

**Welcome to SEG
Annual General
Meeting
2025**

SAVE THE DATE
SEG 15

*CELEBRATING 15 YEARS
OF THE
SUSTAINABLE EEL GROUP*

BRUSSELS, BELGIUM

2 JULY 2025

*FULL DETAILS ON
INVITATION TO FOLLOW*



13 November 2025

Agenda

- | | |
|--|---------------------------------|
| 1. Introductions, apologies and meeting etiquette | Andrew Kerr |
| 2. Financial Report (circulated) | SEG Brussels Accountants, Moore |
| 3. Minutes of last meeting (circulated) | Andrew Kerr |
| 4. Dismissal of SEG Member | Andrew Kerr |
| 5. Chairman's Report | |
| a. Impacts Report | Andrew Kerr |
| b. SEG Standard | David Bunt |
| c. ISEAL | David Bunt |
| d. CITES Appendix Two Listing Proposal for Anguillids | Willem Dekker |
| e. ICES WGEEL report 2025 | Willem Dekker |
| f. Trafficking update | Andrew Kerr |
| g. Business Planning for 2026 | David Bunt |
| 6. Any other business | Andrew Kerr |

2. Annual Financial Report from SEG Brussels Accountants - Moore

3. Minutes of last meeting

**4. Dismissal of an 'Adhering Member' -
Membership Issues created and learning**

Build Up and then Dismissal

- Jan 2024 SEG's Letter to all parties on SEG's position on Trade to Russia and Belorussia
- Main reasons: unable to certify / assure onward traceability; reputational risk
- During 2024 season 1 tonne glass eel trade to Kaliningrad took place. Plans to increase to 3 or even 10 tonnes
- Sept 2024 SEG wrote to UK Govt. promoting a review of the trade and highlighting risks
- Jan 2025 SEG wrote an open letter to Telegraph signed by 24 leading figures opposing the trade
- March 2025 Government announced, following review, its decision not to permit trade
- During this time SEG received 2 formal complaints which were progressed to appeal
- Following actions to undermine SEG in his own name, Dismissal proceedings were started
- A Dismissal hearing was held on 25 September. Dismissal confirmed in writing 30 Sept.

The reasons for dismissal

Acting against SEG's policies & objectives:

1. The former member and the businesses he controls have explicitly acted against SEG's Policy and position on trade with Russia. Since this position was published in January 2024, he has sought multiple times to obtain permits for such trade.
2. The former member has sought to undermine the SEG Standard, including in the email of 7 May 2025 to German customers, in which he stated: "SEG Certification is unnecessary" and described French Structural analysis and Regulatory control as the "Gold Standard".
3. The former member does not accept our arguments and wrongly accuses us of: "not supporting the UK fishery"; "SEG's primary objective is no longer focused on supporting the recovery of the eel"; "set out to destroy our business"; "creating a raft of false narratives" and "SEG has lost its way it has become like any other NGO and even has a separate political agenda".
4. The former member has accused SEG, in recent emails to signatories of the campaign covered by the article in the Telegraph newspaper, of providing them with misinformation.

