

Respondee	Category	Comments	SEG Response
Note, identities not published as not all have granted permission			Note that all respondents received individual and direct replies to their comments.
	Social		
	Science / social	Section 5.2, page 8. A breakdown of value and employment in the different activities should be useful to focus management towards sustainability.	Thanks. We have removed this section anyway now.
		11, p26. Bottom of page 'from' should be 'form'.	Corrected
	Social: Restocking, angling, yellow eel fishing	Dear David, please give me one more week thank you	
	CAB	<p>The most important thing that changes is the N1 Component. There are also small adjustments in other criteria. As you will see in Component N1, everything is mandatory, and this will become the filter for access to SEG certification. If a Participant or candidate wishes to become an SEG, he/she must first be very sure that he/she meets Component N1. If the candidate does not meet only one of the mandatory SEG components, he/she will not be able to be certified. This type of rigour is not unusual; in fact, all the certifications we work on that I am aware of, with the exception of SEG, have mandatory criteria in their first part. Agree -seems sensible? Can we go with 100% SEG eel now?</p> <p>See also spreadsheet attached.</p>	Used

	Auditor	<p><b>Question 1 : Yes :</b></p> <p>1.1 : It should be clarified whether this criterion applies from the moment the offence is under investigation or if found guilty? Also, the auditor's information is very limited in this area and is limited to the declaration of the fisherman/fishmonger and press articles (which do not name the fisherman/fishmonger...). How to know if all SEG fishermen have been convicted or not? SEG and/or CAB watch?</p> <p>Télé-déclaration for fishermen : Some use the remote declaration, but only once a week... whereas the objective is to monitor the quota on a daily basis. Maybe specify that the teledeclaration must be used every day? In any case, <b>this criterion is judged solely on what the fisherman says</b>. The auditor does not have a list of fishermen who do not use the remote declaration provided by the fisheries committees.</p> <p>2.4 : As far as speed is concerned, this can be adapted when we come. We judge only on that, as it is impossible to do otherwise. Perhaps carmine tests should be made commonplace when the boats disembark? That way they will have fished without us on board...</p> <p>2.5 and 2.6 : Very complicated to judge this criterion during audits. Most of the time the rejection screen is emptied very quickly, but this does not guarantee that this is the case when we are not on board.</p> <p><b>Question 2 :</b> I think the criteria are broadly understood... When they know them. The majority of fishermen don't really know what they are conforming to...</p> <p><b>Question 3 :</b> Yes, as mentioned in our reply, we have the feeling that some fishermen do not want us on board at all and even that some organisers (OP, XXX etc) make sure to send us on specific boats... This is why we have proposed that for the next season it is the CAB who will randomly choose the fishermen from the list (from the unaudited fishermen).</p> <p>Also for this year 2023, it is possible that some organisers have played for time to "win" a year on the audits. Indeed, many fishermen's audits could not be carried out.</p> <p><b>Question 4 :</b> I think that overall the criteria are clear. The criterion 1.1 need to be clearer for us. There is also an ambiguity on criteria 2.1 and 2.2 where fishermen are scored, but it is not really or totally up to them.</p> <p>However, some of the criterion could be harder indeed (specially 2.4). First of all, from our point of view, the SEG must be prepared for the fact that some fishermen, or even lists, may lose the certificate. Indeed, if we audit the "second choice" fishermen this is a possibility. Also, the objective of 100% SEG seems unlikely because if some fishermen or lists are no longer SEG, this will create strong tensions among SEG fishmongers. It would perhaps be more judicious to allow fishmongers to have a share of non-SEG fish in their tanks. In any case, great care should be taken when updating the lists, indicating the dates on which the label was acquired and possibly lost. Otherwise, it is impossible to monitor traceability at the fish traders.</p>	<p>Have improved this section. OK / better?</p> <p>How do we inform fishers better? We could pay the assessors to provide local training?</p> <p>Will be interested in your feedback on the changes made We are prepared to lose some. The standard must be credible and seen to be. They will probably return.</p>
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		<p>The criteria should be more stringent regarding the fishery, especially point 2.4. I refer you to our initial feedback, where this point is detailed.</p> <p>Le 15/03/2023 à 13:29, David Bunt a écrit :</p> <p>Dear XXX,</p> <p>Thank you for your recent feedback on the standard, which I am working through.</p> <p>I have some further follow up questions which I hope you might be able to answer please? ...</p> <ol style="list-style-type: none"><li>1. Are there any criteria you feel it is difficult to fully assess (or assess at all), and if so why?</li><li>2. Are there any criteria you don't feel they adequately understand?</li><li>3. Do you ever have concerns about certificate holders that you are unable to reflect in audits?</li><li>4. Are there any requirements for which the guidance or evidence requirements could be made stronger or clearer?</li></ol>	<p>The sector (including the traders) have broadly agreed and accepted the 100% SEG target.</p> <p>We will consider how to have 'real time' knowledge of those fishers on lists.</p>
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	Social: Other Standard	<p><u>P 38, Component 5:</u>  Wording - MSC accredited fisheries  Comment - MSC certified fisheries rather than accredited.</p>	Used
		<p><u>P 38, Component 5:</u>  Wording - IFFO, the Marine Ingredients Organisation, accredit fish feed for sustainability, so use of IFFO accredited feed is a way to meet this criterion.  Comment – IFFO are the trade organisation for marine ingredients but do not certify or accredit fish feed. MarinTrust is a third-party certification programme that certifies the production of marine ingredients (MarinTrust standard) and the Chain of Custody of those marine ingredients (MarinTrust CoC standard). Please refer to website for more details: <a href="https://www.marin-trust.com/">https://www.marin-trust.com/</a></p>	Used
		<p><u>P39, Criterion 5.2.</u>  Wording - Fish meal/oil in the feed (including juvenile feeds) is certified by IFFO or MSC or shown in some other way to be from responsible or sustainable sources  And  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  Comment – IFFO do not certify fishmeal or fish oil. MarinTrust is the relevant standard for this.  MSC do not certify fishmeal or fish oil production, however they do certify the fisheries that source the raw material to produce some fishmeal and oil, and they provide a chain of custody standard that provides traceability of the MSC certified fish through the supply chain.</p>	Used
	Economic		

	Economic / Social (Eel trader & farmer)	<p><b>Your comments on the SEG standard or related documents</b></p> <ul style="list-style-type: none"> <li>- <b>ICPE, Installations Classées Protections Environnements (classified installations environmental protection)</b> Draw on the obligations of European countries such as France: For example, in France, if a French company exploits more than 20 tonnes of live fish, it has to establish an ICPE involving: <ul style="list-style-type: none"> <li>- Wastewater treatment</li> <li>- Disinfection of tanks; buildings; live trucks</li> <li>- Full traceability of raw materials</li> <li>- Hygiene traceability</li> <li>- Importance of environmental protection</li> </ul> </li> <li>- <b>Meticulous and rigorous traceability</b> Ensure that traceability is respected throughout the entire "path" taken by the fish.</li> <li>- <b>European intra-group control</b> In the case of a group of companies, each company should undergo a complete audit to ensure that the visions within the group are similar.</li> <li>- <b>Training for transporters</b> A live animal transport licence should be mandatory for every driver transporting SEG fish in Europe. Proper training is a real security for the fish as the driver will be able to react appropriately in case of an accident, breakdown or other tragic consequences. In France, this licence is obtained from a training centre.</li> <li>- <b>Highlighting the objectives</b> Clarify, distinguish and synthesise the issues, objectives and conditions of SEG for each profession. Indeed, writing summary documents for each profession would ensure a better understanding and awareness of each.</li> <li>- <b>Guaranteeing the future of restocking glass eels</b> There is a great deal at stake: the restocking of European rivers. One of SEG's main objectives is to ensure the future of the glass eels by creating a union of certified, responsible and committed companies. This is why it seems essential to ensure the cohesion and commitment of this union.</li> </ul> <p>117 SEG Standard Feedback Form    © The Sustainable Eel Group (2023)    Version 2.0 Jan 2023    1</p>	<p><b>Used</b></p> <p><b>Used</b></p>
	Economic (Eel farmer)	<p><b>Stocking Page 14:</b> Glass eels are restocked because diluting the species increases the survival rate. In the basis we use a surplus or an abundance of glass eels to be able to collect them and distribute them to healthy food rich waters where they can freely migrate as adult eel for spawning. This point of diluting and increasing the survival rate is constantly forgotten in the discussions about restocking and contribution of the sector. If you should not collect them less eels survive, that is the basis of restocking for the recovery of the stock. Is there a possibility to add this point? Yes. Though it is described earlier in the document.</p>	The restocking section is reworded and includes these points
		<p><b>Criterion 1.2 page 19:</b> The organisation donates at least 2% of its profits ..... If a company loses money it will always get a responsible indicator. Profits maybe should be changed into turnover and % into promillage.</p>	<b>Used</b>

