Assessment against SEG Standard: Component 1: Core requirements
Component 2: Glass eel fishing

Completed by
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From 24th to 26th January 2022

Final Version

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

1) Introduction

This document represents the report produced following the audit of 24 to 26 January 2022 carried out in the framework of the SEG (Sustainable Eel Group) standard (version 6.0a, December 2019) with a group of 40 fishermen operating on the Adour in the maritime and/or fluvial zone and "wave fishermen" of the small coastal waters of the departments of Pyrénées Atlantiques (64) and Landes (40) (fishermen on foot with hand sieves). The fishermen concerned by this certification store the glass eels in fish tanks in their homes before selling them to traders.

The company Gurruchaga Marée organised this audit and the fishermen's group will be called " Fishermen Adour and coastal waterways ". This assessment has only been carried out in relation to components 1 and 2 of the standard.

In this UGA there are two licences, one for fishing in the maritime sector of the Adour and the other for fishing in the fluvial sector of the Adour. In addition to these licences, fishermen can apply to the Délégation à la Mer et au Littoral (DML) for authorisation to fish on foot with a hand sieve, "à la vague", in certain defined sectors in the departments of the Pyrénées Atlantique and Landes (such as the Huchet current at Moliets-et-Maa, the sector audited). Some fishermen hold one or other of the two licences or both, sometimes in addition to the authorisation to fish on the wave.

Thus, the **39 fishermen** concerned by this audit were classified between these 3 categories but some fish in all sectors, while other fish only in one sector.

As regards fishing in the maritime sector of the Adour, 23 fishermen were classified as mainly practising in this area. The gear used in this sector is a circular sieve 120 cm in diameter and 130 cm long. The gear is held in place by ropes and only fishes below the surface. In this sector, fishing is carried out with the help of the motor to go upstream.

For fishing on the Adour freshwater sector, 8 fishermen were classified as fishing mainly in this area. The gear used is identical to that of the maritime Adour, but the sieves are fitted with a handle allowing bottom fishing. In this sector, fishing must be done at a standstill, with the boat anchored and the sieves placed on the bottom and facing the current.

Figure 1 : Gear used on the Adour freshwater sector - FISH PASS -

Finally, as for wave fishermen, 8 fishermen were classified as practising mainly in this area. The sieves are rectangular and 120 cm wide. They are also equipped with a stick as they are operated by hand.

Figure 2 : Gear used by the wave fishermen - FISH PASS -

39 fishermen are concerned by the audit. Initially 9 fishermen were supposed to be audited but technical problems for two fishermen (one maritime and one river) made it possible to conduct only 7 audits.

The following fishermen are concerned for this assessment:

Name	First name	Sector
ALSUGUREN	Dominique	Adour maritime
ALSUGUREN	Enzo	Adour maritime
ALSUGUREN	Jean-Baptiste	Adour maritime
AZARETE	Olivier	Adour maritime
BARRAGUE	Maxime	Adour maritime
BERROUET	Pascal	Adour maritime
CLAVIER	Lionel	Adour maritime
DOMEC	Thomas	Adour maritime
ELISSALDE	Jean-Yves	Adour maritime
ELISSALDE	Matthieu	Adour maritime
FRITSCH	Jean-Luc	Adour maritime
LABADIE	Florent	Adour maritime
LAPASSOUZE	David	Adour maritime
LECUONA	Bixente	Adour maritime
LEGARJU	Eric	Adour maritime
MANSOUR	Boumédienne	Adour maritime
MARTINEZ	Didier	Adour maritime
MENVIELLE	Anthony	Adour maritime
PEPEDER	Didier	Adour maritime
PEYRELONGUE	David	Adour maritime
RICOLLEAU	Tony	Adour maritime
SOYAUX	Frédéric	Adour maritime
AUROUX	Eric	Adour maritime

