

Monitoring, Evaluation and Learning Plan

Version 2.0 24 November 2023



The Sustainable Eel Group

Monitoring, Evaluation and Learning Plan

Versions Issued

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1.0	December 2016	Original version	SEG Board
2.0	24 November 2023	Substantial upgrade.	SEG Board

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1. Introduction and purpose

The Sustainable Eel Group (SEG), is Europe's leading non-government organisation with the sole purpose of working for the protection, recovery and sustainable use of the depleted stock of the European eel.

We have been operating since 2009. In 2011 we introduced our first sustainability standard for fishing and trade in eels, and since 2016 we have been developing to operate towards the ISEAL Codes of Codes practice for credible sustainability systems.

We have published 009Theory of Change (<u>Version 1</u> in 2016, updated in <u>Version 2</u>, January 2023). In that we make our Statement of Change and the Sustainability Impacts we are aiming to achieve.

The aims of this Monitoring, Evaluation and Learning plan are to identify, for our aims (sustainability impacts):-

- targets
- measures
- how they will be monitored
- how they will be evaluated
- how we will gain and implement learning to improve our system

NB. This is a <u>plan</u> of how we will implement our MEL System. It is based on a substantive review of our whole SEG Standard System during 2023. As a plan, it is constantly evolving according to, learning, circumstances and resources. It is therefore subject to constant change. The latest version is published as 302 MEL Plan in our <u>SEG Standard System</u>. This first version is yet to be subject to stakeholder consultation, planned for December 2023 – January 2023, and will be revised after that.

2. System Overview

In 2018 SEG launched a revised standard with a first version of a Monitoring and Evaluation system to demonstrate to stakeholders and the general public the impact of its programme on the protection, recovery and responsible use of the European eel.

In the years since we have published various and annual Impacts reports to report on impacts and progress over time.

This new MEL Plan is more comprehensive. It is more closely aligned to our Theory of Change. It will build on previous baseline data and present new baselines relevant to our activities and impacts. More regular and consistent reports will be developed and published. There will be more stakeholder engagement and there will be greater use of independent evaluation. Such reports will enable us to report regularly and clearly on our progress, and to inform changes to our system and programmes to improve and maximise success.

3. Our Statement of Change and Sustainability Impacts

Our vision. We wish to see:



Biologically safe wild eel populations, distributed throughout their natural range, fulfilling their role in the aquatic environment, recovering in line with the protection targeted by the EC Eel Regulation.

Our sustainability impacts in support of that change:

Social

- Illegal eel trade is minimised (ultimate goal is 0%)
- An increasing proportion (ultimate goal 100%), of eel fishing, trade and consumption demonstrates its commitment to protection and sustainable use by meeting the SEG standard
- The Sustainable Eel Group is a successful advocate of eel protection, sustainable use and recovery with governments and stakeholders.

Environmental

- Protection for the European eel achieves the target of 40% survival
- Barriers to migration are removed or adequately mitigated, initially to meet the 25,000km <u>Swimways target</u> by 2030
- Wetland habitats are restored to increase the quantity, quality and connectivity of the aquatic environment for eels

Economic

- The damaging effects of water operations* to eel populations are minimised,
- The livelihoods of those that fish and trade responsibly in eel are maintained

* pumping, navigation, flood management, hydropower, pollution discharges etc.

4. Theory of Change Diagrams

These objectives and their causative effects are reflected in the following diagrams, explained in more detail in our <u>009 Theory of Change</u>:

4.1 Summary:





4.2 In more detail:



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4.3 In further detail: Outcomes with causal links:-



Major assumptions (a full list in the MEL Plan below)

- 40% protection target level set by ICES will lead to eel recovery over several (3 – 4) generations
- Recovery can take place faster than impacts of Climate Change, which could accelerate in the next 50 years
- Governments don't stop all eel fishing and trade; the Eel Regulation continues
- Other protective legislation is progressed and implemented properly, e.g. Water Framework Directive
- Non EU countries have sufficiently protective similar legislation (e.g. the UK, post-Brexit)

Enabling environment

- Monitoring, evaluation and learning of the SEG system in place
- Good human resources & management
- Good financial management
- Good governance
- Adequate funding
- Governments, agencies, NGOs and companies implementing the Eel Regulation

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5. Analysis of Monitoring, Evaluation and Learning Measures and Sources

5.1 Appendix 1 lists each element of the detailed Theory of change diagram at 4.3, to include the assumptions of causal effects between those elements. It then identifies:

- a) Monitoring areas,
- b) Existing, actual and potential monitoring measures and indicators,
- c) Baseline figures and targets,
- d) Sources of information for those indicators and measures,
- e) References for those indicators,
- f) Learning and monitoring from other sources.

