

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

Completed by
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Final

Reviewed and Approved by Certification Body:
David Bunt, 7 February 2022

1) Introduction

This document is the report of the audit of 12 January 2022 carried out for the Producer Organisation (PO) Estuaires concerning the application of the SEG (Sustainable Eel Group) specifications (version 6.0a, December 2019) with a view to certification. This assessment was carried out for components 1 and 4 of the standard.

The certification concerns the first storage site opened by the OP Estuaires, in Cordemais, France, called "SAS Estuaires". The storage site depends on the Estuaires Producer Organisation. The OP Estuaires is based in Les Sables d'Olonne and was created in 2013 by a group of glass eel fishermen from the Pays de la Loire region and also manages two other storage sites. SAS Estuaires has been SEG certified since 4 January 2019 (audit carried out by MacAlister-Elliott and Partners), so this year was the control audit. This audit should have taken place during the 2019-2020 season but due to the Covid-19 pandemic, SEG has allowed a delay in carrying out the control audit. SAS Estuaires buys glass eels from fishermen who are members of the OP Estuaires (all SEG-certified), but also from non-members in the framework of the French restocking.

2) The assessment

The assessor was Nicolas Belhamiti for Fish-Pass. The audit was carried out in the form of a discussion with Ms Durand on the site of the SAS Estuaires. A full site visit was carried out as well as an analysis of the traceability documents. Some tanks were in water with few elvers, the season being at the beginning.

3) Client Contact Details

| | |
|----------------------------|--|
| Client Contact Name | OP ESTUAIRES / COLLIAS ALEXANDRA – DURAND LAURIE |
| Client Address | 2, rue Colbert 85100 Les Sables d'Olonne |
| Client Email | op.estuaires@gmail.com |

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 | Aspiring | 1 | 0 |
| 1.4.2 Outgoing products | Responsible | 1 | 1 |
| 1.4.3 Record keeping and documentation | Responsible | 1 | 1 |
| 1.5 Biosecurity & welfare – | | | |
| 1.5.2 Eel buying & trading: Biosecurity is present and disease is treated rapidly and appropriate | Aspiring | 1 | 0 |
| 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 | 5 |
| Percentage Responsibility Score: 5/7 = | | 71% | |

Finding: For the generic requirements, the score obtained is 71%, leading to a responsible assessment.

| Component 4: Eel buying and trading | Auditor's findings | Weighting | Score |
|--|--------------------|------------|-------|
| 4.0 Segregation of certified and uncertified eels | Not met | 2 | 0 |
| 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 | Aspiring | 2 | 0 |
| 4.4 Water quality | Responsible | 1 | 1 |
| 4.5 Handling and welfare | Responsible | 1 | 1 |
| 4.6 Transport | Responsible | 1 | 1 |
| 4.7 The required percentage of glass eels is being used for restocking | Responsible | 2 | 2 |
| Total | | 12 | 6 |
| Percentage Responsibility Score: 6/12 = | | 50% | |

Finding: The SAS Estuaries storage site scored 50% and one criterion not met for component 4.

Summary of assessment and scoring

| Component | Not Met | Aspiring | Responsible |
|--|---------|----------|-------------|
| 1 | 0 | 2 | 5 |
| 4 | 2 | 4 | 6 |
| Total | 2 | 6 | 11 |
| Total Responsibility Score: = 11/19 | | | 58% |

Summary finding:

The SAS Estuaires storage site, with a score of 58% and one criterion not met, does not meet the criteria for SEG certification. Nevertheless, it would appear that the non-achieved criterion is due to a lack of traceability, which is planned to be corrected this year. In addition, it is also planned to correct the lack of traceability concerning daily mortality, which causes a loss of 4 points on the overall score of the present audit.

In view of this, we recommend issuing a provisional certificate for the time being and carrying out a segregation check between SEG and non-SEG batches for the current year before the start of the next season.

5) Recommendations:

1. With a total responsibility score of 58% and one criterion not met, SAS Estuaires did not reach the required level for a validation of the certificate following the control audit. However, in view of the elements provided and the planned improvements in traceability, a conditional certificate can be issued.
2. The OP should consider how to make a positive contribution to eel conservation projects (criteria 1.2) and to have implemented those by the time of the next assessment.
3. Regarding criterion 1.4.1 (incoming products): A possible mixing of SEG and non-SEG batches took place during the 2020-2021 season. In order to prove that this is not the case, care should be taken to document basin transfers when they take place.
4. Regarding criterion 1.4.2 (outgoing products), for the following seasons, an exit sheet should be set up for each batch and the mortality associated with the batches should be deducted or at least indicated on the exit or transport vouchers. This would allow for more complete and readable traceability. These improvements are already planned by the structure.
5. Concerning criterion 1.5.2: Biosecurity practices are good and daily monitoring is performed. However, until now, daily mortality was not recorded. It should therefore be properly recorded from this 2021-2022 season (improvement already planned by the structure).
6. The recommendations for criterion 4.0 (not met) are the same as for criterion 1.4.1. Namely, to make sure that traceability is carried out without loss of data that allows the mixing or not of SEG and non-SEG batches to be verified. This has already been considered by the structure and will be included in the new traceability for the 2021-2022 season.
7. Regarding criterion 4.2: In order to have a good knowledge of the mortality of each year of stocking, it will be necessary to set up a daily monitoring of the mortality (already planned by the structure). Also, fishermen have been asked to keep a mortality logbook at home. This will allow a more accurate analysis of mortality during the next audit.
8. Concerning criterion 4.3: During a transport for restocking in Germany, a mortality of 66 kg occurred due to lack of oxygen in some boxes. This was due to human error and should not be repeated.

