



## Sustainable Eel Group (SEG) Standard Assessment

### Aquacultuur Groesbeek

Assessment against:

- **Component 1:** Core requirements.
- Component 4: Eel buying and trading.
- **Component 5:** Eel farming.

<b>Completed by:</b>	<b>On-Site Visit:</b>	<b>Report date:</b>
Andres Fellenberg van der Molen	25 November 2021	20 December 2021
Reviewed and approved by:	<b>Mr. David Bunt</b> Sustainable Eel Group	Certification Body 26 May 2022

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 Aquacultuur Groesbeek. This assessment has been conducted against Components 1, 4 & 5 of the standard.

The assessment is of a farming and trade of Eel located at St. Jansberg 4, 6562 KD, Groesbeek, The Netherlands.



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#### 1. Introduction

Groesbeek is a town and former municipality in the province of Gelderland, the Netherlands. In January 2015, the former municipality merged with Millingen aan de Rijn and Ubbergen. The larger area was known as Groesbeek until January 2016, when its name was changed to Berg en Dal. The Groesbeek valley was carved out by glaciers during the Saale glacial, marking the southernmost expansion of ice-age glaciers in the Netherlands. The hills surrounding the valley in which Groesbeek lies are technically the terminal moraines of those glaciers. Still, in contrast to the central and eastern Netherlands hills, these hills are rising by 0.5-0.8 mm/year due to tectonic uplift.

Because of much better infrastructure, modern Groesbeek has transformed from a small village dependent on agriculture and forestry into a sprawling commuter town near Nijmegen. The town itself is surrounded by hills and forests, including a three-kilometre wide band of woodlands, Dekkerswald, separating it from Heilig Landstichting and Nijmegen proper. In the last decade, a viniculture industry has sprung up in Groesbeek, making the area the northernmost vinicultural centre in Europe, and the only such area in the Netherlands, owing to the highly fertile loess soil, generally warmer summers, and new variations of grapes which do better in the humid climate.

In the hilly landscape of Groesbeek, you will find eel farm Aquacultuur Groesbeek. Harm Wijnhoven, Tom Wijnhoven and their father Hemmie Wijnhoven are the proud owners. The Wijnhoven family has been farming eels on a responsible way since 1996. The farm has been designed from the beginning as an eel farm, considering all aspects of optimisation, sustainability and a minimum possible negative impact on the local ecological system and environment. The farm has a sophisticated heat pump system and electronic monitoring system with many sensors to cover every element of the farm. The farm produces its own oxygen and has minimal effluent discharge with water samples taken every 50 minutes and regularly tested by the local authorities.







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#### 2. The assessment

The assessor was Andres Fellenberg Van der Molen from Green Partner Audits & Consultancy B.V, who visited Aquacultuur Groesbeek on 18<sup>th</sup> of November 2021. The audit included the interview with Mr Harm Wijnhoven.

#### **2.1 Client Contact Details**

Client Contact Name	Harm Wijnhoven   Owner   Aquacultuur Groesbeek		
Client Address	St. Jansberg 4, 6562 KD, Groesbeek, The Netherlands		
Client Email			
<b>Client Phone Number</b>			

#### 3. Results of the assessment

The outcome of this assessment is as follows;

Compor	nent 1: 0	General Requirements	Auditor's findings	Weighting	Score
1.1	Comm	itment to Legality	Responsible	1	1
1.2	<b>1.2</b> Contribution to eel conservation projects		Responsible	1	1
<b>1.3</b> The facility trades in certified responsibly sourced eels		Aspiring	1	0	
1.4	Tracea	bility			
	1.4.1	Incoming products, separation and segregation	Responsible	1	1
	1.4.2	Outgoing products	Aspiring	1	0
	1.4.3	Record keeping and documentation	Responsible	1	1
1.5	Biosec	urity & welfare			
	1.5.1	Eel Fishing	Not Applicable	0	0
	1.5.2	Eel buying & trading	Responsible	1	1
	1.5.3	Eel farming	Responsible	1	1
	1.5.4	Restocking	Responsible	1	1
	1.5.5	Wholesale / Retail / Processing	Not Applicable	0	0
			Total	9	7/9
		Percentage	e Responsibility Score	78	%

Compoi	nent 4: Eel buying and trading.	Auditor's findings	Weighting	Score
4.0	Segregation of certified and uncertified Eel	Not met	2	0
4.1	The Glass Eel holding facility is a registered Aquaculture Production Business	Responsible	2	2
4.2	Mortality in storage facility	Responsible	2	2
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	Not Applicable	0	0
		Total	11	7/11
	Percentage	e Responsibility Score	64	%

Compor	nent 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	<b>5.6</b> Grading, slaughter and transportation are carried out with respect to welfare		Responsible	1	1
5.7	5.7 The farm provides Eel for restocking		Responsible	1	1
5.8	<b>5.8</b> Eels for restocking are not graded out slow-growers		Responsible	1	1
			Total	12	12/12
Percentage Responsibility Score		10	00%		
Summa	ary of assessment and scoring				
	Component	Aspiring	R	Responsible	
	1	2		7	
	4	4		7	
	5	0	12		
	Total	0	26		
То	otal Responsibility Score		26/32 = 81%		,

#### 4. Auditor conclusions

- **Component 1 General Requirements:** Aquacultuur Groesbeek has scored 78% for Component 1; it should be considered **RESPONSIBLE** under the SEG standard.
- **Component 4 Eel buying and trading:** Aquacultuur Groesbeek has scored 64% for Component 4; it should be considered **RESPONSIBLE** under the SEG standard.
- **Component 5 Eel farming:** Aquacultuur Groesbeek has scored 100% for Component 5; it should be considered **RESPONSIBLE** under the SEG standard.
- With an overall Responsibility score of 81%, Aquacultuur Groesbeek can be considered as **RESPONSIBLE** under the SEG standard and suitable for certification.

