



Sustainable  
*Eel* Group

# SEG Standard

## Development and Revision Procedure

**Version 2.2**  
**24 April 2024**

### Amendments

Version No.	Date	Description of Amendment
1.1	16/9/2016	Various to bring into line with ISEAL
1.2	17/10/2016	Minor updates to formatting by SEG Standard Panel Chair
2.0	30/01/2023	Amendments to update and make relevant to the 2023 review
2.1	23/6/23	Amendments to include management of Conflict of Interest in the SEG Standard team in Annex 1
2.2	24/4/24	Minor amendments to provide updated web-links

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# 1 Introduction and background

## 1.1 Standard Setting Procedures

- 1.1.1 This document specifies the Sustainable Eel Group's (SEG) procedures to develop, revise and approve any sustainability standards owned by the Sustainable Eel Group (SEG) and to maintain them over time.
- 1.1.2 Responsibility for approving these procedures rests with the SEG Board of Directors (the 'SEG Board').
- 1.1.3 These procedures shall be published and be available for download from the [SEG website](#).
- 1.1.4 Comments or suggestions are welcome and should be addressed to the SEG Chairperson at [chairman@sustainableeelgroup.org](mailto:chairman@sustainableeelgroup.org) for consideration.
- 1.1.5 These procedures shall be reviewed and may be revised by the SEG Board, taking account of any stakeholder comments that have been received up to that time, prior to their implementation for any future review or revision of a SEG Standard.

## 1.2 Preparation for the Development or Revision of a SEG Standard

- 1.2.1 Preparation for the development or revision of a SEG standard is described in document [101 SEG Standard Background](#):-
- a) Prior to the development of a standard its need shall be assessed. The existence and design of other comparable initiatives shall be researched, and organisations responsible for similar programmes engaged proactively.
  - b) An assessment of risks (e.g. possible unintended negative social, environmental or economic impacts) in implementing a SEG standard shall be carried out, and actions to mitigate these risks shall be identified and documented (see document [018c SEG Risk Management Plan](#)).
  - c) A stakeholder analysis shall be carried out (e.g. see document [008 SEG Stakeholder Analysis](#)), key stakeholder groups and representatives identified and stakeholders proactively engaged in discussions of the SEG programme.
- 1.2.2 The SEG Board has established a series of partnerships with like-minded European initiatives in order to ensure that the SEG Programme is aligned across the region of its application, as described in Document 101 SEG Standard Background.

# 2 Standard Terms of Reference

- 2.1 Prior to the development or revision of standard, SEG shall define its Terms of Reference (ToR).
- 2.2 The Terms of Reference shall include:
- Objectives of the standard
  - Scope of Application
  - Content and structure
- 2.3 The Terms of Reference for the revision of the SEG Standard for the European eel 2023 are published in [114 SEG Standard Revision 2023 ToR](#).

## 3 Development or revision of a SEG standard

### 3.1 Work Programme

3.1.1 The working language for the development of a SEG Standard shall be English.

NOTE: The support of SEG's non-English speaking representatives shall be sought to ensure that key documents are translated and consultation takes place in other languages wherever possible.

3.1.2 The decision to develop or revise a SEG Standard shall be announced on the SEG website together with a summary of the standard development and revision procedure that shall include:-

- a) A summary of the Terms of Reference for the standard and its revision, including the scope, objectives and justification of the need for the standard;
- b) The steps in the standard development or revision process, including the timelines and clearly identified opportunities for contributing; and
- c) Decision-making procedures, including how decisions are made and who makes them.

3.1.3 The work programme and timetable for the development and any subsequent revision of a SEG standard shall be updated on an ongoing basis on the SEG website.

### 3.2 Stakeholder Consultation

3.2.1 The public consultation phase for shall include at least one round of 60 days for development, and 30 days for revision, for submission of comments by stakeholders.

3.2.3 For new standards development, a second round of consultation of at least 30 days shall take place.

3.1.4 Where substantive, unresolved issues persist after the consultation round(s), or where insufficient feedback was received, SEG shall carry out additional rounds of consultation, as necessary.

