

Versions Issued

Version No.	Date	Description of Amendment
1.0	30 October 2020	Creation of Methodology
1.1	1 November 2024	Change to registered address
1.2	6 November 2024	Update to scope to include appeals by CABs
1.3	8 July 2025	Change to registered address

This document is the property of the Sustainable Eel Group. This is the first version. It is effective from the date above.

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1. Purpose

1.1 This procedure sets out the steps to be followed to submit and deal with a formal complaint about SEG, its activities or decisions.

2. Scope

- 2.1 Stakeholders may have disagreements or complaints about any of SEG's activities. Most will normally be resolved through dialogue and negotiation. When such normal resolution methods have been unsuccessful, the stakeholder may wish to lodge a formal complaint. This procedure shall apply to formal complaints only.
- 2.2 SEG will address any formal complaint that is brought to its attention and which meets the requirements as set out in this procedure. A complaint may be from any stakeholder regarding any of SEG's activities, actions, inactions or decisions of SEG.
- 2.3 This procedure can also be applied in the event of a CAB's appeal of an approval decision, but with the complaint being considered as an appeal and the complainant being considered an appellant.
- 2.4 Any complaint about a compliance assessment body (CAB) or auditor including its certification decisions or assessments shall be dealt with under the CAB or auditor's own complaint procedure.