		<p><b>Criterion 1.3 page 20:</b> The percentage of 50% can be increased in the new version to 60% or even more. ?? I think we are aiming for 100% now?</p> <p>Not passing criterion 1.1, 1.3, 1.4 should block the certification. These points can not be aspiring.</p>	<p>Have used. Generally 100% unless any old stock left, and not applied to wild caught yellow eels yet.</p> <p>Agreed and changed</p>
		<p><b>Component 4: Eel buying and trading</b> All companies and collection stations from 1 owner who trades with glass eel in the EU should be SEG certified and if 1 not passes the certification because of the above mentioned points 1.1, 1.3 and 1.4 none of the companies can be certified. I.e. applies to whole organisation / group of companies.</p>	Used
		<p><b>Component 5: Eel farming.</b> <b>Mortality rate during culture:</b> Finding a single method is not difficult: Every farmer should measure the mortality in kg/day/farming system. Every day there will be a total kg of dead fish and pieces. Than you calculate total pieces and kg for year A. The formula should be: (pieces dead year A/mean pieces stock year A) x 100. And you can do so for kg: (kg year A/mean stock year A) x 100 The mean pieces in the stock year A represent 3 years of glass eel intake as the mean life time of eel in the farm is about 1,5 year. Therefore the mortality of year A represents all 3 year classes for that year and gives an correct indication of the mortality in that year and in the end the pieces in total. You should not double the mortality rate (from 4,4 to 8,8 in the example), because in that case you count double on the same pieces in that year. This is a wrong understanding of how it works. And how should you calculate the next year if you already count the mortality of 2 years? This should be corrected in the note on page 38</p>	Used
		<p><b>Restocking of cultured eels:</b> On page 39 the formula for calculating restocking is wrong. It is not a percentage of the pieces in your stock. It is a percentage of the intake of pieces in the farm as glass eels or fingerlings. The formula should be: <math>((\text{Year restocking Total (by piece)}/\text{Year intake (by piece)}) \times 100 = \% \text{ Restocked per year}</math> This is then automatically a control for the intake of glass eels for restocking whether the are restocked. For example: Farmer A bought 100 kg glass eels for restocking and 100 kg glass eels for consumption. The mean pieces of 1 kg glass eels are 2800/kg. This farmer bought in total <math>2 \times 280.000 \text{ pieces} = 560.000</math> If this farmer restocked 84.000 pieces, that is 15% so top score for SEG (responsible indicator at 5.7), but he had to restock minimal 280.000 pieces as they were destined for restocking (wildlife crime). Farmers who do this should not be able to get the SEG certification. Then there is stated that the eels used for restocking should not be graded out. This is a mis understanding of the real situation. Eels are ordered for restocking projects in different sizes, eg. 1-5 gram, 3-7 gram, 3-12 gram etc. Only in Sweden the government orders the whole batch. Fingerlings have to be graded for this purpose in the rest of Europe. We only should prevent that slow growers are restocked. Therefore we should talk about age of the fingerlings.</p>	Used

		<p>I would propose max.age 1,5 year after intake of glass eels. Eels can still be restocked but are not counted for the % of the intake.</p> <p>This part should be rewritten and it should state that as insufficient glass eels for restocking are restocked farmers should not pass the standard.</p>	Used
		<p><b>Criterion 5.3:</b></p> <p>This responsible factor should be changed.</p> <p>All farmers have different systems with different sizes from glass eel till fingerling or fingerling till market size. Some farmers have 2 steps, some 3 or more.</p> <p>Therefore the only interesting feed conversion is the overall feed conversion:</p> <p>Feed used year A / eels produced year A.</p> <p>This feedconversion for a responsible eel farmer should be below 1,6.</p> <p>The way it is now stated 1.1 for fingerlings or less is based on the results of glass eel intakes.</p> <p>Most farmers farm fingerlings in their glass eel system, so they will not pass 5.3, but they might have an overall FCR of less then 1,5.</p> <p>How it is divided here at this criteria I suppose is based on the experience of 1 eel farmer in the North.</p>	Used
		<p><b>Criterion 5.7:</b></p> <p>Here the farm has to restock minimal 10% and has to prove that all pieces of glass eel bought for restocking are restocked.</p>	Used
		<p><b>Criterion 5.8:</b></p> <p>This is a strange criterium as it is written.</p> <p>Eels for restocking should reflect 100% of the age group of the whole farm?</p> <p>This means as the mean weight of the whole farm 100 gram is that you are not able to restock the small eels.</p> <p>As stated before governments determine the size of fingerling restocked (only in Sweden not).</p> <p>We should state here that eels that are restocked should not be older than 1,5 year after glass eel intake.</p> <p><b>General adjustment:</b></p> <ul style="list-style-type: none"> <li>- Farms who only produce fingerlings for other farms should not be controlled for restocking % as this is the responsibility for the farms who buy the fingerlings. Farms who do so miss the score of this restocking % and will never reach high score.</li> </ul>	Used
		<p>I look forward to the new adjusted version.</p> <p>Kind regards</p>	
		<p>As A has proposed in Component N1 everything should be mandatory.</p> <p>I have some adjustments to this:</p> <p>1.2 This point should be changed into: If a company is not contributing to an ESA member than minimal 2% of profit .....</p> <p>If a company contributes to an ESA member it automatically gets the mandatory.</p>	Used
		<p>As I wrote in my previous mail, the 2% of profit is not the rights choice of calculating. As a company who loses money automatically gets the mandatory.</p>	Used
		<p>1.5 should be judged as the other components and not mandatory. So the parts of 1.5 should be brought under the other components eg. eel faming for the part that counts for eel farming.</p> <p>Hope you understand my points and if you have any questions please feel free to contact me.</p>	Used

	Social / Economic (Eel farmer)	<b>5.2 Discussion of terms and targets, P. 8</b> Could the issue: “facilitation of work for local communities” also be added to the table that contains Social, Environmental and Economic issues?	Have removed this section
		<b>5.2 Discussion of terms and targets, P. 9</b> The weblink for “ICES 2017” is not working.	Have removed this section
		<b>6.2 Stocking</b> Glass eels are restocked because diluting the species increases the survival rate. In the basis we use a surplus or an abundance of glass eels to be able to collect them and distribute them to healthy food rich waters where they can freely migrate as adult eel for spawning. This point of diluting and increasing the survival rate is constantly forgotten in the discussions about restocking and contribution of the sector. If you should not collect them less eels survive, that is the basis of restocking for the recovery of the stock. Is there a possibility to add this point?	Have re-written this section
		<b>10.1 Structure, p.17</b> Do I understand well, that a company with illegal catch and trade can still pass the Responsible level certificate? Is it an idea to separate illegal trade from the other criteria points? Or point out that: “the standard will only apply to those who achieve the criteria and have a <u>100%</u> traceable supply of certified eel.”	Incorrect interpretation, however, we have changed the criteria and added a decision diagram to hopefully made it clearer
		<b>11. The standard, P.19</b> The organisation donates at least 2% of its profits ..... If a company loses money it will always get a responsible indicator. Profits maybe should be changed into turnover and % into promillage.	Used – as per above
		<b>11. The standard, P.20</b> The percentage of 50% can be increased in the new version to 60% or even more. Not passing criterion 1.1, 1.3, 1.4 should block the certification. These points cannot be aspiring.	Used – as per above
		<b>11. The standard, P.22</b> “the margin of error does not exceed 2%”, is this for all eel or only glass eel?	This has been removed
		<b>11. The standard, p.24</b> All companies and collection stations from 1 owner who trades with glass eel in the EU should be SEG certified and if 1 not passes the certification because of the above mentioned points 1.1, 1.3 and 1.4 none of the companies can be certified.	Used – as per above
		<b>11. The standard, P.25</b> The sentence “UV is uses .. between tanks”. What is meant between tanks? “UV is used at an appropriate level to control diseases.”	Reference to UV has been removed
		<b>11. The standard, P.27</b> The link to “Good Practice Guide for Glass Eel Fishing & Restocking” is not working. An error occurs.	We have removed references to this now
		<b>11. The standard, P.37</b>	Not changed



		What is meant with a back-up system? A generator?	
		<p><b>11. The standard, p. 38</b></p> <p>Finding a single method is not difficult:  Every farmer should measure the mortality in kg/day/farming system. Every day there will be a total kg of dead fish and pieces.  Than you calculate total pieces and kg for year A.  The formula should be: (pieces dead year A/mean pieces stock year A) x 100.  And you can do so for kg: (kg year A/mean stock year A) x 100  The mean pieces in the stock year A represent 3 years of glass eel intake as the mean life time of eel in the farm is about 1,5 year.  Therefore the mortality of year A represents all 3 year classes for that year and gives an correct indication of the mortality in that year and in the end the pieces in total.</p> <p>You should not double the mortality rate (from 4,4 to 8,8 in the example), because in that case you count double on the same pieces in that year. This is a wrong understanding of how it works.  And how should you calculate the next year if you already count the mortality of 2 years?  This should be corrected in the note on page 38</p>	As above
		<p><b>11. The standard, p. 39</b></p> <p>On page 39 the formula for calculating restocking is wrong. It is not a percentage of the pieces in your stock. It is a percentage of the intake of pieces in the farm as glass eels or fingerlings.  The formula should be:  ((Year restocking Total (by piece)/Year intake (by piece))x100 = % Restocked per year  This is then automatically a control for the intake of glass eels for restocking whether the are restocked.  For example:  Farmer A bought 100 kg glass eels for restocking and 100 kg glass eels for consumption.  The mean pieces of 1 kg glass eels are 2800/kg.  This farmer bought in total 2x 280.000 pieces = 560.000  If this farmer restocked 84.000 pieces, that is 15% so top score for SEG (responsible indicator at 5.7), but he had to restock minimal 280.000 pieces as they were destined for restocking (wildlife crime).  Farmers who do this should not be able to get the SEG certification.  Then there is stated that the eels used for restocking should not be graded out. This is a mis understanding of the real situation. Eels are ordered for restocking projects in different sizes, eg. 1-5 gram, 3-7 gram, 3-12 gram etc. Only in Sweden the government orders the whole batch.  Fingerlings have to be graded for this purpose in the rest of Europe. We only should prevent that slow growers are restocked. Therefore we should talk about age of the fingerlings.  I would propose max.age 1,5 year after intake of glass eels. Eels can still be restocked but are not counted for the % of the intake.</p>	As above

