therefore met.
Score	Responsible

1.4.3: Tracea	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	As for criterion 1.4.1, this audit concerns only fishermen and all of them use electronic reporting. The criterion is therefore met.	
Score	Responsible	

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

1.5.1 Eel Fishing: Biosecurity measures are adopted	
Responsible indicators	 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.
Discussion	The fishermen fish on two fixed stations during the season, both located on the same river. Moreover, the nets are put to dry between each tide. The criterion is therefore met.
Score	Responsible







Summary scores for Component 1	
Not applicable	2
Not met	0
Aspiring	0
Responsible	5
Total possible	5
% Responsibility (Responsible / Total possible)	100%

Component 2 - Glass eel fishing	
Criterion 2.1:	Eel fishing is in a catchment that is meeting its escapement targets
Weighting: 2	
Sustainable Indicator	There are good data which show to the satisfaction of the fisheries authority that the EU silver eel 40% escapement target (40% B0) is being achieved for the river or in the eel management district.
Responsible indicators	There are good data which show to the satisfaction of the fisheries authority that at least 70% of the Bbest target for silver eel escapement is being met in the river or eel management district.
Aspiring indicators	Eel fishing is in a place accepted by the fishery authority as providing a positive contribution to the eel stock or, the river or RBD is meeting 40% - <70% of the Bbest target.
Discussion	The information available on this subject (Report of the Eel Management Plan in France, 2018) shows that, for the moment, the objective of 40% of the BO or 70% of the BBEST is not achieved, both in the UGA concerned (GDC) and in the other French UGA. Moreover, we do not have precise information by catchment area to judge this criterion more accurately. However, all the actions foreseen in the French Eel Management Plan (PGA) have been implemented and the recovery of the eel stock requires a long-term action. The effects of the measures taken in recent years are not yet observable. The actions taken by the fishing sector are detailed in the following criterion. Considering all this, the criterion has not been met, but significant efforts have been made since the establishment of the GPA, in particular by the professional fishermen.
Score	Aspiring



Criterion 2.2: There is good progress with the applicant's responsibilities in the Eel Management Plan for the river or District	
Weighting: 2	
Responsible indicators	There is credible progress with at least 75% of the actions relating to the fishery for the implementation of the Eel Management Plan for the river or eel management district.
Aspiring indicators	There is credible progress with at least 50% of the actions relating to the fishery for the implementation of the Eel Management Plan for the river or eel management district.
Discussion	The professional fishing stakeholders have implemented the majority of the actions related to the AMP.
	Thus, the exploitation rate of the glass eel stock has clearly decreased since the reference period. This rate has been relatively stable in recent years and fluctuates around the management target.
	The allocation of fishing licenses for glass eel has decreased by 57% between 2006 and 2018.
	The ratio of the 40% consumption and 60% restocking fishing quota has been unchanged since 2013. However, the objective of 60% of glass eels for European restocking has never been reached, but the profession is getting closer to this objective over the years. The achievement of this objective is dependent on the European market, which is not the responsibility of the professional fishermen.
	The overall catch quota has been increased for the 2021-2022 season to a total of 65 t, an increase of +13% compared to the previous season. Given the current context and the recent advice of ICES to close all eel fisheries. The increase in quotas is a bad signal for the sustainability of the fishery.
	Finally, France allocates between 5 and 10% of annual catches to French restocking operations, 5.8% in 2018.
	In view of all these elements, it is possible to consider that this criterion is aspiring.
Score	Aspiring

Criterion 2.3: The fishery is well managed		
Weighting: 1	Weighting: 1	
Responsible indicators	 Fishers are licensed and provide catch and effort data via a tele-declaration system. Data on catch and effort are collected and analysed regularly by the fishery authority (at least annually at the end of the season). There is a data set for at least the last 5 years that is considered by the fishery authority to be accurate, useful for statistical purposes and provide a comprehensive picture of the glass eel fishery under assessment. Enforcement is in place throughout the fishing area and there is no evidence of systematic non-compliance. 	







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Aspiring	Fishers are licensed and provide catch and effort data.
indicators	 Data on catch and effort are collected and analysed regularly by the fishery authority (at least annually at the end of the season). There is a data set for at least the last 3 years that is considered by the fishery authority to be accurate and provide enough information on the glass eel fishery under assessment for management and to track annual trends in glass eel arrival. There is no evidence of systematic non-compliance.
Discussion	The fishermen have a license and proceed to the remote declaration via "Télécapêche" in addition to the declaration by the fishing form.

The fishing figures are monitored every day by the Regional Fisheries Committee in order to follow precisely the exact consumption of the quota to avoid a preventive closure. These data are obtained by a declaration by sms.