3.1.5 At the outset of the development or revision process the SEG Team shall review and update its stakeholder contact list to ensure that it includes a broad range of stakeholders from all the key stakeholder groups identified through its stakeholder analysis (e.g. see [document 101 SEG Standard Background](#), Section 7), including stakeholders from large as well as small commercial operations, representatives of organisations that have developed similar international standards, and stakeholders from a broad range of countries within the scope of application of a SEG standard.

### 3.3 Content and structure

3.3.1 The SEG Standard shall include introductory sections describing its objectives, its scope of application, and providing a general description of the mechanisms for its verification and of the claims that may be made by individuals and businesses that are verified as complying with the standard's requirements.

3.3.2 The SEG Standard shall specify:

- a) The formal status of the document (i.e. whether draft, or approved for use);
- b) The date on which it was approved, if applicable, and in the case of an updated version the transition period that will apply before the updated version comes into effect;
- c) SEG's contact information;

- d) A statement to the effect that the approved English language version of the SEG Standard is the official version, and that in the event of inconsistencies between this and other versions it shall be the approved English language version that shall be deemed definitive;
  - e) The date by when the standard will be reviewed, which shall be no longer than five years after the date of its approval.
- 3.3.3 The SEG Standard may include components that are applicable to specific categories of users, for example to glass eel fishers, glass eel buyers, yellow and silver eel fishers, eel aquaculturalists, eel ranchers, live eel traders, and/or to processors, wholesalers and retailers.
- 3.3.4 The SEG Standard may incorporate a scoring or weighting system that provides for differentiation between those users who are achieving the highest levels of performance and those who are achieving lower levels of performance that are nonetheless compatible with the Standard's objectives.
- 3.3.5 The SEG Standard:
- a) Shall be drafted so that conformity can clearly and demonstrably be assessed for any applicant within the scope of the SEG Standard without the need for subsequent modification or adaptation;
  - b) Shall be drafted to minimise ambiguity in interpretation;
  - c) May be expressed in terms of process, management or performance requirements;
  - d) Shall not favour any particular technology or patented item;
  - e) Shall include requirements relating to data collection and reporting designed to facilitate the monitoring and evaluation of progress toward achieving the standard's objectives;
  - f) Shall include or reference a glossary of key terms required to guide its consistent interpretation and implementation.
- 3.3.6 At the outset of the development or revision process the SEG Team shall inform all stakeholders on its stakeholder contact list of its intention to develop/revise a standard and:
- a) Inform them of the information that is available on the SEG website;
  - b) Seek their input on the standard's Terms of Reference;
  - c) Encourage their participation in the standard's development.

### 3.4 Summary of Responsibilities

3.4.1 Governing procedures for the Sustainable Eel Group are defined in document [004 SEG Governance](#). Key responsibilities for the development, revision and approval of a SEG Standard are summarised as follows:

**a) SEG Board of Directors ('SEG Board')**

The SEG Board:

- i. mandates the development of a SEG Standard;
- ii. approves the SEG Standard Development Procedures, including the Terms of Reference for a Standard and for development or revision;
- iii. appoints the SEG Standard System Manager and the members of the SEG Standard Team;
- iv. approves the finalised SEG Standard (and subsequent substantive revisions) on the basis that the SEG Standard Development procedures have been implemented to the Board's satisfaction and the resulting SEG Standard meets the specified Terms of Reference.

## b) SEG Chairperson

The SEG Chairperson shall be independent of the interests represented at the Board. He/she shall seek to gain a balanced consensus of views in the aim to get the best outcomes for SEG and the range of those different interests. Where there is not consensus or there is an equal balance of different views on any subject, the Chairperson may provide a casting vote, again with the objective of aiming to get the best balance of outcomes for those interested in sustainability for the European eel.