		This part should be rewritten and it should state that as insufficient glass eels for restocking are restocked farmers should not pass the standard.	
		<p><b>11. The standard, P.40</b>  This responsible factor should be changed.  All farmers have different systems with different sizes from glass eel till fingerling or fingerling till market size. Some farmers have 2 steps, some 3 or more.  Therefore the only interesting feed conversion is the overall feed conversion:  Feed used year A / eels produced year A.  This feedconversion for a responsible eel farmer should be below 1,6.  The way it is now stated 1.1 for fingerlings or less is based on the results of glass eel intakes.  Most farmers farm fingerlings in their glass eel system, so they will not pass 5.3, but they might have an overall FCR of less then 1,5.  How it is divided here at this criteria I suppose is based on the experience of 1 eel farmer in the North.</p>	As above
		<p><b>11. The standard, P.41</b>  Criterion 5.7: Here the farm has to restock minimal 10% and has to prove that all pieces of glass eel bought for restocking are restocked.</p>	As above
		<p><b>11. The standard, P. 41</b>  Criterion 5: I don't understand the criterium. The size of fingerling restocked are determined by the government. It would probably be better to state that eels should not be older than 1,5 year after glass eel intake.</p>	As above
		<p><b>General adjustments:</b></p> <ul style="list-style-type: none"> <li>- In a future version I would also focus on a more professional designed format of the document.</li> <li>- Farms who only produce fingerlings for other farms should not be controlled for restocking % as this is the responsibility for the farms who buy the fingerlings. Farms who do so miss the score of this restocking % and will never reach high score.</li> </ul>	We do have that as well – provide link in reply t
		<p>As A has proposed in Component N1 everything should be mandatory.  We have some adjustments to this:</p> <ul style="list-style-type: none"> <li>• 1.2 This point should be changed into: If a company is not contributing to an ESA member than minimal 2% of profit .....</li> </ul> <p>If a company contributes to an ESA member it automatically gets the mandatory. The 2% of profit is not the right choice of calculating. As a company who loses money automatically gets the mandatory.</p>	As above
		<p>And:</p> <ul style="list-style-type: none"> <li>• 1.5 should be judged as the other components and not mandatory. So, the parts of 1.5 should be brought under the other components eg. eel faming for the part that counts for eel farming.</li> </ul> <p>If you have any questions, please don't hesitate to ask!</p>	As above
	Social / Commercial	SEG should put more emphasis on who is the UBO of a company. This will give SEG more insight into how organisational structures run. A mandatory organogram with UBO statement is the solution.	Used

	(Smoker)	The UBO is the ultimate benefactor who usually also bears responsibility or a group of companies. Especially important for complex organisations consisting of multiple companies or entities located in sometimes multiple countries, this is extremely important	
	Commercial - Trader	<u>Component 1. 1.1</u> Provide “extrait de casier judiciaire” or equivalent from the country's authority where you are running a business linked to eels from. Might be over kill for the fishermen but for buyers, farmers ... it should apply to managers and anyone involved in the trading. Could be required from several different countries if you are involved in the eel business in different countries. It is a personal record and not a company record.	Used
		<u>Component II, 27 - 28</u> “Mortality rate in Glasseel fishery and storage” this part is not clear, must be understandable at first read. Too complicated.	Have reduced and made clearer. Should we apply just the Carmine Indigo test?
		<u>29</u> BY catch in glass fisheries : too complicated for the fisherman	Has been reduced / simplified
		<u>2.4</u> Vivier tank on board : not always possible. Kept moist in polystyrene box show very often better results than in tanks. They do not control water quality, density... Boxes is much simpler and less risky.	Used
		<u>Component IV, 4.2</u> Mortality rate <2% again not clear. Do we have to remove the mortality from the first week of storage? The all mortality records are not clear enough. To be stated more clearly.	Have amended to hopefully make clearer and simpler. Please review and feed back
	Commercial - Trader	I see the whole standard has become very prescriptive and this carries its own complexities in the management and interpretation of the standard. Though it is done with the best intention there comes a point when all these demands reduce the credibility of the standard. For example It is one thing to define escapement targets and population density. it is another to try measure them with certainty as we have seen in the proposed stocking plan. It does seem that the EA have no confidence in the data that that they are capturing. We are also long way from understanding the efficacy of eel passes and for the UK there is no funding available to do this. If we cannot measure these things it is very difficult to manage. On specifics: My concern is that it is still possible for persons that have been able to benefit from the proceeds crime to hold the standard. After running a legal business for more than twenty years in France we have come away with nothing. It has been a hand to mouth existence. There is something wrong with our business model or the standard if we have worked to the standard all this time for no reward. On the other hand those running illegal businesses have really benefited from the proceeds of crime. They have been able to develop their supplier base, invest in new facilities and equipment and have a surplus of cash which is a buffer for difficult times. The present standard negates these issues in just a couple of years but the proceeds of crime impact on the sector for decades.	Noted and used where appropriate.

		<p>How is that someone like XXX who took 70,000 euros out of our company, was involved with illegal trade with XXX, and has been investigated for tax evasion associated with property and holiday lets able to achieve SEG certification.</p> <p>There are other Ramaseurs out there that also have very chequered careers. There is no place for these sort of people in this sector. These people will not be reformed and will be able to participate invisibly with illegal trade, I agree at a lower volume, with little risk of being detected. It is a mistake to allow them to remain in the regulated sector. No doubt if they are removed from the sector they will continue to trade illegally. At least the whole process will be more transparent and there is a greater risk of them being caught.</p>	
	Commercial - Farmer	<u>General</u> : When being assessed a lot of promises not kept by the assessor, but there were a lot of assessments being processed at the same time.	Agreeing a new CAB
		<u>Outgoing product</u> . p21 Could not find "see also section 12.3"	Changed Link to Claims & Labelling guide
		Is it possible to either use the term "restocking" or stocking" so there is no confusion. I prefer the term "restocking"	Hope this is more consistent now?
		<u>Eel Farming Mortality</u> . p38 "Total Stock" is used in calculating the % mortality: is this the maximum stock number during the year, or average stock number for the year, or something else?	Formula has been amended and simplified
		<u>% Restocking</u> . P39. In the calculation of % restocking the term "/Year Production (by piece)" is used. What is included in production?	Formula has been amended and simplified
	Commercial - Farmer	<p><b>6.2 Stocking, P14</b></p> <p>Glass eels are restocked because diluting the species increases the survival rate. In the basis we use a surplus or an abundance of glass eels to be able to collect them and distribute them to healthy food rich waters where they can freely migrate as adult eel for spawning. This point of diluting and increasing the survival rate is constantly forgotten in the discussions about restocking and contribution of the sector. If you should not collect them less eels survive, that is the basis of restocking for the recovery of the stock</p>	As above
		<p><b>1.2, P19</b></p> <p>The organisation donates at least 2% of its profits ..... If a company loses money it will always get a responsible indicator. Profits maybe should be changed into turnover and % into promillage</p>	As above
		<p><b>5. P38</b></p> <p>In my opinion Eel farmers can count the Mortality by kg in one year. To count all the mortality per day is too much work. The company who collects the dead Eels has all the data we need. The formula should be: (Pieces mortality year A/mean pieces stock year A) x 100. You should not double the mortality rate (from 4,4 to 8,8 in the example), because in that case you count double on the same pieces in that year. This is a wrong understanding of how it works.</p>	As above
		On page 39 the formula for calculating restocking is wrong. It is not a percentage of the pieces in your stock. It is a percentage of the intake of pieces in the farm as glass eels or fingerlings. The formula should be: ((Year restocking Total (by piece)/Year intake (by piece))x100 = % Restocked per year	As above

