

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

Completed by
Nicolas Belhamiti
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Final Version

Reviewed and Approved by Certification Body:
David Bunt, Sustainable Eel Group, 5 May 2022

1. Introduction

This document is the report of the audit from 26 of January 2022 carried out for Mr. Christian DUPUIS in the context of the audit of the Gurruchaga Marée group. The audit concerned the application of the specifications of the SEG (Sustainable Eel Group) standard (version 6.0a, December 2019) in pursuit of certification. This assessment was carried out for components 1 and 4 of the standard.

Mr DUPUIS' operation is different from what is usually done in the glass eel trade. He is registered with the Commercial Court of Dax as a fish trader but does not have a fixed fish tank. He has a van equipped with a water tank connected to an oxygenation system. He goes to the fishermen to buy the glass eels and then delivers all the glass eels to Gurruchaga Marée in Hendaye. He has an exclusive contract with the Gurruchaga Marée group.

2. The assessment

The evaluator was Nicolas Belhamiti for Fish-Pass. The audit was carried out in the form of a discussion with Mr Dupuis. The audit was conducted on the basis of the documents presented and a visit of the van.

3. Client Contact Details

Client Contact Name	DUPUIS, Christian
Client Address	530, Av du Touring Club Résidence Le Clos Bremontier - APPT 7 40150 - HOSSEGOR
Client Email	c_dupuis@aol.fr

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)	Not applicable	NA	NA

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1.3 The organisation trades in certified responsibly sourced eels	Responsible	1	1
1.4 Traceability:			
1.4.1 Incoming products, separation and segregation	Responsible	1	1
1.4.2 Outgoing products	Responsible	1	1
1.4.3 Record keeping and documentation	Responsible	1	1
1.5 Biosecurity & welfare –			
1.5.2 Eel buying & trading: Biosecurity is present and disease is treated rapidly and appropriate	Responsible	1	1
1.5.4 Restocking: The risk of restocked eels introducing disease into wild populations has been assessed and is minimal	Responsible	1	1
Total		7	7
Percentage Responsibility Score 7/7:		100%	

Finding: For Component 1, a generic requirement, the score is 100% leading to a Responsible assessment.

Component 4: Eel buying and trading	Auditor's findings	Weighting	Score
4.0 Segregation of certified and uncertified eels	Responsible	2	2
4.1 The glass eel holding facility is a registered aquaculture production business	Responsible	1	1
4.2 Mortality in storage facility	Responsible	2	2
4.3 Mortality during transport and initial holding if transported to farm	Responsible	2	2
4.4 Water quality	Aspiring	1	0
4.5 Handling and welfare	Aspiring	1	0
4.6 Transport	Responsible	1	1
4.7 The required percentage of glass eels is being used for restocking	Aspiring	2	0
Total		12	8
Percentage Responsibility Score:		67%	

Finding: Christian Dupuis obtained a score of 67% for component 4 and can therefore be considered responsible according to the SEG specifications.

Summary of assessment and scoring

Component	Not Met	Aspiring	Responsible
1	0	0	7
4	0	4	8
Total	0	4	15
Total Responsibility Score: = 15/19			79%

Summary finding:

Mr Christian Dupuis, for the sale of glass eels, **with a score of 79%, meets the criteria for obtaining SEG certification.**

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5. Recommendations:

1. **With a score on the responsibility criteria of 79% M. Dupuis has reached the level required to be considered responsible. We recommend that a final certificate be issued.**
2. Concerning criterion 4.4: During the storage and transport of glass eels in the fish tank, a connected probe should be added so that the oxygen level can be known directly in order to be able to react in case of a problem.
3. Concerning criterion 4.5: The practices are good, but in order to meet the responsibility criterion, they should be recorded on a piece of paper, which would then be visible in the vehicle.
4. Concerning criterion 4.7: Mr Dupuis should try to get the fishermen to continue fishing to achieve the objective of 60% of sales for restocking.