## c) SEG Standard Team

The SEG Standard Team drafts a SEG Standard or revision in accordance with this procedure, for approval by the SEG Board. It shall be appointed by the SEG Board. It shall consist of at least one person with each social, economic and environmental interests, and someone who has an expertise in eel science. It shall be independent of the commercial eel sector – i.e. it shall have no one who has a significant interest in any commercial part of the sector, e.g. fishing, trading, eel farming or processing. It may have advisors co-opted or contracted to assist its development; such advisors shall be appointed with the approval of the SEG Board.

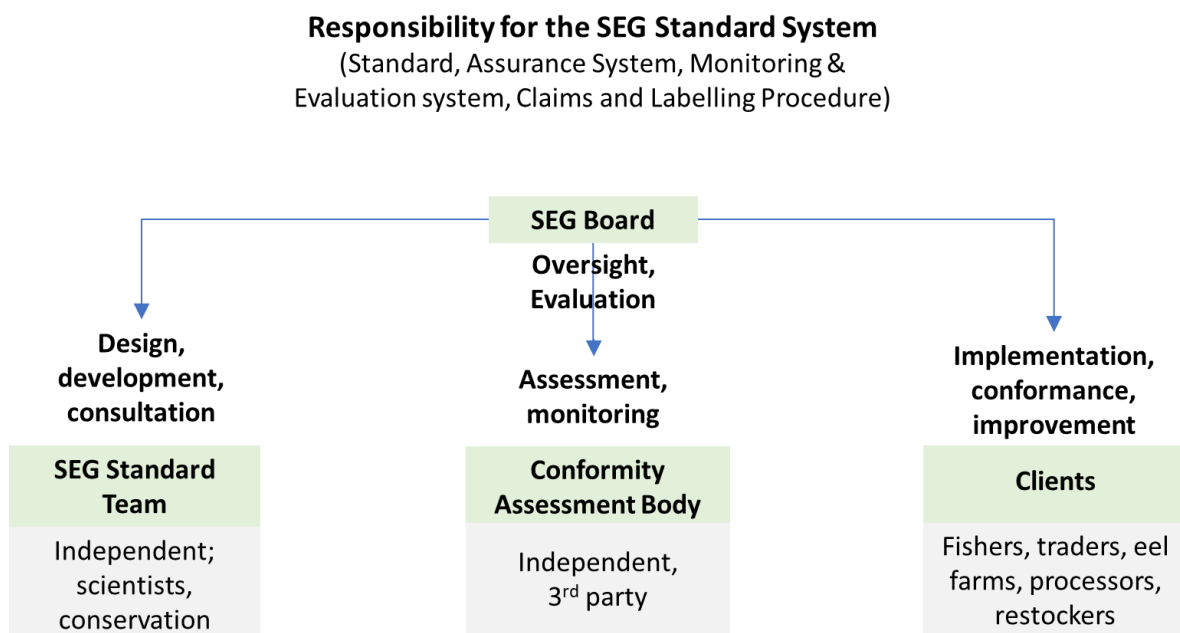
The SEG Standard Team:-

- i. drafts and manages the development or revision of a standard
- ii. develops and manages the SEG Standard system – the series of procedures and guidance that support the standard, for example, the Assurance system, the Monitoring and Evaluation system, guidance and training for auditing, certification procedures etc.
- iii. Seeks approval for the final versions and publication of the standard and supporting system from the SEG Board.

## d) SEG Standard System Manager

The SEG Standard System Manager shall be the lead and project manager, responsible for the management of the SEG Standard System, and the review and implementation of its governing procedures and the Standard. They shall be appointed by the SEG Board.

3.4.2 Responsibilities for the SEG standard system, (1) for design, development and consultation and (2) for implementation, assessment and monitoring, is summarised in the diagram below.



