



Sustainable
Eel Group

Monitoring, Evaluation and Learning Plan



The Sustainable *Eel* Group

Monitoring, Evaluation and Learning Plan

Versions Issued

| Version No. | Date | Description of Amendment | Approved by |
|-------------|------------------|--------------------------------------------------------------------------------------------------------|-------------|
| 1.0 | December 2016 | Original version | SEG Board |
| 2.0 | 24 November 2023 | Version 2 | SEG Board |
| 2.1 | 24 October 2024 | Development of Plan to identify Performance Indicators. Record of the consultation on the MEL Plan. | SEG Board |

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[Appendix 1.](#) **Monitoring, Evaluation and Learning Measures**

[Appendix 2.](#) **Record of the Consultation on this MEL Plan**

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 we have been continually improving that system, supporting it with improved assurance, monitoring and evaluation and learning, according to the [ISEAL Codes of Good Practice for Sustainability Systems](#).

We have published our Theory of Change ([Version 1](#) in 2016, updated in [Version 2](#), 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 plan 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 [SEG Standard System](#).

This second version has been revised following stakeholder consultation in April and May 2024. This now identifies the performance indicators SEG will use to report on its key impacts for the foreseeable future.

Appendix 2 provides a record of the consultation exercise.

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. See: <https://www.sustainableeelgroup.org/seg-reports/>.

This new MEL Plan is more comprehensive. It is more closely aligned to our Theory of Change. It builds on previous baseline data and present new baselines relevant to our activities and impacts. More regular and consistent reports are now being developed and published, starting with our [2023 Annual Report](#). There is now more stakeholder engagement and greater use of independent evaluation (one per year). Such reports 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 [Swimways target](#) by 2030
- Wetland habitats are restored to increase the quantity, quality and connectivity of the aquatic environment for eels

Economic

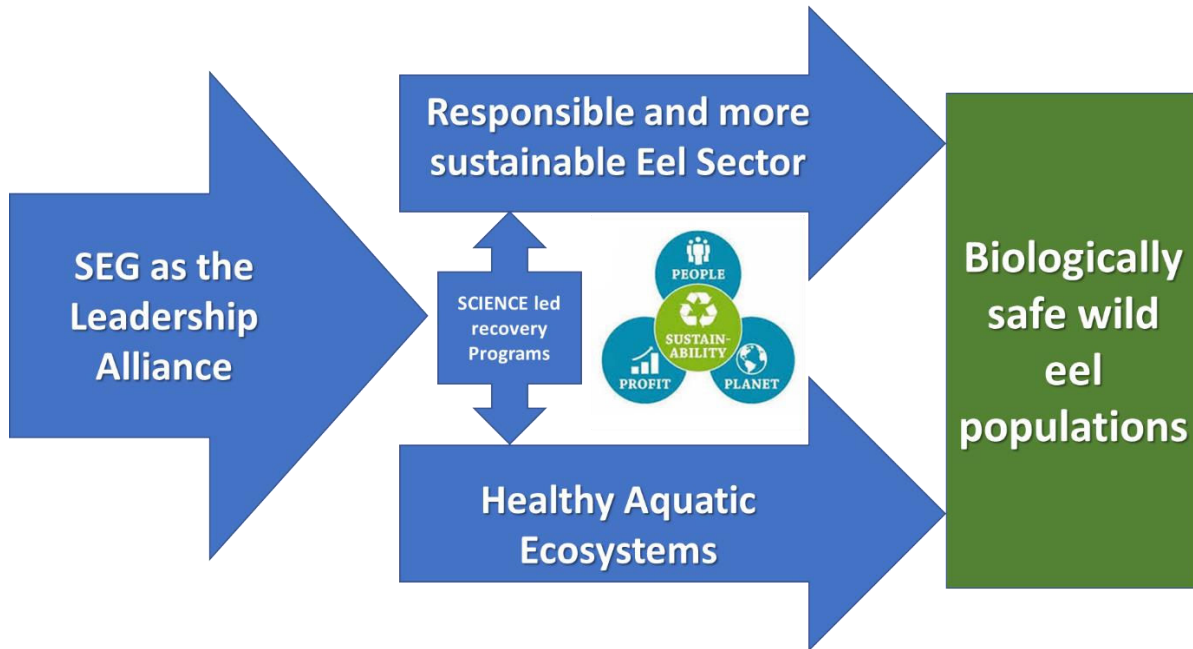
- The damaging effects of water operations* to eel populations are minimised,
- The livelihoods of those that fish and trade responsibly in eel are maintained