6. Next Audit

Question	Performance of the Client at Audit	Yes	No
1	Has the client been part of any external investigation which may be of concern to SEG AND/OR been suspended from any other certification standard?	Enhanced Surveillance	Go to Q2
2	Has the client received a borderline pass for a Component in its previous audit?	Enhanced Surveillance	Go to Q3
3	Does the client only buy and sell product (does not physically handle it?)	Minimum Surveillance	Go to Q4
4	All other scenarios	Standard Surveillance	

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

Based on the results of the audit, standard surveillance is recommended. The next audit will take place in two years time, in January 2024.

7. The Assessment

The tables below give the assessment 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	Mr Dupuis was convicted in 2016 in a case of illegal elver trafficking. Since then he has not been convicted and has been allowed to carry out his fish trade. The criterion has therefore been met.
Score	Responsible

Criterion 1.2: Contribution to Eel Conservation Projects. (Optional bonus score) (The intention is for this to be mandatory from summer 2020)	
Responsible indicators	The organisation donates at least 2% of its profits or at least 20% of its corporate responsibility programme to projects that make a positive contribution to eel conservation or population enhancement, such as Eel Stewardship Funds, River Restoration projects, conservation and education projects.
Aspiring indicators	The organisation donates 1 – 1.99% of its profits or 10 - 20% of its corporate responsibility programme to projects that make a positive contribution to eel conservation or population enhancement, such as Eel Stewardship Funds, River Restoration projects, conservation and education projects.
Discussion	Not applicable

Criterion 1.3: The organisation trades in certified responsibly sourced eel	
Responsible indicators	The organisation trades in at least 50% (by number) of certified responsibly sourced eel and has the documentation to demonstrate that.
Aspiring indicators	The organisation trades in 10 – 49.9% (by number) of certified responsibly sourced eel and has the documentation to demonstrate that.
Discussion	Mr. Dupuis works with many fishermen exclusively. All the fishermen he works with were SEG certified during the 2021-2022 season. As a result, he now trades, in theory, with 100% SEG glass eels. The criterion has therefore been met.
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 purchases made by Mr Dupuis are systematically transferred to the Gurruchaga Marée fish tanks in Hendaye. These purchases are declared via Visiomer, on behalf of Mr. Dupuis, by the secretariat of the Gurruchaga Marée group.</p> <p>As all the fish are sold to Gurruchaga Marée, the traceability system makes it possible to know the origin of all the glass eels making up a batch, as well as the basins in which they were in Hendaye, and their final destination. This is made possible by linking the traceability of Mr Dupuis' purchases and the sales of the Gurruchaga Marée group.</p> <p>The mortality suffered by Mr. Dupuis is zero since the glass eels only spend a few hours in his fish tank.</p> <p>For the time being, the glass eels purchased by Mr Dupuis were 100% non-SEG and then 100% SEG. In theory, therefore, there is no mixing. This should be verified at the next audit.</p> <p>The criterion has been met.</p>
Score	Responsible

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

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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. • 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>All glass eels are transported to the main site of the Gurruchaga Marée company in Hendaye. During sales, the declaration is made on Visiomer and no sales are made to other countries. In all cases, an invoice and a delivery note with the batch number and the quantity by weight (kg) of glass eels are issued and associated with the fishing sheets corresponding to the batch. All traceability information on the batch is kept.</p> <p>In view of these elements, this criterion is met.</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 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>The traceability system is very simple as all glass eels are sold to the Gurruchaga Marée group. Documentation is kept in paper format and organised by batch. The transport vouchers are digitised.</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. 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 aquacultural zoosanitary approval number is FR 40 181 951 CE.</p> <p>The only chemical product used is bleach, for the disinfection of the tank.</p> <p>The tank is cleaned after each sale. On arrival at the Gurruchaga Marée site in Hendaye, the glass eels are transferred and the tank is emptied, disinfected, rinsed and refilled with water.</p> <p>There is no mortality as the glass eels only spend a few hours in the tank.</p> <p>Oxygen and temperature parameters are constantly monitored with probes.</p> <p>No medication is used.</p> <p>The criterion is therefore met.</p>
Score	Responsible