### **3.5 Preliminary Standard Development and Pilot Testing**

- 3.5.1 This section shall apply when there is a new or substantially different standard.
- 3.5.2 The SEG Board shall be responsible for overseeing the preliminary development and pilot testing of a first draft Standard or revision prior to finalisation.
- 3.5.3 Preliminary development and pilot testing shall include:
  - a) Drafting of a pilot version SEG Standard in consultation with relevant experts and stakeholders,
  - b) Establishing a pilot assurance programme to verify implementation of the standard,
  - c) Drawing on learning from the pilot to develop the final first operation version.

### **3.6 Drafting or Revision of a SEG Standard**

- 3.6.1 The SEG Standard Team shall publish the draft revision of a standard for stakeholder consultation on the SEG website, together with a form for the submission of comments.
- 3.6.2 The SEG Standard Team shall contact all stakeholders on its contact list informing them of the launch of the SEG Standard development or revision process and inviting comments on the standard or revision, within a specified timetable.
- 3.6.3 At the end of the specified comment period the SEG Standard Team shall collate all comments received and prepare a general synopsis.
- 3.6.4 At the end of the specified comment period the SEG Standard Team shall carry out an analysis of the number and variety of stakeholders that have submitted comments, and determine whether comments have been received from stakeholders that are representative of all the key groups identified in SEG's initial stakeholder analysis, including any groups that may be considered disadvantaged.
- 3.6.5 At the end of the specified comment period the SEG Standard Team shall meet to review and revise the draft standard to meet the standard's Terms of Reference, taking account of the stakeholder comments previously received.
- 3.6.6 At the discretion of the SEG Chairperson in consultation with the Chair of the SEG Standard Team (the SEG Standard Manager), additional experts may be invited to take part in the meeting of the SEG Standard Team, to provide advice on particular issues, or for particular purposes such as ensuring editorial consistency or clarity, or to ensure that the views of disadvantaged stakeholders that have not been expressed through the consultative process may be taken into account.
- 3.6.7 When the SEG Standard Team has agreed on a revised draft standard the SEG Chairperson shall determine, in consultation with the chair of the SEG Standard Team what if any further work is required before the draft standard is ready to be submitted to the SEG Board for formal approval.
- 3.6.8 If the SEG Chairperson determines that insufficient input has been received from any key stakeholder group or that substantive, unresolved issues persist that may be resolved through further consultation, then steps 3.4.2 to 3.4.6 shall be repeated as necessary, and the SEG Standard Team shall proactively address constraints faced by and seek contributions from under-represented stakeholder groups.
- 3.6.9 In the case of a standard that is being developed under these procedures for the first time there shall be at least two rounds of public consultation and review as per steps 3.6.2 to 3.6.6, however the second consultation period may be reduced to 30 days.

- 3.6.10 When the SEG Chairperson determines that the draft standard is ready to be submitted for formal approval the SEG Board shall be asked for its approval. If it is not approved, steps 3.6.2 to 3.6.7 shall be repeated as necessary.

### **3.7 Approval of a SEG Standard**

- 3.7.1 When a SEG Standard or revision is ready to be submitted for SEG Board approval, the SEG Chairperson shall direct the SEG Standard Team to prepare a report that:
- a) summarises the standard's development process to date, demonstrating how the approved procedures have been implemented, and including a clear description of any departure from the approved procedure together with the justification for any such departure;
  - b) explains the main issues and concerns raised during the process, and explains how these have been responded to;
  - c) includes a summary of all comments received during the last period of consultation and an explanation of how these comments have been responded to in the final draft of the standard, published and also sent to those who commented;
  - d) includes as an Annex the final version of the standard that is being submitted for approval;
  - e) Includes an explanation of how and when certified clients will transition from certification under the previous version of the standard, to the new standard.
- 3.7.2 The SEG Standard System Manager shall submit the report to the SEG Board together with the recommendation of the SEG Standard Team that the standard or revision be submitted to the SEG Board for approval.
- 3.7.3 The SEG Board shall review the standard or revision and the report on the process for its development to determine whether the approved SEG Standard Development Procedure has been followed, and whether the standard or revision meets the defined Terms of Reference.
- 3.7.4 If the SEG Board determines that the procedures for SEG Standard development or revision have not been fully implemented or that the standard or revision does not meet the defined Terms of Reference it shall document its concerns and specify what actions it considers necessary to address these concerns. The SEG Chairperson shall then be responsible for ensuring that such actions as have been specified by the SEG Board are implemented.
- 3.7.5 If revisions to the standard are required then such revisions shall be reviewed and shall be considered by the SEG Standard Team before the revised standard is re-submitted to the SEG Board for its review.
- 3.7.6 When the SEG Board is satisfied that the procedures for SEG standard development or revision have been fully implemented and that the SEG standard or revision meets its Terms of Reference it shall document its decision that the standard is approved.
- 3.7.7 The decision to approve the SEG standard or revision shall be made by the SEG Board, in accordance with its usual decision-making procedures.
- 3.7.8 If the SEG Board does not approve the SEG standard or revision, it shall guide the SEG Standard Team what further action to take prior to re-submission.