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

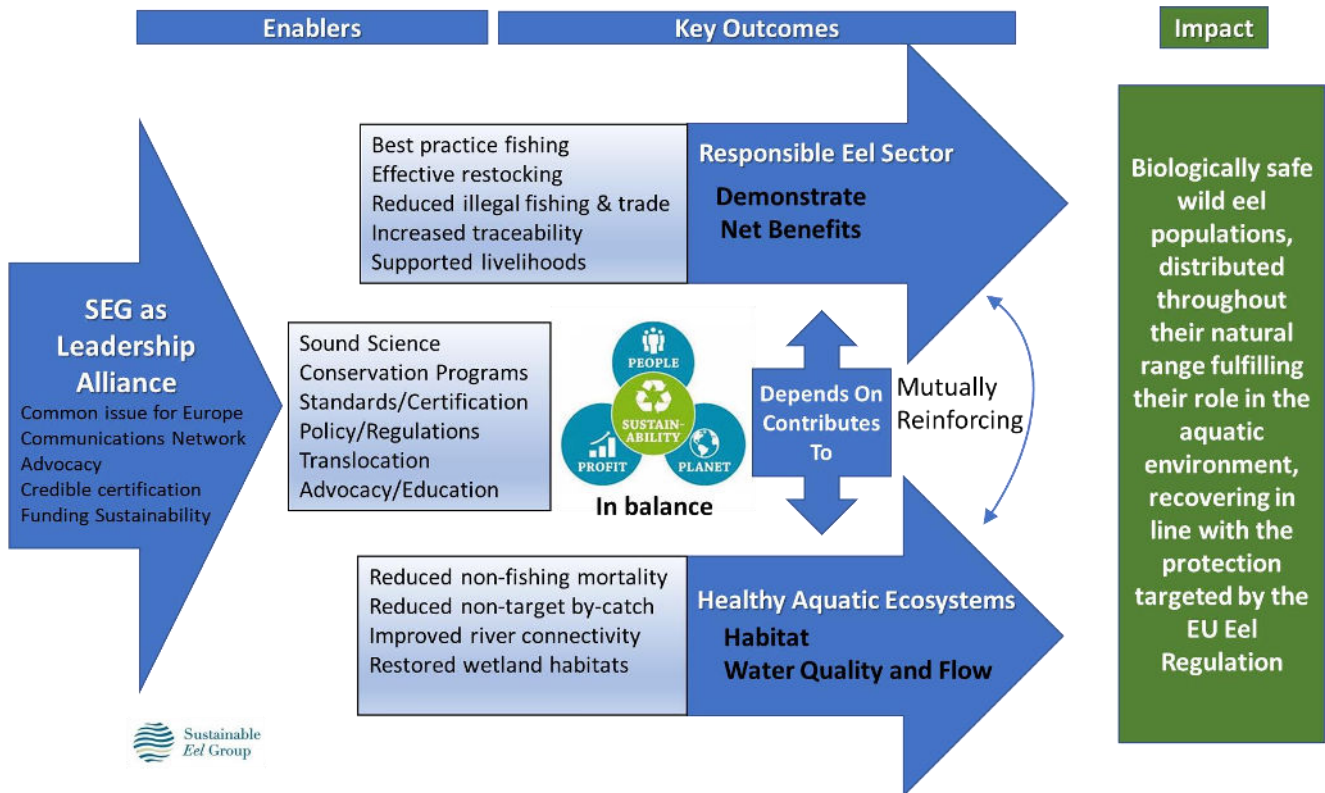
4. Theory of Change Diagrams

These objectives and their causative effects are reflected in the following diagrams, explained in more detail in our [009 Theory of Change](#):

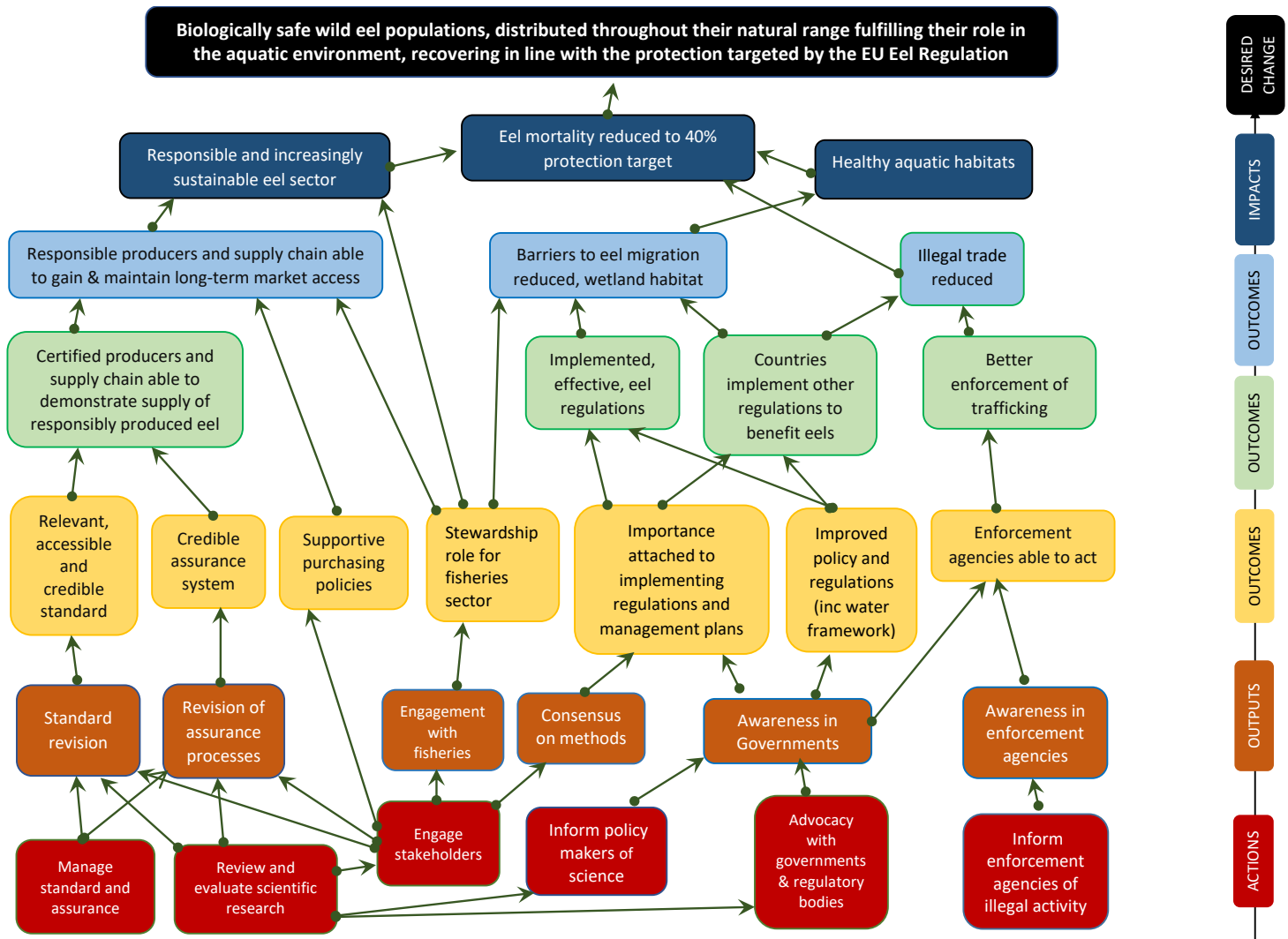
4.1 Summary:



4.2 In more detail:



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

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

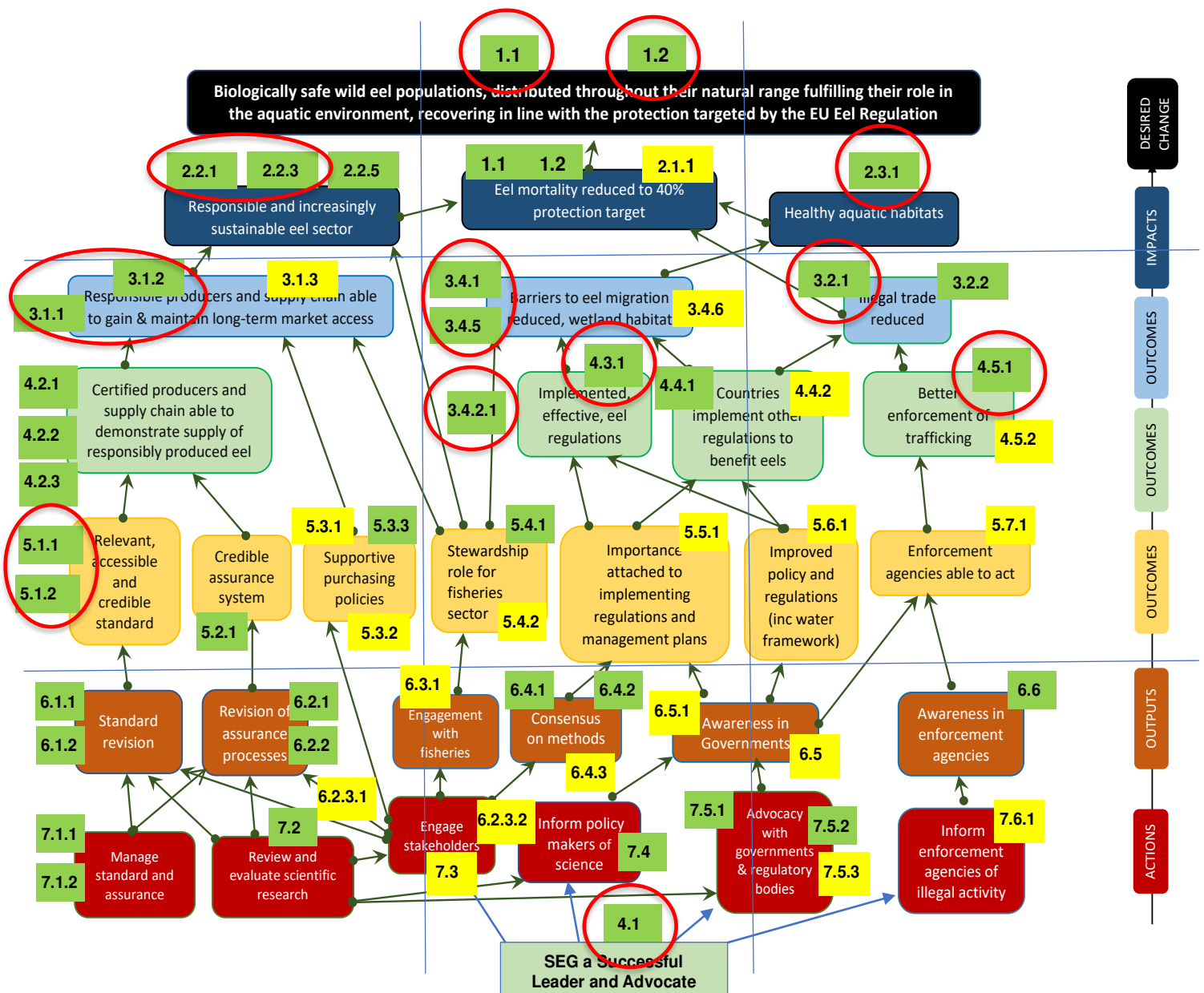
5.1 Appendix 1 lists each element of the detailed Theory of change diagram at 4.3, to include the assumptions of causal effects between those elements. It then identifies:

- Monitoring areas,
- Existing, actual and potential monitoring measures and indicators,
- Baseline figures and targets,
- Sources of information for those indicators and measures,
- References for those indicators,
- 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 has been overlain with a 3 x 3 grid (see below) and the references for the measures identified in Appendix 1. **Those ringed in red are those chosen in 2024 as key performance indicators for regular monitoring and reporting:**



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.; and (B), vertically to reflect the three levels: Impacts, Outcomes and Actions. The fourth strategy of SEG being a successful advocate is also indicated as an enabler at the bottom
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 prioritised (see 6.4.1) measures referenced in green in Table 5 and Diagram 5.1.
- (b) Record the outcome of the assessment of the assumptions referenced [2.2.4.A](#) (fishing reduced but not stopped in 2024), [3.2.1.A](#) (Hull University Report), [7.6.1.A](#) (Hull University Report), in Table 5.
- (c) CABs collect data from client audits.
- (d) Publish an Annual Impacts Report at our Annual General Meeting in 2024.
- (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) Since 2023 we have undertaken an annual System Management Review, according to our [014 SEG Standard System Management Review](#). 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
 - ii. 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 (actual)

- (a) To start collecting the measures in yellow in Table 5 Diagram 5.1 referenced 2.1.1 (**new Data Officer to be commissioned to do this**) and the unintended effect 11.2. **CAB yet to be asked for this.**

- (b) Publish an Annual Impacts Report at our Annual General Meeting in the spring. **The AGM was in September 2024 and the Annual Report was published for that.**
- (c) Decide on our next Independent Evaluation. **At the SEG Board October 2024 it was agreed to commission a study to: learn from and understand what more SEG could do / do better in its social dimension. This is being shaped to be commissioned and budgeted for 2025.**
- (d) Publish other reports commissioned by SEG as they are available. **We have updated and added to our [Reports web-page](#) and also our [Positions web-page](#).**
- (e) Reference and publicise via news items and social media when others publish notable reports. **We have been active on X this year and are starting to use Facebook as a platform to communicate with Fishers in France. We have published 14 news items so far on our [News web-page](#).**
- (f) Gain performance data from client audits via the CAB to include in our database. **This hasn't been done yet as the CAB has just bedded into its new role starting in November 2023. It is under consideration for 2025.**
- (g) Recruit a data officer to be responsible for recording and reporting the data and information, according to the requirements of our [011 Data Management System](#). **This role is being fulfilled by a combination of the continuation of Toby Mills, and a new recruit, Emily Ostler.**
- (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. **This will be done in 2025 when we start the transition to that Code.**
- (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. **This will be done in 2025 when we start the transition to that Code.**
- (j) Continue our annual System Management Review, to identify learning and improvements to be made for 2025 and beyond. **Started at our Board meeting 1 October 2024 and is under development.**
- (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.**These are all under active review.**
- (l) Develop specific indicator protocols for each monitoring indicator in use, and as we plan for new indicators. **Developed and documented in our [MEL Database](#).**