1.5.4 Restocking: The risk of restocked eels introducing disease into wild populations has been assessed and is minimal

Responsible indicators	Eels are tested before restocking and found to be free of disease AND/OR eels are from a known source which is tested on at least an annual basis and known to be free of disease.
Aspiring indicators	Eels are tested before restocking when first sourced from a new area, and periodically (at least annually) thereafter to ensure they are free from disease.
Discussion	Each batch of glass eels for restocking is tested by Gurruchaga Marée group. The test result is then sent directly to the project leader.
Score	Responsible

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

Component 4 - Eel buying and trading	
Criterion 4.0: Segregation of certified and uncertified eels	
Weighting: 2	
Responsible indicators	Certified and non-certified are kept separated, from point of collection through holding to sale and onward transport.
Aspiring indicators	None.
Discussion	In theory, all of Mr Dupuis' fishermen are now SEG certified. There can therefore be no mixing. However, if new fishermen were included in his clientele, he would have to be very careful not to mix these glass eels with those of SEG-certified fishermen. This criterion has been met.
Score	Responsible

Criterion 4.1: The Glass eel holding facility is a registered Aquaculture Production Business	
Weighting: 1	
Responsible indicators	The Glass eel holding facility is a registered Aquaculture Production Business.
Aspiring indicators	The facility is not a registered Aquaculture Production Business, but has credible plans to register within the next 6 months.
Discussion	The company has an aquacultural zoosanitary approval: FR 40 181 951 CE
Score	Responsible

Criterion 4.2: Mortality in storage facility	
Weighting: 2	
Responsible indicators	Mortality rate over the season is less than 2% on average.
Aspiring indicators	Mortality rate over the season is less than or equal to 5% on average but greater than or equal to 2%.
Discussion	There is no mortality in the trading process of M. Dupuis
Score	Responsible

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>The company Gurruchaga Marée, which buys all the glass eels from Mr Dupuis, does not observe any mortality during deliveries.</p> <p>The criterion is therefore met.</p>
Score	Responsible

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). • 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.</p> <p>There is only one tank without water recirculation but connected to an oxygenation system. There is always a full spare bottle in the truck.</p> <p>The water temperature and oxygen level are monitored with probes. However, a visual check of these sensors is necessary to know the data.</p> <p>If there is a problem with oxygenation during transport, Mr Dupuis will not be informed.</p>

	<p>The practices observed are good, but in the event of a problem, significant mortality can occur. It would be necessary to add a connected probe to know the oxygen level in real time in order to intervene if necessary.</p> <p>This criterion is therefore aspiring</p>
Score	Aspiring

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 handle the glass eels as little as possible. The transport truck can be parked close to the ponds during the sale.</p> <p>For the purchase of the glass eels, the sieve is made of fine-mesh stainless steel.</p> <p>The glass eels are collected by emptying the tank completely through a bottom valve. The glass eels are then placed on fine-mesh sieves and weighed before being transferred to the Gurruchaga Marée tanks. No nets are used.</p> <p>There is no written protocol that records these good practices.</p> <p>This criterion is therefore aspiring.</p>
Score	Aspiring

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>The fish are transported in a tank with an oxygen supply over a relatively short period of time. A completed transport voucher together with the fishing logs is used when transporting glass eels. The staff have an accreditation for the transport of live animals.</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	<p>The percentage of glass eels bought and sold for restocking was 42% in the 2020-2021 season. In this UGA (Adour), fishermen never fish the entire restocking quota. The share of restocking purchased by Mr Dupuis is therefore dependent on the willingness of fishermen.</p> <p>Taking this into consideration the criterion is considered aspiring. In addition, it is the legal obligation under EU law to achieve the 60% restocking target. The actors in France (fishers, traders, National Comité de Pêches the Government department, and others) should work together to find solutions to meet this target.</p>
Score	Aspiring

Summary scores for Component 4	
Not met	0
Not applicable	0
Aspiring	4
Responsible	8
Total possible	12
% Responsibility (Responsible / Total possible)	67%