

2023 Revision of the SEG Standard for the European eel

Terms of Reference

Version 2.1
24 April 2024

Amendments

Version No.	Date	Description of Amendment
1.0	2016	Original publication
2.0 draft 1	January 2023	Update to reflect that this is a revision, not original development. For consultation
2.0	June 2023	Finalised following consultation (no changes)
2.1	April 2024	Amended to clarify that there were no changes to these terms of Reference following consultation. Corrections and updates to web-links.

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NB. These Terms of Reference (ToR) were presented for consultation during the first consultation phase, February 2023. There were no comments on these ToR, so they were finalised and adopted in June 2023.

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1. Purpose

This sets the terms of reference for the SEG Standard for the European Eel (hereafter referred to as the SEG Standard) as it undergoes a substantive revision in 2023.

2. Objectives of these Terms of Reference

The objectives of these Terms of Reference are to:-

1. ensure the revised standard for European eel meets the expressed objectives for revision,
2. ensure the standard revision process is inclusive and transparent to affected stakeholders,
3. provide a robust review process that ensures the standard effectively meets its goals,
4. ensure that the development and revision of the standard complies with international best practices for standard setting (i.e. ISEAL Codes of Good Practice for Setting Social and Environmental Standards).

3. Background

The Sustainable Eel Group was formed in 2009 to create an international alliance of stakeholders with a common interest in the recovery of the depleted stock of the European eel.

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').

Our Vision / Statement of Change is: -

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.

We are a not-for-profit organisation, registered as an ASBL in Belgium. We have a Board of seven, with representatives from around Europe; two for each Science, Conservation and the Commercial Eel Sector, and a Chairman. We have a wide range of stakeholders, many being SEG certificate holders and others with an interest in the conservation or sustainable use of the eel.

We operate across the eel's natural range, to include North Africa and the Mediterranean, though the majority of our work is in Europe, and the EU in particular, as it has applied the Eel Regulation and has a good communications network to share information and effect change. We interact with the wide diversity of stakeholders who have an interest in the eel, seeking to lead and gain consensus on actions help the eel population. That diversity of stakeholders covers:-

- conservation organisations, for example Wetlands International, World Wildlife Fund for Nature,
- the scientific community – universities and research institutes,
- standards organisations, e.g. ISEAL, Marine Stewardship Council, SeaFoodWatch,
- the commercial eel sector – from net to plate: fishers, traders, eel farmers, processors and retailers,
- recreational fishers (anglers),

- consumers of eel and eel products,
- restocking organisations,
- governments – at EU level, including MEPs, and national governments and their agencies,
- law enforcement agencies,
- water operators: water supply, power companies, hydropower, flood management and navigation authorities.

We also lead or are a partner in eel conservation or science projects. And we are also starting to have an influence with other anguillid eel species around the world – for example we are trialing the development of a similar standard for the American eel in North America.

The SEG standard was first developed and implemented in 2011, two years after our formation. It has been through a number of revisions since and is currently on version 6.1. The standard is one of our strategies to help meet our overall vision / statement of change (see above) and directly or indirectly supports all of our sustainability impacts.

4. Aims and objectives of the revised standard

The SEG standard for the European eel shall be designed to meet the following aims and objectives:-

The aim of the SEG standard is to:-

Define the criteria by which each step in the chain of custody in the commercial eel sector can be assessed for its sustainability and contribution to protection and recovery of the eel population.

with the objectives to:-

- define how implementation at the level of each individual certificate holder is such that they can demonstrate how they have made a positive contribution to SEG's sustainability objectives,
- support the collection and availability of the data necessary to monitor the efficacy of the standard in achieving those sustainability objectives,
- provide the possibility for operators to demonstrate high and responsible standards and their commitment to sustainability,
- drive high and responsible standards throughout the supply chain, from fishery to consumer,
- provide confidence to retailers and consumers who wish to buy responsibly,
- define and certify higher standards of practice than just following the law,
- be compatible with other relevant standards,
- reduce and discourage illegal eel fishing and trade,
- support the implementation of the EC Eel Regulation.