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, enhanced monitoring is recommended, and the next audit should take place before the start of the next season in November 2022. This audit will only cover the control of the correct segregation between SEG and non SEG batches. This can be done remotely.

7) The Assessment

The tables below give the standard and a rationale for the scores given above. The score is highlighted in the appropriate colour.

| 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 | Since its establishment in 2013, the organisation has not been linked to any judicial investigations concerning eel fishing or trade. This criterion is therefore met. |
| 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 | N/A |
| Score | N/A |

| 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>Over the last three seasons, the majority of glass eels have been purchased from SEG fishermen. In 2018-2019 the share of SEG glass eels was 66%, in 2019-2020 100% of the glass eels purchased were SEG and in 2020-2021 82% of the glass eels were SEG.</p> <p>In 2018-2019 some end-of-season orders required purchase from non-SEG fishermen but apart from that, SAS Estuaires only buys glass eels from its members, all of whom are SEG. The rate is not always 100% because, during the French restocking, the structure is sometimes obliged to take glass eels from certain non-SEG fishermen and, in this case, the entire French restocking order is considered as non-SEG.</p> <p>The responsibility criterion is met.</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 fishermen who are members of the structure use the remote declaration and purchases are declared via Visiomer.</p> <p>For the 2019-2020 season, all glass eels were SEG so there was no segregation to be made between SEG and non-SEG.</p> <p>For the 2020-2021 season, part of the French restocking batch was purchased from non-SEG fishermen. The stocking period for the French restocking overlaps with other orders from SAS Estuaires. A study of the distribution of these orders and the French restocking in the basins was carried out and it was noted that there was a possible mixing of batches in certain basins. After discussion with Mrs Durand, it seems that the tanks have been emptied and cleaned to receive the French restocking and avoid any mixing of batches. However, there is no documentation to confirm this and therefore mixing of SEG and non-SEG fish is possible.</p> |

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| | <p>The share of certified and non-certified glass eels entering the organisation is identical to that which emerges from the organisation.</p> <p>This criterion is therefore aspiring and in future it will be necessary to trace the transfers of pools to prove that there is no mixing of batches between the usual orders and the French restocking.</p> |
| Score | Aspiring |

1.4.2: Traceability - Outgoing product

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|-------------------------------|--|
| 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: <ul style="list-style-type: none"> • 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): <ul style="list-style-type: none"> • 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>Sales are declared to the administration by the OP Estuaires for all storage sites. For sales in France, the remote declaration on Visiomer is made and for sales abroad the TRACES (TRAdE Control and Expert System) remote procedure is used. In all cases, a delivery note with the batch number and the quantity in weight (kg) of glass eels is issued and associated with the fishing sheets corresponding to the batch.</p> <p>The exit of the batches is done and traceable, but the system could be improved. For the moment it consists of a simple Excel file but there is no specific sheet for each batch output. Moreover, the weight of the batch is always the same between entry and exit. However, given the mortality occurring in the ponds, the exit voucher should have a lower weight by subtracting the mortality quantified on the batch. The new forms created for the 2021-2022 season will allow better traceability.</p> <p>For the 2020-2021 season, there is a slight positive difference (+0.18%) between entries and exits. This is due to rounding differences on several batches.</p> <p>The batch codes are well indicated as well as the names and SEG numbers of each fisherman who contributed to the batch.</p> <p>In view of these elements, it is possible to consider this criterion as responsible.</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 eels 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>The SAS estuaries was opened in the 2018-2019 season and paper documentation is available for all seasons. All documents are scanned and stored.</p> <p>The fishing sheets and all the product traceability data are kept in well-organised files, and it is easy to find the information and reconstruct the origin and weight of the glass eels making up the batch.</p> <p>The purchase of glass eels is tele-declared on the FranceAgrimer website (Visiomer) in accordance with French legislation.</p> <p>Thus, this criterion can be considered as responsible.</p> |
| 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 | <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 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 | <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. |