Note, that this analysis is under constant revision as we develop and evolve our MEL system

5.2 Theory of change diagram with measures references mapped

The Theory of Change Diagram at 4.3 is now overlain with a 3 x 3 grid (see below) and the references for the measures identified in Appendix 1:



5.3 Mapping to this diagram:

- 1. The references of measures in the Appendix 1 are mapped to the relevant place in diagram 5.2,
- 2. Those measure references in green are those that we measure already and/or can do so easily.
- 3. Those that we could measure, but with more effort are in yellow. Those represent improvements to the MEL system for the future (see 6.3 a)),
- 4. The diagram is overlain with a 3 x 3 grid. That is (A), horizontally, to reflect the three main strategies of our Theory of Change, i.e. (1) a Responsible eel Sector, (2) Illegal Trade reduced and (3) Healthier Aquatic Habitats. The fourth strategy of SEG being a successful advocate is also indicated as an enabler at the bottom; and (B), vertically to reflect the three levels: Impacts, Outcomes and Actions.
- 5. Each of the nine areas in the grid, and the SEG Advocacy, are well represented with each existing and future measures.
- 6. This indicates to us that there are adequate current measures to represent the breadth of the Theory of Change. It also identifies those to be developed for future improvement of the system.



6. Monitoring, Evaluation and Learning (MEL) Plan

Based on this analysis, we have implemented or have plans to implement the following:

6.1 Already in place

- (a) Collect the measures referenced in green in Table 5 and Diagram 5.1.
- (b) Record the outcome of the assessment of the assumptions referenced <u>2.2.4.A</u>, <u>3.2.1.A</u>, <u>7.6.1.A</u> in Table 5.
- (c) CABs collect data from client audits.
- (d) Publish an Annual Impacts Report at our Annual General Meeting in the spring.
- (e) Publish other reports commissioned by SEG as they are available.
- (f) Reference and publicise via news items and social media when other publish notable reports.
- (g) Allocate budget, approx. €10,000 € 15,000 per year from 2023, to commission an independent evaluation report.
- (h) During 2022, an unintended effect of the success of the SEG system was the perception by a few stakeholders that we had created a monopoly. Whilst we successfully refuted that claim, showing that there were three traders in the system (it was a fourth that made the claim), we are now mindful of this unexpected effect, and have taken it into account in 2023 with the revision of the SEG Standard and its supporting Assurance system.
- (i) From 2023, undertake an annual System Management Review, according to our <u>014 SEG Standard</u> <u>System Management Review</u>. This has included the measures identified 1.1 – 8.2 in Table 5, and the additional sources, 9. Enabling Environment, 10. Risk Management and 11. Unintended Effects. That annual review normally takes place in October of each year. There will also be interim reviews at bimonthly Board meetings.
- (j) At those meetings, identify improvements to be made to our MEL Plan, to include:
 - i. to start recording and reporting those measures in yellow in Table 5 not yet recorded
 - Keep improving the range, definition and access to sources of data and information to support the evidence of our impacts. There are many unfinished measures and definitions in Table 5 which provide much scope for further improvement and learning.
 - iii. Maintain a record of improvements made.

6.2 Planned for 2024

- (a) To start collecting the measures in yellow in Table 5 Diagram 5.1 referenced 2.1.1, and the unintended effect 11.2.
- (b) Publish an Annual Impacts Report at our Annual General Meeting in the spring.
- (c) Decide on an Independent Evaluation for 2024.
- (d) Publish other reports commissioned by SEG as they are available.
- (e) Reference and publicise via news items and social media when other publish notable reports.
- (f) Gain performance data from client audits via the CAB to include in our database.
- (g) Recruit a data officer to be responsible for recording and reporting the data and information, according to the requirements of our <u>011 Data Management System</u>.
- (h) Include gender issues within MEL and within stakeholder mapping and consultations as we complete and resolve against a gap analysis of the ISEAL Integrated Code after it is published in 2024.