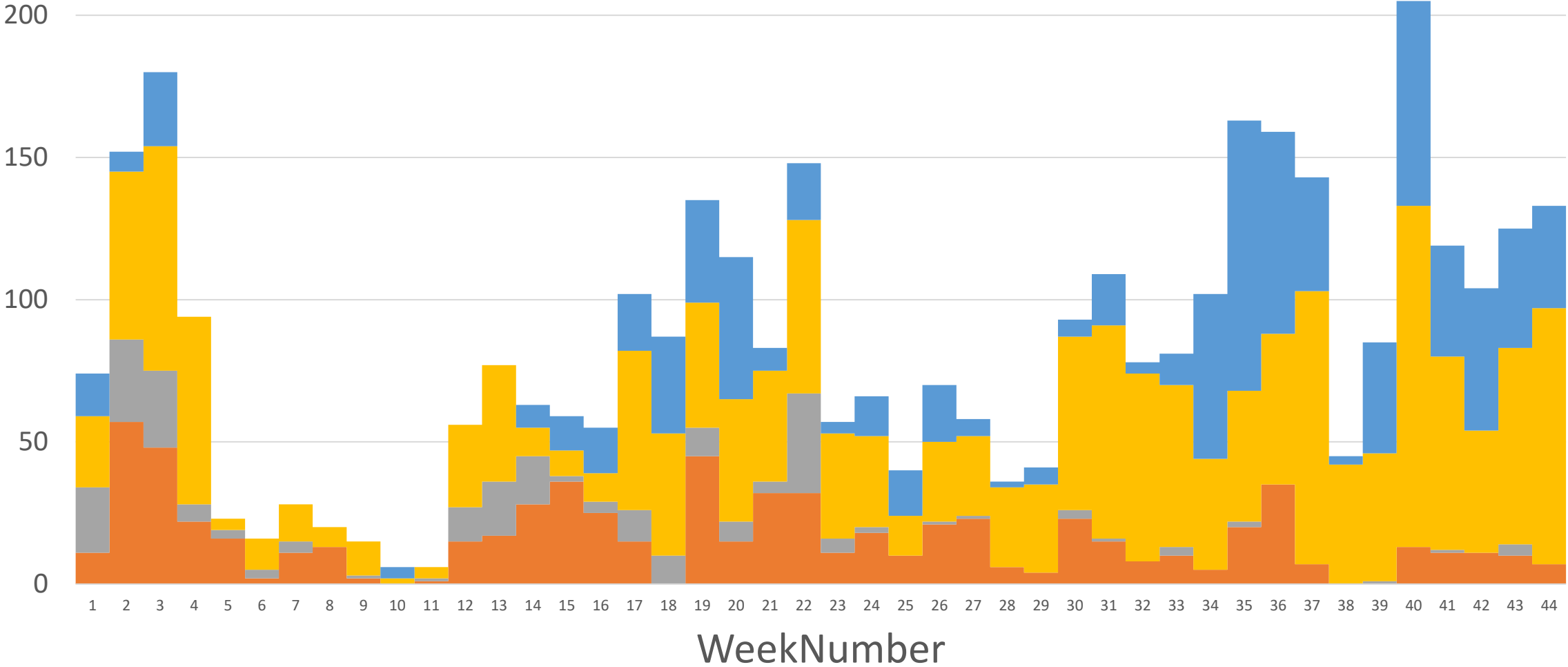
The SEG Community - Membership Issues and learning points

- SEG Needs to revisit Membership and for all categories define and or redefine the criteria.
- Membership will require Annual Subscriptions fees.
- An Active Communication Plan for the membership will be developed and implemented.

Recent X campaigns

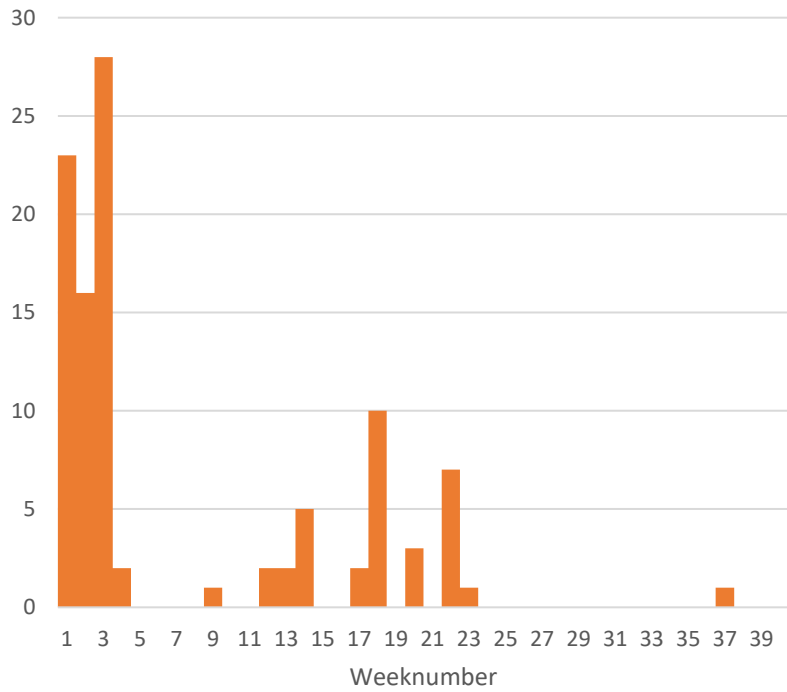
Since spring 2025, a daily stream of Twitter-messages, often addressing SEG Questions about our responsibilities, accountabilities, communication & response --- a short overview ---