Name	First name	Sector
CANEVET	Christian	A la vague
ELISSALDE	Patrick	A la vague
GRIFFOIN	Jérôme	A la vague
LARREDE	Benoit	A la vague
MARTINEZ	Vincent	A la vague
NEROU	Yannick	A la vague
SIMON	Emeric	A la vague
VALVERDE	Xavier	A la vague
BURRET	Jacques	Adour fluvial
DARRORT	Jean Pierre	Adour fluvial
DUPART	Didier	Adour fluvial
DUPORT	Hubert	Adour fluvial
LASSERRE	Sébastien	Adour fluvial
OLMEDA	Pedro	Adour fluvial
SENHAUX	Serge	Adour fluvial
LUPUYAU	Daniel	Adour fluvial

2) The assessment

The evaluator was Nicolas Belhamiti from the consultancy firm Fish-Pass. The visit took place from 24 to 26 January 2022. The fishermen audited were the following:

- Dirassar Dominique (taking over from Berrouet Pascal, who is ill) and Lapassouze David in Bayonne for the Adour maritime sector, the evening tide of 24 January.
- Darrort Jean-Pierre and Lupuyau Daniel in Port de Lanne for the freshwater Adour sector, the evening tide of 25 January.
- Mansour Boumédienne, Menvielle Anthony and Griffoin Jérôme for the wave fishermen, in Moliets and Maa, the evening tide of 26 January.

3) Client Contact Details

The company Gurruchaga Marée requested this audit. The contact person is therefore the head office of this structure as well as the independent fish merchant who collects from the majority of fishermen, Mr Christian Dupuis.

Name/Compagny	Gurruchaga Marée
Postal address	88 route de la corniche 64700 Hendaye
email address	gurrumaree@wanadoo.fr
Phone number	05 59 56 68 91

4) Results of the assessment

The outcome of this assessment is as follows:

Component 1: General Requirements	Auditor's findings	Weighting	Score
1.1 Commitment to Legality	Responsible	1	1
1.2 Contribution to eel conservation projects (bonus)	N/A	N/A	N/A
1.3 The organisation trades in certified responsibly sourced eels	N/A	N/A	N/A
1.4 Traceability:			
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
1.5.1 Biosecurity & welfare – Biosecurity measures are adopted	Responsible	1	1
	Total	5	5
	Percentage Responsibility Score:	**100%**	

Finding: The fishery with a score of 100% meets the generic requirements and can be considered **responsible** for this component.

Component 2: Glass eel fishing	Auditor's findings	Weighting	Score
2.1 Eel fishing is in a catchment that is meeting its escapement targets	Aspiring	2	0
2.2 There is good progress with the applicant's responsibilities in the eel management plan for the river or district	Aspiring	2	0
2.3 The fishery is well managed	Responsible	1	1
2.4 Mortality during fishing is minimised	Aspiring	2	0
2.5 The fishery has negligible impacts on by-catch species	Responsible	1	1
2.6 The fishery has negligible impacts on rare or other protected species	Responsible	1	1
2.7 The fishery has negligible impacts on habitats	Responsible	1	1
2.8 Transport	Responsible	1	1
2.9 Bonus score: fishermen donate a proportion of their catch for a local positive contribution	N/A	N/A	N/A
	Total	11	5
	Percentage Responsibility Score:	**46%**	

Finding: With a score of 46%, the fishery doesn't meet the requirements of component 2 for elver fishing and is considered **aspiring** under the SEG standard.

Summary of assessment and scoring

Component	Not Met	Aspiring	Responsible
1	0	0	5
2	0	6	5
Total	**0**	**6**	**10**
Total Responsibility Score: = 10/16			**63%**

Summary finding:

With a score on the responsibility criteria of 63%, the fishery has reached the level required to be considered **responsible** and meets the criteria for **certification by the SEG standard**.