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 [2.2.1.A](#), [2.2.3.A](#), [2.3.4.A](#), [3.1.1.A](#), [5.1.1.A](#), [5.5.A](#), [6.3.1.A](#) in Table 5
- (c) Any unintended effects discovered during 2024.
- (d) Publish an Annual Impacts Report at our Annual General Meeting.
- (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

6.4 Identified to start reporting annually from 2024

6.4.1 Following review of this first plan and review of comments received during consultation, we have decided on the following indicators for annual reporting in the short term. Some may change – eg. the subject of Independent Evaluation Reports. Others will be added over time.

| Ref. | Description |
|---------|--------------------------------------------------------------------------------|
| 1.1 | Glass Eel Index. |
| 1.2 | Silver Eel Index / Overall Silver eel escapement. |
| 2.2.1 | Number of SEG certified operators |
| 2.3.1 | % Aquatic Habitats in WFD 'Good Ecological Status' |
| 3.1.2 | Proportion of certified operators in each sector |
| 3.4.5 | Km river with freed or improved migration (from Swimways project) |
| 3.2.1 | Europol estimate of no. tonnes Glass eel trafficked |
| 3.4.2.1 | Value of ESF into eel conservation projects |
| 4.3.1 | Independent evaluation report(s) into 'Implemented, Effective Eel Regulation'. |
| 4.5.1 | No. arrests, seizures etc (indicators of level of enforcement activity) |
| 4.1 | Independent evaluation report(s): SEG as a successful advocate |
| 5.1. | Relevant, Accessible and credible standard |

NB. the colours in the table equate to those in Diagram 5.2

6.4.2 These indicators were chosen:

1. Following internal review and consideration of consultee comments.
2. Because (and referencing Diagram 5.2 above)
 - a. There are indicators across the three columns: 'Responsible Sector'; 'Eel Mortality Reduced' and 'Healthy Aquatic Habitats' and with broadly similar numbers in each (4,3, & 3)
 - b. They focus on Impacts and Outcomes – towards the top of the diagram, rather than measuring 'activity' towards the bottom.

6.4.3 These Indicators:

1. Were collated and reported in the Annual Report presented at our Annual General Meeting in 2024 (and published on our website [here](#)) and
2. Are collated in our MEL Plan Database, currently available [here](#), but soon to be transferred to our more secure Cloud Drive.

7. Review and improvement

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

This second version was developed following consultation in April / May 2024, following review as we developed our first set of performance measures and following production of our Annual Report that used those measures.

Appendix 1. 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):



Social Environmental Economic

Of the following, need to filter out and decide the priorities

Agreed: Aim for 10 measures: 1 at top, then one - two from each of the top two levels

| Monitoring areas and Assumptions | Notes | Baseline (year) | Target (year) | Measures / Indicators Already available or easily got Not available yet / less easy Measure Reference | 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? | 1.1 ICES Glass eel index Graph 1.2 Other ICES eel population indices | 1. ICES Glass eel index 2. Other ICES eel population indices 1. Annual 2. 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? | <ul style="list-style-type: none"> All MS have EMP actions on target by 2030 (#EelDeal2030) | 2.1.1 % of EMP plans & actions in place. 1.1 Glass eel index 1.2 Silver eel escapement measures. ?? Overall combined? Willem? David | 1. Annual ICES WGEEL reports 2. Annual ICES WGEEL reports 3. Annual ICES WGEEL reports 4. Annual ICES WGEEL reports |

| | | | | | |
|--------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|-------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2.1.1 40% target is adequate? | | | • | | |
| 2.1.2 Eel survival is known with sufficient accuracy? | | | • | | |
| 2.1.3 Reduction of illegal trade is contributing to reduced mortality? | This seems obvious, but would they have died anyway due to lack of access to habitats? | | • | 3.2.1 Calculation of Europol figures Andrew to provide | |
| 2.2 Responsible Eel Sector | | 2009: no standard and no protection | <ul style="list-style-type: none"> 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 for 5 years then stabilising contributions to ESFs Part direct, part indirect. | 2.2.1 No. and proportion of certified operators David 2.2.2 Total value and proportion of certified sector 2.2.3 Number of certified organisations in each part of the sector David 2.2.4 Value of retail trade of certified product in EU and other nations. 2.2.5 % weight and number David? 2.2.6 EUR total annually. | 1. Annual survey by SEG. Independently every 3 – 5 years. 2. Annual survey by SEG. Independently every 3 – 5 years. 3. Annual survey by SEG. Independently every 3 – 5 years. 4. Annual survey by SEG. Independently every 3 – 5 years. 5. Annual survey by SEG. Independently every 3 – 5 years. 6. ESFs (independent), annually. |
| 2.2.1 SEG standard set at a level that provides adequate protection and leads to recovery? | We won't know until perhaps 15 – 20 years (1 generation) of use | | • | Feedback and opinion by 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 fishing and trade? | This is tested every year | | • | 2.2.4.A Easily tested each year (usually December) Paragraph / narrative - Willem | |
| 2.3 Healthy Aquatic Habitats | | | | 2.3.1 % aquatic habitats of WFD 'Good Ecological Status' | |

| | | | | | |
|--------------------------------------------------------------------------------------------------------|----------------------------------------------------|--|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | | | Wetlands for a View. And state of the Planet Report – recent WWF. DB to source. | |
| 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? | | | | 2.3.4.A Possible future study related to Water Framework Directive Swimways – how many km opened up in 2023. Wetlands and Dam Removal Europe. DB to source. For report: Headline and link to report. Emily | |
| 3.1 Responsible traders gain & maintain market access | ?? | | | 3.1.1 No. certified operators 3.1.2 Proportion of certified operators 3.1.3 Value of certified market compared to non David to supply | |
| 3.1.1 Market access enabled by certification? | | | | 3.1.1.A Potential future study | |
| 3.2 Illegal trade minimised | 1. Legal quotas are set at protective levels 2. | | <ul style="list-style-type: none"> 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. Andrew 3.2.2 The ‘gap’ in the EU Glass eel market. Andrew | 1. The independent, international enforcement organisation, Europol, provides indicators on the extent of illegal trade each year. SEG will publish those annually. Independent. 2. 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. AK to glean from report(s). | |