3.3 The standard shall be supported by the following, each guided by the [ISEAL Codes of Good practice](#):-

- [107 Standard Overview](#): a summary of what the standard is, why it is needed and how it works,
- [101 Standard Background](#): the background to the SEG Standard, the part it plays in the recovery and sustainable use of the European eel, and why a revision is needed,

- [102 Standard Development & Revision procedure](#): ensuring the standard is developed and reviewed according to good practice and in consultation with all stakeholders,
- [202 Assurance system](#): defining the procedures by which the standard must be applied and governed,
- [301 Monitoring, Evaluation and Learning system](#): a description of the metrics by which we will measure the sustainability impacts of the system,

The current SEG standard system and all supporting procedures for the existing standard are published on our website at: www.sustainableeelgroup.org/the-seg-standard-system/.

Further background to SEG and the SEG Standard are described in more detail in the [101 SEG Standard Background](#) and the [107 SEG Standard Overview](#).

These Terms of Reference set out the need and objectives for a substantive revision of the [SEG Standard \(Version 6.1\)](#) through an open consultative process. The revision process is defined in the [102 SEG Standard Development and Revision Procedure](#)), which is designed to follow the [ISEAL Codes of Good Practice](#).

5. Challenges

The nature and scale of the principal challenges that SEG and the standard aim to address are:

- To assist in the recovery of the European eel, of which recruitment by glass eel arrivals is estimated to have declined by 90 - 95% between 1980 and 2010;
- To define the conditions under which the cultures and traditions of fishing, eating and celebrating the European eel can still be enjoyed, even in its declined and vulnerable state, and showing how it can be done so responsibly, more sustainably, and in such a way that it aids its recovery;
- To bring together the diverse views on the different methods by which the eel should be protected, such that there is collaborative action. The great majority of stakeholders have the common aim of wishing to see eel recovery;
- To help tackle the significant illegal trade of eels; 100 tonnes in 2017; 25% of the stock and with an end market value of € 3 Billion. In 2022 it was estimated by Europol to have reduced by 80% and we continue to pressurize with the ultimate target of zero.

6. Need for revision

Revision of the current version of the SEG standard is required for a number of reasons, some of which are taken from the review of the achievement of objectives of the previous standard, version 6.1 (see Appendix 1):-

- Up-take by yellow eel fisheries has not happened,
- Up-take in some key countries has been limited,
- Scientific knowledge has progressed,
- There has been feedback from stakeholders, to address and include
- There have been ambiguities and inconsistencies in language and scoring, identified by auditors to address
- To improve the consistency of auditability,
- To simplify and strengthen data collection,
- There have been some issues with the credibility of claims and labeling to address,

- It is five years since our last substantive revision and it is time for a new review.

The accepted recommendations (in green) in Appendix 1, a strategic review of the achievement of the objectives of the standard, version 6, are also to be adopted as they are regarded as needed for this revision.

The proposed revision reflects a growing demand from diverse stakeholders and the need for a standard to facilitate sustainability solutions that include a responsible market-based element. The standard also aims to serve as a tool to inform policymaking that incentivises and rewards adoption of sustainability best practices that support national targets and international obligations under the [UN Sustainable Development Goals](#).

SEG will consult with other sustainability standard or indicator system owners active in the fisheries sector that meet part or all of the need for a revised standard, to explore areas for collaboration, and to ensure the greatest overall progress towards SEG's objectives. This will include Marine Stewardship Council, Aquaculture Stewardship Council, Monterey Bay's SeaFoodWatch and the European Good Fish Guide.

Other standard owners will be invited to contribute to the consultation process during revision of the SEG standard.

7. Objectives

The objectives of this revision of the SEG Standard are to ensure its continued effectiveness in meeting its goals. In particular, the revision will:-

- Improve the effectiveness and applicability of the standard and align it with SEG's vision / statement of change,
- Allow the standard to better support the evolving regulatory environment,
- Ensure the standard includes strong representation of fishers, NGOs, certified operators and is informed by the experiences of assessors,
- Incorporate the views and experiences of more representatives of all relevant stakeholder groups,
- Encourage wider stakeholder participation, acceptance, and recognition of the standard,
- Take account and where possible be consistent with other sustainability initiatives and standards,
- Ensure the standard is fully consistent with other SEG documentation,
- Encourage consensus on the methods for the common aim of eel recovery.