## 4 Availability of a SEG Standard

- 4.1 The approved standard shall be published on the SEG website within four weeks of its approval by the SEG Board, and all current SEG certificate holders and certification bodies shall be informed of such.
- 4.2 Any associated guidance or explanations relating to the standard shall be published on the SEG website.
- 4.3 The standard and any associated documentation shall be available for download from the SEG website free of charge.
- 4.4 SEG shall arrange to develop translations of the standard into languages other than English. In case of doubt the official English language version of the standard shall be deemed definitive.

## 5 Variation of documented procedures

- 5.1 Departures from these procedures may be approved by the SEG Board in exceptional circumstances, when compliance is not possible for reasons beyond the control of the SEG Chairperson or SEG Standard Team, or when the SEG Board advises that an alternative process would better achieve the SEG programme's objectives.
- 5.2 The SEG Standard Team shall document any such departures in writing and include a description and explanation in the report submitted when SEG Board approval for the final standard is sought.

## 6 Record keeping

- 6.1 The SEG Chairperson shall ensure that the following records are kept for at least five years and for each standard development or revision process are accessible for review on request:
  - a) Copies of drafts of the standard circulated for public review, and of the final approved version of the standard;
  - b) Names and affiliations of organisations, groups and/or individuals invited to comment on the standard during each stage of its development or revision;
  - c) Names and affiliations of the members of the SEG Standard Team and invited experts who participated in the review and revision of each draft of the standard.
  - d) Copies of all comments received on drafts of the standard circulated for formal review;
  - e) A synopsis of the comments received in response to each draft of the standard circulated for formal review, together with an explanation of how the comments were subsequently taken into account;
  - f) A copy of the policies and procedures that guided the standard development activity at the time;
  - g) A description of and explanation for any departures from the published procedures for SEG Standard Development and Revision procedure;
  - h) The final report on the implementation of the standard development and revision procedure considered by the SEG Board showing how the procedure was implemented.
  - i) All formal decisions of the SEG Standard Team and the SEG Board in relation to the development and approval of the standard.

## 7 Concerns and complaints

- 7.1 Any stakeholder has the right to raise their concerns or submit a complaint about the implementation of the SEG Standard Development or Revision procedure or about the content of the standard.
- 7.2 Concerns or complaints related to content of a draft or approved standard, or any procedural issues shall be sent to and responded to initially by the SEG Standard System Manager, at [standard@sustainableeelgroup.org](mailto:standard@sustainableeelgroup.org)
- 7.3 If the complainant is not satisfied with the explanation, the concern or complaint shall be forwarded to the SEG Chairperson at [chairman@sustainableeelgroup.org](mailto:chairman@sustainableeelgroup.org)
- 7.4 If the complainant is still not satisfied, a formal complaint can be logged using the SEG [Complaints procedure](#). In that case the SEG Board will investigate and respond to the complaint. The response of the SEG Board shall be final.
- 7.5 No further appeal or complaint in relation to content shall be considered but all comments shall be documented and maintained in the standards comment file for future reference when the standard is next reviewed.