#### 5. Recommendations:





#### 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 Su	irveillance
			V	/ear 4

	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

Andres Fellenberg Van der Molen Accredited SEG Assessor





#### 7. The Assesment

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

component I -	Generic requirements
Criterion 1.1: C	ommitment to legality
Responsible	For at least the past two years: the organisation has not been found guilty for any offences relating
indicators	to eel fishing or trading.
Aspiring	For at least the past 12 months: the organisation has not been found guilty for any offences relating
indicators	to eel fishing or trading.
Discussion	At the time of the assessment, the company declared that there had been no legal proceeding
	against the company under the evaluation in the past two years. There were no ongoing
Score	Responsible
Critorion 1 2: C	nesponsible
Criterion 1.2. C	The experientian devetes at least 2% of its medits on at least 20% of its sements menoweikility
Responsible	The organisation donates at least 2% of its profits or at least 20% of its corporate responsibility
mulcators	enhancement such as Fel Stewardshin Funds River Restoration projects conservation and
	education projects.
Aspiring	The organisation donates 1 – 1.99% of its profits or 10 - 20% of its corporate responsibility
indicators	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 in a range of 5-7%. This is a yearly contribution. Once a
	month, it is reported to DUPAN how much has been sold. €0.50 per kgs of round eels are then paid to
<b>6</b>	DUPAN. Refer to evidence 1:1:1
Score	
Criterion 1.3: 1	ne organisation trades in certified responsibly sourced Eel
Responsible	The organisation trades in at least 50% (by number) of certified responsibly sourced Fel and has the
to all a stand	The organisation trades in at least 50% (by number) of certified responsibly sourced Lerand has the
indicators Accertains	documentation to demonstrate that.
indicators Aspiring indicators	documentation to demonstrate that. The organisation trades in 10 – 49.9% (by number) of certified responsibly sourced Eel and has the documentation to demonstrate that
indicators Aspiring indicators Discussion	documentation trades in 10 – 49.9% (by number) of certified responsibly sourced Eel and has the documentation to demonstrate that.
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indicators Aspiring indicators Discussion	documentation to demonstrate that. The organisation trades in 10 – 49.9% (by number) of certified responsibly sourced Eel and has the documentation to demonstrate that.
indicators Aspiring indicators Discussion	Interview       Interview
indicators Aspiring indicators Discussion	documentation to demonstrate that.         The organisation trades in 10 – 49.9% (by number) of certified responsibly sourced Eel and has the documentation to demonstrate that.
indicators Aspiring indicators Discussion	documentation to demonstrate that.         The organisation trades in 10 – 49.9% (by number) of certified responsibly sourced Eel and has the documentation to demonstrate that.
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indicators Aspiring indicators Discussion	documentation to demonstrate that. The organisation trades in 10 – 49.9% (by number) of certified responsibly sourced Eel and has the documentation to demonstrate that.
indicators Aspiring indicators Discussion	Interview       Interview





Criterion 1.4: T	raceability
1.4.1: Traceabil	ity - Incoming product, separation and segregation
Responsible indicators	<ul> <li>Certified and uncertified eel products can be clearly and easily traced back to their source.</li> <li>Where a fishery or buyer, an electronic tele-declaration system is used</li> <li>It operates a clear system which ensures that the product remains separated at all stages from arrival to dispatch from non-certified eel products.</li> <li>The organisation ensures that any products wishing to make a claim as certified do not contain any non-certified eel-based ingredients.</li> </ul>
	<ul> <li>If resolved through mass- or number- balance calculations, the margin of error does not exceed 2%</li> </ul>
Aspiring indicators	<ul> <li>Certified and uncertified eel products can be traced back to their source.</li> <li>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</li> <li>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</li> <li>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</li> </ul>
Discussion	The farm has an effective control system to avoid mixing suppliers. Each 2020 batch is identified in a "LOT" assigned a specific traceability number. There are digital records and appropriate documentation. According to Dutch regulations, the eels can be traced for up to seven years through documentation. It should be noted that the batches still contain eels that do not come from a reliable source, as even the two suppliers that are SEG certified have not yet been able to reach a 100% level. <i>Refer to Criterion 1.3</i> <i>Befer to Evidence 1:1</i>
Score	Responsible
1.4.2: Traceabil	ity - Outgoing product
Responsible indicators	<ul> <li>Where a fishery or buyer, an electronic tele-declaration system is used</li> <li>Documentation is well maintained with a maximum of 2% error in the following:</li> <li>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</li> <li>All product to be sold as certified by an organisation is accompanied by an invoice which meets the following criteria: <ul> <li>Includes an appropriate batch code</li> </ul> </li> </ul>
Acroiving	- Includes a record of the quantity (no. & weight) of product and to whom it was sold
Aspiring indicators	<ul> <li>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):</li> <li>The organisation correctly uses batch-coding for labelling certified product, which can be on the</li> </ul>
	<ul> <li>packaging for the product, or included in the documentation (e.g. invoice) with the assignment</li> <li>All products to be sold as certified by an organisation are accompanied by an invoice which meets the following criteria: <ul> <li>Includes an appropriate batch code</li> <li>Includes a record of the quantity (no. &amp; weight) of product and to whom it was sold</li> </ul> </li> </ul>
Discussion	Aquacultuur Groesbeek 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. One of the two suppliers of Aquacultuur Groesbeek delivers complete documentation per batch, including the INTRA code and full traceability from the catch of the glass eel, including the names of the fishers and their boats and the original signed documentation.