8. Timetable

This is the planned timetable for the revision of the SEG standard in 2023. Timings are subject to possible change.

Date	Activity
1 February 2023	<ul style="list-style-type: none">• Publish the intention to revise the standard to include invitation of comments for 30 days on the existing standard from users and interested parties.• Targeting of under-represented groups, e.g. fishers, yellow eel sector.• Analysis of stakeholder engagement
March 2023	<ul style="list-style-type: none">• SEG Standard team meets to review Standard and existing feedback and start development of next draft, Version 7.0
May 2023	<ul style="list-style-type: none">• 1st draft Version 7.0 published for at least 30 days consultation (1 May 2023 – 15 June 2023)• Targeting of under-represented groups, e.g. fishers, yellow eel sector.• Analysis of stakeholder engagement
May & June 2023	<ul style="list-style-type: none">• Stakeholder workshops to consult on content
Jul - Aug 2023	<ul style="list-style-type: none">• 2nd draft developed
Sept 2023	<ul style="list-style-type: none">• Consultation on 2nd draft for at least 30 days• Targeting of under-represented groups, e.g. fishers, yellow eel sector.• Analysis of stakeholder engagement
Oct 2023	<ul style="list-style-type: none">• Review and create 3rd draft, towards final version• Create log of how all comments have been used
Nov 2023	<ul style="list-style-type: none">• Gain SEG Board approval• Correspondence with consultees to explain how comments have been used
Dec 2023	<ul style="list-style-type: none">• New standard published and available for use

9. Specific guidance

Revision of the Standard will follow [102 SEG Standard Setting & Revision Procedure](#) and be designed to follow the [ISEAL Standard Setting Code version 6.0.](#)

10. Scope and geographical application

The SEG Standard shall apply to the European eel *Anguilla anguilla* (L.) throughout its natural range and potentially to places where it may be traded outside of its natural range.

Geographically, it covers the natural biological range of the eel in its continental phase, from North West Africa, to the Mediterranean, to the whole of Europe, to the North Cape of Scandinavia. Illegal trade transcends those boundaries – routes are via European and North African outlets mostly to the Far East; predominantly China.

The SEG Standard shall be designed to be applicable to eel fishing within European coastal, estuarine and freshwater systems, to eel ranching and aquaculture, to the trade and transportation of live eels, to restocking for conservation and management, and to processing for consumption.

The standard shall include provisions for the monitoring of the trade in live eels and for the trade of eel products from source to end consumer.

It might also include provisions to encourage the improvement of aquatic habitats to aid eel populations, and to encourage water operators to reduce or mitigate the damaging effects of their operations on the eel.

11. Social, environmental, and economic outcomes

11.1 Brundtland Convention

SEG considers its outcomes, or sustainability impacts in a holistic approach, to balance the three pillars of sustainability according to the [Brundtland Convention](#), i.e. Social, Economic & Environmental; or People, Planet & Prosperity.



The SEG standard is one of our tools to promote the development of a responsible and ultimately sustainable eel sector. It aims to help meet our overall vision / statement of change (see above) and directly or indirectly supports all of our sustainability impacts. **The impacts in bold below are those that are directly supported by the standard:-**

Social

- **Greater engagement of all stakeholders interested in the European eel**
- **Illegal eel trade is minimized (the ultimate goal is zero)**
- **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**
- 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 river target by 2030
- Wetland habitats are restored to increase the quantity, quality and connectivity of the aquatic environment for eels