5) Recommendations:

Fish-Pass makes the following recommendations in relation to the Adour and coastal rivers fishery:

1. With a score on the responsibility criteria of 63%, the fishery has reached the level required to be considered **responsible** and meets the criteria for **certification by the SEG standard**. However, component 2 relating to the glass eel fishery is considered aspiring. This component should be improved by the next audit by following the recommendations below.
2. The fishery should consider how to make a positive contribution to eel conservation projects (criteria 1.2 and 2.9) and implement them by the next assessment.
3. Criterion 2.2: In view of the current context, the fragility of this resource and the recent ICES advice to close all eel fisheries, the representative bodies of professional glass eel fishermen should not request an increase in the annual quota. Fishermen wishing to engage in a sustainable exploitation of this resource must ensure that their representatives do not make such a request and follow the advice of scientists (most often recommending a reduction in the quota).
4. Regarding criterion 2.4, several things can be improved in order to achieve the responsibility criterion:

   a) For fishermen on the Adour freshwater sector:

      i. Change the nets to have a terminal mesh size of 1 mm or less by the time of the control audit

      ii. Reduce the fishing time to always remain under 20 minutes

      iii. Install a livewell and bubbler system on the boat and always use it to hold glass eels

   b) Reduce the fishing speed to stay below 1 knot (only concerns fishermen from the Adour maritime). This is more important as the gear is very short (130 cm), which increases the pressure on the elvers caught

   c) Concerning wave fishermen, by the next audit all fishermen will have to have a small stove in the box used to keep eels during the tide. This is the only way to ensure that there will be no impact on glass eels caught due to a sudden freeze

   d) All the fishermen in this UGA have a fish tank at home which they use to store glass eels for at least 48 hours. However, for the majority, no mortality monitoring is carried out on these tanks. We recommend that, starting this year, fishermen keep a logbook of home mortalities that they can provide to the auditor during the control audit. Mortality should be linked to a period and a quantity of glass eels caught (fishing log). For greater legibility, it is preferable that the elver releases during sales are also indicated. An exemple :

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

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

5. We recommend testing with indigo carmine during the control audit. The lesions taken into account remain to be defined but this system would allow us to judge whether the practices are in accordance with the SEG standard, despite the excessively high speeds observed.

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

Standard monitoring is recommended. The next Audit should be scheduled for January 2024.

7) The Assessment

The tables below give the outcomes of the assessment against each of the criteria of Components 1 and 2 of the standard, providing a rationale for the scores given above.

Component 1 – Generic requirements (Weighting: 1 for each criterion)	
Criterion 1.1: Commitment to legality	
Responsible indicators	For at least the past two years: the organisation has not been found guilty for any offences relating to eel fishing or trading.
Aspiring indicators	For at least the past 12 months: the organisation has not been found guilty for any offences relating to eel fishing or trading.
Discussion	The seven fishermen have no current or recent judicial investigations. In addition, all fishermen sign an agreement certifying that they respect the conditions of the ESG standard, which includes a commitment to legality. The criterion is therefore met.
Score	Responsible

Criterion 1.2: Contribution to Eel Conservation Projects. (Optional bonus score)	
Responsible indicators	The organisation donates at least 2% of its profits or at least 20% of its corporate responsibility programme to projects that make a positive contribution to eel conservation or population enhancement, such as Eel Stewardship Funds, River Restoration projects, conservation and education projects.
Aspiring indicators	The organisation donates 1 – 1.99% of its profits or 10 - 20% of its corporate responsibility programme to projects that make a positive contribution to eel conservation or population enhancement, such as Eel Stewardship Funds, River Restoration projects, conservation and education projects.
Discussion	N/A
Score	N/A

Criterion 1.3: The organisation trades in certified responsibly sourced eel	
Responsible indicators	The organisation trades in at least 50% (by number) of certified responsibly sourced eel and has the documentation to demonstrate that.
Aspiring indicators	The organisation trades in 10 – 49.9% (by number) of certified responsibly sourced eel and has the documentation to demonstrate that.
Discussion	The audit only concerns fishermen who have not yet been certified by SEG and who therefore do not yet market certified eels. They are therefore not yet concerned by this criterion.
Score	N/A