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Score	Aspiring
1.4.3: Traceabi	lity - Record keeping and documentation
Responsible indicators	<ul> <li>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</li> <li>If a fisherman or buyer, a tele-declaration system is used to report catches and trade</li> <li>The organisation operates a system that also allows for the completion of a batch reconciliation of eel product by weight over a given period.</li> <li>The organisation maintains records for a minimum of three (3) years.</li> </ul>
Aspiring	The above requirements are met except that:
indicators	<ul> <li>Records have been maintained for less than three (3) years</li> <li>If a fisherman or trader, a tele-declaration system is planned to be used to report catches and trade in the next season</li> </ul>
Discussion	Aquacultuur Groesbeek keeps records for seven years to date, following Dutch regulations. The batch numbering of the supplier also accompanies eels received from an SEG source. The growth of fish is monitored regularly, and therefore the weight of fish within separate systems is monitored closely. Each sale of live 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
	registers. Considering the records and on-site evidence, Aquacultuur Groesbeek has solid record- keeping, documentation, and internal traceability in place. <i>Refer to Evidence 1:4</i>
Score	registers. Considering the records and on-site evidence, Aquacultuur Groesbeek has solid record- keeping, documentation, and internal traceability in place. <i>Refer to Evidence 1:4</i> <b>Responsible</b>
Score Criterion 1.5: B and alien specie	registers. Considering the records and on-site evidence, Aquacultuur Groesbeek has solid record- keeping, documentation, and internal traceability in place. <i>Refer to Evidence 1:4</i> <b>Responsible</b> Siosecurity & welfare – Eel and eel products are provided with minimal risk of diseases, parasites as
Score Criterion 1.5: B and alien specie 1.5.2: Eel buyir	registers. Considering the records and on-site evidence, Aquacultuur Groesbeek has solid record- keeping, documentation, and internal traceability in place. <i>Refer to Evidence 1:4</i> <b>Responsible</b> Siosecurity & welfare – Eel and eel products are provided with minimal risk of diseases, parasites as
Score Criterion 1.5: B and alien specie 1.5.2: Eel buyin Responsible indicators	<ul> <li>registers. Considering the records and on-site evidence, Aquacultuur Groesbeek has solid record-keeping, documentation, and internal traceability in place.</li> <li><i>Refer to Evidence 1:4</i></li> <li><b>Responsible</b></li> <li><b>Biosecurity &amp; welfare – Eel and eel products are provided with minimal risk of diseases, parasites</b></li> <li><b>res &amp; trading: Biosecurity is present and disease is treated rapidly and appropriately</b></li> <li>The use of chemicals follows legal requirements of the appropriate EU regulations and of the country concerned.</li> <li>The facility has the appropriate permissions to operate from the relevant licensing authority</li> <li>An effective and documented biosecurity plan is in place and there is evidence that it is being followed.</li> <li>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.</li> <li>Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility.</li> </ul>
Score Criterion 1.5: E and alien specie 1.5.2: Eel buyin Responsible indicators	<ul> <li>registers. Considering the records and on-site evidence, Aquacultuur Groesbeek has solid record-keeping, documentation, and internal traceability in place.</li> <li><i>Refer to Evidence 1:4</i></li> <li><b>Responsible</b></li> <li><b>Responsible</b></li> <li><b>Biosecurity &amp; welfare – Eel and eel products are provided with minimal risk of diseases, parasites</b></li> <li><b>Biosecurity is present and disease is treated rapidly and appropriately</b></li> <li>The use of chemicals follows legal requirements of the appropriate EU regulations and of the country concerned.</li> <li>The facility has the appropriate permissions to operate from the relevant licensing authority</li> <li>An effective and documented biosecurity plan is in place and there is evidence that it is being followed.</li> <li>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.</li> <li>Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility.</li> <li>The use of chemicals follows legal requirements of the appropriate EU regulations and of the</li> </ul>