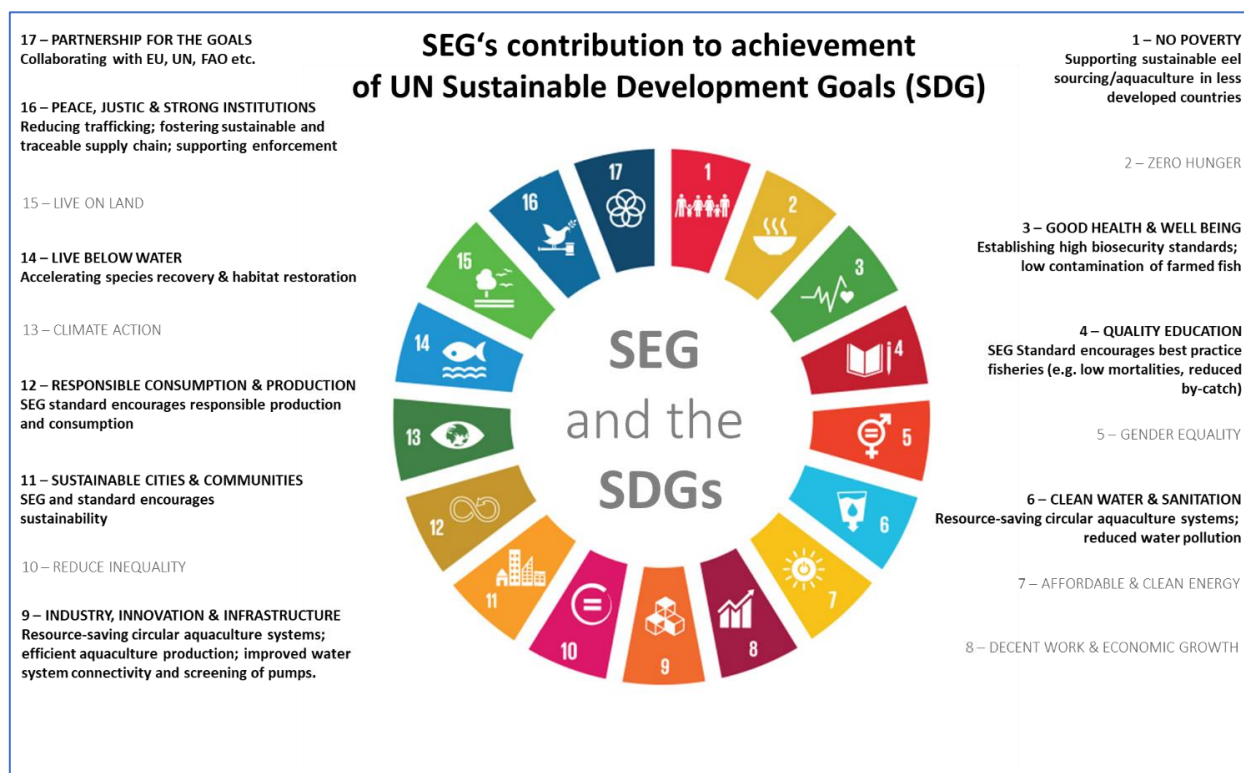
Economic

- The damaging effects of water operations* to eel populations are minimized, whilst still fulfilling their purpose
- **The livelihoods of those that fish and trade responsibly in eel are maintained**

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

11.2 United Nations Sustainable Development Goals

As well as considering the Brundtland Convention, SEG also aims to support the [United Nations' Sustainable Development Goals](#) (SDG) as follows:



11.3 The European Green Deal

SEG also supports the [European Green Deal](#), in particular, Preserving Biodiversity and Ensuring the Sustainability of our Blue Economy and Fisheries Sectors.

To support this, SEG has its [#EelDeal2030](#) campaign for full end effective implementation of the Eel Regulation.

12. Risks and mitigations

These are some key risks associated with implementing the standard, and possible mitigations. A more comprehensive analysis is being developed and will be published in the [SEG Standard System](#).

- Increased costs for fishers and traders. Potentially mitigated by (1) increased prices paid to them for certified product and (2) fishers coming together as a fishery or co-operative.
- Disproportionate increase in cost for smaller farmers or traders. Potentially mitigated by quicker and cheaper audits for smaller operations
- Potential conflict between certified and non-certified fishers. Potentially mitigated by better dialogue, engagement and understanding and equal opportunities to choose access to the SEG system,
- Fraudulent claims. Potentially mitigated by a more robust claims management system.
- Perception of the creation of a monopoly system. Potentially mitigated by the transparency of eligibility for entry.
- Those in the supply chain and consumers confused about what certification and different labeling means. Mitigated by a clear Claims & Labelling guidance and monitoring there-of.