Criterion 1.4: Traceability	
1.4.1: Traceability - Incoming product, separation and segregation	
Responsible indicators	• Certified and uncertified eel products can be clearly and easily traced back to their source. • Where a fishery or buyer, an electronic tele-declaration system is used. • It operates a clear system which ensures that the product remains separated at all stages from arrival to dispatch from non-certified eel products. • The organisation ensures that any products wishing to make a claim as certified do not contain any non-certified eel-based ingredients. • If resolved through mass- or number- balance calculations, the margin of error does not exceed 2%.
Aspiring indicators	• Certified and uncertified eel products can be traced back to their source. • If segregation is not possible, there are clear and auditable records of the numbers of certified and uncertified eels entering the organisation at each facility. • It can demonstrate through auditable records that the number of certified eels exiting the organisation in a ear did not exceed the number that entered. • If resolved through mass- or number- balance calculations, the margin of error does not exceed 5% or if a farm, the 2800 pieces per 1 kg of glass eels is applied.
Discussion	All the fishermen audited use the electronic declaration system. This system enables them to declare their catches via sms directly to the departmental fisheries committee. A computerised database makes it possible to track the fishermen's quota finely and to avoid exceeding the authorised quotas. Each day's fishing is also declared on paper via fishing forms in 3 copies: 1 for the administration (France Agrimer), 1 for the wholesaler and the last one is kept by the fisherman. This criterion has therefore been met
Score	Responsible

1.4.2: Traceability - Outgoing product	
Responsible indicators	• Where a fishery or buyer, an electronic tele-declaration system is used • Documentation is well maintained with a maximum of 2% error in the following: • The organisation correctly uses batch-coding for labelling certified product, which can be on the packaging for the product, or included in the documentation (e.g. invoice) with the assignment • All product to be sold as certified by an organisation is accompanied by an invoice which meets the following criteria: - Includes an appropriate batch code - Includes a record of the quantity (no. & weight) of product and to whom it was sold
Aspiring indicators	• Documentation is well maintained. If resolved through mass- or number- balance calculations, the margin of error does not exceed 5% in the following (or if a farm, the 2800 pieces per 1 kg of glass eels is applied): • The organisation correctly uses batch-coding for labelling certified product, which can be on the packaging for the product, or included in the documentation (e.g. invoice) with the assignment. • All products to be sold as certified by an organisation are accompanied by an invoice which meets the following criteria: - Includes an appropriate batch code.

	- Includes a record of the quantity (no. & weight) of product and to whom it was sold.
Discussion	As in the previous point, this audit concerns only fishermen and they use a system of electronic tele-declaration and fishing form. The criterion is therefore met.
Score	Responsible

1.4.3: Traceability - Record keeping and documentation	
Responsible indicators	• The organisation operates a system that allows the tracking and tracing of all eel from purchase to sale and including any steps in between. In the case of live eels this should include the ability to track each batch delivered to a buyer to be connected back to a water, a time period (maximum duration one month) and specific fisherman/vessel. • If a fisherman or buyer, a tele-declaration system is used to report catches and trade. • The organisation operates a system that also allows for the completion of a batch reconciliation of eel product by weight over a given period. • The organisation maintains records for a minimum of three (3) years.
Aspiring indicators	The above requirements are met except that: • Records have been maintained for less than three (3) years • If a fisherman or trader, a tele-declaration system is planned to be used to report catches and trade in the next season
Discussion	The fishermen all use an electronic tele-declaration system and fishing forms. These data are kept by the administrative authorities for more than 3 years. The criterion is therefore met.
Score	Responsible