## 8 Feedback and comments on a standard

- 8.1 SEG shall make a formal [feedback form](#) publicly available on its website at all times inviting any stakeholder to submit comments on the SEG standard and/or proposals for revisions or clarifications.
- 8.2 The SEG Chairperson shall keep a file of all comments, including those made by stakeholders and members of the SEG Board and the SEG Standard Team, that are received on the SEG Standard after its approval.
- 8.3 The SEG Standard Team shall review all received comments on an ongoing basis with a view to providing guidance on interpretation of the SEG Standard by certification applicants, certificate holders, certification bodies and other stakeholders, and/or proposals for revisions in accordance with Sections 9 – 12 below, as required.

## 9 Urgent revisions

- 9.1 The SEG Board may determine that there is a need for an urgent revision to a standard.
- 9.2 Conditions under which an urgent revision can be triggered may include, but are not limited to:
  - a) Formal complaints raised by stakeholders that are deemed to have merit as per the SEG complaints procedure;
  - b) Problems of implementation which affect multiple organisations;
  - c) Perceived threats to SEG's credibility; or
  - d) Changes in legislation or international obligations that affect the implementation of the standard.
- 9.3 If the SEG Board determines that there is a need for an urgent revision it shall direct the SEG Standard Team, to draft a proposed change and submit it to the SEG Board for approval.

- 9.4 If the SEG Board determines that an urgent revision is not required it shall provide reasons for the decision and shall direct the Standard Team as to alternative measures that it considers to be appropriate.
- 9.5 Urgent revisions shall not be required to undergo a public consultation process. However, any approved urgent revisions shall be included in the subsequent regular SEG Standard revision and consultation process.
- 9.6 Upon Board approval of an urgent revision, a new version number of the SEG Standard shall be created along with an effective date, and this SEG Standard shall be published on the SEG website and announced to SEG stakeholders.

## 10 Administrative and non-substantive changes

- 10.1 The SEG Standard Team or SEG Board may determine that there is a need for an administrative or non-substantive change to a SEG standard.
- 10.2 Administrative and non-substantive changes to a SEG standard may be made at any time at the discretion of the SEG Standard Team. These do not require a formal revision process though any changes that are made shall be noted to stakeholders in the subsequent revision process and published in a list of changes on the SEG website. Administrative and non-substantive changes do not affect the regular review and revision cycle but shall require a new version number of the standard, to be issued and published on the SEG website. The changes shall be summarised in the version control section of the updated standard.

## 11 Clarifications and interpretations

- 11.1 The SEG Standard Team or SEG Board may determine that there is a need for a clarification or interpretation of a SEG standard:
- a) A clarification is an *informative* explanation of the intent of a requirement of a standard. Clarifications may be provided without the need for stakeholder consultation.
  - b) An interpretation is a *normative* explanation of the intent or application of a requirement based on stakeholder consultation, where the interpretation has implications for how compliance is assessed and where existing requirements and guidance are ambiguous or lacking. Interpretations require stakeholder consultation prior to finalisation.
- 11.2 **Clarifications.** Where a clarification is required, the SEG Standard Team shall provide a written explanation.
- 11.3 The clarification shall be provided to the individual who requested it, circulated to all SEG certificate holders and conformity assessment bodies and be posted on the SEG website.
- 11.4 **Interpretations.** Where an interpretation is required, the SEG Board shall oversee the development of the interpretation by the SEG Standard Team.
- 11.5 The SEG Standard Team shall prepare a consultation paper which includes at least the following:
- a) Scope of the issue for interpretation;
  - b) considerations;
  - c) a draft proposal for review;

- a) consultation process, including timeline and opportunities for stakeholders to contribute; and
  - b) decision-making process – including how decisions are made and by whom.
- 11.6 Interpretations shall be subject to a minimum consultation of 30 days. The SEG Standard Team shall inform SEG members, conformity assessment bodies and certificate holders of the draft proposal and shall make it publicly available on the SEG website.
- 11.7 The SEG Standard Team shall prepare a summary of input received and revised draft interpretation for a decision by the SEG Board. Where an interpretation is approved, it shall come into immediate effect and shall be communicated to SEG members, conformity assessment bodies and certificate holders and announced on the SEG website.
- 11.8 Where appropriate, interpretations shall be incorporated into a SEG standard during its next revision.