SEG has also identified a number of factors that could negatively affect the ability of the SEG Standard to meet its objectives. These include the following:-

- the limited availability of competent auditors in countries and languages across Europe, mitigated by having a growing network of trained auditors in different countries and with multi-lingual abilities;
- incomplete consensus on the methods for the common aim of eel recovery, mitigated by engaging all stakeholders equally, applying scientific evidence and reasoned evidence and all parties willing to listen and compromise, also mitigated by recognition that it is not always possible to find consensus when there are very diverse opinions;
- difficulty in collecting sufficient quality and quantity of the data to monitor the efficacy of the standard, mitigated by specifying better data collection requirements in the agreement with the Conformity Assessment Body.

13. Stakeholder engagement

Throughout the SEG Standard Revision process, SEG will follow an open, inclusive and transparent consultation process to ensure stakeholder engagement as set out in the SEG Standard Development & Revision Procedure. SEG seeks to engage all stakeholders to ensure that the SEG standard meets the stated objectives of the Standard Revision.

SEG has carried out a [008 Stakeholder Analysis](#) and, following the [012 SEG Stakeholder Engagement Plan](#) will monitor stakeholder participation throughout the revision process to ensure balanced and effective participation of stakeholder constituencies against target participation goals.

The official language of the SEG standard and supporting procedures and systems will be English. Translations will be provided into other languages where there is an identified need.

14. Phases of the revision process

The revision process will follow SEG's [102 Standard Development & Revision Procedure](#).

15. Review

These terms of reference will be reviewed in response to feedback received in the initial phase of stakeholder consultation, in February 2023. Future terms of reference will be developed according to further feedback and from learning from its application of the standard.

16. Reference Documents

- [009 SEG Theory of Change](#)
- [102 SEG Standard Setting and Revision Procedure](#)
- [SEG Standard version 6.1](#)
- [ISEAL Standard Setting Code of Good Practice version 6.0](#)
- [ISEAL Assurance Code of Good Practice, version 2.0](#)
- [ISEAL Impacts Code of Good Practice, version 2.0](#)
- [ISEAL Sustainability Claims Good Practice Guide, version 1.0](#)

Appendix 1. Review of Objectives of Version 6 of the SEG Standard

Objective	What has gone well	What has not been achieved	Recommendations to Standard Version 7.0 Comments on adoption RAG
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.	<ul style="list-style-type: none"> At a strategic level, the Standard has been very effective at providing a tool to communicate to, encourage and influence operators to play a stewardship role for the eel. 	<ul style="list-style-type: none"> The eel and the sector is complex. It is very challenging to convey in simple terms (1) how the sector as whole can make a 'positive contribution' to stock that has been described by different commentators as 'vulnerable., 'depleted' or 'outside safe biological limits', 'critically endangered'. 	<ul style="list-style-type: none"> Aim to communicate our position more clearly. Maybe use the term 'effective protection' rather than 'positive contribution'. Aim to use clear and plain language at all times
The standard is designed to ensure that implementation at the level of each individual certificate holder has a positive contribution to eel populations.	<ul style="list-style-type: none"> Assessments indicate the extent to which operators contribute to protection and overall targets And their contribution can be described as part of a collective whole Each certificate holder has a '% Responsibility' score 	<ul style="list-style-type: none"> It is however very challenging to give any indication, for example, 'how many eels has an operator saved' 	<ul style="list-style-type: none"> As above, review term 'positive contribution' and its use. Adopt Consider if it possible to develop a formula to create a simple indicator for 'contribution' or 'protection' – e.g. 'no. eels saved'. Consider
The standard will support the collection and availability of the data necessary to monitor the efficacy of the standard in achieving these objectives.	<ul style="list-style-type: none"> Good data has been collected during assessments 	<ul style="list-style-type: none"> However, it has not been collated well and used at a strategic level, until the CAB was appointed 	<ul style="list-style-type: none"> Review data to be measured and collected to support the new standard and MEL plan. High priority Set up systems to (1) efficiently record the data, (2) report it and (3) analyse it for learning. Will need to allocate additional resource
Enable operators to demonstrate high and responsible standards and their commitment to sustainability	<ul style="list-style-type: none"> At a strategic level, the Standard has influenced and enabled a large section of the sector to change towards greater sustainability 	<ul style="list-style-type: none"> Audits have shown some operators to be inadvertently or deliberately ignorant of requirements of documentation within the system, e.g. using restocking quota for consumption 	<ul style="list-style-type: none"> Continue with more robust audits, corrective measures and strong messaging to operators, with suspensions where necessary. High priority (NB. more relevant to the Assurance System than Standard Setting)