		This is then automatically a control for the intake of glass eels for restocking whether they are restocked. For example: Farmer A bought 100 kg glass eels for restocking and 100 kg glass eels for consumption. The mean pieces of 1 kg glass eels are 2800/kg. This farmer bought in total 2x 280.000 pieces = 560.000	
		<b>5.8 P41</b> Then there is stated that the eels used for restocking should not be graded out. This is a mis understanding of the real situation. Eels are ordered for restocking projects in different sizes, eg. 1-5 gram, 3-7 gram, 3-12 gram etc. Only in Sweden the government orders the whole batch. Fingerlings have to be graded for this purpose in the rest of Europe. We only should prevent that slow growers are restocked. Therefore we should talk about age of the fingerlings. I would propose max.age 1,5 year after intake of glass eels. There are not any 'slow growers' within 1,5 years in the Eel farm. Eels for restocking should reflect 100% of the age group of the whole farm? This means as the mean weight of the whole farm 100 gram is that you are not able to restock the small eels. We should state here that eels that are restocked should not be older than 1,5 year after glass eel intake. This part should be rewritten and it should state that as insufficient glass eels for restocking are restocked farmers should not pass the standard.	As above
		<b>5.3 P40</b> This responsible factor should be changed. All farmers have different systems with different sizes from glass eel till fingerling or fingerling till market size. Some farmers have 2 steps, some 3 or more. Therefore the only interesting feed conversion is the overall feed conversion: Feed used pro year / eels produced year. This feedconversion for a responsible eel farmer should be below 1,6	As above
		<b>5.7 P41</b> Here the farm has to restock minimal 10% and has to prove that all pieces of glass eel bought for restocking are restocked	As above
	<b>Environmental</b>		
	Environmental	ICES have clearly stated that all eel fishing should cease including for restocking, due to the decline in eel numbers and the lack of knowledge about their conservation. We follow this scientific advice and we consider a certification label on the marketing of an endangered species to be undesirable.	Opinion is noted and respected. But whilst legal in many places, we are providing a code for best practice
		Also we cannot support a certification which doesn't also include fish welfare.	There are many elements related to fish welfare in the standard
	Environmental	Thank you for the opportunity to allow us to input to the review of the SEG Standard. We have limited capacity to engage at present, but have reviewed the documents, and in many cases feel our specific responses to the previous call for input, still applies. As such we are providing high level comments below that we believe are fundamental to the credibility of the Standard – we hope they are helpful.	Thank you for taking the time to respond and provide your comments – it is appreciated.



		We feel there are a number of areas across the multiple document that are confusing for the reader and undermine the stated aim of the Standard:	
		Our fundamental concern is that most statements are unsupported so it's difficult to know if they are SEG's opinion or come from other literature – the few references seem to come from within SEG rather than using the wider literature. As a result of this lack of supporting evidence, we believe that there are contradictory and/or potentially misleading statements. If the aim of the Standard is to use the 'best available science' this should be presented. As an example, there are a lot of statements that ascribe benefits to eels as a result of the Standard that are either not evidenced and/or will undoubtedly be due to many other factors.	Thanks – we use scientific literature wherever possible. Unfortunately there is not a great deal of scientific literature for eel in many subject areas, so we sometimes have to use assumptions, opinions, common sense balance of evidence and the precautionary principle. We will look out for those and reduce as much as possible.
		Further, some of the criteria within Standard seem to be very vague e.g. what is the difference between negligible and low-level impacts on by-catch? These need defined and evidenced.	We will aim to improve such definitions. Those were already in the glossary
		Despite a statement to the contrary, 'responsible' and 'sustainable' seem to be used almost interchangeably which causes confusion. It has to be explicit that the Standard does not represent a sustainable off-take – indeed it is likely to be difficult to determine what this looks like for any eel species.	Agreed. We will review and seek clarity and consistency of approach and use of the terminology.
		Metrics are often referred to using different language e.g. 40% target, which again causes confusion – there needs to be consistency as to how these are used and what they support.	Agreed. We will review and seek clarity and consistency of use of metrics.
		At present it appears that much of the Standard is defined within SEG by the board, which only includes allies/paid employees and therefore has no independence. While this process of input by stakeholders is useful, we suggest an independent review board, outside of this process is needed in order to properly guide the development of the Standard.	We are actively seeking independent experts to join the Standard Development Team. You were previously part of our Panel but you stood down several years ago Would you like to join the team?
		SEG have identified that there is poor consumer recognition/understanding of the Standard – this seems a fundamental failing, and undermines the arguments that it is an effective measure from catch to sale.	So far this has been a business-to-business assurance scheme. We have been waiting until we have absolute confidence ourselves in the traceability in the supply chain to provide assured SEG certified eels to the consumer. We are now at that point and after the release of this new standard, we will be marketing a new consumer facing logo.

		Restocking is often characterised as a positive when in reality there are examples of where it works and doesn't work – this is acknowledged in the documents but the SEG 'stocking is better than not' position does not reflect the best available science.	Section has been re-written to reflect our more recent position statements
		<p>Operators can achieve the Standard just 12 months after being found guilty of breaking the law – this doesn't seem to be a particularly strong stance on illegal activity.</p> <p>Further to this, the Aspiring indicators should not just represent a lower level of achievement compared to the Responsible indicators but should also require evidence of action(s) being taken to achieve Responsible within a defined timeframe. For some criterion this is the case, but not all, and as a result the use of the word 'Aspiring' is sometimes misleading.</p>	<p>Good points – thank you... Was based before n stakeholder feedback.</p> <p>We will be increasing and making tougher the ability to join the scheme if there is a legal investigation or prosecution.</p> <p>Current practice is to require those achieving less than a score of 80% (ie. there are several Aspiring indicators), to make improvements by the next assessment in 2 years. We are considering removing the 'Aspiring' category. If we retain it we will seek to build improvements into the criteria as you suggest.</p>
<b>General Comments</b>	Environmental / Social – other Standard operator	<p>XXX welcomes this development and wished to push the SES towards an ISEAL accredited label, as to ensure that it really contributes to the recovery of the eel. To see where the international Sustainable Eel Group (SEG) currently stands, XXX commissioned students at Wageningen University to objectively research what the potential effect of the SEG label is on increasing the sustainability in the eel sector and to what extent the SEG is currently compliant with the ISEAL requirements. To answer these questions, the research also focused on the current government of the SEG and SES. The full report can be read <a href="#">here</a>.</p> <p>Getting the SES label accredited by ISEAL would be a great step into the direction of the recovery of the eel. It might eventually allow customers to buy eel in supermarkets again. Both the SEG and XXX have a vision of a recovered European Eel population and with that, sustainable use of this resource. However, at the moment, there are too many uncertainties connected to the SES label for XXX to promote the consumption of eel of any kind, including eel with a SES label. Below we elaborate further on this viewpoint.</p> <p>First and foremost, the eel is listed as a critically endangered species by IUCN and as stated in the latest ICES advice, eel mortality should be brought down to zero right now. This includes wild caught eel and the aquaculture based on wild caught glass eels. To present the eel with a SES label as 'sustainable' is therefore misleading in our opinion. The aquaculture sector puts a pressure on a wild stock that has no surplus. SEG sees complying with the 60% restocking rate as a way to contribute to the sustainability of</p>	<p>Thank you – we are pleased to know that XXX supports the SEG standard being recognised by ISEAL and that this could be a step towards eel being more widely available to customers; and that you share a vision of a recovered eel population and its sustainable use.</p> <p>Note that we have not used the term 'SES for over 5 years now – since before the current standard was published in 2018. Also, that ISEAL does not 'accredit' labels.</p>