## 12 Revision of a standard

- 12.1 Within a maximum of five years of the date of approval of a SEG standard, the SEG Board shall oversee a formal consultation with SEG members, approved conformity assessment bodies, SEG certificate holders and other interested stakeholders to undertake a substantive review of the standard to ensure and improve its continuing relevance and effectiveness in meeting its objectives.
- 12.2 To prepare for the review the SEG Standard Team shall review the SEG Standard Development and Revision Procedure and the Terms of Reference for the standard or revision and propose any revisions for approval by the SEG Board.
- 12.3 The procedures specified in Sections 3 and 4 above subject to any revisions that have been approved by the SEG Board shall then be followed.

## ANNEX 1: SEG Standard Team

The SEG Standard Team is responsible for drafting the SEG Standard in accordance with the approved SEG Standard Development and Revision Procedure, for approval by the SEG Board of Directors.

The roles and responsibilities of the SEG Standard Team are as follows:

- To draft the SEG Standard under the direction of the SEG Chairperson and in accordance with the approved SEG Standard development procedure,
- To provide formal guidance on the interpretation of the SEG Standard as required, on an ongoing basis, in order to facilitate its consistent, effective implementation.

SEG Standard Team members shall be appointed by the SEG Board. The SEG Board shall appoint one of the Team's members to chair the Team.

The SEG Standard Team shall consist of a minimum of four (4) and maximum of ten (10) people comprising:

- One member of the SEG Board representing each of the three SEG membership categories
- A maximum of seven (7) additional experts appointed by the SEG Board

The SEG Standard Team may appoint advisors or sub-groups to assist with the resolution of any emerging challenging matters.

The SEG Board shall aim to ensure that the SEG Standard Team's membership includes members with experience and expertise in the following areas, to link with the three pillars of sustainability:

- **Social:** traditions, fishing, food provisions, eating, history, art
- **Environmental:** eel conservation, habitat improvement
- **Economic:** eel trade, culture, water operations
- **Scientific:** eel protection and management, eel biology

The SEG Board shall aim to ensure that the SEG Standard Team's membership includes members from a broad range of countries affected by the implementation of the SEG Standard, and in particular seeks to include individuals from France, Spain, Germany and the Netherlands, as these countries are considered key to the restoration of sustainable eel populations and trade.

The Team may invite additional individuals to attend meetings to assist the Team with its work at its discretion, subject to the approval of the Team's Chairperson.

By being representatives of stakeholders, SEG Standard Team members might have conflicts of interest. The SEG Board shall be mindful of these when appointing the team, seeking to reduce those conflicts as much as possible. SEG Standard Team members shall be required to complete a Conflict of Interest Declaration Form, according to the [116 SEG Conflict of Interest Policy](#), which shall be published on the SEG website alongside the SEG Standard Revision process.

The current SEG Standard Team membership is provided in Document [115 SEG Standard Team Membership](#).

SEG Standard Team members may participate in and act at any meeting through the use of telephone conference or video-conference. Participation in a meeting by such means shall constitute attendance and presence in person at the meeting.

A minimum of 67% of the total number of eligible group members shall be present in person at a meeting in order for the meeting to achieve quorum.

Additional invitees attending SEG Standard Team meetings but who are not listed as members of the team shall not count towards quorum and shall not vote.

**Decision-making:**

The SEG Standard Team shall aim to take all decisions relating to the drafting of the SEG Standard by consensus, but if consensus cannot be achieved a decision may be taken by majority vote, with the team Chair having the casting vote, if required.

Decision making on approval of a standard is defined in 3.7 above.