	<ul style="list-style-type: none"> At operator level, SEG certificates have been important to demonstrate their compliance and to bid for contracts 		
Drive high and responsible standards throughout the supply chain, from fishery to consumer	<ul style="list-style-type: none"> Standards have undoubtedly improved throughout the supply chain, at least in the glass eel supply and aquaculture sectors 	<ul style="list-style-type: none"> Some lessons, as above, have been learnt and we will keep making improvements 	<ul style="list-style-type: none"> Continue with making improvements as we learn lessons. High priority Aim to extend the certification programme (1) to more countries and (2) to the yellow eel fishing sector. Adopt
Provide confidence to retailers and consumers who wish to buy responsibly	<ul style="list-style-type: none"> It has provided an assured traceability system for B2B 	<ul style="list-style-type: none"> The SEG label has little recognition by retailers and consumers There is confusion between the application and relationship between SEG and ESF labels 	<ul style="list-style-type: none"> Clarify the relationship between SEG and ESF labels, ideally creating and marketing one consumer facing logo. Adopt
Define and certify higher standards of practice than just following the law	<ul style="list-style-type: none"> All criteria and procedures either support legislation or go beyond it 	<ul style="list-style-type: none"> Getting the balance right of treating operators justly when they are accused of transgressions is a challenge. 	<ul style="list-style-type: none"> Review investigation procedures to be compatible with other systems and consult with stakeholders. Adopt
Support the EU Eel Regulation.	<ul style="list-style-type: none"> Several articles of the Eel Regulation are directly supported by being aspects of criteria in the Standard; e.g. 60% of glass eels for restocking, delivery of eel management plans, traceability 	<ul style="list-style-type: none"> Some organisations don't support the Eel Regulation 	<ul style="list-style-type: none"> Review and consider if additional aspects of the regulation should be incorporated. Consider the Regulation Make clear why we support the Regulation. Adopt (is already in some documents)
Other aspects of the SEG Standard V6.0			
Criterion 1 - Core requirements			
Commitment to legality	<ul style="list-style-type: none"> This has been effective at hindering recently convicted or under-investigation operators into the system It has also probably deterred others from acting illegally 	<ul style="list-style-type: none"> The one complaint about us to ISEAL has been about how we have applied this to a failed applicant 	<ul style="list-style-type: none"> Review if current criteria are just. Review, with stakeholder consultation
Trading in responsibly sourced eel	<ul style="list-style-type: none"> This has been effective and creating market demand, which has caused the great majority of the largest fishery (French glass eel) to turn towards the SEG system 	<ul style="list-style-type: none"> Some operators have been abusing documentation and restocking quota 	<ul style="list-style-type: none"> Gain feedback from operators on application Continue with robust auditing, corrective actions, messaging and suspensions. High priority – adopt.