Discussion	The volume of chemicals used is so small that the effect on the water quality is virtually non-existent. There are suitable biosecurity measures in place. No outside personnel are allowed onto the premises. Aquacultuur Groesbeek 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 fishery products. The company holds permits issued by the Dutch Food Standards Agency under number 206947. Aquacultuur Groesbeek has eliminated almost all use of medication and has focused on maintaining the health of the eels by guaranteeing an excellent level of water quality. Eels arriving at the facility are placed in separate systems from eels already present as a form of quarantine. The facility usually uses pH as a form of controlling disease outbreaks. In the remote case, that medication is required for the eels; this is defined via veterinary approval. <i>Refer to Evidence 1:4:1</i>
Score	Responsible
1.5.3: Eel farm	ing: Biosecurity is present, and disease is treated rapidly and appropriately
Responsible	<ul> <li>The facility has the appropriate permissions to operate from the relevant authority.</li> <li>The use of chamicals follows legal requirements of the FU and of the country concerned.</li> </ul>
mulcators	<ul> <li>The use of chemicals follows legal requirements of the EO and of the country concerned</li> <li>An effective and documented biosecurity plan is in place and there is evidence that it is being followed</li> </ul>
	<ul> <li>Daily records are available showing monitoring of fish health and signs of stress and daily mortality is recorded</li> </ul>
	• Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility
	<ul> <li>UV is used at an appropriate level and separation between tanks</li> </ul>
Aspiring indicators	<ul> <li>The facility has the appropriate permissions to operate from the relevant licensing authority</li> <li>The use of chemicals follows legal requirements of the EU and of the country concerned.</li> <li>An effective and documented biosecurity plan is in place and there is evidence that it is being followed.</li> </ul>
	<ul> <li>Eels are regularly inspected for disease (although this may not be documented) and daily mortality is recorded.</li> </ul>
	<ul> <li>Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility.</li> </ul>
Discussion	Aquacultuur Groesbeek is listed by the Public register of Authorised aquaculture production businesses number 206947, following the regulations of Article 6 of Directive 2006/88/EC implemented in Article 2.2.1 of the Dutch aquaculture Regulation, updated in April 2020. The company has eliminated almost 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. Aquacultuur Groesbeek does not have a UV system on-site, and the level of water quality used was on-site controlled during this 2021 audit. The nursery water does not contain any artificial additives. All water used in the nursery passes through a recirculation system. This means that all the water used is reused. This ensures extremely low energy consumption. The water in the tank is renewed constantly. The water passes through a filtration system and then returns to the tanks. Waste goes to the farm's own water purification system. In addition, there are all kinds of heat exchangers and all the water disappears into the sewage system. In addition, there are all kinds of heat exchangers and all the waste heat is recovered. <i>Refer to Evidence 4:3</i>
Score	Responsible





1.5.4: Restocki minimal	ng: The risk of restocked eels introducing disease into wild populations has been assessed and is		
Responsible	Eels are tested before restocking and found to be free of disease AND/OR eels are from a known		
indicators	source which is tested on at least an annual basis and known to be free of disease.		
Aspiring	Eels are tested before restocking when first sourced from a new area, and periodically (at least		
indicators	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 control before they leave the premises. Mr. Wijnhoven directly controls this process, and without his supervision, the eels do not leave the company. The company provides all documentation requested by customers and authorities in the international market appropriately. In all cases, it is always the intention of the company to deliver eels that are free of disease in all instances. Considering that the eels come partially from a known source already controlled by SEG, it is possible to establish their traceability in case of sickness.		
Score	Responsible		
Component 4 - Eel buying and trading			
Criterion 4.0: S	egregation of certified and uncertified eels		
Weighting: 2			
Responsible	Certified and non-certified are kept separated, from point of collection through holding to sale and		
indicators	onward transport		
No Aspiring			
indicators			

Criterion 4.1: 1	The Glass Eel holding facility is a registered Aquaculture Production Business
Weighting: 1	
Responsible	The Glass Eel holding facility is a registered Aquaculture Production Business
indicators	
Aspiring	The facility is not a registered Aquaculture Production Business, but has credible plans to register
indicators	within the next 6 months
Discussion	Aquacultuur Groesbeek is a company registered under the chamber of commerce of The Netherlands number 09195475, and aquaculture authorities NVWA under number 206947, which establishes its registration as a fish processor under SBI number code 1020 following the policy and regulations set by the national and EU Common Fisheries Policy (CFP) and rules for aquaculture. <i>Refer to Evidence 1:4:1</i>
<u> </u>	
Score	Responsible
Score Criterion 4.2:	Responsible Mortality in storage facility
Criterion 4.2: 1 Weighting: 2	Responsible Mortality in storage facility
Criterion 4.2: 1 Weighting: 2 Responsible	Responsible Mortality in storage facility Mortality rate over the season is less than 2% on average.
ScoreCriterion 4.2:Weighting: 2Responsibleindicators	Responsible         Mortality in storage facility         Mortality rate over the season is less than 2% on average.
Score Criterion 4.2: 1 Weighting: 2 Responsible indicators Aspiring	Responsible         Mortality in storage facility         Mortality rate over the season is less than 2% on average.         Mortality rate over the season is less than or equal to 5% on average but greater than or equal to
ScoreCriterion 4.2:Weighting: 2ResponsibleindicatorsAspiringindicators	Responsible         Mortality in storage facility         Mortality rate over the season is less than 2% on average.         Mortality rate over the season is less than or equal to 5% on average but greater than or equal to 2%
ScoreCriterion 4.2:IWeighting: 2ResponsibleindicatorsAspiringindicatorsDiscussion	Responsible         Mortality in storage facility         Mortality rate over the season is less than 2% on average.         Mortality rate over the season is less than or equal to 5% on average but greater than or equal to 2%         According to the information and evidence provided by Mr. Wijnhoven revised on-site, mortality is
ScoreCriterion 4.2:IWeighting: 2ResponsibleindicatorsAspiringindicatorsDiscussion	Responsible         Mortality in storage facility         Mortality rate over the season is less than 2% on average.         Mortality rate over the season is less than or equal to 5% on average but greater than or equal to 2%         According to the information and evidence provided by Mr. Wijnhoven revised on-site, mortality is 1.52% in 2020, presenting an effective form of control.
ScoreCriterion 4.2:Weighting: 2ResponsibleindicatorsAspiringindicatorsDiscussion	Responsible         Mortality in storage facility         Mortality rate over the season is less than 2% on average.         Mortality rate over the season is less than or equal to 5% on average but greater than or equal to 2%         According to the information and evidence provided by Mr. Wijnhoven revised on-site, mortality is 1.52% in 2020, presenting an effective form of control.         Refer to Evidence 4:2