Criterion 1.5: Biosecurity & welfare – Eel and eel products are provided with minimal risk of diseases, parasites and alien species	
1.5.1 Eel Fishing: Biosecurity measures are adopted	
Responsible indicators	• The fishery conducts good biosecurity measures such as the disinfection and drying of nets and equipment between each fishing in different waters. **OR** • The fishermen only operate in the same river or estuary, with no risk of transferring diseases or alien species between catchments.
Discussion	The fishermen work either on the Adour (maritime and/or freshwater) or wave fishing in different sectors. Some fishermen practice their activity on all the sites. However, the sieves used on the Adour and on the wave are different. So, the sieves used on the Adour are not used elsewhere, so there is no biosafety problem for these sectors. On the other hand, wave fishermen can change sectors. But these fishermen fish in salt water and the equipment is then dried between each tide. Thus, the risk of carrying diseases with the sieve is almost non-existent. The criterion is therefore met.
Score	Responsible

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

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

Criterion 2.2: There is good progress with the applicant's responsibilities in the Eel Management Plan for the river or District	
Weighting: 2	
Responsible indicators	There is credible progress with at least 75% of the actions relating to the fishery for the implementation of the Eel Management Plan for the river or eel management district.
Aspiring indicators	There is credible progress with at least 50% of the actions relating to the fishery for the implementation of the Eel Management Plan for the river or eel management district.
Discussion	Professional fisheries stakeholders have implemented the majority of actions related to the EMP. So, the exploitation rate of glass eel stock has decreased significantly since the reference period. This rate has been relatively stable in recent years and fluctuates around the management target. The allocation of glass eel fishing licences has decreased by 57% between 2006 and 2018. The ratio of the fishing quota 40% consumption and 60% restocking is unchanged since 2013. However, the target of 60% glass eels for restocking in Europe has never been reached, but the profession is getting closer to this target over the years. Reaching this objective is dependent on the European market, which is not the responsibility of professional fishermen.

	The overall catch quota has been increased for the 2021-2022 season to a total of 65 tonnes, an increase of +13% compared to the previous season. Given the current context and the recent ICES advice to close all eel fisheries. The increase in quotas is a bad signal for the sustainability of the fishery. Finally, France allocates between 5 and 10% of annual catches to French restocking operations, 5.8% in 2018. Despite the efforts made over many years, the quota increase for the 2021-2022 season does not meet the responsibility criterion.
Score	Aspiring

Criterion 2.3: The fishery is well managed	
Weighting: 1	
Responsible indicators	• Fishers are licensed and provide catch and effort data via a tele-declaration system. • Data on catch and effort are collected and analysed regularly by the fishery authority (at least annually at the end of the season). • There is a data set for at least the last 5 years that is considered by the fishery authority to be accurate, useful for statistical purposes and provide a comprehensive picture of the glass eel fishery under assessment. • Enforcement is in place throughout the fishing area and there is no evidence of systematic non-compliance.
Aspiring indicators	• Fishers are licensed and provide catch and effort data. • Data on catch and effort are collected and analysed regularly by the fishery authority (at least annually at the end of the season). • There is a data set for at least the last 3 years that is considered by the fishery authority to be accurate and provide enough information on the glass eel fishery under assessment for management and to track annual trends in glass eel arrival. • There is no evidence of systematic non-compliance.
Discussion	All fishermen have a licence and carry out the electronic filing in addition to the declaration by the fishing form. Fishing figures are monitored throughout the season by the Fisheries Committee to know the exact consumption of the quota to avoid a preventive closure. The official data come from the fishing sheets sent by fishermen to the administrative authorities. Thus, the Directorate of Maritime Fisheries and Aquaculture (DPMA in French) collects and compiles these data. During the elver fishing season, the DPMA distributes a table every week to report on the consumption of quotas in the various UGAs. In May-June, when the season is over, the DPMA distributes a statistical compendium (quota consumption, market price, number of wholesalers, etc.) per UGA. There is a set of reliable data for more than 5 years. This criterion has therefore been met.
Score	Responsible