- (i) Develop ethical guidelines for MEL research activities as we complete and resolve against a gap analysis of the ISEAL Integrated Code after it is published in 2024.
- (j) Continue our annual System Management Review, to identify learning and improvements to be made for 2025 and beyond.
- (k) In that 2024 review, start a more systematic evaluation of our data, i.e.
 - i. An annual comparison of data against targets.
 - ii. Assessment of what beneficial changes can be made.
 - iii. Where there are shortfalls and analysis of what has caused these.
 - iv. Summarise (for at least internal use) what has been learned
 - v. Documenting any changes made to the MEL Plan.
 - vi. Documenting how the success or otherwise of changes made will be assessed.
- (I) Develop specific indicator protocols for each monitoring indicator in use, and as we plan for new indicators.

6.3 Planned for 2025 – 2028

- (a) The measures in yellow in Table 5 or Diagram 5.1 referenced 2.2.2, 2.2.4, 2.2.6, 3.1.3, 3.4.1, 4.2, 4.4.2. 3.4.3, 3.4.4, 3.4.6, 4.2.4. 4.4.2, 4.5.2, 5.3.1, 5.3.2, 5.5.2, 5.5.1, 5.6.1, 5.7.1, 6.2.3.1, 6.2.3.2, 6.3.1, 6.4.3, 6.5, 7.3. 7.5.3, 7.+6.1, 8.2, 8.3, 8.4.
- (b) The assumptions referenced <u>2.2.1.A</u>, <u>2.2.3.A</u>, <u>2.3.4.A</u>, <u>3.1.1.A</u>, <u>5.1.1.A</u>, <u>5.5.A</u>, <u>6.3.1.A</u> in Table 5
- (c) Any unintended effects discovered during 2024.
- (d) Publish an Annual Impacts Report at our Annual General Meeting in the spring.
- (e) Publish other reports commissioned by SEG as they are available.
- (f) Reference and publicise via news items and social media when other publish notable reports.
- (g) Continue our annual System Management Review, to identify learning and improvements to be made for 2026 and beyond.

7. Review and improvement

This plan will be updated regularly – at least annually flowing the annual System Management Review.

This first version is yet to be subject to stakeholder consultation, planned for December 2023 – January 2023, and will be revised after that.



<u>Appendix 1</u>. Monitoring, Evaluation and Learning Measures

The following table lists all possible measures in the above 4.3 Detailed Theory of Change Diagram.

Where there are existing measures in the table below, its reference (far left column) is mapped to the Theory of Change diagram at 5.2. The table also lists other sources and types of monitoring areas and sources of information.

Key (links with Theory of Change Diagram):	DESIRED CHANGE	IMPACTS	OUTCOMES	OUTCOMES	OUTCOMES	OUTPUTS	ACTIONS
Social Environmental Economic		<mark>Of the fol</mark> l	lowing, need to	filter out and d	ecide the priori	ities	

Monitoring areas and Assumptions	Notes	Baseline (year)	Target (year)	Measures / Indicators Already available or easily got Not available yet / less easy <u>Measure Reference</u>	Information sources (priorities in bold)
1. Biologically safe wild eel population	ICES to identify what target level(s) to be regarded as 'safe' / 'recovered'	2009	2060?	<u>1.1</u> ICES Glass eel index <u>1.2</u> Other ICES eel population indeces	 ICES Glass eel index Other ICES eel population indeces Annual Annual
1.1 A 'biologically safe' population is					
known for different locations?					
1.2 Population numbers are known					
with sufficient accuracy?					
1.3 Population recovery and					
maintenance is dependent on					
achieving mortality targets?					
1.4 Recovery can take place faster					
than impacts of climate change?					
2.1 Eel survival increased to 40% target		Willem, any idea of a baseline figure?	 All MS have EMP actions on target by 2030 (#EelDeal2030) All part direct, part indirect. 	 2.1.1 % of EMP plans & actions in place. 1.2 Glass eel index 1.3 Silver eel escapement measures 	 Annual ICES WGEEL reports Annual ICES WGEEL reports Annual ICES WGEEL reports Annual ICES WGEEL reports
2.1.1 40% target is adequate?			•		
2.1.2 Eel survival is known with			•		
sufficient accuracy?					