Criterion 4.3: Mortality during transport and initial holding if transported to farm						
Weighting: 2						
Responsible	Buyers source at least 90% of their eels from certified suppliers OR					
indicators	Mortality during transport and for the first week at the farm is less than 2% on average					
Aspiring	Buyers source 50% - 89.9% of their eels from certified suppliers OR					
indicators	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.					
	but greater than or equal to 2% on average.					
Criterion 4.4: W	/ater quality					
Weighting: 1						
Responsible	A system is in place that is expected to keep key water quality parameters within suitable tolerances					
indicators	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					
	retecting operates a backup system to ensure that water quality will not adversely affect survival					
Acpiring	A system is in place that is expected to keep key water sublity representers within switchle to be a set					
Aspiring	for healthy colouriyal (o.g. Ammonia, Suspended Solids, pH, ovygen)					
mulcators	The facility has a minimum of a backun generator and oxygen supply					
Discussion	Water quality plays an essential role at Aquacultuur Groesbeek, as water control has made it possible					
Discussion	to eliminate diseases and avoid supplying the eels with medicines.					
	The water is coming from a deep well of 200 metres, and it is constantly monitored. Ammonia solids					
	pH, and oxygen levels are checked regularly.					
	Aquacultuur Groesbeek has the appropriate permits related to groundwater rights. The company					
	employ effective systems of filtration, resulting in clean breeding water. All water used in the nursery					
	passes through a recirculation system. This means that all the water used is reused. This ensures low					
	energy consumption.					
	Refer to Evidence 4:3					
Score	Responsible					
Criterion 4.5: H	andling and welfare					
Weighting: 1						
Responsible	Systems are in place and the facility is designed to keep handling to an absolute minimum					
indicators	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	The facility may not be optimally designed, but systems are in place to avoid handling as much as					
indicators	Handling, where personally is carefully planned and executed					
	The infractructure has been ontimised as far as possible to avoid injuries					
	Nets are small-mesh (1mm maximum)					
	Fels are moved without being allowed to dry out					
Discussion	Aguacultuur Groesbeek facilities are optimised as much as possible to avoid handling to prevent					
	injuries. The auditor checked the entire handling without presenting substantial evidence of handling					
	and eel welfare deficiencies.					
	Refer to Evidence 4:4					
Score	Responsible					