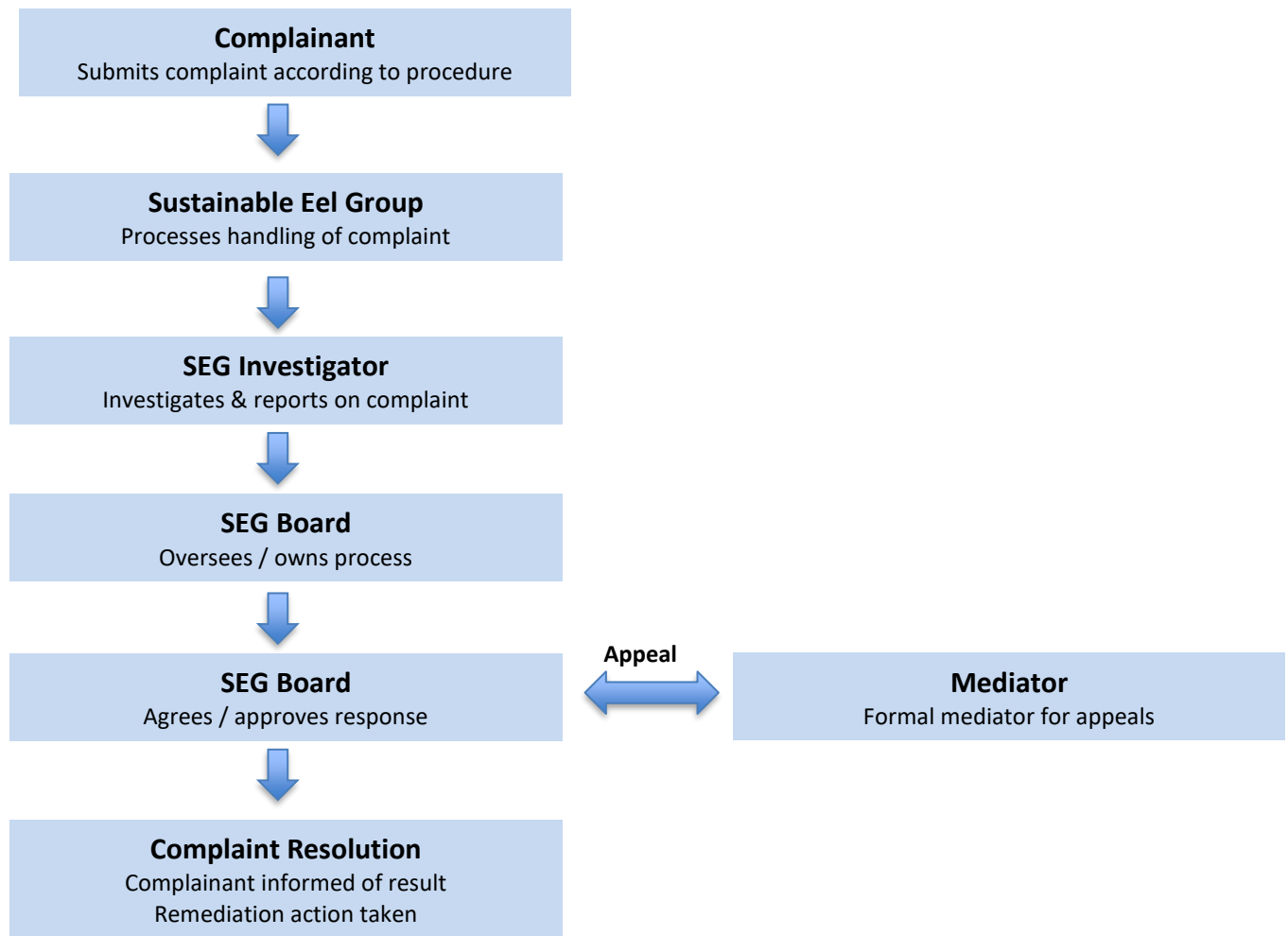
3. Basis

- 3.1 Complaints can be made about any part of SEG's business operations or decision making. Most of SEG's operations and governance are defined in documents published on our website in [Governance](#) or the [SEG Standard System](#). Those documents can often be used as references on which to base a complaint.
- 3.2 A template Complaints Form is provided (Annex 1 of this document) that shall be used by any complainant. It is also on the SEG website [here](#).

4. Overall process

- 4.1 This is the overall process for handling complaints. It is summarised at 4.2:
 - 4.1.1 The complainant submits a formal complaint as described at 5.
 - 4.1.2 Upon receipt of a complaint SEG acknowledges receipt as described at 5.3.1.
 - 4.1.3 A member of the SEG Board is appointed as SEG Investigator as described at 5.4.
 - 4.1.4 The Investigator analyses the complaint, makes enquiries with relevant parties and aims to form an objective response, with any recommendations for the SEG Board, as described in 7.
 - 4.1.5 The SEG Board considers and approves (or reviews) the response.
 - 4.1.6 SEG responds to the complainant. The aim is to reply within thirty days of receipt of the complaint.
 - 4.1.7 If the complainant is dissatisfied with the response they may appeal. This can be handled by an independent mediator, at 50% shared cost to each SEG and the complainant.
 - 4.1.8 The decision of the SEG Board team shall be final, unless the case is referred on appeal to the mediator, in which case the decision of the mediator shall be final.

4.2 Summary of the process and roles of the parties involved in the Complaints Procedure.



5. Roles and responsibilities

5.1 The following are the different roles and responsibilities of those involved in making and resolving complaints, i.e.:-

- the complainant
- the Sustainable Eel Group (operational organisation)
- the SEG Board
- SEG Chairman
- Mediator

5.2 Complainant

Any stakeholder involved in SEG's standard setting activities, impacted by any action or inaction of SEG or engaged in other activities of SEG.

5.3 SEG (operational organisation)

The SEG operational organisation is the point of entry for all complaints that meet the requirements set out in this procedure.

5.3.1 On receipt of a complaint, SEG will acknowledge its receipt to the complainant, in writing, no later than 5 working days after it has been received. It will give an indication of the likely timescale for a response.

5.3.2 SEG has the right to return incomplete complaints to the submitting party. Incomplete complaints will be returned with an explanation of why it was considered incomplete.

5.3.4 SEG will:

- Receive, acknowledge, and process the complaint.
- Administer and monitor the handling of all complaints
- Appoint a member of the SEG Board to be the Investigator and lead the investigation into the complaint
- Oversee and execute relevant communications and announcements regarding the complaint.

5.4 SEG Investigator

5.4.1 The SEG Investigator:

- Shall be selected on the basis of them (a) having the seniority to lead an investigation and (b) to have no connection or conflict of interest either internally within SEG, or externally with the complainant.
- Shall gather as much independent evidence about the complaint as possible; analyse the complaint, make enquiries with relevant parties and aim to form an objective response.
- Within a maximum of thirty days (longer if necessary and in agreement with the complainant), the investigator will present the evidence, a draft response and any recommendations to the SEG Board.

5.5 SEG Board

5.5.1 The SEG Board oversees the SEG operational organisation and ensures the following:

- Takes any decisions based on the recommendation as provided by the Investigator, or mediator. It may decide to take an alternative decision, depending on the consideration of information and risks unavailable to the mediator. Complaints are documented in the 'SEG Complaints Log' that includes a summary of the complaint and subsequent actions.
- Documentation related to the complaint will be held by SEG and available to stakeholder(s) at the discretion of the SEG Board.