		1			1
2.1.3 Reduction of illegal trade is	This seems obvious,		•	3.2.1 Calculation of Europol figures	
contributing to reduced mortality?	but would they have				
	died anyway due to				
	lack of access to				
	habitats?				
		2009: no standard and no protection	 Value of SEG certified market is stable or increases sustainably Direct. 75% of glass eel and 50% of yellow trade (weight, number) is SEG certified by 2030 Direct 5% increases pa 	 2.2.1 No. and proportion of certified operators 2.2.2 Total value and proportion of certified sector 2.2.3 Number of certified organisations in each part of the sector 2.2.4 Value of retail trade of certified product in EU and other nations. 2.2.5 % weight and number 2.2.6 EUR total annually. 	 Annual survey by SEG. Independently every 3 – 5 years. Annual survey by SEG. Independently every 3 – 5 years. Annual survey by SEG. Independently every 3 – 5 years. Annual survey by SEG. Independently every 3 – 5 years. Annual survey by SEG. Independently every 3 – 5 years. Annual survey by SEG.
			for 5 years then stabilising contributions to ESFs Part direct, part indirect.		Independently every 3 – 5 years. 6. ESFs (independent), annually.
2.2.1 SEG standard set at a level	We won't know until		•	Feedback and opinion by	
that provides adequate protection and leads to recovery?	perhaps 15 – 20 years (1 generation) of use			stakeholders. 2.2.1.A Potential future study	
2.2.2 Sufficient % of eel market meets SEG Standard?		0% in 2009	• 75% by 2028		
2.2.3 Market access is driving meeting of Standard?			•	2.2.3.A. Potential future study	
2.2.4 Governments don't stop all eel	This is tested every		•	2.2.4.A Easily tested each year	
fishing and trade?	year			(usually December)	
2.3 Healthy Aquatic Habitats				2.3.1 % aquatic habitats of WFD 'Good Ecological Status'	
2.3.1 Healthy habitats help keep eel mortality at target level?					
2.3.2 Adequate information available on habitat health?					



 2.3.4 Reduction of migration barriers & improved wetland management is contributing to habitat health? 3.1 Responsible traders gain & maintain market access 	??		2.3.4.A Possible future study related to Water Framework Directive 3.1.1 No. certified operators 3.1.2 Proportion of certified operators 3.1.3 Value of certified market	
3.1.1 Market access enabled by certification?			compared to non 3.1.1.A Potential future study	
3.2 Illegal trade minimised	 Legal quotas are set at protective levels 2. 	 10 % reduction per year from the Europol figure of 20 tonnes in 2021 i.e. less than 13 tonnes in 2025 and less than 8 tonnes in 2030 Ultimate target is Zero. Part direct, part indirect. 	3.2.1 Europol indicators 3.2.2 The 'gap' in the EU Glass eel market.	 The independent, international enforcement organisation, Europol, provides indicators on the extent of illegal trade each year. SEG will publish those annually. Independent. SEG conducts an annual glass eel market survey amongst all traders. Results of this are published annually. SEG.
3.2.1 Better enforcement results in reduced illegal trade			3.2.1.A Hull University Report 2023 will give an indication of this	
3.2.2 Further (non-eel) regulations result in reduced illegal trade?				
3.3 Barriers to migration reduced	1. Barriers to migration are a limiting factor	 Barriers [need a target based on other initiatives] to eel migration are removed Indirect 	 2.3.1 % aquatic habitats of WFD 'Good Ecological Status' 3.4.1 Ha of habitat available 3.4.2 Ha increased each year 3.4.3 Km of river increased each year 3.4.4 No. barriers removed 3.4.5 Measures related to Swimways project 	 WFD reports Is anyone measuring this? Is anyone measuring this? Is anyone measuring this? Is anyone measuring this? Reports from these campaigns, eg. Amber, etc. etc. via WIEA?