| | | | | | |
|-------------------------------------------------------------------------------|-------------------------------------------------|--|-------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 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 | | <ul style="list-style-type: none"> Barriers [need a target based on other initiatives] to eel migration are removed Indirect | 2.3.1 % aquatic habitats of WFD 'Good Ecological Status' DB 3.4.1 Ha of habitat available 3.4.2 Ha increased each year 3.4.3 Km of river increased each year DB 3.4.4 No. barriers removed 3.4.5 Measures related to Swimways project DB 3.4.6 Measures from other projects – eg. no dams removed, | 1. WFD reports 2. Is anyone measuring this? 3. Is anyone measuring this? 4. Is anyone measuring this? 5. Reports from these campaigns, eg. Amber, etc. etc. via WIEA? |
| 3.3.1 Implemented regulations actually result in reduction of barriers? | | | | | |
| 3.3.2 Stewardship role for fisheries sector results in reduction of barriers? | | | | 3.4.2.1 Value of ESF that goes into barrier mitigation. , Habitat improvement & restocking. DB | |
| 3.4 Wetland habitat improved | 1. Wetland habitat quality is a limiting factor | | Wetland habitats are restored to increase the quantity, quality and connectivity of the aquatic environment for eels | 2.3.1 % aquatic habitats of WFD 'Good Ecological Status' DB 3.4.2 Ha of habitat available 3.4.2 Ha increased each year 3.4.3 Km of river increased each year DB 3.4.4 No. barriers removed 3.4.5 Measures related to Swimways project DB 3.4.6 Measures from other projects – eg. no dams removed, | 1. WFD reports 2. Is anyone measuring this? 3. Is anyone measuring this? 4. Is anyone measuring this? 5. Reports from these campaigns, eg. Amber, etc. etc. via WIEA? |
| 3.4.1 Implemented regulations actually result in improved habitat? | | | | | |
| 3.4.2 Stewardship role for fisheries sector results in improved habitat? | | | | 3.4.2.1 Value of ESF that goes into habitat improvement | |
| 4.1 SEG is a successful advocate | | | <ul style="list-style-type: none"> SEG successfully influences the EC SEG successfully influences national policies | 4.1 Current Independent Evaluation Reports. Hull report? Ruissen Report. Narrative. Andrew 4.2 Current Independent Evaluation Reports <ul style="list-style-type: none"> Support for SEG policies by EC | <ul style="list-style-type: none"> Annual report by SEG. Independently by fishery journalist? every 3 – 5 years. Annual report by SEG. Independently by fishery journalist? every 3 – 5 years. |

| | | | | | |
|-------------------------------------------------------------------------------------|--|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | | <ul style="list-style-type: none"> • SEG successfully influences other NGOs • SEG successfully influences fishers and traders All direct | <ul style="list-style-type: none"> • Support for SEG policies by national govts and agencies • Support for SEG policies by other NGOs • Support for SEG policies by fishers and traders (no & % of certification) | <ul style="list-style-type: none"> • Annual report by SEG. Independently by fishery journalist? every 3 – 5 years. • Annual report by SEG. Independently by fishery journalist? every 3 – 5 years. |
| 4.2 Certified operators able to demonstrate trade of responsibly sourced eel | | | | 4.2.1 Existence of standard 4.2.2 No. certified operators 4.2.3 Proportion of certified operators DB 4.2.4. Value of certified market compared to non | |
| <i>4.2.1 SEG Standard is what enables demonstration?</i> | | | | | |
| <i>4.2.2 SEG assurance system is what enables demonstration?</i> | | | | | |
| 4.3 Implemented, effective, eel regulations¹ | | | | 4.3.1 Independent evaluation reports Poseidon report, Ruissen, Andrew. Parliamentary vote. AK | |
| <i>4.3.1 Importance attached to regulations drives implementation?</i> | | | | | |
| <i>4.3.2 Improvement to regulations makes them more effective?</i> | | | | | |
| 4.4 Countries implement other regulations to benefit eels | | | | 4.4.1 EC reports on implementation of Eel Reg, Water Framework Directive 4.4.2 Independent evaluation reports | |
| <i>4.4.1 Importance attached to regulations drives implementation?</i> | | | | | |
| <i>4.4.2 Improvement to regulations makes them more effective?</i> | | | | | |
| 4.5 Better enforcement of trafficking | | | | 4.5.1 No. arrests / seizures AK 4.5.2 Weight of glass eel seizures | |
| <i>4.5.1 Ability of enforcement agencies leads to better enforcement?</i> | | | | | |

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

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|-------------------------------------------------------------------------------------------|--|--|--|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| 4.5.2 More aware enforcement agencies leads to better enforcement? | | | | | |
| 5.1 Accessible and credible standard | | | | 5.1.1 Standard published and in different languages 5.1.2 Compliance with ISEAL Code DB | |
| 5.1.1 Standard revision makes standard more accessible and credible? | | | | 5.1.1.A Potential future survey | |
| 5.2 Credible assurance system | | | | 5.2.1 Compliance with ISEAL Code DB | |
| 5.2.1 Assurance system revision makes standard more accessible and credible? | | | | 5.1.1.A Potential future survey | |
| 5.3 Supportive purchasing policies | | | | 5.3.1 Average price of certified v non-certified products 5.3.2 Business is maintained / viable between certified and non certified 5.3.3 No. and % of certified businesses in the sector DB | |
| 5.3.1 Stakeholder engagement leads to more supportive purchasing policies? | | | | | |
| 5.4 Stewardship role for fisheries sector | | | | 5.4.1 Total annual value of ESFs 5.4.2 % of sector contributing to ESFs | |
| 5.4.1 Engagement with fisheries leads to stewardship roles? | | | | | |
| 5.5 Importance attached to implementing regulations and EMPs | | | | 5.5.1 Independent evaluation reports; Questionnaires | |
| 5.5.1 Consensus on methods leads to more importance attached to implementing regulations? | | | | 5.5.A Potential future report | |
| 5.5.2 Awareness in governments leads to importance attached? | | | | 5.5.A Potential future report | |
| 5.6 Improved policies and regulations | | | | 5.6.1 Independent evaluation reports; Questionnaires | |