	<p>the eel populations, however, the positive effects of restocking remain unclear. The label does have potential to create traceability in documenting the logistics of glass eel from the member companies.</p> <p>Especially in the throughput legitimacy we are not convinced the SES label is at a level it should be, as confirmed in the attached research report.</p> <p>The SEG targets the commercial sector to pay for, and use their label while Board members of SEG own eel aquaculture companies, distributing the SES-labelled eel. Next to that, some Board members are part of the Board of DUPAN as well, with DUPAN funding 50% of the SEG through their Eel Stewardship Fund. This creates distrust in the procedural fairness towards the role of the commercial sector in influencing decisions taken by SEG. The distrust is strengthened by the lack of transparency in SEG's income and funding as well as their decision-making process.</p> <p>The SES label has been in existence for over 10 years and not only have they not become ISEAL accredited by March 2021, as stated by SEG in 2019, the gap analysis in the report shows that this is still quite far away. Once an organization has been an ISEAL Community Member for at least twelve months, it can participate in ISEAL's compliance program to become ISEAL Code Compliant. SEG has not yet applied for the compliance program. There are significant gaps, especially in areas such as the monitoring and evaluation system that SEG needs to fulfil before becoming ISEAL Code Compliant.</p> <p>Which means it would currently take at least another 2-3 years before they would be able to reach the status of ISEAL Code Compliance.</p> <p>Currently, the SEG Standard only issues certificates to the glass eel industry. SEG does plan on moving towards penetrating the yellow eel market somewhere within the next ten years. However, at the moment both eel originated from aquaculture as well as wild caught yellow eel are sold by companies that carry the SEG certificate. How can such companies earn the certificate when not all streams of incoming products are meeting the set standards? Incorporation of the yellow eel market into the SEG</p>	<p>Provide SEG positions on ICES advice and IUCN.</p> <p>We present it as 'Responsible' not 'Sustainable'</p> <p>There is surplus in certain places – where the glass eels are caught – see EA data for the Parrett and Severn.</p> <p>Willem's one-liner re restocking</p> <p>The report was prepared by trainee students. We identified a number of flaws and errors but were not permitted to provide those comments by the commissioners of the report – XXX. There are many points in the report which we find helpful and are using to improve, but there are also many errors which reduces the report's credibility.</p> <p>The commercial sector pays for audits and the certification process only to a third party – not SEG.</p> <p>One Board member owns a smoking company. No Board members own an eel aquaculture company. One Board member is also a member of the Board of Dupan. Conflicts of Interest are declared. The assessment and certification process is by a 3<sup>rd</sup> part independent CAB and there is no procedural influence. Our income and funding is declared and published.</p> <p>SEG has been fully participating in the ISEAL process as a 'Community Member' since September 2019</p>
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		<p>Standard is crucial in creating both a levelled playing field as well as more extensive recovery effort and transparency.</p> <p>XXX wishes to encourage the SEG to get to a level where it could get a full ISEAL Code Compliance status and is looking forwards in participating as a stakeholder in the next revision of the SEG standard.</p>	<p>We are seeking ISEAL full Code Compliance at our own pace, and intend to make a submission at the end of 2023.</p> <p>The standard is there for Yellow eels – we just have no fisheries apply for it yet.</p> <p>Companies can only apply the certificate to those product that have the certified chain of custody. It quite appropriate for companies to have separate lines of products – some certified and some not.</p> <p>There is a standard for yellow eels and we encourage participants to apply. So you DO think that that will provide a ‘more extensive <u>recovery</u> effort’?</p> <p>Thank you – that is what we are aiming for too.</p>
		<p>XXX organised an online workshop on certification March 8th 2022. SEG was invited to be there but declined. XXX discussed certification and its potential role in eel restoration. Purpose of the workshop was to create a shared knowledge field amongst relevant NGOs on the SEG standard and management measures that could contribute to improved regulation.</p> <p>After the presentations had interactive sessions through which identify the main gaps, views, opportunities and risks in the presented approaches. We asked for the participants to help us to answer the question whether and under what conditions improved regulation could contribute to eel restoration and develop a joint perspective. Among the 20 participants of 13 different organizations out of whole Europe, there was a good deal of discussion. As part of your consultation, we would like to submit some of the points made at the workshop/ recommendations to the SEG:</p> <p><i>European eel is listed as a critically endangered species. As long as there is no full ban on fisheries, protective measures need to be taken to support stock recovery.</i></p>	<p>We have written privately to discuss our engagement.</p> <p>We are pleased to consider comments made ...</p> <p>Yes, we agree with that. That is why we support the Eel Regulation – developed as a result of advice from ICES on the early 2000s. Our standard supports the regulation and</p>

		<p><i>The Sustainable Eel Group (SEG) is developing a sustainability standard that claims to support eel stock restoration. XXX believes that if the standard meets certain conditions, it might potentially contribute to eel restoration.</i></p> <p><i>To this end a workshop was organised in December 2022 in which a group of 13 international NGOs and scientists discussed the SEG standard.</i></p> <p><i>ILVO held the SEG standard against the principles of the Marine Stewardship Council (MSC) and identified serious flaws;-</i></p> <div data-bbox="443 619 1366 1141"> <h3>Identified gaps of the SEG standard</h3> <div> <div>Content</div> <ul style="list-style-type: none"> <li>• It is difficult to make predictions of future impacts of the standard on the eel population</li> <li>• We cannot count restocked eel with the spawning biomass of eel. Restocking does not support the wild eel population</li> <li>• The standard lacks legitimacy. The sustainability system lacks good procedural approaches</li> <li>• The gap analysis against the ISEAL Codes of Good Practice showed that about half of the requirements were being met</li> <li>• A data management system should be put into place to monitor performance and made publicly available</li> </ul> </div> <div>  <div>Governance</div> <ul style="list-style-type: none"> <li>• SEG governance risks to be biased due to the influence of the commercial sector in SEG's Board</li> <li>• There is a lack of transparency in the financial structure, where does the financing comes from?</li> <li>• There is a lack of transparency of SEG's decision-making process</li> <li>• The (NGO) stakeholder involvement is not sufficient. An objection procedure should be in place</li> </ul>  </div> </div>	<p>goes beyond that and the law – it provides even greater protective measures.</p> <p>What are those conditions?</p> <ul style="list-style-type: none"> <li>• Agree it is difficult to make predictions of future impacts. But we are setting best practice and hope / expect that positive impacts will follow, and that those will be demonstrated in time.</li> <li>• Results of studies are mixed, so it cannot be said that 'restocking doesn't support the wild eel population. It has shown to do so in Sweden and Germany.</li> <li>• The standard is developed according to ISEAL principles and we are a Community member of ISEAL.</li> <li>• We are improving and moving towards full ISEAL code compliance</li> <li>• We are developing a data management system and it will be made publicly available</li> <li>• We have a balanced board to reflect Environmental, Social, Economic and Scientific interests.</li> <li>• We have published our income and governance at: <a href="https://www.sustainableeelgroup.org/documents-2/">https://www.sustainableeelgroup.org/documents-2/</a> [</li> <li>• We publish our key decision making processes, eg. in Standard Development procedure (on developing the Standard)</li> </ul>
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			suggest we seek to align and collaborate with?
		<p>XX suggest SEG to present itself as a traceability label or a Best Practise standard, also in its name and logo</p> <p>SEG standard = Sustainability standard?</p> <p>Main principle relevant for a sustainability standard for fisheries:</p> <p><b>Input resource must be healthy</b></p> <p>→ In case of fisheries: Sustainable fish stock: 'Fishing must be at a level that ensures it can continue indefinitely and the fish population can remain productive and healthy.' (MSC) → MSC</p> <div><ul style="list-style-type: none"><li>• Eel = Critically Endangered (IUCN <u>redlist</u>, 2020), listed by CITES</li><li>• Eel stock is depleted according to ICES. ICES advises zero catch of eel at all life stages in all habitats</li></ul></div> <div><p>Sustainable fishery</p><p>Sustainable aquaculture</p><p>Traceability label</p><p>Best practice standard</p></div>	<p>SEG std goes beyond traceability. It is already described as a 'Code of Conduct for a Responsible Eel Sector'. We could add 'Best Practice'.</p> <p>We will not change our name – our mission and core purpose is to achieve 'sustainable' for the European eel – that ambition is reflected in our name.</p> <p>The SEG standard meets the ISEAL definition of a 'sustainability standard'.</p> <p>We are certain that current catch levels can continue and to gradually restore and become healthy, especially now that the illegal trade has much better control (reduced by 80%). Even when the illegal catch was at its peak in 2018-18, ICES data implied that glass eel arrivals started to recover.</p> <p>IUCN listing does not imply that it is close to extinction. Only that it is much reduced.</p> <p>ICES also recommends 'make all other human impacts zero', but that is clearly unrealistic. We are certain that catching under our code will lead to recovery. We may just have to agree to disagree on that – it can't be proven scientifically so it is a matter of opinion.</p> <p>Whilst many countries have ignored the ICES advice, and eel fishing is permitted and legal, we are offering</p>

			a voluntary standard to apply more protective conditions than what is legal.
		<p>Transparency of certification process is key.</p> <p>Will draft reports be available to the public and stakeholders? Similar to MSC, stakeholders should be allowed to raise objections to the certification and an objection procedure should be in place.</p>	<p>Completed reports are published for transparency. Certification process is defined in our (ISEAL compliant) Assurance process.</p> <p>The ability for stakeholder to comment at the decision stage is not a requirement of ISEAL. However, we do see it as good practice, and is something we will consider as a n improvement in future.</p>
General comments		<p><b>Restocking.</b> Centuries of eel restocking have learned that there is no clear relationship between percentage escapement and restocking. To quote Willem Dekker (2016a): “As successful as restocking might have been locally, it has not markedly changed the overall trends and distribution patterns or halted the general decline of the stock and fishery.”</p>	<p>Provide SEG position statement. It does no harm. Some countries (eg Sweden, Germany) are dependent on restocking for their EMPs and for there to be eel populations in their wetlands and escapement.</p> <p>No, the general decline hadn’t stopped because the fundamental issues – habitat loss and migration barriers were too great. Restocking would have had to take place at a pan-European level – not just in some places, to have mitigated for the loss of habitat.</p>
Theory of Change		<p><i>Protection for the European eel achieves the target of 40% survival’ is a too minimal environmental target especially with the following ICES advice in 2022 ‘Fishing European eel is not considered sustainable. In 2023, ICES advises that there should be zero catches. This advice applies to fishing eel in all habitats, to both recreational and commercial catches, and includes catches of glass eels for restocking and aquaculture.’</i></p> <p>The SEG needs to have its Theory of Change (and its standard) scrutinized by scientists from renowned institutions.</p>	<p>Provide SEG position statement</p> <p>ICES also recommends ‘make all other human impacts zero’, but that is clearly unrealistic.</p> <p>The ToC and standard have been made publically available to 850 stakeholders for comment and scrutiny.</p>