	· · · · · ·		3.4.6 Measures from other	
	4		projects – eg. no dams removed,	
3.3.1 Implemented regulations				
actually result in reduction of				
barriers?				
3.3.2 Stewardship role for fisheries			<u>3.4.2.1</u> Value of ESF that goes into	
sector results in reduction of			barrier mitigation	
barriers?				
3.4 Wetland habitat improved	1. Wetland habitat	Wetland habitats	2.3.1 % aquatic habitats of WFD	1. WFD reports
	quality is a limiting	are restored to	'Good Ecological Status'	
	factor	increase the	3.4.2 Ha of habitat available	2. Is anyone measuring this?
		quantity, quality	3.4.2 Ha increased each year	3. Is anyone measuring this?
		and connectivity of	3.4.3 Km of river increased each	4. Is anyone measuring this?
		the aquatic	vear	
		environment for	3.4.4 No. barriers removed	5. Reports from these
		eels	3.4.5 Measures related to	campaigns, eg. Amber, etc. etc.
			Swimways project	via WIEA?
			3.4.6 Measures from other	
			projects – eg. no dams removed,	
3.4.1 Implemented regulations			projects – eg. no dans removed,	
actually result in improved habitat?				
3.4.2 Stewardship role for fisheries			3.4.2.1 Value of ESF that goes into	
sector results in improved habitat?			habitat improvement	
4.1 SEG is a successful advocate		 SEG successfully 	4.1 Current Independent	 Annual report by SEG.
		influences the EC	Evaluation Reports	Independently by fishery
		 SEG successfully 	<u>4.2</u> Current Independent	journalist? every 3 – 5 years.
		influences	Evaluation Reports	 Annual report by SEG.
		national policies	• Support for SEG policies by EC	Independently by fishery
		 SEG successfully 	• Support for SEG policies by	journalist? every 3 – 5 years.
		influences other	national govts and agencies	 Annual report by SEG.
		NGOs	• Support for SEG policies by other	Independently by fishery
		SEG successfully	NGOs	journalist? every 3 – 5 years.
		influences fishers	 Support for SEG policies by 	Annual report by SEG.
		and traders All	fishers and traders (no & % of	Independently by fishery
		direct	certification)	journalist? every 3 – 5 years.
			,,,	journalist: every 5 – 5 years.
4.2 Certified operators able to			4.2.1 Existence of standard	
demonstrate trade of responsibly			4.2.2 No. certified operators	
sourced eel			4.2.3 Proportion of certified	
			operators	



	4.2.4. Value of certified market
	compared to non
4.2.1 SEG Standard is what enables	
demonstration?	
4.2.2 SEG assurance system is what	
enables demonstration?	
4.3 Implemented, effective, eel	4.3.1 Independent evaluation
regulations ¹	reports
4.3.1 Importance attached to	
regulations drives implementation?	
4.3.2 Improvement to regulations	
makes them more effective?	
4.4 Countries implement other	4.4.1 EC reports on implementation
regulations to benefit eels	of Eel Reg, Water Framework
	Directive
	4.4.2 Independent evaluation
	reports
4.4.1 Importance attached to	
regulations drives implementation?	
4.4.2 Improvement to regulations	
makes them more effective?	
4.5 Better enforcement of	4.5.1 No. arrests / seizures
trafficking	4.5.2 Weight of glass eel seizures
4.5.1 Ability of enforcement agencies	
leads to better enforcement?	
4.5.2 More aware enforcement	
agencies leads to better	
enforcement?	
5.1 Accessible and credible standard	5.1.1 Standard published and in
J.I Accessible and credible standard	different languages
	5.1.2 Compliance with ISEAL Code
5.1.1 Standard revision makes	
standard more accessible and	5.1.1.A Potential future survey
credible?	
5.2 Credible assurance system	5.2.1 Compliance with ISEAL Code
5.2.1 Assurance system revision	5.1.1.A Potential future survey
makes standard more accessible and	
credible?	

¹ Regulations refers to both EU and non-EU countries.



