

Sustainable Eel Group (SEG) Standard Assessment

Vishandel De Groot B.V.

Assessment against:

- **Component 1:** Core requirements.
- **Component 4:** Eel buying and trading.
- **Component 7:** Eel farming.

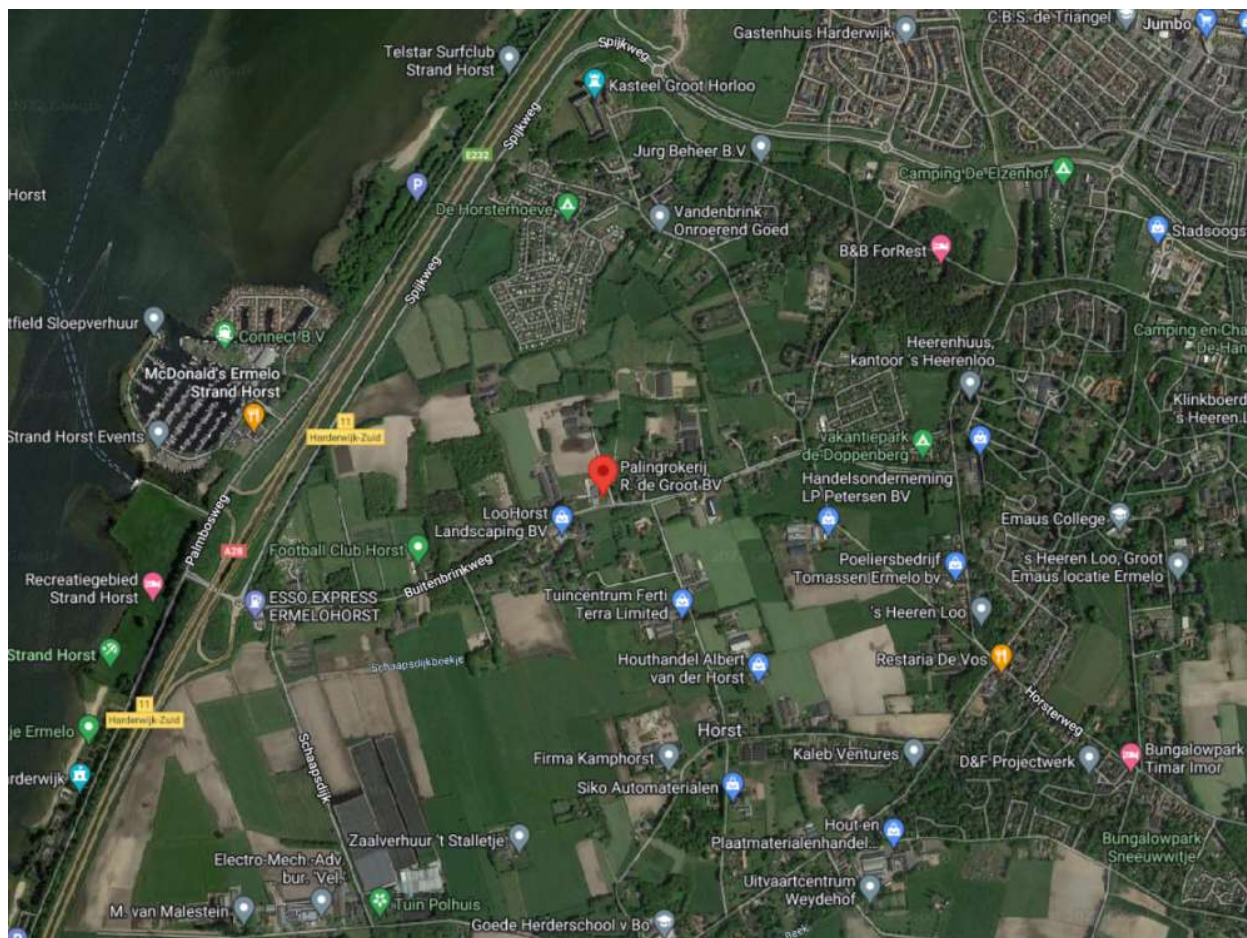
Completed by: Andres Fellenberg van der Molen	On-Site Visit: 2 December 2021	Report date: 28 December 2021
Reviewed and approved by:	Mr. David Bunt Sustainable Eel Group	Certification Body 28 May 2022
This version has had commercially sensitive information removed to meet Data Protection requirements		

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 Vishandel De Groot B.V. This assessment has been conducted against Components 1, 4 & 7 of the standard.