Criterion 4.6: Tr	ansport
Weighting: 1	
Responsible	There is a Transport Plan in place to minimise travel time – this meets the Transport requirements
indicators	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	Aquacultuur Groesbeek transport process from aquaculture to customers is minimum. Customers
	usually come with their own vehicles to pick up the Eel. Aquacultuur Groesbeek makes it easy for
	them to load the vehicles most efficiently and effectively without damaging the eels welfare. Handling
	is minimum, minimising time and stress. The client's vehicles are equipped with appropriate systems
	following all Dutch and European regulations in this matter.
	Refer to evidence 4:4
Score	Responsible
Criterion 4.7: T	he required percentage of glass eels is being used for restocking
Weighting: 2	
Responsible	The buyer can provide documented evidence that they have sold at least 60% for restocking the
indicators	required target percentage of its glass eels from the last season for the primary purpose of
Acmiring	Conservation / escapement.
Aspiring	The buyer can provide documented evidence that they <u>have reserved or made available at least 60%</u>
mulcators	or the required target percentage of its glass eets from the latest season available for the primary
	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	Aquacultuur Groesbeek has sufficient evidence to demonstrate that Fel has been sold for the primary
Discussion	purpose of conservation/escapement. This evidence is shown in the source document with the
	respective INTRA codes and documentation. All Eel sold for restoking went to several clients in The
	Netherlands and Germany.
Score	Not Applicable   Farm   Refer to 5.7
Component 5 -	Eel farming
Criterion 5.1: 1	he total mortality rate during the culture process is low
Weighting: 2	The Development and Martality Data of eals in culture is less than an anyolds 100% an average in the
Responsible	The Percentage Mortality Rate of eels in culture is less than or equal to 10% on average in the
indicators	An accurate daily log is maintained of the number and causes of mortality
Acniring	The Dercentage Mortality Date of calc in culture is between 10 and 15% on average in the current
indicators	and provious years OP as an average of the provious five years
mulcators	An accurate daily log is maintained of the number of mortalities
Discussion	Aquacultuur Groesbeek recorded mortality per tank manually and recorded daily per dead Fel
Discussion	Considering that the life cycle process of the Fel in aquaculture before consumption is two years it
	can be defined for this audit that the mortality rate reaches 1 52% Dutch law dictates that dead eels
	are required to be disposed of and that this is payable by weight. Detailed records are maintained in
	kilograms of all dead eels collected from the tanks.
	Refer to evidence 4:2
Score	Responsible
Criterion 5.2: T	he fish meal/oil ingredients in the feed come from a responsible source
Weighting: 1	
Responsible	Fish meal/oil in the feed (including juvenile feeds) is certified by IFFO or MSC or shown in some
indicators	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			
Score	Responsible			
Criterion 5.3: F	eed is used as efficiently as possible			
Weighting: 1				
Responsible	The average feed conversion ratios in the farm are as follows:			
indicators	Glass eel to fingerlings: 1.1 or less			
	Fingerlings to 200g: 1.6 or less			
Asniring	Large eels: 2.0 of less  The average feed conversion ratios in the farm are as follows:			
indicators	Glass eel to fingerlings: 1.3 or less			
	• Fingerlings to 200g: 1.8 or less			
	• Large eels: 2.2 or less			
Discussion	The feeding of the eels at Aquacultuur Groesbeek is crucial for the eels' health and the company's			
	commercial success. Feeding is done through timed automated dispensers through a computerised			
	silo-controlled system. The feeding process is carried out in different ways depending on the growth			
	cycle of the glass eef. The first part of the cycle starts with glass eef tanks which are supplied with an			
	depending on the eel activity in the tanks. FCR figures were calculated for each size range identified			
	in the standard as 1.0 - 1.1 for Glass eels to fingerlings; Fingerlings 1.3 - 1.5; and less than 2.0 for larger			
	eels. Refer to Evidence 5:1			
Score	Responsible			
Criterion 5.4: W	/ater quality			
Weighting: 1				
Responsible	<ul> <li>A system is in place that is expected to keep key water quality parameters within suitable telerances for healthy calcuminal (a.g. Ammenia, Suspended Selide, pl. evygen).</li> </ul>			
mulcators	• 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 backup system to ensure that water quality will not adversely affect			
	survival rates in the case of a power supply failure.			
Aspiring	<ul> <li>A system is in place that is expected to keep key water quality parameters within suitable</li> </ul>			
indicators	tolerances (e.g. Ammonia, Suspended Solids, pH, Oxygen)			
	relevant parameters which shows that water quality is always high and stable			
Discussion	Water quality plays an essential role at Aquacultuur Groesbeek as water control has made it possible			
	to eliminate diseases and avoid supplying the eels with medicines.			
	The water is constantly monitored, and ammonia, solids, pH, and oxygen levels are checked regularly.			