Criterion 2.4: Mortality during fishing is minimised	
Weighting: 2	
Responsible indicators	• Fishing is by hand-held nets and has effective nearby holding facilities **OR** • Fishing from vessels meets the following criteria: i) fishing is at slow speed (no more than 1 knot relative to water); ii) haul duration is on average no longer than 20 minutes, with the maximum duration not more than 30 minutes; iii) mesh size of cod end no greater than 1mm; iv) rest of the net designed such that glass eels do not become trapped or abraded; v) vivier tank on board and in use; vi) fishermen maintain accurate daily records of mortality. **OR** • Fishermen can demonstrate that the mortality rate of the catch over the duration of holding in the storage facility is less than 4% for each batch captured. **OR** • Fishing methods (in France) meet the criteria in Category 1 of the France Good Practice Guide. **OR** • The Carmin Indigo or similar test indicates that mortality averages less than 4%.
Aspiring indicators	• Fishing from vessels meets the following criteria: i) fishing is at slow speed (no more than 1.5 knots relative to water); ii) maximum haul duration no longer than 30 minutes; iii) mesh size of cod end no greater than 1mm; iv) rest of the net designed such that glass eels do not become trapped or abraded; v) vivier tank on board and in use; vi) fishermen maintain accurate daily records of mortality. OR • Fishermen can demonstrate that the mortality rate of the catch over the duration of holding in the storage facility is between 4% and 8% for each batch captured. **OR** • Fishing methods (in France) meet the criteria in Category 2 of the France Good Practice Guide. **OR** • The Carmin Indigo or similar test indicates that mortality averages between 4% and 8%.
Discussion	The practices observed in the three sectors are very different. They are therefore presented by sector. • Adour maritime: This is the only sector where fishing is carried out on a boat with the engine running. The circular sieve (120 cm in diameter) is launched on the surface only. Fishing is carried out exclusively against the current. During the audit, the hauls made by the two fishermen lasted between 7 and 10 minutes. The maritime fishermen all have a livewell on their boat, most of the time with a bubbling system activated during the tide. They also have a bin, where the bags are emptied, which is topped by a reject screen allowing by-catch to be released quickly. The mesh size at the bottom of the sieve is larger than required by the standard (1.3 mm). However, maritime fishermen have already ordered new bags with a 1 mm codend. The fishing speed observed was on average 2.5 knots (between 2.3 and 2.7). The average speeds are higher than what is required in the standard, however, they are lower than what is recommended in the CNPMEM's Guide des Bonnes Pratiques de France. • Adour freshwater sector: In this sector, fishing is carried out at a standstill with the boat anchored. The sieves are placed on the bottom facing the current using a handle fixed to the circular frame (120 cm in diameter) and attached to the boat. The fishing time is between 10 and 30 minutes depending on the quantity of elvers and the strength of the current. The more elvers or the stronger the current, the shorter the fishing time. Most fishermen who fish only in the freshwater area do not have a livewell on board. The elvers are kept in a plastic or polystyrene box throughout the tide. They all have a reject screen to separate the glass eels from the rest of the catch and to release the by-catch. The mesh size at the bottom

	of the sieve is larger than required by the standard (1.3 mm). For the time being, the fishermen have no plans to change the sieve bags. • Wave fishermen: This type of fishing must be done on foot with a hand-held sieve (120 cm wide). The fishermen fish either on the beach at the level of the waves' arrival, or at the level of the "current", areas of freshwater arrival. In all cases, the sieve is placed on the bottom to catch the elvers and raised immediately to collect the elvers. The fishing time is very short. In rare cases they place themselves a little higher up on the freshwater inlet and fish with the gear placed on the bottom facing the current for about ten minutes. All the fishermen store the elvers in plastic boxes topped with a reject sieve to release the by-catch (rare with this fishing technique). Some have a small stove in the box to prevent the glass eels from freezing during the tide. The mesh size is larger than 1 mm but it turns out that a finer mesh would be dangerous for fishermen. Indeed, this would lead to an increased risk of falling in the event of a very strong current (less important filtration of the water in the sieve). During the audits carried out with the 7 fishermen, no glass eel was seen trapped in any of the gear used. All the fishermen store their glass eels in a fish tank at home. This tank is official and declared to the administration. They indicate low mortality without it being possible to verify this in a file. Depending on the site, certain criteria are not met. The most impactful is the mesh size of the gear. In the maritime sector, this will be resolved with the purchase of bags with a terminal mesh of 1 mm. On the other hand, there are no plans to change the mesh size in the other sectors for the moment. However, in the other sectors, the fisherman does not use any speed and therefore the pressure on the elvers is very low. On this basis, the practices of these fishermen can be considered as sensitive. We therefore recommend assigning an aspiring criterion with several recommendations (part 5, page 5 of the document) to be applied by the control audit.
Score	Aspiring