The assessment is of a processor/smoker and trade of Eel located at Buitenbrinkweg 48 B, 3853LX Ermelo, The Netherlands.



1. Introduction

The town has been known to exist since at least 855, when the name Irminlo first appeared in a legal document. However, human presence in the area goes back further, with many archaeological finds of the Bell-Beaker culture made in the area. For a long time, the town most likely consisted of little more than a few farms and some other buildings like a windmill and a church, and it didn't grow much until the 19th century; in the year 1830 a road was made to make this part of the Veluwe more accessible, and at the end of the 19th century the town got a railway station. Because the railway station was some distance away from what was then the town centre, a road was constructed, which is now considered to be the centre of the town. After the second world war, a shortage of houses resulted in the rapid growth of Ermelo. In 1973 Nunspeet became its separate municipality after being part of Ermelo. In 2005, Ermelo celebrated its 1150-year-long existence.

In Ermelo, we found the Eel smokehouse De Groot, which has been smoking eels according to traditional methods since 1850. Initially, the company was established in Harderwijk, and it has been located at Buitenbrinkweg in Ermelo for many years. Palingrokerij De Groot has grown into a real family business. Father and both sons and daughter work with heart and soul in the traditional smokehouse.



2. The assessment

The assessor was Andres Fellenberg Van der Molen from Green Partner Audits & Consultancy B.V, who visited Vishandel De Groot B.V on 3th of December 2021. The audit included the interview with Mr Jacco De Groot and Mr Jan Hakvoort.

2.1 Client Contact Details

Client Contact Name	Jan Hakvoort Quality Manager Vishandel De Groot B.V
Client Address	Buitenbrinkweg 48 B, 3853LX Ermelo, The Netherlands

3. Results of the assessment

The outcome of this assessment is as follows;

Component 1: General Requirements			Auditor's findings	Weighting	Score
1.1	Commitment to Legality		Responsible	1	1
1.2	Contribution to eel conservation projects		Responsible	1	1
1.3	The facility trades in certified responsibly sourced eels		Aspiring	1	0
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				
	1.5.1	Eel Fishing	Not Applicable	0	0
	1.5.2	Eel buying & trading	Responsible	1	1
	1.5.3	Eel farming	Not Applicable	0	0
	1.5.4	Restocking	Not Applicable	0	0
	1.5.5	Wholesale / Retail / Processing	Responsible	1	1
			Total	8	6/8
Percentage Responsibility Score				75%	

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

Component 7: Processing, wholesale and retail supplies		Auditor's findings	Weighting	Score
7.0	Processing, wholesale and retail supplies	Responsible	1	1
Total			1	1
Percentage Responsibility Score			100%	

Summary of assessment and scoring		
Component	Aspiring	Responsible
1	2	6
4	4	7
7	0	1
Total	6	14
Total Responsibility Score		14/20 = 70%

4. Auditor conclusions

- **Component 1 General Requirements:** Vishandel De Groot B.V has scored 75% for Component 1; it should be considered **RESPONSIBLE** under the SEG standard.
- **Component 4 Eel buying and trading:** Vishandel De Groot B.V has scored 64% for Component 4; it should be considered **RESPONSIBLE** under the SEG standard.
- **Component 7 Processing, wholesale and retail supplies:** Vishandel De Groot B.V has scored 100% for Component 5; it should be considered **RESPONSIBLE** under the SEG standard.
- **With an overall Responsibility score of 70%,** Vishandel De Groot B.V 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 Surveillance	