Traceability	<ul style="list-style-type: none"> Criteria and auditing have been fit for purpose to improve standards and reduce misuse of documentation and quotas 	<ul style="list-style-type: none"> Some operators have been abusing documentation and restocking quota 	<ul style="list-style-type: none"> Gain feedback from operators on application Continue with robust auditing, corrective actions, messaging and suspensions. Adopt
Biosecurity & welfare	<ul style="list-style-type: none"> Criteria and auditing have been fit for purpose to improve practices 	<ul style="list-style-type: none"> 	<ul style="list-style-type: none"> Gain feedback on application from assessors and operators. Adopt
Component 2 - Glass eel fishing	<ul style="list-style-type: none"> Has been very effective at increasing standards, engagement and demand for SEG certification 	<ul style="list-style-type: none"> Measurement of mortality or use of correct gear has been a challenge in some fisheries 	<ul style="list-style-type: none"> Gain feedback from fishers, traders and auditors on if can measure better and improve fishing handling mortality. Adopt
Criterion 3: Yellow and silver eel fishing	<ul style="list-style-type: none"> Criteria are believed to be fit-for-purpose 	<ul style="list-style-type: none"> There has been no take-up by any yellow eel fishers and this component remains untested 	<ul style="list-style-type: none"> Review if we wish to extend to wild fisheries and consult. Adopt If so, make efforts to engage a yellow eel fishing group. Adopt
Component 4 – Eel buying and trading	<ul style="list-style-type: none"> Has been very effective at improving certificate holder performance, engagement and demand for SEG certification 	<ul style="list-style-type: none"> Small number of operators means that some observers perceive that we have created a monopoly 	<ul style="list-style-type: none"> Ensure it is clear the SEG Standard is available to all. Adopt
Component 5 – Eel farming	<ul style="list-style-type: none"> Good take-up in the sector and testing of application of criteria 	<ul style="list-style-type: none"> Some operators have abusing documentation and restocking quota 	<ul style="list-style-type: none"> Continue robust auditing for good traceability. Adopt Gain feedback from operators and auditors on application and improvements. Adopt
Component 6 - Restocking	<ul style="list-style-type: none"> Criteria are believed to be fit-for-purpose 	<ul style="list-style-type: none"> There has been no take-up of this component by any restocking organisation so remains untested Some observers believe that restocking is ineffective for recovery of the eel stock 	<ul style="list-style-type: none"> Gain feedback from restockers during consultation on why they are not using it. Adjust according to their comments. Adopt Support research and reviews into the efficacy of restocking. Review ICES advice
Component 7 – Processing, wholesale and retail supplies	<ul style="list-style-type: none"> Criteria believed to be fit-for-purpose and have been successful in engaging and certifying a number of smokeries and other processors They are simple – using other standards and other criteria in the standard 	<ul style="list-style-type: none"> This is where consumer facing labelling could be improved 	<ul style="list-style-type: none"> Gain feedback from auditors and operators on criteria and labelling. Adopt Clarify the relationship between SEG and ESF labels, ideally creating and marketing one consumer facing logo. Adopt

Component 8 - Contribution to healthy aquatic ecosystems	<ul style="list-style-type: none"> Criteria are simple 	<ul style="list-style-type: none"> There has been no take-up of this component from any sector of the water industry 	<ul style="list-style-type: none"> Engage and gain feedback from the water industry, Eel and eNGO sectors to consult if this is viable for V7.0. Or remove this element of the standard
Assurance	<ul style="list-style-type: none"> Assurance system has been generally effective and fit-for-purpose over past 4 years. Some improvements have been made to the system as we have learnt from experience 	<ul style="list-style-type: none"> 	<ul style="list-style-type: none"> Review to accommodate V7.0 changes. Adopt And move to substantial upgrade to the system to support ISEAL Code Compliance. Adopt
Monitoring, Evaluation and Learning	<ul style="list-style-type: none"> MEL system has been generally effective and fit-for-purpose over past 4 years. Key monitoring data have demonstrated substantial improvements in the sector. Some improvements have been made to the system 	<ul style="list-style-type: none"> Not all data have been measured, collected, reported and analysed as intended. 	<ul style="list-style-type: none"> Review data to be measured and collected to support the new standard and MEL plan to support ISEAL Code compliance. Adopt Set up systems to (1) efficiently record the data, (2) report it and (3) analyse it for learning. Adopt, using most efficient methods. Likely to need additional SEG resource
Theory of Change	<ul style="list-style-type: none"> Original Theory of Change has been effective at driving and communicating our strategies. Majority of it still applies 	<ul style="list-style-type: none"> 	<ul style="list-style-type: none"> Review to ensure it applies and is improved. Adopted
Claims and labelling	<ul style="list-style-type: none"> Claims and labelling guide is clear We have identified and corrected some obvious mis-claims 	<ul style="list-style-type: none"> Few operators use 'labelling' as such, most do it via invoicing No cross-sector proactive review or monitoring of operators' claims There is still confusion over different labels and permitted claims 	<ul style="list-style-type: none"> Review SEG Claims & Labelling procedure according to ISEAL Credible Claims guide, to include development of a SEG consumer facing label. Adopt Commission a review of claims made by operators. Consider a review as part of an independent evaluation