		<h2>The eel population</h2> <p>The SEG standard's <b>goal</b> is a net positive contribution to the eel population from all the certificate holders and alignment with the nationally approved Eel management plan.</p> <ul style="list-style-type: none"> <li>Specified in the standard: Reach 40% of <math>B_0</math> in each management area (=amount of silver eel that would have existed if no human influence had been exerted on the stock). → Toned down to min 70% of <math>B_{best}</math> (calculated current biomass, with only natural mortality) as a 'suitable interim target' to reach 'responsible level standard'. 40 to 69% of <math>B_{best}</math> is acceptable to reach certification.</li> </ul> <p>How? → 60% glass eel sold for restocking  → 10% silver eel sold for restocking  = adding to the biomass of the eel management area and the escapement goal</p>  <p>National Management Plan: 40% escapement target of silver eel to the sea  → introduces a legal obligation for restocking: 60% glass eel for restocking → high price glass eel market → sustains an artificial yellow and silver eel fishery in areas without natural recruitment</p> <p>How can the eel population be supported?</p> <ul style="list-style-type: none"> <li>Open migration routes: identify and communicate transparently what is being done and what the progress is.</li> <li>Partial closure of fishery will increase the amount of <u>spawners</u> that reach the Sargasso sea.</li> <li>Reduce anthropogenic mortality, establish quota?</li> </ul> <p>→ It is difficult to make predictions of future impacts of the standard on the eel population</p>	<p>Unsure of the points being made here but we would be happy to have a discussion with you to discuss and explore them.</p>
		<p>Setting an economic target like this 'The livelihoods of those that fish and trade responsibly in eel are maintained' is impossible, not realistic and has nothing to do with responsible fisheries. (see also own wording in Standard 6.1 pag. 8 'Due to the decline in eel populations, the value of the sector is approximately 50% of what it was 15 years ago.'</p> <p>It would be more appropriate to make sure that the present people (2023) that fish and trade eel will be helped to be compensated for extra effort for conservational measurements to save the eel.</p>	<p>We don't see why that is impossible or inappropriate. To consider social and economic impacts and targets is compatible with ISEAL and Brundtland sustainability principles.</p> <p>We disagree.</p>
Page 5		<p>'Sound Science Conservation Programs' is mentioned but XXX was shocked by the reaction of the SEG in November 2021 'SEG considers "Zero Catch" advice'. Besides that, the chair of the SEG have mentioned publicly (see article Aquaculture and rectification over rectification) that ICES is being influenced by NGOs.</p> <p>We believe that the SEG should have reacted differently to ICES' advice. We recommend to accept the ICES advice and see it as an independent institute instead of criticizing the science. Especially if you see yourself as a 'SEG Leadership Alliance' role and as 'Sound Science'.</p> <p>SEG can indicate that SEG has an alternative plan for recovery and by ensuring that this plan is scientifically substantiated by a large group of renowned scientists. At the moment, this alternative plan is not yet 'Sound Science'</p>	<p>We understand from our own involvement with ICES how ICES WGEEL and ICES Acom operates. We are therefore entitled to our opinion. The advice became no longer credible, as it was going against its own advice of 20 years ago, which created the eel regulation for 'protection, recovery and sustainable use of the eel stock'. Hardly one generation of eels has passed since the Regulation was implemented, so we could not expect to see a 'recovery' in that time - i.e. the Regulation (and our standard) need to be given time and a chance to have an effect before changing the advice.</p>

			<p>We believe that eel fishing at well regulated levels, according to our standard, can continue, and create recovery of the eel population. It is based on many sound scientific principles and will take time before science can prove if it has succeeded or failed.</p> <p>See our published position on ICES advice</p>
<p>Theory of Change Page 6</p>		<p>Disagree with the following major assumptions as XXX sees no scientific basis for this:</p> <ul style="list-style-type: none"> <li>• 40% protection target level set by ICES will lead to eel recovery over several (3 – 4) eel generations</li> <li>• Recovery can take place faster than impacts of Climate Change, which could accelerate in the next 50 years.</li> </ul> <p>XXX: the present plan of the Eel regulation is not taking Climate Change properly into account, neither does the present standard of the SEG. Changes in ocean heat content (OHC), salinity, and stratification provide critical indicators for changes in Earth's energy and water cycles. In 2022, the world's oceans, as given by OHC, were again the hottest in the historical record and exceeded the previous 2021 record maximum (see Cheng, L., Abraham, J., Trenberth, K.E. et al. Another Year of Record Heat for the Oceans. Adv. Atmos. Sci. (2023). <a href="https://doi.org/10.1007/s00376-023-2385-2">https://doi.org/10.1007/s00376-023-2385-2</a> ). Since the 1990s, the heat content of at least the top 2 kilometers of the oceans has risen straight up. The sea is also disturbed in other ways: saline areas are becoming saltier, and areas with less salt water are becoming less salty. This can have consequences for the species that live there and thus have an impact on fisheries, among other things. Warmer oceans have all kinds of consequences, including that large ocean currents can be disrupted. Like the current from the equator to the north. This is the 'Atlantic Meridional Overturning Circulation' (AMOC) and it now ensures the supply of heat not only to Europe, but also to the eel.</p> <p>Non EU countries have sufficiently protective similar legislation (e.g. the UK, post-Brexit)</p> <p>I also see that one of the major assumptions is also missing: In the summary at pag 5, 'effective restocking' is mentioned. Due to that 'effective restocking is also one of your assumptions' but the effect of restocking is not scientifically proven. To be transparent you at least have to mention that one of your assumptions is 'restocking has a positive effect'.</p>	<p>That is in line with previous ICES recommendations which led to the Eel Regulation.</p> <p>Agree, Climate Change could very well accelerate in the next 50 years. If it causes the Gulf Stream to redirect or 'switch off' then that might be the end of the eel in Europe, and will also markedly change the mild nature of our climate in Europe.</p>
	Page 7	<p><i>'A responsible and sustainable eel sector'</i></p> <p>The name is misleading. SEG is pushing for full traceability in the eel sector and via this hoping to have a positive impact on the reduction of the illegal trade.</p>	<p>We are making it clear that we are aiming towards creating a sustainable eel sector; and that being</p>

	<p><i>‘The SEG standard is designed to promote and assess sustainability and best practice in the eel fishing and trade sector via a voluntary certification scheme for assured, traceable ‘responsibly sourced eel’,</i> We disagree and we suggest other wording: ‘The SEG standard is designed to promote best practice in the eel fishing and trade sector via a voluntary certification scheme for assured, traceable eel’</p> <p><i>‘The SEG certification scheme provides assurance and choice to traders and consumers who wish to buy responsibly and so encourage further adoption of this sustainability standard’</i> We disagree and we suggest other wording: The SEG certification scheme provides assurance and choice to traders and consumers who wish to buy traceable eel and so encourage further adoption of sustainability indicators in this traceability standard’.</p> <p><i>‘This promotes more sustainable forms of fishing with reduced mortality, reduced illegal trade, restocking to EC target levels and contribution to the recovery of the eel population’</i> Why is ‘restocking to EC target levels’ mentioned here? I would suggest ‘proven effective restocking practices’</p>	<p>‘responsible’ is different, and a step towards it. Yes, good traceability is intended to reduce the illegal trade.</p> <p>We are sorry that you disagree. It was your suggestion in 2017/18 that we use the term ‘Responsible.</p> <p>Because we are overtly supporting the Eel Regulation. Why do you suggest ‘proven effective restocking practices’, when you make the point elsewhere that restocking is not proven to be effective?</p>
	<p>You mention the following ‘We will use a range of methods to monitor and evaluate the effectiveness of our strategies. Some we are directly responsible for and have our own data – e.g. the number of SEG standard certificates in place, the number of eels involved, the size of the market covered. Others we have little direct influence or data, e.g. the impact on illegal trade,..’ On paper it sounds good but does SEG also put it in practise. XXX received the following e-mail last month with the following claim for SEG:</p> <p>‘We believe that the SEG standard has been integral to many successes for the protection and recovery of the European eel, for example:</p> <ul style="list-style-type: none"> <li>• 75% of the glass eels caught in Europe are now SEG certified ‘responsibly sourced’,</li> <li>• 75% of the commercial sector using glass eels in aquaculture for consumption are SEG certified,</li> <li>• Handling mortality of glass eels has reduced from as much as 42% to less than 5%, meaning that much fewer need to be caught to fulfil orders,</li> </ul> <p>Comment: How long will handling mortality seen as a success by SEG? It is not a common practise at the moment to take good care of the glass eels as the prices are high? The standard is not more than 13 years old.</p> <ul style="list-style-type: none"> <li>• More glass eels are being used for restocking programmes, getting closer towards the Eel Regulation’s target of 60%, It is not a target, it is a reservation. 60% should be reserved for restocking. The full 60% can be used with lower prices.</li> <li>• The level of illegal trafficking of glass eels has reduced by 80% over the past 3 years.</li> <li>• ICES reported that the decline in the eel population stopped in 2011.</li> </ul>	<p>It absolutely is much more common practice for better handling now: an independent scientific paper found handling mortality to have reduced on <b>average</b> (across all fishers) to below 5%. That means that previously 101 tonnes of glass eels had to be caught in France to provide 60 tonnes of live fish. Now, 63 tonnes must be caught to provide 60 tonnes – a saving of 48 tonnes. How can that not be regarded as a good thing? The standard has driven that change in practice. It was introduced in 2011.</p> <p>The study also showed that handling mortality was lower, on average, in SEG certified fishers.</p>