	Certification Audit	Year 1	Year 2	Year 3	Year 4 Recertification Audit
Minimum Surveillance	On-site Audit	Remote Audit	Remote Audit	Remote Audit	On-site Audit
Standard Surveillance	On-site Audit	No Audit	On-site Audit	No Audit	On-site Audit
Enhanced Surveillance	On-site Audit	On-site Audit	On-site Audit	On-site Audit	On-site Audit

As the client has been seen to fall into the Standard Surveillance bracket, the next audit will be due in December 2023 (in 2 years) and shall be an on-site audit.



Andres Fellenberg Van der Molen
Accredited SEG Assessor

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

Component 1 – Generic requirements	
Criterion 1.1: Commitment to legality	
Responsible indicators	For at least the past two years: the organisation has not been found guilty for any offences relating to eel fishing or trading.
Aspiring indicators	For at least the past 12 months: the organisation has not been found guilty for any offences relating to eel fishing or trading.
Discussion	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 investigations either.
Score	Responsible
Criterion 1.2: Contribution to Eel Conservation Projects. (Optional bonus score)	
Responsible indicators	The organisation donates at least 2% of its profits or at least 20% of its corporate responsibility programme to projects that make a positive contribution to eel conservation or population enhancement, such as Eel Stewardship Funds, River Restoration projects, conservation and education projects.
Aspiring indicators	The organisation donates 1 – 1.99% of its profits or 10 - 20% of its corporate responsibility programme to projects that make a positive contribution to eel conservation or population enhancement, such as Eel Stewardship Funds, River Restoration projects, conservation and education projects.
Discussion	The company's profits are paid into DUPAN on a range of 5-7%. This is a yearly contribution. Once a month, it is reported to DUPAN how much has been sold. €0.50 per kgs of round eels are then paid to DUPAN. <i>Refer to evidence 1:1:1</i>
Score	Responsible
Criterion 1.3: The organisation trades in certified responsibly sourced Eel	
Responsible indicators	The organisation trades in at least 50% (by number) of certified responsibly sourced Eel and has the documentation to demonstrate that.
Aspiring indicators	The organisation trades in 10 – 49.9% (by number) of certified responsibly sourced Eel and has the documentation to demonstrate that.

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>Eels are bought and sold very quickly; according to available information, the period can fluctuate from 1 day to less than a week. Each eel batch remains separate from the others to avoid mixing up the origin. The products are segregated and can be traced back to the source following a precise internal control from order, arrival and invoicing. The company has comprehensive documentation throughout the entire process, from receipt to dispatch, with software that generates batch codes.</p>
1.4.2: Traceability - Outgoing product	
Responsible indicators	<ul style="list-style-type: none"> • Where a fishery or buyer, an electronic tele-declaration system is used • Documentation is well maintained with a maximum of 2% error in the following: <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): • 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

	<ul style="list-style-type: none"> • 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
--	--

1.4.3: Traceability - Record keeping and documentation

Responsible indicators	<ul style="list-style-type: none"> • The organisation operates a system that allows the tracking and tracing of all Eel from purchase to sale and including any steps in between. In the case of live eels this should include the ability to track each batch delivered to a buyer to be connected back to a water, a time period (maximum duration one month) and specific fisherman/vessel • If a fisherman or buyer, a tele-declaration system is used to report catches and trade • The organisation operates a system that also allows for the completion of a batch reconciliation of eel product by weight over a given period. • The organisation maintains records for a minimum of three (3) years.
Aspiring indicators	<p>The above requirements are met except that:</p> <ul style="list-style-type: none"> • Records have been maintained for less than three (3) years • If a fisherman or trader, a tele-declaration system is planned to be used to report catches and trade in the next season
Discussion	<p>Vishandel De Groot B.V 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, Vishandel De Groot B.V has solid record-keeping, documentation, and internal traceability in place.</p>
Score	Responsible