	Aquacultuur Groesbeek has the appropriate permits related to groundwater rights. The company employ effective systems of filtration, resulting in clean breeding water. All water used in the nursery passes through a recirculation system. This means that all the water used is reused. This ensures extremely low energy consumption. Oxygen reserves are kept at the facility in case any of the systems require immediate saturation, should one of the oxygenation systems fail or require maintenance.				
	Water quality monitoring is linked to alarm systems in case of any sudden incidents concerning water				
	quality. In addition, the entire water circuit is connected to an emergency generator to ensure the				
	eels' survival and maintain a constant water cycle in the event of a power failure.				
Coore	Refer to Evidence 5:2				
Score	Responsible				
Weighting: 1	iere are minimal ecological impacts from endent discharge				
Responsible	The system is closed-circuit and has no discharge OR				
indicators	<ul> <li>Effluent discharge is regularly tested by the farm AND</li> </ul>				
	Effluent discharge complies with all local and national requirements AND				
	Has not been found to be non-compliant in the past 5 years.				
Aspiring	Effluent discharge is regularly tested by the farm AND/OR				
indicators	• Has been found to be non-compliant on no more than 1 occasion in the past 5 years.				
Discussion	The management handles the discharge and water management, where the waste generated by the aquaculture process is effectively managed, and the energy recovery has been added to this. The waste is removed periodically 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.				
	Aquacultuur Groesbeek follows the municipality's plans as stipulated in the Municipal Sewage Plan.				
<b>C</b>	Refer to Evidence 5:3				
Score					
Critorion E. 6. G	rading claughter and transportation are carried out with respect to welfare				
Criterion 5.6: G	rading, slaughter and transportation are carried out with respect to welfare				
Criterion 5.6: G Weighting: 1 Responsible	<ul> <li>Grading is completed in an efficient manner</li> </ul>				
Criterion 5.6: G Weighting: 1 Responsible indicators	<ul> <li>Grading is completed in an efficient manner</li> <li>Slaughter is completed by a method that provides an instant death or renders them</li> </ul>				
Criterion 5.6: G Weighting: 1 Responsible indicators	<ul> <li>Grading is completed in an efficient manner</li> <li>Slaughter is completed by a method that provides an instant death or renders them insensible to pain, i.e. electric stunning or percussive stunning.</li> </ul>				
Criterion 5.6: G Weighting: 1 Responsible indicators	<ul> <li>Grading is completed in an efficient manner</li> <li>Slaughter is completed by a method that provides an instant death or renders them insensible to pain, i.e. electric stunning or percussive stunning.</li> <li>Procedures are in place to ensure transportation provides suitable conditions for fish</li> </ul>				
Criterion 5.6: G Weighting: 1 Responsible indicators	<ul> <li>Grading is completed in an efficient manner</li> <li>Slaughter is completed by a method that provides an instant death or renders them insensible to pain, i.e. electric stunning or percussive stunning.</li> <li>Procedures are in place to ensure transportation provides suitable conditions for fish welfare.</li> </ul>				
Criterion 5.6: G Weighting: 1 Responsible indicators Aspiring indicators	<ul> <li>Grading is completed in an efficient manner</li> <li>Slaughter is completed by a method that provides an instant death or renders them insensible to pain, i.e. electric stunning or percussive stunning.</li> <li>Procedures are in place to ensure transportation provides suitable conditions for fish welfare.</li> <li>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</li> </ul>				
Criterion 5.6: G Weighting: 1 Responsible indicators Aspiring indicators Discussion	<ul> <li>Grading, slaughter and transportation are carried out with respect to welfare</li> <li>Grading is completed in an efficient manner</li> <li>Slaughter is completed by a method that provides an instant death or renders them insensible to pain, i.e. electric stunning or percussive stunning.</li> <li>Procedures are in place to ensure transportation provides suitable conditions for fish welfare.</li> <li>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</li> <li>Aquacultuur Groesbeek 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. The company does not have a slaughtering process in the facilities. Live eels leave the Aquacultuur Groesbeek facility via logistical transports, which Aquacultuur Groesbeek customers entirely provide. Cooling before transport is carried out in separate tanks following grading where eels are lowered in temperature gradually from 23°C to around 14°C over one week to habituate and purge eels before final weighing, loading and transportation and processes do not allow to lets the eels go without water or dry out. <i>Refer to evidence 4:4</i></li> </ul>				
Criterion 5.6: G Weighting: 1 Responsible indicators Aspiring indicators Discussion Discussion	<ul> <li>arading, slaughter and transportation are carried out with respect to welfare</li> <li>Grading is completed in an efficient manner</li> <li>Slaughter is completed by a method that provides an instant death or renders them insensible to pain, i.e. electric stunning or percussive stunning.</li> <li>Procedures are in place to ensure transportation provides suitable conditions for fish welfare.</li> <li>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</li> <li>Aquacultuur Groesbeek 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. The company does not have a slaughtering process in the facilities. Live eels leave the Aquacultuur Groesbeek facility via logistical transports, which Aquacultuur Groesbeek customers entirely provide. Cooling before transport is carried out in separate tanks following grading where eels are lowered in temperature gradually from 23°C to around 14°C over one week to habituate and purge eels before final weighing, loading and transportation and processes do not allow to lets the eels go without water or dry out. <i>Refer to evidence 4:4</i></li> </ul>				
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Criterion 5.6: G Weighting: 1 Responsible indicators Aspiring indicators Discussion Discussion Score Criterion 5.7: Th Weighting: 2 Responsible	<ul> <li>Grading, slaughter and transportation are carried out with respect to welfare</li> <li>Grading is completed in an efficient manner</li> <li>Slaughter is completed by a method that provides an instant death or renders them insensible to pain, i.e. electric stunning or percussive stunning.</li> <li>Procedures are in place to ensure transportation provides suitable conditions for fish welfare.</li> <li>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</li> <li>Aquacultuur Groesbeek 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. The company does not have a slaughtering process in the facilities. Live eels leave the Aquacultuur Groesbeek facility via logistical transports, which Aquacultuur Groesbeek customers entirely provide. Cooling before transport is carried out in separate tanks following grading where eels are lowered in temperature gradually from 23°C to around 14°C over one week to habituate and purge eels before final weighing, loading and transportation and processes do not allow to lets the eels go without water or dry out. <i>Refer to evidence 4:4</i></li> <li>Responsible</li> <li>The farm can provide documented evidence that 10% or more of the farm's annual eel production.</li> </ul>				
Criterion 5.6: G Weighting: 1 Responsible indicators Aspiring indicators Discussion Discussion Score Criterion 5.7: Th Weighting: 2 Responsible indicators	<ul> <li>Frading, slaughter and transportation are carried out with respect to welfare</li> <li>Grading is completed in an efficient manner</li> <li>Slaughter is completed by a method that provides an instant death or renders them insensible to pain, i.e. electric stunning or percussive stunning.</li> <li>Procedures are in place to ensure transportation provides suitable conditions for fish welfare.</li> <li>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</li> <li>Aquacultuur Groesbeek 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. The company does not have a slaughtering process in the facilities. Live eels leave the Aquacultuur Groesbeek facility via logistical transports, which Aquacultuur Groesbeek customers entirely provide. Cooling before transport is carried out in separate tanks following grading where eels are lowered in temperature gradually from 23°C to around 14°C over one week to habituate and purge eels before final weighing, loading and transportation and processes do not allow to lets the eels go without water or dry out. <i>Refer to evidence 4:4</i></li> <li>Responsible</li> <li>Refarm provides Eel for restocking</li> </ul>				
Criterion 5.6: G Weighting: 1 Responsible indicators Aspiring indicators Discussion Discussion Score Criterion 5.7: Th Weighting: 2 Responsible indicators Aspiring	<ul> <li>Grading is completed in an efficient manner</li> <li>Slaughter is completed by a method that provides an instant death or renders them insensible to pain, i.e. electric stunning or percussive stunning.</li> <li>Procedures are in place to ensure transportation provides suitable conditions for fish welfare.</li> <li>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</li> <li>Aquacultuur Groesbeek 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. The company does not have a slaughtering process in the facilities. Live eels leave the Aquacultuur Groesbeek facility via logistical transports, which Aquacultuur Groesbeek to habituate and purge eels before final weighing, loading and transportation and processes do not allow to lets the eels go without water or dry out. <i>Refer to evidence 4:4</i></li> <li>Responsible</li> <li>Refarm 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.</li> </ul>				
Criterion 5.6: G Weighting: 1 Responsible indicators Aspiring indicators Discussion Discussion Score Criterion 5.7: Th Weighting: 2 Responsible indicators Aspiring indicators	<ul> <li>Grading is completed in an efficient manner</li> <li>Slaughter is completed by a method that provides an instant death or renders them insensible to pain, i.e. electric stunning or percussive stunning.</li> <li>Procedures are in place to ensure transportation provides suitable conditions for fish welfare.</li> <li>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</li> <li>Aquacultuur Groesbeek 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. The company does not have a slaughtering process in the facilities. Live eels leave the Aquacultuur Groesbeek facility via logistical transports, which Aquacultuur Groesbeek to tabituate and purge eels before transport is carried out in separate tanks following grading where eels are lowered in temperature gradually from 23°C to around 14°C over one week to habituate and purge eels before final weighing, loading and transportation and processes do not allow to lets the eels go without water or dry out. <i>Refer to evidence 4:4</i></li> <li>Responsible</li> <li>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.</li> <li>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.</li> </ul>				