non-certified products 5.3.1 Stokeholder engagement leads to more supportive purchasing policies? 5.3.1 Stokeholder engagement leads to more supportive purchasing policies? 5.4.1 Engagement with fishenes leads to stewardship role for fisheries sector 5.4.1 Engagement with fishenes leads to stewardship roles? 5.4.1 Engagement with fishenes leads to stewardship roles? 5.4.1 Engagement with fishenes leads to stewardship roles? 5.5.1 Independent evaluation regulations and ENPs 5.5.2 Avareness in governments leads to importance attached to implementing regulations? 5.5.2 Avareness in governments leads to importance attached? 5.6.1 Avareness in governments leads to importance attached? 5.6.1 Avareness in governments leads to importance attached? 5.6.2 Avareness in governments leads to importance attached? 5.6.3 Avareness in governments leads to importance attached? 5.6.4 Avareness in governments leads to importance attached? 5.7.1 Independent evaluation regulations? 5.7.2 Avareness in governments leads to imported policies and regulations? 5.7.4 Avareness in governments leads to imported policies and regulations? 5.7.4 Avareness in governments enables enforcement agencies able to act? 5.7.4 Avareness in governments enables enforcement agencies to act? 5.7.4 Avareness in governments enables enforcement agencies able to a		
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subset water between certified 5.3.1 Stakeholder engagement leads to more supportive purchasing policies? submission in the sector 5.4.1 Engagement with fisheries sector s.1.1 Total annual value of ESF S.4.2 % of sector contributing to ESFs 5.4.1 Engagement with fisheries leads to stewardship roles? s.1.1 Total annual value of ESF S.4.2 % of sector contributing to ESFs 5.4.1 Engagement with fisheries leads to stewardship roles? s.1.1 Total annual value of ESF S.4.2 % of sector contributing to ESFs 5.5.1 Consensus on methods leads to more importance attached to implementing regulations and EMPs S.5.1 independent evaluation reports; Cuestionnaires 5.5.2 Awareness in governments leads to improved policies and regulations? S.5.A Potential future report 5.6.1 Awareness in governments leads to improved policies and regulations? S.5.A Potential future report 5.6.1 Awareness in governments leads to improved policies and regulations? S.5.A Potential future report 5.7.1 Awareness in governments leads to improved policies and regulations? S.5.A Potential future report 5.7.1 Awareness in governments leads to improved policies on regulations? S.5.A Potential future report 5.7.2 Awareness in governments enables enforcement agencies able to act? S.5.A Potential future report 5.7.1 Awareness in governments enables enforcement agencies to act? S.5.A Potential future report <td< td=""><td></td><td></td></td<>		
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6.4 Consensus on responsible fishing		6.4.1 Criteria in the Standard
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8.2 The livelihoods of those that fish and trade responsibly in eel are maintained			from the damage by water operators by collaborating with others, to meet Europe-wide targets. Indirect The proportion of the sector that is certified increases Certified operators more likely to survive Direct	 8.2 Number and 8.3 turnover of certificate holders as a proportion of the total 8.4 Proportion and turnover of certified operators that remain in business compared to those who do not 	1. <mark>Annual report by SEG</mark> 3 yearly report by eg. Wageningen University
Learning from Other Sources	Netes		Townst (us or)		Information courses
Other monitoring areas	Notes	Baseline (year)	Target (year)	Measures / Indicators	Information sources (priorities in bold)
9. Enabling environment				I	(p
9.1 Effective monitoring	Annual Impact	2018			Annual Impact Report,
	Report, inc. in AGM				
9.2 Effective evaluation	Regular evaluation. Annual System Management Review				Annual System Management Review
9.3 Effective learning	Annual System Management Review				Annual System Management Review
9.4 Effective management reviews	Annual System Management Review Bimonthly Board meetings				Annual System Management Review Board meetings
9.5 Effective stakeholder feedback, including complaints	Annual System Management Review Bimonthly Board meetings				Annual System Management Review Board meetings
9.6 Outcome Evaluation Reports	Annual Evaluation Report				Annual Independent Review
9.7 Effective Risk Management Plan	Reviewed annually	2023			Risk Management review
9.8 Financial management	Annual Budget and performance, inc. in AGM	2010			Finance Team
9.9. Governance	AGM report			No. meetings Make up of Board	Chairman



9.10 HR	AGM report			FTE staff, consultants € Expenditure Diversity	SEG Board
9.11 Funding	Annual Finance Report and accounts	2018		 € Income % from sources: Grants, Donations, Membership, Licensing 	Finance Team
9.12 System Management Review	The SEG business plan for 2024 will be finalised at our Board meeting in January 2024. There we will agree our work for 2024, having completed our monitoring, evaluation and learning from our System Management Review for 2023.			System Management Review – autumn and winter 2023.	SEG Board
10. Risk Management					
	Risk Management Plan Priority Risks	2023		The priority risks and associated measures will be incorporated when we have completed the next phase of our Risk Management Plan in January 2024.	SEG Board
	To add info when progtressed				SEG Board
11. Unintended Effects (from N	MEL System)	1		1	<u> </u>
2018 – 2023 actual. 11.1 Perception of Creation of a Monopoly	This came from a complaint from an unsuccessful applicant for certification			No immediate plans for regular monitoring as this was a 'one-off' two years ago, but we will be constantly mindful of any similar repeat feedback.	Stakeholder – certificate holders and agencies
2023 Forecast 11.2 Preparation for the EU Directive on Corporate Sustainability Due Diligence Directive	We have just discovered this planned EU Directive and built it into our 2023 revised Standard and Assurance			11.2 To be measured through CAB audits from 2024 as this has been added to SEG Standard 7.0.	CAB audits.

The references for the measures are mapped to the Detailed Theory of Change Diagram at 5.2 to identify (1) if there is a good spread of measures across our Theory of Change and (2) where there are gaps that we should seek to fill.