		XXX is missing the measurement of the side effect by creating a market for eel by this label. If only glass eel will be certified and some eel cultured, will this label enhance the demand for eel coming from silver and yellow eel fisheries? Especially as still none of these fisheries is certified?	We hope and will encourage yellow and silver eel fisheries to become certified, and we hope and expect that consumer choice of eel will increasingly come from the certified supply chain.
The Need for the SEG Standard		You mentioned: 'If fishing and eating of this vulnerable species is to continue, it must be done responsibly;' As eel is an endangered species, eating eel should be done sustainable instead of responsibly.	That is your opinion. There is not set guidance on how species with different IUCN classifications should be managed.
		Instead of 'The Sustainable Eel Group (SEG) Standard sets the criteria for the most protective forms of fishing, handling, trading, farming and consumption of eel.' We suggest to say 'The Sustainable Eel Group (SEG) Standard sets the criteria for best practises of glass eel fishing, handling, trading, farming and consumption of eel.'. SEG hasn't got a standard for catching silver and yellow eel.	That is a viable alternative. Used  There is a Component in the standard for silver and yellow eel fisheries.
		You mention that 'Our objectives are aligned to, and intended to support, the EC Eel Regulation 2007/1100, which states its purpose as being for the 'recovery' and 'protection and sustainable use' of the stock of the European eel (here-after referred to as the 'eel').'  SEG is translating this the objective 'Protection for the European eel achieves the target of 40% survival' but the full text is 'The objective of each Eel Management Plan shall be to reduce anthropogenic mortalities so as to permit with high probability the escapement to the sea of at least 40 % of the silver eel biomass relative to the best estimate of escapement that would have existed if no anthropogenic influences had impacted the stock.'  Why is the objective only 'Protection for the European eel achieves the target of 40% survival'? According to XXX the goal of this objective is not high enough.	These are in line with the Eel Regulation targets.  Should we interpret from this that you disagree with / don't support the Eel Regulation?
		You mention 'Whilst the stock is at an all time low, the decline appears to have halted from about 2011, two years after' I wish I could be as optimistic but I see this as wishful thinking.  ICES '22 is saying 'The status of European eel remains critical. Indices of both glass and yellow eel recruitment strongly declined from 1980 to 2011.' And ' Time-series from 1980 to 2022 show that glass eel recruitment remains at a very low level.'  It is impossible to go much more lower that the present index, it does not mean that the decline has been halted	There is a clear upturn in the graphs of ICES data.  Yes, agreed.  Don't agree that it is impossible to go much lower. ICES study in 2017 suggested 1.3 billion arrivals. It could decline by another 90% and be 130 million arrivals.

		<p>You mention ‘This Code of Conduct is available to (regional groups of) individual fishers, traders, processors and aquaculturists.’</p> <p>We suggest to say ‘This Code of Conduct is available to (regional groups of) individual glasseel fishers, traders, processors and aquaculturists.’ As it is not yet suitable for fishers on yellow and silver eel.</p>	<p>There is a Component in the standard for silver and yellow eel fisheries.</p>
	Page 7	<p>You mention</p> <p>‘• Shows when well-regulated fishing or trade has a net positive contribution to eel protection,’</p> <p>XXX strongly disagrees with this, a net positive contribution has not yet been proven scientifically.</p>	<p>The study showing reduced handling mortality is an example of how responsible fishing (according to the standard) has caused reduced handling and thence overall fishing mortality.</p>
	Page 8	<p>Is this correct? ‘We first approached the market-leading Marine Stewardship Council (MSC) to consider the eel to be included in their system. MSC declined as the unique biology of the eel population didn’t match their requirements.’</p> <p>in 2013, MSC wrote a statement (see:  <a href="https://dupan.nl/wpcontent/uploads/downloads/factsheet_paling_en_certificering.pdf">https://dupan.nl/wpcontent/uploads/downloads/factsheet_paling_en_certificering.pdf</a> </p>	<p>Yes, this is correct. SEG had the interaction with MSC and documented what happened.</p>
	Page 9	<p>You mention ‘The criteria have been set to a high standard which are designed to be protective to the eel stock.’</p> <p>XXX disagrees with this statement, at the moment the present standard is not a high standard which is protective to the eel stock.</p>	<p>Sorry that you disagree. Please explain why you don’t think it is protective, when it is designed to support and go beyond the Eel Regulation, which is a Europe-wide legal framework designed to protect and restore the eel stock?</p>
		<p>You mention ‘ICES data suggests that the eel stock stopped declining in 2011 . XXX disagrees with this statement, ICES is not suggesting this</p>	<p>It is our interpretation, looking at the graph, using ICES data.</p>
		<p>What has been achieved from an environmental perspective?</p> <p>The traceability has improved, the survival rate of the glass eel has been improved but the quota on fishing glass eel has not been effected so for the eel nothing is changed.</p> <p>The restocking of 60% of the glass eel is a legal requirement and it is unknown whether restocking has a positive impact on the recovery of eel.</p>	<p>Quotas in France have decreased and increased depending on French scientist’s assessment of the stock. They set the quota according to what they see as an acceptable ‘sustainable’? take). The Illegal export of 100 tonnes has been reduced by 80%, so this is a huge reduction in catch.</p> <p>There are plenty of studies that show it has a positive impact on eel populations (eg Bramwick) and some</p>

		<p>It is good that more attention has been given to the illegal trafficking of glass eels to Asia but this is mainly the work of Europol, it is not a direct result because glass eel fisheries alarmed the police for colleague fishers that are catching glass eels illegally.</p> <p>The results are more administrative results, are just in line with the Eel regulation and less about impact on the eel recovery itself.</p>	<p>countries – eg Germany and Sweden depend on restocking to meet their EMP targets. Europol and all enforcement agencies have done an excellent job. The political will to do this was driven in large part by SEG's campaigning to the EC. There will hopefully be an independent study on this soon.</p> <p>They are all indicators as steps towards recovery (which is too early to see yet). Yes, it is designed to support the Eel Regulation.</p>
	Page 10	<p>Item 5 and 6. The word sustainable is misleading in the label. Consumers think they are buying sustainably sourced eel not responsible sourced eel. XXX has suggest (like we did before) not to use the word sustainable in a label.</p> <p>Looking at you reaction to Draft 1 (consultation period 1 June – 31 July 2017) you mention yourself: 'Whilst fishing is permitted under the EU Regulations and UK Eel Management Plans, we want to see best practice adopted. This standard is designed for best practice. We also believe that, managed properly according to the standard, eel fishing can actually help the recovery of the eel.'</p> <p>Please take an example by BAP, it is a traceability standard that over the time adopted more indicators concerning sustainability. In the label the S of the SEG is misleading. It would be better to say e.g. <b>Best Eel fisheries &amp; aquaculture Practises.</b></p>	<p>The word does not appear in the label. The logo you refer to has not been used for over 5 years. We have developed a new logo which says 'eel group' only.</p> <p>We don't use the S in the label. Only in the standard itself. And the standard states clearly in the title that it is a Code of Practice.</p>
	Page 10	<p>Item 9. It is not a matter of believe. Most ngos will follow scientific advice. If SEG comes up with an alternative plan for stopping fisheries on eel (according to the advice of ICES) and that plan is scrutinized by renowned scientists, a large group of ngo's will support the SEG. I suggest this text to be rewritten as it is not framing a large group of ngos properly.</p>	<p>We will follow scientific advice when the science is clear. Often for eel, however, science is not clear, and we sometimes have to follow 'common sense, 'most likely' and the precautionary principle.</p>
		<p>You mention 'The main issues at present are political' . What is meant by 'political'?</p>	<p>We wrote privately on this matter</p>
		<p>'and in that short time the decline in glass eel recruitment halted in 2011, with some hints of recovery since.' XXX disagrees with 'some hints of recovery since'.</p>	<p>We have presented the ICES data. That suggests some slight upturn since 2011.</p>
2023 Revision of	Page 3	<p>At the moment, only 1 seat in the board is fulfilled with a person working for a University / research institute instead of two.</p>	<p>Yes, we are reviewing the Board representation having lost a</p>