5.6 SEG Chairman

5.7.1 The SEG Chairman chairs the SEG Board, taking an overview of SEG's business, aiming to resolve matters in an objective and balanced way, by consensus and without conflict of interest. He/she:

- Appoints the SEG Investigator from the SEG Board
- Gains agreement for the resolution to the complaint with the SEG Board, seeking a balanced and objective response.

5.7 Mediator

5.7.1 A professional mediator can be appointed if SEG and the complainant are unable to resolve the complaint. The mediator:

- Is completely independent of SEG.
- Handles complaints referred to it that SEG and the complainant have been unable to resolve.
- Decides on the legitimacy and course of action of the complaint.
- Seeks to mediate and find common ground to enable the two parties to move forward.
- Gives recommendations deducted from the complaint and any further investigation deemed necessary to the SEG Board.
- Aims to handle all complaints within 2 months of being referred the complaint.
- Shall agree a fee for its mediation services to be paid 50% by each the complainant and SEG.

6. Submitting complaints

6.1 To be accepted and classified by SEG as a formal complaint, the complainant shall:

- Use the [Complaint form](#) in ANNEX 1
- Submit it in writing by email to: info@sustainableeelgroup.org or
- Be specific and include appropriate objective justification and evidence to credibly substantiate any claim

6.2 Upon receipt, the SEG shall endeavour to verify if the complaint meets the general criteria set out in Section 2 within 5 working days of receipt.

6.3 SEG may ask for further information to substantiate the information received from the complainant. Unsubstantiated complaints or complaints based upon hearsay will not be accepted.

6.4 Once accepted SEG shall refer the complaint to the SEG Investigator within 2 working days and shall record the complaints in the complaints log.

6.5 Non-accepted complaints will also be logged.

7. Investigating complaints

7.1 SEG shall allocate an 'investigator' within 5 working days of receipt of the complaint to review or resolve a complaint according to the following criteria:

- 7.1.1 The investigator shall not be directly implicated in the complaint.
- 7.1.2 A copy of the complaint, with all correspondence, shall be passed to the investigator.
- 7.1.3 The investigator may contact the complainant to determine the full nature and extent of the complaint and to obtain any additional information from whatever source, including the complainant and other stakeholders, if necessary.
- 7.1.4 The investigator shall send the complainant an estimated timeframe for dealing with the complaint and keep them informed of the progress of the investigation.
- 7.1.5 The investigator shall determine whether the complaint has merit or whether the complaint has not borne out as a situation needing corrective actions. Any decisions shall be recorded in the complaints log and passed to the SEG Board.

- 7.1.6 For complaints with merit, the investigator shall determine the cause of the complaint and, after review, shall set up an action plan to correct the cause of the complaint and prevent its reoccurrence. This shall be presented to the SEG Board.
- 7.1.7 For complaints with no merit, SEG will inform the complainant accordingly, including a summary of the underlying assessment.

8. Appeals

- 8.1 If the complainant is dissatisfied with the response, they may appeal to SEG.
- 8.2 If the appeal is unsuccessful the complainant can choose to seek independent mediation. This will be at 50% shared cost to the complainant and SEG. There will be one round of mediation.
- 8.3 The decision of the mediator will be final for both parties.

9. Review

This procedure will be reviewed at a minimum of every 5 years or sooner if deemed necessary.

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Sustainable
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Version 1.3

For further information please see:

www.sustainableeelgroup.org

Or contact us at:

info@sustainableeelgroup.org

Registered address:

Sustainable Eel Group VZW
Rond Point Schuman 6, Box 5
Brussels, 1040
Belgium.

Complaint Form



As required in the [SEG Complaints Procedure](#) all formal complaints shall be submitted to SEG using this Complaint Form.

In order to process your complaint efficiently and to your satisfaction, please read the following carefully:

- All fields with a * must be completed
- You should read the SEG Complain Procedure carefully
- Complaints filed on hearsay will not be accepted
- In case multiple complaints are filed with the same motivational context, these are considered as 1 complaint and will be processed as such
- All filed complaints shall be accompanied by relevant evidence
- Send the completed form by: email: info@sustainableeelgroup.org, or

Your information

Date *	
Surname *	
First Name *	
Title	
Email *	
Telephone no.	
Organisation (if applicable) *	
Address	
List enclosed evidence (if applicable)	Title(s) of document(s) - -
Your complaint *	Describe the nature of your complaint and what you would like as an outcome.