Number of posts on X

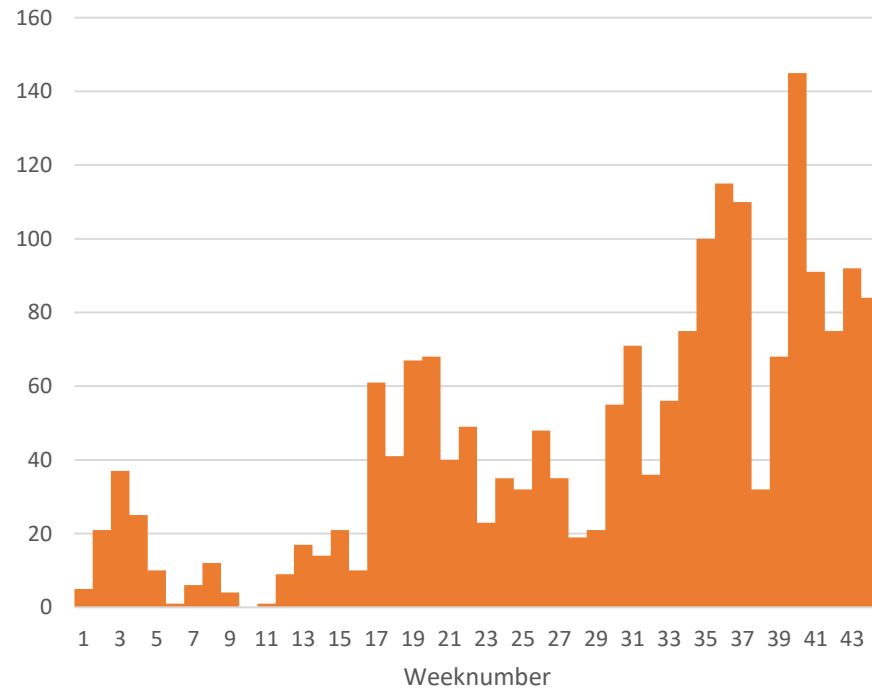


DaveWozencroft elverdave leerust1966 seasaxa

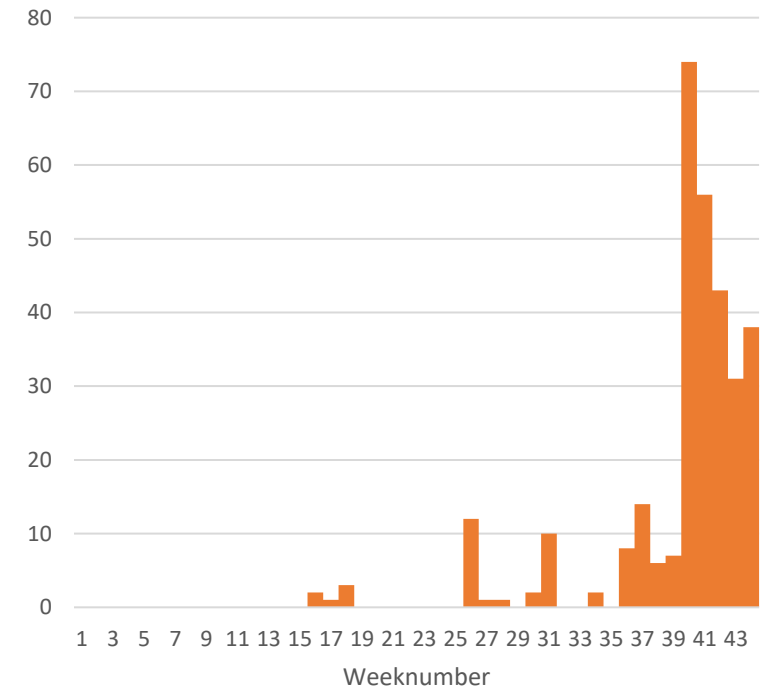
Number of times "Richard" is mentioned