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

1.5.1: Eel Fishing: Biosecurity measures are adopted

Responsible indicators	<ul style="list-style-type: none"> • The fishery conducts good biosecurity measures such as the disinfection and drying of nets and equipment between each fishing in different waters. OR: • The fishermen only operate in the same river or estuary, with no risk of transferring diseases or alien species between catchments
Discussion	Not Applicable
Score	Not Applicable

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.
-------------------------------	---

	<ul style="list-style-type: none"> • The facility has the appropriate permissions to operate from the relevant licensing authority • An effective and documented biosecurity plan is in place and there is evidence that it is being followed. • Records are available showing regular monitoring of health and possible signs of stress according to the facility's plan (including the completion of microscope parasite checks) and daily mortality is recorded. • Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility.
Aspiring indicators	<ul style="list-style-type: none"> • The use of chemicals follows legal requirements of the appropriate EU regulations and of the country concerned. • The facility has the appropriate permissions to operate from the relevant authority • An effective and documented biosecurity plan is in place and there is evidence that it is being followed. • Eels are regularly monitored for health and possible signs of stress (although this might not be documented) and daily mortality is recorded. • Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility.
Discussion	<p>The 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. Vishandel De Groot B.V 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. Eels arriving at the facility are placed in separate tanks from eels already present in the facilities. 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.</p>
Score	Responsible
1.5.3: Eel farming: Biosecurity is present, and disease is treated rapidly and appropriately	
Responsible indicators	<ul style="list-style-type: none"> • The facility has the appropriate permissions to operate from the relevant authority. • The use of chemicals follows legal requirements of the EU and of the country concerned • An effective and documented biosecurity plan is in place and there is evidence that it is being followed. • Daily records are available showing monitoring of fish health and signs of stress and daily mortality is recorded • Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility • UV is used at an appropriate level and separation between tanks
Aspiring indicators	<ul style="list-style-type: none"> • The facility has the appropriate permissions to operate from the relevant licensing authority • The use of chemicals follows legal requirements of the EU and of the country concerned. • An effective and documented biosecurity plan is in place and there is evidence that it is being followed. • Eels are regularly inspected for disease (although this may not be documented) and daily mortality is recorded. • Records are maintained according to the Medicines Regulations for use of any medicines and/or chemicals used in the facility.
Discussion	Not Applicable
Score	Not Applicable
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	Not Applicable
Score	Not Applicable
1.5.5: Wholesale / Retail / Processing: Hygiene Plans are followed and there are rare examples of infection	
Responsible indicators	Food processing hygiene plans are followed
Discussion	Vishandel De Groot B.V does process food on a local medium scale. The company has all permissions to operate as a fish trader, and visually is easy to define Vishandel De Groot B.V facilities as adequately managed. De Groot counts with an effective HCCP in place and constant monitoring via an independent external company. Dutch authorities request HCCP. <i>Refer to Evidence 1:5:1</i>
Score	Responsible

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
No Aspiring indicators	
Discussion	Eel is kept separately in different batches in different tanks. The eels are not mixed. De Groot has SEG suppliers, which means that the point of collection, handling until sale and transport are also SEG audited. But it is important to mention and highlight that out of the 100% of the batches from De Groot's SEG suppliers, a high percentage of the eels are already mixed from the origin itself. As this point creates uncertainty, and De Groot is out of this control, as there is no quantitative evidence in
Score	Responsible



Criterion 4.1: The Glass Eel holding facility is a registered Aquaculture Production Business	
Weighting: 1	
Responsible indicators	The Glass Eel holding facility is a registered Aquaculture Production Business
Aspiring indicators	The facility is not a registered Aquaculture Production Business, but has credible plans to register within the next 6 months
Discussion	Not Applicable De Groot does not hold Glass eel in the facilities
Score	Not Applicable