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|-------------------|---|
| | <ul style="list-style-type: none"> Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility. |
| Discussion | <p>The facility has all the necessary permits. The sanitary approval number is FR44045017CE The only chemical product used is AGRIGERM 1510, a universal disinfectant. A biosecurity plan is posted on the wall in the glass eel storage area. It is clear and makes it possible to know how to proceed. The tanks are monitored daily and each time dead glass eels are removed; the temperature and oxygen are taken in one or two tanks. This is recorded on a sheet available in the offices above the fish tank. The other physico-chemical parameters are not monitored but a visual check is made every day. Daily mortality is not currently recorded (this is planned to be done from the 2021-2022 season). A minimum of 1/3 water renewal is conducted every day for each pond. If necessary, a change of tank is conducted. In the event of a basin emptying, a new form has been created to record the washing of the basin. The practices outlined are in line with the SEG standard and regular monitoring of the ponds is conducted. The monitoring that will be conducted from the current season onwards theoretically achieves the responsibility criteria. However, the documentation of the last two seasons does not allow us to know the daily mortality. This discrepancy will be corrected, but for the moment only the aspiring criterion has been reached.</p> |
| Score | Aspiring |

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| 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 | <p>Each batch of glass eels for restocking is systematically tested. Last year, the test revealed two positive EVEX out of the 6 tested. After consultation with the project leader of the restocking (COREPEM), positive tests are increasingly frequent but do not block the restocking operations because the sector where the glass eels are dumped is not free of this disease. Thus, as everything is done in accordance with the rules and the result of the tests does not affect the restocking operations, we consider this criterion to be responsible.</p> |
| Score | Responsible |

| Summary scores for component 1 | |
|---------------------------------------|---|
| Not Met | 0 |
| Not applicable | 1 |
| Aspiring | 2 |
| Responsible | 5 |

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|--|------------|
| Total possible | 7 |
| % Responsibility (Responsible / Total possible) | 71% |

| 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 | <p>For the 2020-2021 season, part of the French restocking batch has been purchased from non-SEG fishermen. The storage period for the French restocking overlaps with other orders from SAS Estuaires. A study of the distribution of these orders and the French restocking in the basins was carried out and it was noted that there was a possible mixing of batches in certain basins.</p> <p>After discussion with Mrs Durand, it seems that the ponds have been emptied and cleaned to accommodate the French restocking and avoid any mixing of batches. However, there is no documentation to confirm this and therefore mixing of SEG and non-SEG fish is possible. This constitutes a serious non-compliance. This non-compliance should not be repeated and the segregation of batches should be checked for the 2021-2022 season.</p> |
| Score | Not met |

| 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 44045017CE. |
| 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 | As mortality has not been regularly monitored and recorded in recent seasons, it is difficult to calculate mortality within the storage site. However, one rendering was carried out at the end of the season last year. A priori, this corresponds to the cumulative mortality of the last |

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| | <p>three seasons. If this is the case, the average mortality over the last three seasons would be 1.9%. If we relate the cull weight to the 2020-2021 season, this gives a mortality of 4%.</p> <p>In the absence of regular and recorded monitoring we cannot exclude that the rendering corresponds only to the last fishing season.</p> <p>Furthermore, most fishermen store their fish in a fish tank for a minimum of 48 hours before delivering them to the storage centre. The study by Le Roux and Guigue (2002) showed that it is during the period of 2 to 3 days after fishing that the main mortalities are observed. We therefore recommend that each fisherman keep a mortality logbook that can be linked to a quantity of glass eels caught and to a defined period (e.g., one or more fishing sheets). The mortality logbooks should be presented at the next audit. Mortality can thus be assessed over the entire stocking period.</p> <p>Considering all these elements, the awareness criterion is met. Daily monitoring of mortality is planned and fishermen have been asked to keep a mortality logbook at home. This will allow a more accurate analysis of mortality during the next audit.</p> |
| Score | Aspiring |

| Criterion 4.3: Mortality during transport and initial holding if transported to farm | |
|---|---|
| Weighting: 2 | |
| Responsible indicators | <ul style="list-style-type: none"> 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 | <ul style="list-style-type: none"> 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 | <p>When delivered for restocking in Germany, there was a mortality of 66 kg for an order of 375 kg. This is 17.6% and far in excess of the rates required by the SEG. However, this was due to human error. During the packing process, it seems that the operator in charge of injecting oxygen into the boxes did not realise that the oxygen cylinder was empty. As a result, many boxes left without pure oxygen added inside.</p> <p>The auditor contacted several of SAS Estuaires' customers and received feedback from a farm that does grow-out. On the batch purchased in 2020-2021, the cumulative mortality from transport and the first week on the farm was 2.6%.</p> <p>The structure only buys SEG-certified glass eels (apart from the special case of French restocking).</p> <p>In view of these elements and despite the very high mortality on one order due to human error, we consider this criterion as aspiring.</p> |
| Score | Aspiring |