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	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.		
Score	Responsible		
Criterion 5.8: E	els for restocking are not graded out slow-growers		
Weighting: 2			
Responsible	The size range and quantities in the eels for restocking reflect 100% that for the age group in the		
indicators	whole farm		
Aspiring	The size range and quantities indicate no more than a 25% supplement of those for restocking are		
indicators	from slower growing fish of the same age group		
Discussion	Eels purchased for restocking do not undergo sorting processes. They, therefore, reflect and represent		
	the actual state of glass eels from where they were caught and are kept separate from eels intended		
	for processing and human consumption. Consequently, the size range received and the quantities of		
	eels for restocking reflect 100% of the age group received, unaltered and unmanipulated.		
Score	Responsible		





#### 8. On-site Evidence per Component

Compone	nt 1		
Evidence	Evidence	Evidence	Description
1:1			
1:1:1	Stichting DUPAN zet zich in voor het behoud de paling op de lange termijn en heeft hier er aalherstelplan voorontwikkeld. Wanneer u er palingproduct koopt, draagt u automatisch aar fonds bij. Voorafgaand aan de oprichting van stichting, hebben de samenwerkende partije duidelijke afspraken gemaakt over de doelstellingen. Deze afspraken zijn vastgeleg een convenant.	van en in dit ide an d in	Aquacultuur Groesbeek presents to the public via their webpage the commitment to Eel.
1:2			The farm has separate tanks, and each batch is managed separately and is not mixed to avoid cross- contamination between eels.



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1:3					
	+				-
1:4					
1:4:1	MOD	BIJLAGE I EL VOOR AQUACULTUURPRODUCTIEBEDRI	IJVEN DIE VIS HOUDEN		Information in
	In	(ALS BEDOELD IN ARTIKEL 2, LID 2, formatie overeenkomstig artikel 59 van Rie	ONDER a)) chtlijn 2006/88/EG		accordance
	Informatie	Kwekerij 1	Kwekerij 2	T	with Article 59
	1. Aquacultuuroroductiehedriif	1.1.1. Naam aquacultuurproductiebedriif	1.2.1. Naam van:	-	of Directive
		Aquacultuur Groesbeek B.V.	<ul> <li>het aquacultuurproductiebedrijf</li> <li>de kwekerij</li> </ul>		
		1.1.2. Adres of ligging van de kwekerij	1.2.2. Adres of ligging van de kwekerij		2000/88/EG
		Sint Jansberg 2, 6562 KD Groesbeek			
	2. Registratienummer	2.1. Vergunningnummer:	2.2.	1	
	(voor elke kwekerij)	20034711	3		





Componen	t 4		
Reference	Evidence 01	Evidence 02	Description
4:1		<image/>	The tanks are clearly separated. The eels are not mixed in each tank. Each tank represents individual, isolated batches.
4:2			Mortality is controlled in detail with a daily log. Each tank presents individuals who register and maintains a low mortality level.

















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5:3	The waste is removed periodically and given to local farmers to fertilise their land. A heat recovery system is present.
5:4	