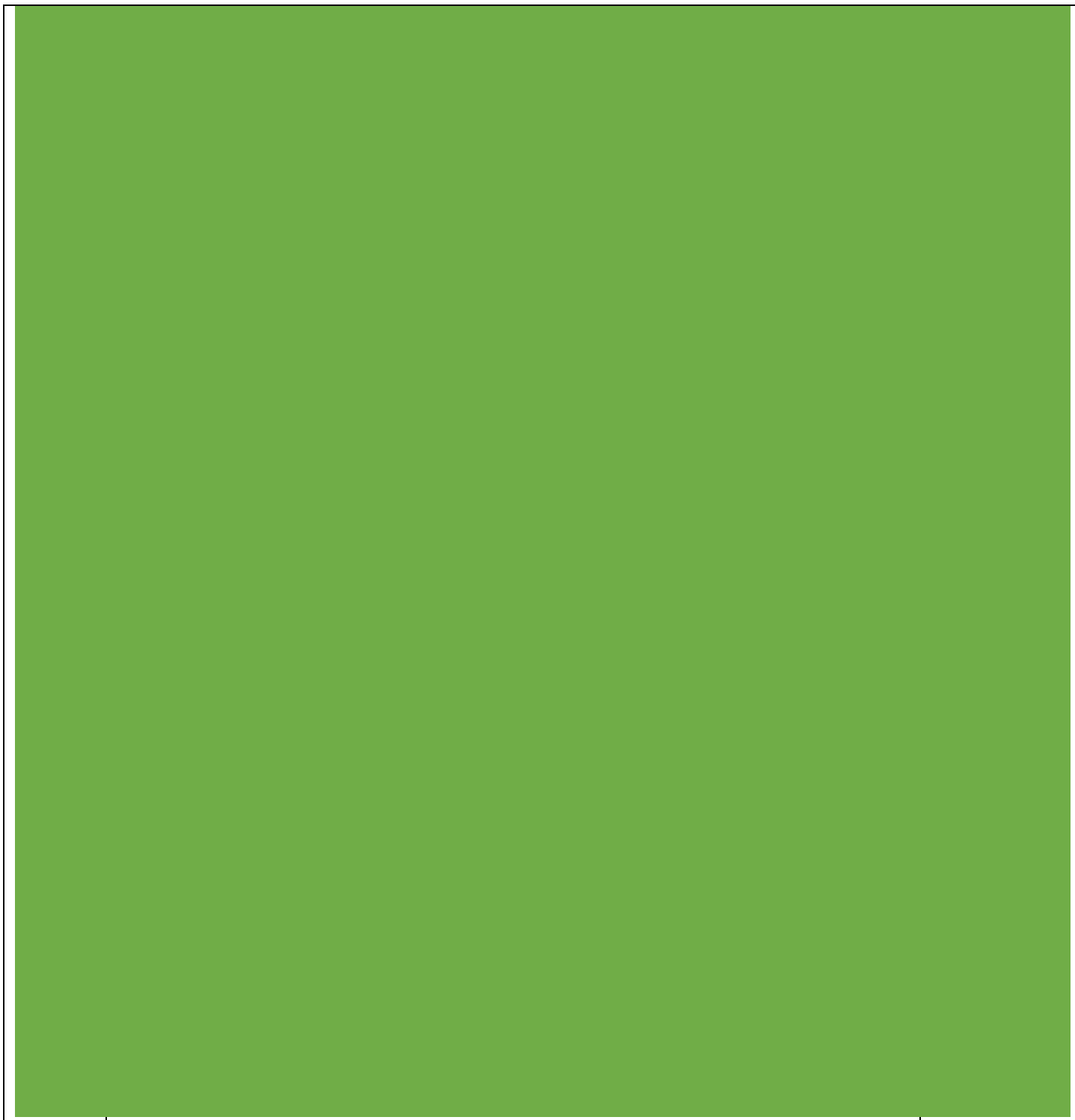
Criterion 4.2: Mortality in storage facility	
Weighting: 2	
Responsible indicators	Mortality rate over the season is less than 2% on average.
Aspiring indicators	Mortality rate over the season is less than or equal to 5% on average but greater than or equal to 2%