The official data are obtained from the fishing sheets sent by the fishermen to the administrative authorities. Thus, the Direction des Pêches Maritimes et de l'Aquaculture (DPMA) collects and compiles these data. During the glass eel fishing season, the DPMA distributes a table every week to report on the consumption of quotas in the different UGAs. In May-June, when the season is over, the DPMA distributes a statistical compilation (quota consumption, market price, number of fish merchants, etc.) by UGA. There is a reliable data set of more than 5 years. This criterion is therefore met.

Score Responsible

Criterion 2.4: Mortality during fishing is minimised

Weighting: 2	
Responsible	• Fishing is by hand-held nets and has effective nearby holding facilities OR
indicators	Fishing from vessels meets the following criteria:
	i) fishing is at slow speed (no more than 1 knot relative to water);
	ii) haul duration is on average no longer than 20 minutes, with the maximum duration not more than 30 minutes;
	iii) mesh size of cod end no greater than 1mm;
	iv) rest of the net designed such that glass eels do not become trapped or abraded; v) vivier tank on board and in use;
	vi) fishermen maintain accurate daily records of mortality. OR
	• Fishermen can demonstrate that the mortality rate of the catch over the duration of holding in the storage facility is less than 4% for each batch captured. OR
	• Fishing methods (in France) meet the criteria in Category 1 of the France Good Practice Guide. OR
	• The Carmin Indigo or similar test indicates that mortality averages less than 4%.
Aspiring	Fishing from vessels meets the following criteria:
indicators	i) fishing is at slow speed (no more than 1.5 knots relative to water);
	ii) maximum haul duration no longer than 30 minutes;
	iii) mesh size of cod end no greater than 1mm;
	iv) rest of the net designed such that glass eels do not become trapped or abraded;
	v) vivier tank on board and in use;
	vi) fishermen maintain accurate daily records of mortality. OR
	• Fishermen can demonstrate that the mortality rate of the catch over the duration of holding in the storage facility is between 4% and 8% for each batch captured. OR







Criterion 2.5: The fishery has negligible impacts on by-catch species			
Weighting: 1			
Responsible indicators	 The fishery has a negligible impact on by-catch. By-catch is returned to the water alive as gently and rapidly as possible. 		
Aspiring indicators	 The fishery has low-level impacts on by-catch. By-catch is returned to the water alive as gently and rapidly as possible. 		
	No by-catch was observed during the audit. According to the fishermen, the by-catches are very small and can be elvers, juvenile sea bass, mullets, etc. The responsible criterion is therefore met.		
Score	Responsible		

Criterion 2.6: The fishery has negligible impacts on rare or other protected species

Weighting: 1	
Responsible indicators	The fishery has no direct interactions resulting in mortality or injuries with other species that are considered vulnerable, threatened, endangered or are protected under national or international law.
Aspiring indicators	Interactions, resulting in mortality or injury, with other species that are considered vulnerable, threatened, endangered, or are protected under national or international law, are rare and have no overall measurable impact on the population.
Discussion	No vulnerable, threatened or endangered species have been identified in the catches. All species are released very quickly. The criterion has therefore been met.
Score	Responsible





Criterion 2.7: The fishery has negligible impacts on habitats		
Weighting: 1		
Responsible indicators	The fishing gear does not cause any damage to the benthos.	
Aspiring indicators	Damage to the benthos by gear is limited or minimal.	
Discussion	Fishing for glass eel is carried out at a fixed station with no movement of fishing gear in the water. This criterion is therefore met.	
Score	Responsible	

Criterion 2.8: Transport		
Weighting: 1		
Responsible indicators	 The operator holds the relevant transport authorisations. 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 fishing form filled in at the end of the trip is the authorisation for transport in France. At the end of the fishing trip, the fishermen empty their catch into a plastic box. They transport this box to the lorry where the catch is weighed, generally without transferring the container (the tare is known). The eels are left in the open air for the time of transport between the port and the fisherman's fish tank. This transport time is generally short and during transport the eels are kept moist and cool (air temperature in winter). All fishermen operate with storage at home with a fish tank including an aerator. The fishmonger comes to collect the glass eels on average every 3-4 days. The criterion is therefore met.	
Score	Responsible	

Criterion 2.9: Bonus Score: Fishermen donate a proportion of their catch for a local positive contribution

Weighting: 1	
Responsible indicators	Fishermen have donated an average of at least 5% of their catch in the past 2 years to local stocking programmes, e.g. translocating over barriers to aid upstream migration and recruitment in the catchment, or have credible plans in place to do so next season (note that this is separate from any planned restocking to meet the 60% target).
Discussion	Not applied, but the fishers should consider how to do this by the next audit
Score	Not applicable







Summary scores for Component 2		
Not applicable	1	
Not met	0	
Aspiring	4	
Responsible	7	
Total possible	11	
% Responsibility (Responsible / Total possible)	64%	