| | | | | | |
|------------------------------------------------------------------------------|--|--|--|------------------------------------------------------------------------------------------------------------------------|--|
| 5.6.1 Awareness in governments leads to improved policies and regulations? | | | | 5.5.A Potential future report | |
| 5.7 Enforcement agencies able to act | | | | 5.7.1 Independent evaluation reports | |
| 5.7.1 Awareness in governments enables enforcement agencies to act? | | | | 5.5.A Potential future report | |
| 5.7.2 Awareness in enforcement agencies enables them to act? | | | | 5.5.A Potential future report | |
| 6.1 Revision of SEG Standard | | | | 6.1.1 Versions published 6.1.2 Compliance with ISEAL Code | |
| 6.1.1 Standard management leads to better Standard? | | | | | |
| 6.1.2 Review and evaluation of scientific research leads to better Standard? | | | | | |
| 6.1.3 Stakeholder engagement leads to better Standard? | | | | | |
| 6.2 Revision of Assurance processes | | | | 6.2.1 Versions published 6.2.2 Compliance with ISEAL Code | |
| 6.2.1 Assurance management leads to better assurance processes? | | | | | |
| 6.2.2 Review and evaluation of scientific research leads to better Standard? | | | | | |
| 6.2.3 Stakeholder engagement leads to better assurance processes? | | | | 6.2.3.1 Potential survey of stakeholders 6.2.3.2 Independent evaluation reports | |
| 6.3 Engagement with fisheries | | | | 6.3.1 No. contacts with fishers and/or their representatives (OPs) | |
| 6.3.1 Engagement with stakeholders leads to engagement with fisheries? | | | | 6.3.1.A Potential future study | |
| 6.4 Consensus on responsible fishing methods | | | | 6.4.1 Criteria in the Standard 6.4.2 Audit results of fishing methods 6.4.3 Independent reports of audit methods | |

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| 6.4.1 Engagement with stakeholders leads to consensus on responsible fishing methods? | | | | 6.3.1.A Potential future study | |
| 6.5 Awareness of eel protection needs in governments | | | | 6.5 Independent evaluation reports | |
| 6.5.1 Informing policy makers leads to awareness of eel protection needs in governments? | | | | 5.5.A Potential future report | |
| 6.5.2 Advocacy with governments & regulatory bodies leads to awareness of eel protection needs in governments? | | | | 5.5.A Potential future report | |
| 6.6 Awareness of trafficking by enforcement agencies | | | | 6.6 No. reports of arrests posted on our website | |
| 6.6.1 Informing enforcement agencies of illegal activity leads to awareness of trafficking? | | | | 5.5.A Potential future report | |
| 7.1 Manage standard and assurance | | | | 7.1.1 ISEAL status 7.1.2 Versions to each Standard and Assurance system | |
| 7.2 Review and evaluate scientific research | | | | 7.2 No. position statements published | |
| 7.3 Engage stakeholders | | | | 7.3 Number of engagements with stakeholders of different types | |
| 7.3.1 Reviewing and evaluating scientific research leads to stakeholder engagement? | | | | | |
| 7.4 Inform policy makers of science | | | | 7.4 No. position statements communicated | |
| 7.4.1 Reviewing and evaluating scientific research leads to informing policy makers? | | | | | |
| 7.5 Advocacy with governments and regulatory bodies | | | | 7.5.1 Position statements published 7.5.2 No. attendances at Govt. meetings 7.5.3 No. Govts. That adopt our position | |
| 7.5.1 Reviewing and evaluating scientific research leads to successful | | | | | |

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|-----------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------|------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|
| <i>advocacy with governments and regulatory bodies?</i> | | | | | |
| 7.6 Share knowledge of illegal activity with enforcement agencies | | | | 7.6.1 No. items info shared | |
| 7.6.1 Sharing knowledge on illegal activity leads to successful advocacy with governments and regulatory bodies | | | | 7.6.1.A This is the basis of the Hull University Study in 2023 | |
| 8. Other sustainability impacts (not presently shown in the Theory of Change) | | | | | |
| 8.1 The damaging effects of water operations to eel populations are minimised, whilst still fulfilling their purpose | | | SEG successfully influences the improving protection for eels from the damage by water operators by collaborating with others, to meet Europe-wide targets. Indirect | 8.1 Will need info / targets from partners | Will need info from partners |
| 8.2 The livelihoods of those that fish and trade responsibly in eel are maintained | | | 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. Annual report by SEG 3 yearly report by eg. Wageningen University |
| Learning from Other Sources | | | | | |
| Other monitoring areas | Notes | Baseline (year) | Target (year) | Measures / Indicators | Information sources (priorities in bold) |
| 9. Enabling environment | | | | | |
| <i>9.1 Effective monitoring</i> | Annual Impact Report, inc. in AGM | 2018 | | | Annual Impact Report, |
| <i>9.2 Effective evaluation</i> | Regular evaluation. Annual System Management Review | | | | Annual System Management Review |
| <i>9.3 Effective learning</i> | Annual System Management Review | | | | Annual System Management Review |
| <i>9.4 Effective management reviews</i> | Annual System Management Review | | | | Annual System Management Review Board meetings |

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| | Bimonthly 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 was finalised at our Board meeting in January 2024. There we agreed 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 |
| | The SEG business plan for 2025 will be prepared following completion of our monitoring, evaluation and learning from our System Management Review for 2024. | | | System Management Review – autumn and winter 2024. | |
| 10. Risk Management | | | | | |
| | Risk Management Plan Priority Risks | 2024 | | The priority risks and associated measures were incorporated into our 2024 business plan. | SEG Board |
| | Risk Management Plan Priority Risks | 2025 | | The Risk Management Plan is currently under review and the priorities will be incorporated into the 2024 business plan | SEG Board |
| 11. Unintended Effects (from MEL System) | | | | | |
| 2018 – 2023 actual. 11.1 Perception of Creation of a Monopoly | This came from a complaint from an unsuccessful | | | No immediate plans for regular monitoring as this was a ‘one-off’ two years ago, but we will be | Stakeholder – certificate holders and agencies |

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| | applicant for certification | | | constantly mindful of any similar repeat feedback. | |
| <u>2023 Forecast</u> 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.