Criterion 4.3: Mortality during transport and initial holding if transported to farm	
Weighting: 2	
Responsible indicators	Buyers source at least 90% of their eels from certified suppliers OR Mortality during transport and for the first week at the farm is less than 2% on average
Aspiring indicators	Buyers source 50% - 89.9% of their eels from certified suppliers OR Mortality during transport and for the first week at the farm is less than or equal to 3% on average but greater than or equal to 2% on average.
Criterion 4.4: Water quality	
Weighting: 1	
Responsible indicators	A system is in place that is expected to keep key water quality parameters within suitable tolerances for healthy eel survival (e.g. Ammonia, Suspended Solids, pH, oxygen) Water quality management procedures are in place including regular monitoring of relevant parameters which shows that water quality is always high and stable The facility operates a back-up system to ensure that water quality will not adversely affect survival rates in the case of an equipment failure
Aspiring indicators	A system is in place that is expected to keep key water quality parameters within suitable tolerances for healthy eel survival (e.g. Ammonia, Suspended Solids, pH, oxygen) The facility has a minimum of a back-up generator and oxygen supply
Discussion	Water quality plays an essential role at Vishandel De Groot B.V, as water control has made it possible to eliminate diseases and avoid supplying the eels with medicines. The water comes from a deep well, and it is monitored once a year. Ammonia, solids, pH, and oxygen levels are checked. The local company Bacteriologisch Adviesbureau B.V. under register number KvK 08174121 control the water parameters via laboratory analysis. Vishandel De Groot B.V has the appropriate permits related to groundwater rights. The company employ effective systems of filtration, resulting in clean water. We have to constate the level of TAN (NH3/ NH4+) as 0.25 mg/ltrs, which is not extreme, but it can be better. <i>Refer to Evidence 4:3</i>
Score	Responsible
Criterion 4.5: Handling and welfare	
Weighting: 1	
Responsible indicators	Systems are in place and the facility is designed to keep handling to an absolute minimum Documented procedures are in place for handling, and handling, where necessary, is careful The infrastructure is designed to avoid injuries, and so that the use of nets is rarely necessary. When used, nets are small-mesh (1mm maximum) Eels are moved without being allowed to dry out.
Aspiring indicators	The facility may not be optimally designed, but systems are in place to avoid handling as much as possible within the constraints of the facility Handling, where necessary, is carefully planned and executed The infrastructure has been optimised as far as possible to avoid injuries Nets are small-mesh (1mm maximum) Eels are moved without being allowed to dry out.
Discussion	Vishandel De Groot B.V facilities are optimised as much as possible to avoid handling to prevent injuries. More is always possible, but good systems when handling the eels are already implemented. The auditor checked the entire handling without presenting any substantial evidence of handling and eel welfare deficiencies. <i>Refer to Evidence 4:4</i>
Score	Responsible