the SEG Standard for the European eel Terms of Reference			member, and as we develop to be even more representative
		SeafoodWatch is a conservation organization not a standards organization	Noted, thank you for clarification. But does it not provide guides for consumers based on assessment of criteria?
		<p>What is meant by ‘the European XXX Guide’ ?</p> <p>In Europe, there are three Seafood Guides available, Mr. XXX (guide only for France, European eel is not on their list because it is an endangered species), Marine Conservation Society has the XXX Guide, European Eel is listed in red and WWF EU and XXX have a Seafood Guide distributed in 28 countries worldwide, European is also listed in red). XXX is the holder of the secretariat of the GSRA. The GSRA is a collaboration of seafood rating organizations focused on ensuring healthy oceans and freshwater bodies by supporting sustainable production of wild and farmed seafood through evaluating the environmental performance of seafood producers, advancing sustainable seafood issue salience and promoting sustainable products.</p> <p>GOALS OF THE ALLIANCE</p> <ol style="list-style-type: none"> <li>1. Improve the effectiveness and efficiency of Seafood Rating Organizations (SROs)</li> <li>2. Increase the standing and leverage of SROs within their spheres of influence and globally</li> <li>3. Work with other SROs to harmonize fisheries and aquaculture environmental sustainability assessments worldwide</li> </ol> <p>Monterey Bay (holder of the Seafood Watch) is one of the founders of the alliance. All of the seafood guides has listed European Eel on red.</p>	<p>The range of guides that we believe are all quite similar in Europe ie. GFG, Mr Good Fish, MCS Ratings, as you discuss below.</p> <p>Thank you for these clarifications</p>
		<p>‘Objectives - Ensure the standard includes strong representation of fishers, NGOs, certified operators and is informed by the experiences of assessors,’</p> <p>The present ambition of the SEG is too minimal to be able to include strong representation of ngo’s.</p>	<p>What do you mean ‘ambition of SEG is too minimal to include strong representation of NGOs’?</p>
		<p>You mentioned ‘<i>An increasing proportion (the ultimate goal is 100%), of eel fishing, trade and consumption demonstrates its commitment to protection and sustainable use by meeting the SEG standard</i>’</p> <p>The present standard is not yet sustainable, the wording sustainable is misleading. XXX agrees that the whole fisheries (glass, yellow and silver eel should be in.</p> <p>Suggestion for text: ‘The ultimate goal is 100%, of eel fishing, trade and consumption is committed to the SEG standard’</p>	<p>We take the phrase ‘sustainable use’ from the Eel Regulation. That is a long term target for it. But the real measure here is the trade ‘demonstrating its commitment to ...’</p> <p>We have used this recommended text – thank you.</p>

		<p>‘Protection for the European eel achieves the target of 40% survival’ is a too minimal environmental target especially with the following ICES advice in 2022 ‘Fishing European eel is not considered sustainable. In 2023, ICES advises that there should be zero catches. This advice applies to fishing eel in all habitats, to both recreational and commercial catches, and includes catches of glass eels for restocking and aquaculture.’ The SEG needs to have its Theory of Change (and its standard) scrutinized by scientists from renowned institutions.</p>	<p>This target is in line with that of the Eel Regulation</p> <p>Our Theory of Change and Standard was put out with this consultation to 850 contacts, including scientists, with their invitation to comment.</p>
		<p>You mention that ‘Our objectives are aligned to, and intended to support, the EC Eel Regulation 2007/1100, which states its purpose as being for the ‘recovery’ and ‘protection and sustainable use’ of the stock of the European eel (here-after referred to as the ‘eel’).’</p> <p>SEG is translating this the objective ‘Protection for the European eel achieves the target of 40% survival’ but the full text is ‘The objective of each Eel Management Plan shall be to reduce anthropogenic mortalities so as to permit with high probability the escapement to the sea of at least 40 % of the silver eel biomass relative to the best estimate of escapement that would have existed if no anthropogenic influences had impacted the stock.’</p> <p>Why is the objective only ‘Protection for the European eel achieves the target of 40% survival’?</p> <p>According to XXX the goal of this objective is not high enough.</p>	<p>Our objectives and the aim of the standard are to support meeting of Eel Regulation targets.</p> <p>Do you not support the Eel Regulation?</p>
		<p>Setting an economic target like this ‘The livelihoods of those that fish and trade responsibly in eel are maintained’ is impossible, not realistic and has nothing to do with responsible fisheries. It would be more appropriate to make sure that the present people (2023) that fish and trade will be helped to be compensated for extra effort for conservational measurements to save the eel</p>	<p>It is an aspiration. If we are collectively successful in restoring the eel population, then social and economic indicators can be maintained</p>
		<p>The stakeholder analysis is missing a lot of ngo’s working on eel and should be taking into account as a stakeholder: Compassion in World Farming (CIWF), Des Requins et Des Hommes (DRDH), NABU state office for Baltic Sea Protection, WWF Sweden, Estonian Fund for Nature, Marine Conservation Society (MCS), WWF-Germany, RAVON, Fish Sec, Coalition Clean Baltic, TRAFFIC and Bund für Umwelt und Naurschutz Deutschland</p> <p>Stakeholder assessment is also saying ‘SeaFood Watch and XXX Guide’ are standard owners but they are not. Sefood Watch and Seafood Guides are tools created to inform consumers and the fish sector which seafood is sustainable and which are not. The organisations behind it are: Mr. XXX (guide only for France), Marine Conservation Society (XXX Guide in UK) and WWF EU and XXX (Seafood Guide distributed in 28 countries worldwide).</p> <p>XXX is the holder of the secretariat of the GSRA. The GSRA is a collaboration of seafood rating organizations focused on ensuring healthy oceans and freshwater bodies by supporting sustainable production of wild and farmed seafood through evaluating the environmental performance of seafood producers, advancing sustainable seafood issue salience and promoting sustainable products. Monterey</p>	<p>They were examples. I wrote to MCS, Ravon, Fish Sec and WWF direct as well (and as well as GF) to prompt and ensure they got an opportunity to comment.</p> <p>Noted, thank you for clarifying. Yes, they are Guides, not standards. They a are assessments based on criteria, so not hugely dissimilar.</p> <p>Thank you for clarifying.</p>

		Bay (holder of the Seafood Watch) is one of the founders of the alliance. All of the seafood guides has listed European Eel on red.	
SEG Standard V6.1	Page 4	<p>You mention 'The principal objective of the standard is to help to meet the vision defined in the Theory of Change, i.e. to increase the contribution of eel fishers, ranchers, aquaculturalists, traders and consumers of eel products to the restoration of healthy eel populations, distributed throughout their natural range, fulfilling their role in the aquatic environment and supporting sustainable use for the benefit of communities, local economies and traditions.'</p> <p>Looking at you reaction to Draft 1 (consultation period 1 June – 31 July 2017) you mention yourself:</p> <p>'Whilst fishing is permitted under the EU Regulations and UK Eel Management Plans, we want to see best practice adopted. This standard is designed for best practice. We also believe that, managed properly according to the standard, eel fishing can actually help the recovery of the eel.'</p> <p>It hasn't been proven that the standard had a positive impact to the recovery of the eel.</p> <p>The traceability has improved due to the SEG standard of several glasseel fishers and traders, the survival rate of the glasseel has been improved but the quota on fishing glasseel has not been effected so for the eel nothing is changed.</p> <p>The restocking of 60% of the glasseel is a legal requirement and it is unknown whether restocking has a positive impact on the recovery of eel.</p> <p>It is good that more attention has been given to the illegal trafficking of glass eels to Asia but this in mainly the work of Europol, it is not a direct result because glasseel fisheries alarmed the police for colleague fishers that are catching glasseels illegally</p>	<p>We have indicators to suggest it, but agree 'not proven'. Independent studies will be commissioned to seek to answer this.</p> <p>It has in effect – where mortality was up to 42% before - to sell say 60 tonnes, 100 tonnes had to be caught. Now 63 tonnes caught to sell 60 tonnes.</p> <p>Apply our position on restocking.</p> <p>Yes, it is the result of all parties working together. SEG played a big part in raising awareness and embedding it in the standard.</p>
		<p>The results are more administrative results, are just in line with the Eel regulation and less about impact on the eel recovery itself.</p> <p>The objectives are good but the underlying actions do not comply with them. Looking at what the SEG at the moment is doing, is that it is not meeting its own objectives. Due to that, XXX believe it is more honest to explain that you are improving the traceability of the eel sector and promote best practices.</p>	There are a range of results that build up a picture. And as we are about supporting the Eel Reg, some are aligned to that too.
	Component 2	If there is no market for restocking, what is the procedure that happens with the glass eel reserved for restocking? And/or what happens if there is no market for restocking, will there be no fisheries and/or will the glass eel put back by the glass eel fishers? I see no procedure on this item.	This is a hypothetical question and not one that we, but the respective governments and the EC have responsibility for. The markets for

			restocking are steadily increasing /and getting closer to the 60% target.
	Criterion 5.2	This criterion is not aiming at a high standard/best practice. European eel farmers can source from European feed industry and easily adjust The Feed Standard of ASC. In this standard an improvement model for marine ingredients should be mentioned which requires feed mills to source from more sustainable fisheries over time. MarinTrust and MSC, both ISEAL Code Compliant organisations, play a crucial role in this mechanism and form the key steppingstones for improvement. XXX suggest to source from 100% ASC certified feed producers in 2024	Thank you. In our consultation with the Marin Trust we have adopted their suggested criteria.
	Criterion 5.3	At the consultation period 1 June – 31 July, XXX already suggested the following: ‘Feed component of the standard should not only include FCR. Fish In Fish Out (FIFO) ratio should be estimated for both fish oil and fish meal according to Jackson (2009). Ideally Forage Fish Dependency Ratio (FFDR) should be estimated similar to how this is done in the ASC standards, e.g. the 2012 salmon standard Appendix IV-1.’ The reaction of SEG was ‘Feed conversion ratio criteria were provided from expertise within the eel farming sector.’ XXX sees this not as an appropriate answer for a label going for ‘Best practises’. We again recommend to set up criteria in line with the ASC. FCR is not an appropriate way of measuring impact. (and if SEG would still want to use the FCR, 2.0 can be easily met with high quality feed including high FO and FM content. This might mean a high FFDR ratio.)	Thank you, we will consider this further as we develop Version 7.0,