Appendix 2. Record of the Consultation on this MEL Plan

In April and May 2024, SEG undertook a consultation exercise on an earlier version of this plan, with the aim of gaining stakeholder input with other views in order to formulate the best possible set of performance indicators to collate and report in the short term.

1. On 9 April 2024, the following email was sent to:

- b) All 850+ contacts on our database
- c) Seven Members of the ICES WGEEL (International Council for the Exploration of the Seas, Working Group on Eel) as specialist eel scientists
- d) Six experienced auditors in our Conformity Assessment Body
- e) The holders of the 58 certificates for the SEG standard.

The email:

**Notice to the
SEG Standard Certification Community**

To those interested in the European eel,

**Have your say on the SEG [Monitoring, Evaluation & Learning Plan](#).
Comments requested by Friday 10 May**

As we hope you are aware, the [SEG Standard](#) is one of the key tools and strategies that [SEG](#) uses in its [Theory of Change](#) to assist the recovery of the European eel in the long term quest for its sustainability.

To support the new standard (Version 7) published in November 2023, we have developed an enhanced [Monitoring, Evaluation and Learning \(MEL\) system](#). The purpose of that system is to define the short to long term outcomes and impacts that are expected from implementing SEG's strategies, including the SEG standard. It describes what those outcomes and key assumptions are and will be measured to provide learning feedback for improving our strategies.

To develop that further, we have developed a [MEL Plan](#). The purpose of this plan is 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.

As interested stakeholders, we are seeking your input to this plan, i.e.:

- **In general** – on any part of the plan and its use in helping SEG and our policies to improve,
- **The plans listed at 6.1, 6.2 and 6.3 on pages 3 and 4,**

- **The measures in Appendix 1.** In particular:
 - The **usefulness of those measures** in indicating the outcome desired,
 - The **sources of those data** and their ease of collection.
- Your beliefs or predictions of any **unintended effects** of our programme
- We are particularly seeking **any comments**, either in support of our proposals, or to suggest how improvements might be made.

To comment, please contact us at standard@sustainableeelgroup.org by Friday 10 May.

Thank you,

David Bunt
Director of Conservation Operations

2. Reminders were sent to the same groups on 3 May and 6 May 2024.

3. The following replies were received

a) From Nicolas Belhamiti (an auditor in France):

- **Ref: 6.2 (g) Recruit a data officer to be responsible for recording and reporting the data and information, according to the requirements of our 011 Data Management System.**
Comment: *'It would be great if this person could keep a very regular update of the SEG fishermen.'*
- **Ref: Indicator 2.2. 5% increases pa for 5 years then stabilising contributions to ESFs.**
Comment: *'I assume that criterion 1.2 aims to improve this factor. However, this new criterion in the standard is not yet taken into account by wholesalers in France, and they are aiming more for contributions in kind as a priority. We'll see about that next season.'*
- **Ref: 2.3.1 Healthy habitats help keep eel mortality at target level?**
Comment: *'Unfortunately we have very little information on this in France. In fact, the latest AMP report, which shows what has been done/remains to be done, dates from 2018... A new report should have come out since then, but it hasn't. This aspect is more the responsibility of the scientific institutes.'*
- **Ref 5.1.1 Standard published and in available in different languages**
Comment: *'Yes but, in France, most of the time the traders did not read it (or don't remember what it says...). Fishermen know very little about it.'*
- **Ref 5.3.1 Average price of certified v non-certified products**
Comment: *'Initially, [named of Trader] paid more for SEG-certified fish to encourage fishermen to apply for the label. Now that it is 100% SEG, the price is obviously the same for everyone. I don't know whether the wholesalers' selling prices are higher if the fish is SEG, but if that's the case, the fishermen should get a better return.'*
- **Ref 6.4.1 Criteria in the Standard**
Comment: *'Criteria are good but there are some things that we can't evaluate. One of the most important criteria, speed, can very well be*

adapted when we are present. Also, we don't know how many deaths occur in fishermen's homes, and if they provide statistics, it's impossible to know whether the numbers are real. Perhaps you could add some thoughts on the best way to audit fisheries? Systematisation of the indigo carmine test (only carried out in the event of NC at the moment), carrying out mortality tests in aquariums, etc. '

b) From Benoit Chambon (a SEG certified eel trader in France):

- **Ref 1. Eel Populations**

Comment: *'Get Data from fisheries'*

- **Ref. 1.2 Population numbers are known with sufficient accuracy.**

Comment: *'Assuming the authorities have a proper monitoring system and reliable data. This is not the case in France and the rest of EU'*

- **Ref. 2.2 Increasing contributions to ESF.**

Comment: *'ESF only? Other ONG from EU countries'*

- **Ref. 2.2.4 Governments don't stop all eel fishing and trade.**

Comment: *'However fishing regulations are becoming more restrictive every year following ICES recommendation to close the fishery'*

- **Ref. 4.1 Ha of wetland habitat available.**

Comment: *'Reports and studies available for the french wetland. Ministry of Ecology. Office Protection de la Biodiversité. Schéma d'aménagement et gestion de l'eau (SAGE)'*

- **Ref. 3.4.2.1 Value of ESF that goes into habitat improvement.**

Comment: *'Include ARA France'*

- **Ref. 4.1 SEG is a successful advocate.**

Comment: *'SEG needs French representation to be able to influence French policy'*

- **Ref. 5.3.1 Average price of certified v non-certified products.**

Comment: *'Price of certified fish not different than not certified. SEG needs to promote the certification on the restocking part especially to state institutions (Baltic states, Poland, Belgium, Germany....)'*

- **Ref. 5.4.1 Total annual value of ESFs.**

Comment: *'ESF should not have the monopoly on stewardship role for fisheries sector'*

- **Ref. 6.4 Consensus on responsible fishing methods**

Comment: *'Fishers to be involved and changes to be done in partnership with the fishery industry'*