| Criterion 4.4: 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). |

| | |
|----------------------------|---|
| | <ul style="list-style-type: none"> • 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 | <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). • The facility has a minimum of a back-up generator and oxygen supply. |
| Discussion | <p>The water used is drinking water. When a new tank is put in the water, it is waited 24 hours before placing glass eels in it. More exceptionally, the tank is put in the water in the morning for delivery by the fishermen in the afternoon.</p> <p>In each tank there is a probe to measure the oxygen level and the temperature. Oxygenation of the ponds is done by adding air under pressure continuously. If the safety threshold is exceeded (less than 60% oxygen saturation), electrovalves are activated and oxygen is automatically added. The water temperature is regulated by the outside air, whose temperature is kept constant. An alarm is triggered and warns fishermen if oxygen falls below 60% or up to 120% and if the water temperature reaches the thresholds of 5°C or 10°C.</p> <p>The oxygen and temperature conditions are automatically recorded on a computer server. The history of these conditions can be consulted per pool on a computer.</p> <p>The pools are also visually monitored on a daily basis and the water is renewed as required. An emergency generator is present and takes over automatically in case of a power cut.</p> |
| Score | Responsible |

Criterion 4.5: Handling and welfare

Weighting: 1

| | |
|-------------------------------|---|
| Responsible indicators | <ul style="list-style-type: none"> • 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 | <ul style="list-style-type: none"> • 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 | <p>The installation has been designed to minimise fish handling.</p> <p>Fine mesh screens are present in the tanks to prevent them from being sucked in by the water circulation.</p> <p>When buying elvers, a stainless-steel cone is used to drain the elvers.</p> <p>It is intended that the glass eels are taken out of the pond only to package them for sale. However, there may be a change of tank if the physico-chemical conditions have deteriorated or exceptionally to separate SEG and non-SEG batches.</p> <p>When glass eels are handled, two different systems are used:</p> <ul style="list-style-type: none"> - When a sale leaves in a fish tanker, the drain valve of the tank is used. The tanks have a slight slope and when the valve is opened, the water and glass eels are discharged through |

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| | <p>a gutter which is extended by a pipe. This pipe reaches a fine mesh screen and the glass eels are then weighed before being placed in the fish tanker.</p> <p>- When transported in polystyrene boxes. In this case, the glass eels are taken directly from the tanks with a fine mesh net and placed in the polystyrene box. This avoids double handling, first through the sieve and then from the sieve into the polystyrene box.</p> <p>A written protocol has been created for the 2021-2022 season for the proper handling of glass eels, from arrival in the storage centre to exit from the basins for sale.</p> <p>The transport truck can be parked a few metres from the ponds.</p> <p>The practices are good and documented, so this criterion is considered responsible.</p> |
| Score | Responsible |

| Criterion 4.6: Transport | |
|---------------------------------|---|
| Weighting: 1 | |
| Responsible indicators | <ul style="list-style-type: none"> • 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 | <p>This structure does not deliver live fish itself. Either the customer picks up the glass eels or they use an approved transporter.</p> <p>In case of delivery to France, a Delivery Note is issued. In case of sales abroad, the teleprocedure TRACES (TRAdE Control and Expert System) is used.</p> <p>Packaging is carried out in polystyrene crates with a maximum load of 5kg, distributed on 3 trays. A bottle of frozen water is placed inside the case, without touching the fish. The elvers are kept wet and oxygen is added before closing the box. The box is then sealed with adhesive tape at the joint between the lid and the box.</p> <p>The criterion is therefore met.</p> |
| Score | Responsible |

| Criterion 4.7: The required percentage of glass eels is being used for restocking | |
|--|---|
| Weighting: 2 | |
| Responsible indicators | <ul style="list-style-type: none"> • 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. • The eels for restocking are representative of the stock – slow growers are not selected. |
| Aspiring indicators | <ul style="list-style-type: none"> • The buyer can provide documented evidence that <u>they 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 re-stocking will occur in the forthcoming season. • The eels for restocking are representative of the stock – slow growers are not selected. |
| Discussion | For the 2020-2021 season, 64% of glass eels were sold for restocking. |

| | |
|--------------|---|
| | <p>For the 2019-2022 season, 58% of glass eels were sold for restocking. For the 2018-2019 season, 74% of glass eels were sold for restocking. On average over the last 3 years, 64% of glass eels were bought and sold for restocking. Thus, this criterion is met.</p> |
| Score | Responsible |

| Summary scores for component 4 | |
|--|------------|
| Not Met | 2 |
| Aspiring | 4 |
| Responsible | 6 |
| Total possible | 12 |
| % Responsibility (Responsible / Total possible) | 50% |