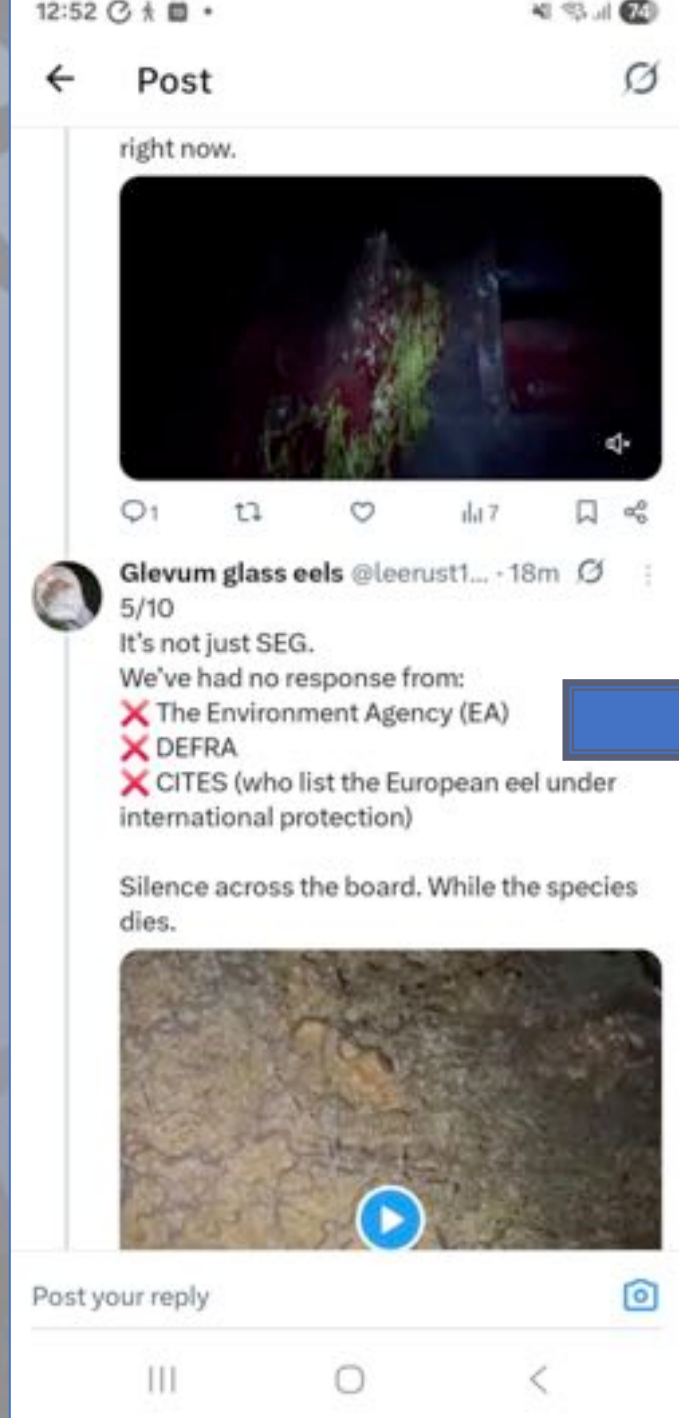


Number of times "SEG" is mentioned



Number of times "ISEAL" is mentioned





 **Glevum glass eels** @leerust1... · 18m ↻ ⋮

5/10
It's not just SEG.
We've had no response from:

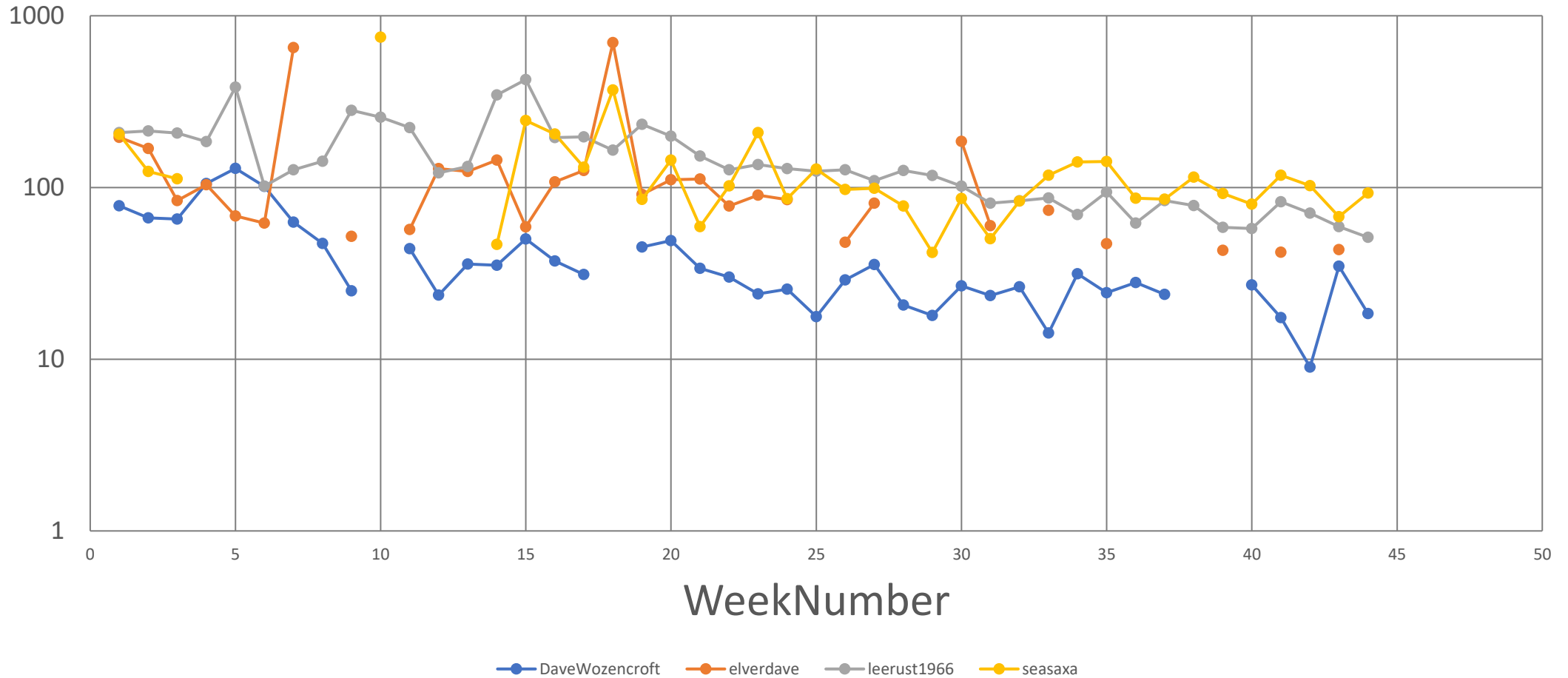
- ✘ The Environment Agency (EA)
- ✘ DEFRA
- ✘ CITES (who list the European eel under international protection)

Silence across the board. While the species dies.