4. Respondent comments and how we used them

| Respondent: Name Role in the Eel Sector: Economic/Social/ Environmental | Reference in MEL Plan | Comment | SEG Immediate Reply * | How SEG Has used this comment |
|-------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Nicolas Belhamiti</p> <p>Auditor / Assessor (and Scientist)</p> <p>Social / Environmental</p> | 6.2 (g) Recruit a Data Officer | It would be great if this person could keep a very regular update of the SEG fishermen. | Agree. We will see if/how this person can liaise with the CAB to keep a better record of the regularly changing list of certified fishers. | We will see if/how this person can liaise with the CAB to keep a better record of the list of certified fishers. |
| | 2.2. 5% increases pa for 5 years then stabilising contributions to ESFs | I assume that criterion 1.2 aims to improve this factor. However, this new criterion in the standard is not yet taken into account by wholesalers in France, and they are aiming more for contributions in kind as a priority. We'll see about that next season | The new criterion 1.2 has been improved with more guidance. We'll be pleased to have feedback via the CAB how that is being implemented. | We'll seek feedback via the CAB how this updated criterion is being implemented. |
| | 2.3.1 Healthy habitats help keep eel mortality at target level | Unfortunately we have very little information on this in France. In fact, the latest AMP report, which shows what has been done/remains to be done, dates from 2018... A new report should have come out since then, but it hasn't. This aspect is more the responsibility of the scientific institutes. | We agree that current reporting needs improving. We hope that as the EU and member states get better at this through better implementation of eg. the Eel Regulation, Water Framework Directive, Green Deal etc. that this will improve. | SEG continues to press for better implementation |
| | 5.1.1 Standard published and in available in different languages | Yes but, in France, most of the time the traders did not read it (or don't remember what it says...). Fishermen know very little about it. | It has been published in French since 2018. We are improving the 'SEG Standard in French' part of our website. If Traders don't read it then they have a greater likelihood of non-compliance. We are trying to establish a forum in France to improve communications with each Traders and Fishers. Can you suggest any ways we can improve this? | We are improving the 'SEG Standard in French' part of our website. We are trying to establish a forum in France to improve communications with each Traders and Fishers. We ask for any suggestions for ways to improve communications with Traders and Fishers. |

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|----------------------------------------------------------------------------------------------|-----------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|
| | 5.3.1 Average price of certified v non-certified products | Initially, [named of Trader] paid more for SEG-certified fish to encourage fishermen to apply for the label. Now that it is 100% SEG, the price is obviously the same for everyone. I don't know whether the wholesalers' selling prices are higher if the fish is SEG, but if that's the case, the fishermen should get a better return | We will enquire about greater transparency and information on prices as we would like to see a differential. However, it is not quite 100% SEG so there may be a difference? Being SEG certified has, we believe, helped the sector to survive and not be closed. | We will enquire about greater transparency and information on prices as we would like to see a differential. |
| Benoit Chambon SEG Certified Eel Trader Social / Economic | 1. Eel Populations | Get Data from fisheries | This is a good idea and possible, though more difficult, to gain from all fisheries in Europe. It may be reported to ICES, in which case we can collate from there. Are the catch (and effort) data reported to ICES via the National Comite? | SEG will enquire if/how direct fisheries data can be collated |
| | 1.2 Population numbers are known with sufficient accuracy | Assuming the authorities have a proper monitoring system and reliable data. This is not the case in France and the rest of EU' | Accurate eel population data are indeed difficult to measure accurately. We hope that, and will press for, improved scientific techniques. | This is an 'assumption' with low confidence. We will continue with best scientific knowledge and keep pressing for better. |
| | 2.2 Increasing contributions to ESF | ESF only? Other ONG from EU countries' | At present we have data from the two existing ESFs in NL and Germany. But it is a good idea to look at other similar sources from other countries and we will look into that. | We will look into gaining information on contributions to other similar organisations in outer countries. |
| | 2.2.4 Governments don't stop all eel fishing and trade | However fishing regulations are becoming more restrictive every year following ICES recommendation to close the fishery' | Yes, we have recognised that. Every year we advocate against the ICES ACOM advice to close the fishery – with success but we note that sometimes there are more restrictions rather than close. This year (2024) we published our 'Recommendations' as a proactive counter and possible influence to the ICES Advice. | The comment is noted and every year we do everything possible to enable the continuation of a Responsible fishery. |
| | 4.1 Ha of wetland habitat available | Reports and studies available for the french wetland. Ministry of Ecology. Office Protection de la Biodiversité. Schéma d'aménagement et gestion de l'eau (SAGE) | Thank you for this information. With current limited SEG resources we seek to collate from centralised (EU) reports. We will collate from each country if/when resources allow. | This is a helpful reference to gain this information from one of circa 30 countries. |
| | 3.4.2.1 Value of ESF that goes into habitat improvement | Include ARA France | Agreed. A good example of a similar organisation contributing to eel conservation projects (and part funded by eel fishers). We will seek others too. | We will seek to use information from this organisation, and explore others in other countries. |
| | 4.1 SEG is a successful advocate | SEG needs French representation to be able to influence French policy' | We agree. We are trying to establish a 'SEG France' or similar, and to have a French representative on the SEG Board. | We are trying to establish a 'SEG France' or similar, and to |

| | | | | |
|--|-----------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | | | have a French representative on the SEG Board. |
| | 5.3.1 Average price of certified v non-certified products | Price of certified fish not different than not certified. SEG needs to promote the certification on the restocking part especially to state institutions (Baltic states, Poland, Belgium, Germany....) | We would like to see that differential to help all involved recognise an advantage with being SEG certified. We are promoting certification and more restockers are specifying 'SEG Certified' in contracts which is benefitting the SEG certified reply. It is all 'market driven' Do you have any suggestions on how the market can be encouraged to pay more for SEG certified fish? | SEG continues to promote certification. We seek suggestions on how the market might be encouraged to pay more for SEG certified fish. |
| | 5.4.1 Total annual value of ESFs | ESF should not have the monopoly on stewardship role for fisheries sector' | It has been a good idea to include ARA in this category. We will seek to use those in future and to explore similar others for other countries. | We will seek to use ARA data in future and to explore similar others for other countries. |
| | 6.4 Consensus on responsible fishing methods | Fishers to be involved and changes to be done in partnership with the fishery industry | Yes, we wish to be able to consult better more directly with fishers. At present it is done via Traders, OPs and local Comites. Do you have any suggestions on how we can involve fishers better? | We currently consult with Traders, OPs and local Fisheries Committee who are directly connected to fishers. We seek and welcome any suggestions on how to better involve / liaise with the 450 French fishers direct. |