Criterion 2.5: The fishery has negligible impacts on by-catch species	
Weighting: 1	
Responsible indicators	• The fishery has a negligible impact on by-catch. • By-catch is returned to the water alive as gently and rapidly as possible.
Aspiring indicators	• The fishery has low-level impacts on by-catch. • By-catch is returned to the water alive as gently and rapidly as possible.
Discussion	During the audits, few by-catches were observed. None with wave fishermen. With freshwater fishermen, only pseudorasbora were caught. In the maritime sector, the following species were observed in small quantities: Thinlip grey mullet, bleak, bitterling and pseudorasbora. The rejection sieves were always emptied quickly and the practices do not seem to have any impact on by-catches. The criterion is therefore met.
Score	Responsible

Criterion 2.6: The fishery has negligible impacts on rare or other protected species	
Weighting: 1	
Responsible indicators	The fishery has no direct interactions resulting in mortality or injuries with other species that are considered vulnerable, threatened, endangered or are protected under national or international law.
Aspiring indicators	Interactions, resulting in mortality or injury, with other species that are considered vulnerable, threatened, endangered, or are protected under national or international law, are rare and have no overall measurable impact on the population.
Discussion	Of the species caught, the bitterling is a species with several protection statuses. However, the fish were always returned to the water quickly and alive. The criterion is therefore met.
Score	Responsible

Criterion 2.7: The fishery has negligible impacts on habitats	
Weighting: 1	
Responsible indicators	The fishing gear does not cause any damage to the benthos.
Aspiring indicators	Damage to the benthos by gear is limited or minimal.
Discussion	The practices observed are carried out in open water in the maritime sector. In the other sectors, fishing is carried out on the bottom, but without any speed on the part of the fisherman. There is therefore no risk of damaging the benthos. This criterion is therefore met.
Score	Responsible

Criterion 2.8: Transport	
Weighting: 1	
Responsible indicators	• The operator holds the relevant transport authorisations. • There is a Transport Plan in place to minimise travel time – this meets the Transport requirements for vertebrates. • Packing is done in a way that minimises handling, time and stress. • Eels are kept cool and wet with an adequate supply of oxygen.
Discussion	The fishing form is filled in at the end of the tide, before leaving the boat. All fishermen have a fish tank at home and operate in the same way. The glass eels are transported from the boat to their vehicle in a plastic box or bucket. The catch is weighed, usually without transferring the container (the tare is known) at the truck. The glass eels are then transported either directly into the container, or placed in a polystyrene box with a glass of water, or (more rarely) in a small oxygenated tank. Once at home, the glass eels are placed in the oxygenated water tank. The criterion is thus met.
Score	Responsible

Criterion 2.9: Bonus Score: Fishermen donate a proportion of their catch for a local positive contribution	
Weighting: 1	
Responsible indicators	Fishermen have donated an average of at least 5% of their catch in the past 2 years to local stocking programmes, e.g. translocating over barriers to aid upstream migration and recruitment in the catchment, or have credible plans in place to do so next season (note that this is separate from any planned restocking to meet the 60% target).
Discussion	N/A
Score	N/A

Summary scores for Component 2	
Not met	0
Not applicable	1
Aspiring	6
Responsible	5
Total possible	11
% Responsibility (Responsible / Total possible)	**46%**