Criterion 4.6: Transport	
Weighting: 1	
Responsible indicators	<p>There is a Transport Plan in place to minimise travel time – this meets the Transport requirements for vertebrates</p> <p>Packing is done in a way that minimises handling, time and stress</p> <p>Eels are kept cool and wet with an adequate supply of oxygen</p> <p>The operator holds the relevant transport authorisations</p>
Discussion	<p>The evidence presented on the site by De Groot demonstrates the maximum time of transport is not above 24 hrs, meeting all legal requirements in this matter. Handling live Eel is minimum, minimising time and stress. The vehicles are equipped with appropriate systems following all Dutch and European regulations regarding the transport of live aquatic animals. Clients bring or pick up eels. The transport from De Groot to clients is minimum.</p> <p><i>Refer to evidence 4:4</i></p>
Score	Responsible
Criterion 4.7: The required percentage of glass eels is being used for restocking	
Weighting: 2	
Responsible indicators	<p>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.</p>
Aspiring indicators	<p>The buyer can provide documented evidence that they <u>have reserved or made available at least 60%</u> of the required target percentage of its glass eels from the latest season available for the primary purpose of conservation / escapement, OR</p> <p>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</p> <p>The buyer can provide credible evidence that restocking will occur in the forthcoming season.</p>
Discussion	<p>De Groot does not handle glass eels, and glass eels do not reach De Groot's facilities. De Groot has evidence that it has made available restocking of glass eels within the Netherlands.</p>
Score	Responsible
Component 7 – Processing, wholesale and retail supplies	
Discussion	<p>De Groot's facilities, considering the processing of wholesale and retail supplies, present a high quality of operations, complying with all Dutch regulations related to health, safety and labour. The labelling and packaging of the products present the sustainability effort of the products, which is shown to the public and customers through their website and in their store. They are passionate about contributing to eel recovery and ensuring compliance. De Groot understands and demonstrates the intent to meet the three pillars of sustainability.</p> <p><i>Refer to Evidence 7:0</i></p>
Score	Responsible

8. On-site Evidence per Component

Component 1			
Evidence	Evidence	Evidence	Description
1:1:1			Vishandel De Groot B.V presents to the public via their webpage the commitment to Eel via NEVE & DUPAN
1:2			The company has 12 separate tanks, and each batch is managed separately with a connected water system.




1:5:1

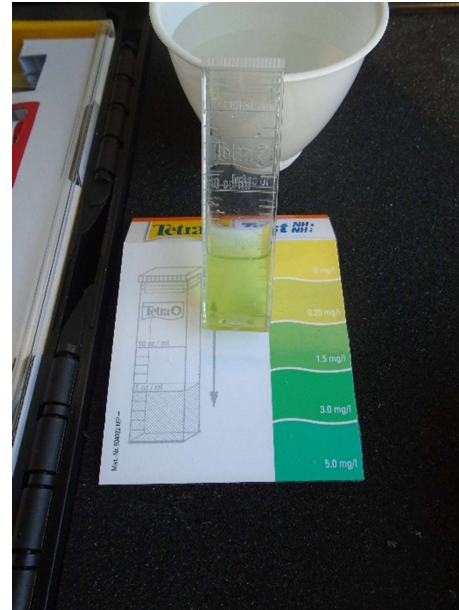
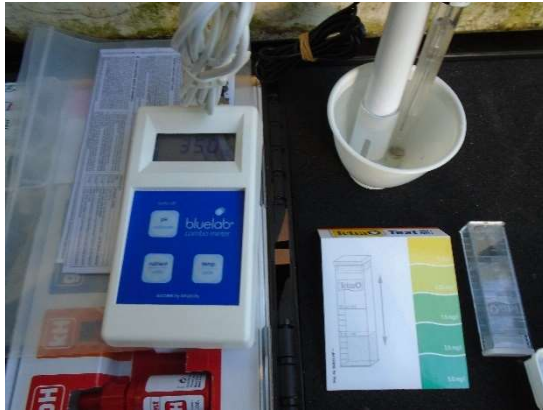


Slaughtering, processing and smoking are medium-sized. The farm has adequate health and hygiene averages visible to the public during this audit.



Component 4			
Reference	Evidence 01	Evidence 02	Description
4:1			<p>The 15 tanks are clearly separated. The eels are not mixed in each tank, but they use a connected united water system in the tanks.</p>

4:3



The water comes from a deep well. The water quality and control are monitored once a year.

4:4



The handling of the eels is minimal, and the company takes care to minimise contact with the Eel. The machinery is suitable to minimise possible damage to the Eel.

Component 7			
Reference	Evidence 01	Evidence 02	Description
7:1	<div></div>		<p>De Groot is a family company with a strong tradition with Eel. The company is committed to sustainability and social activities and promotes the sustainable consumption of the Eel. De Groot is a clean example of family protection, the traditional Dutch way of smoking eel.</p>
	<div></div>		