Content of the tweets, SEG's reaction

- Often only partially true, facts not supported by evidence.
- Very judging, provoking, never asking or explaining.
- Will a public fight do any good? Who are we fighting with, "leerust1966"?
- Our tactical decision: no response, just monitoring.
- SEG is accountable within SEG, discussions need to be substantiated with arguments.
- SEG is open about its values, protocols, evaluations and decisions.
- SEG decides about SEG and here, ultimately in the AGM.

Av number of views, by week Number and author



5. Chairman's Report

Impacts Report

Social



Economic

Environmental

Monitoring, Evaluation & Learning (MEL)

Theory of Change

Responsible and more Sustainable Eel Sector

SEG as the Leadership Alliance

SCIENCE led recovery Programs



Healthy Aquatic Ecosystems

Biologically safe wild eel populations

Monitoring, Evaluation & Learning (MEL)

- From ISEAL Impacts Code
- Allows understanding our effectiveness, learning, adapting & improving
- This diagram is expanded Theory of Change: Actions → Outcomes → Impacts
- Each box/step can be measured to understand effectiveness
- A subset prioritised for annual reporting



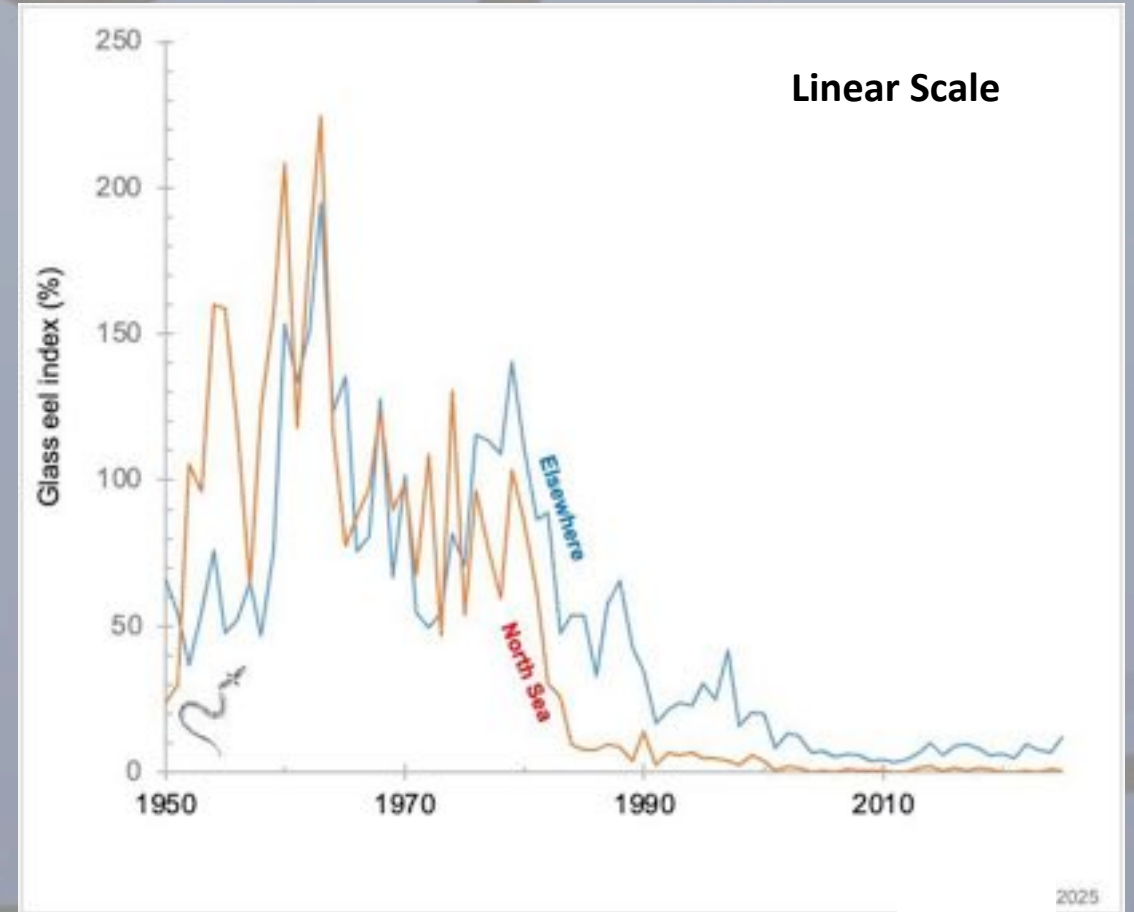
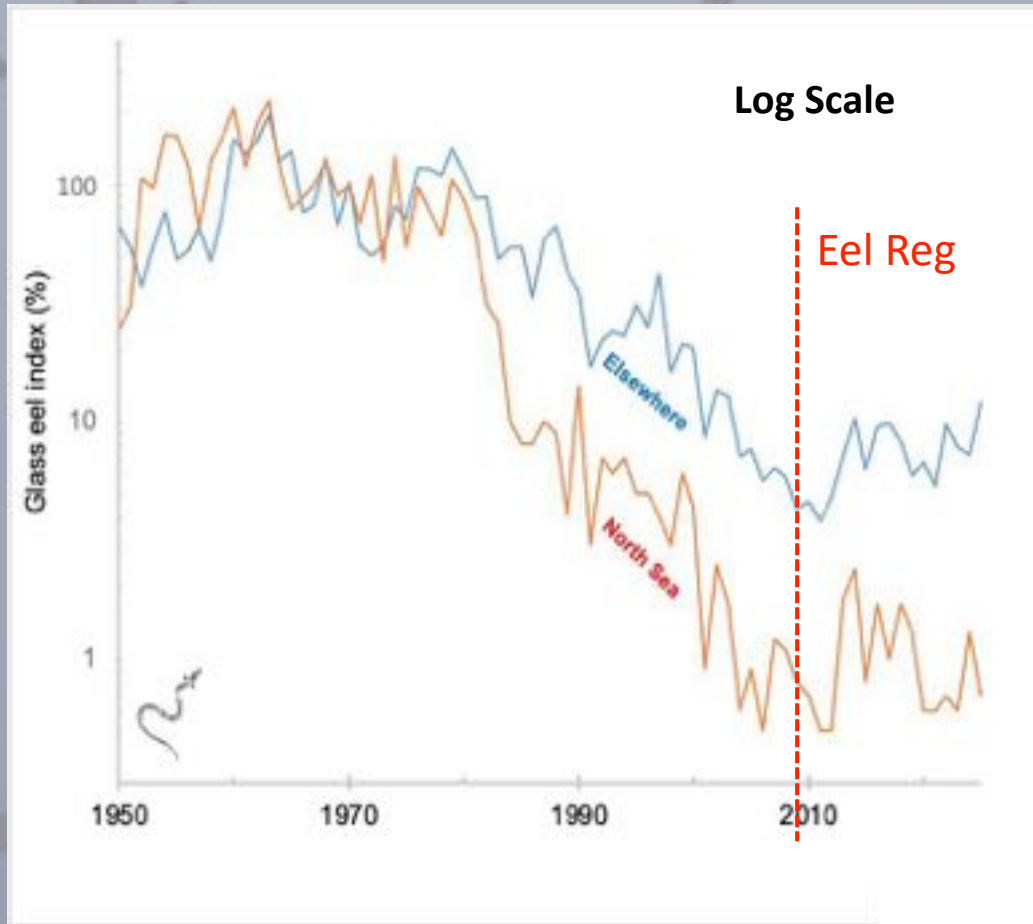
Monitoring, Evaluation & Learning (MEL)

Key Performance Indicators (from 302 MEL Plan)

Key Indicators			
Reference	Indicator	Desired Impacts / Outcomes	Theme
1.1	Glass eel Index	Healthy Wild Eel Population (recruits)	Environmental
1.2	Silver Eel Index	Healthy Wild Eel Population Spawners)	Environmental
2.2.1	Number of Certified Operators	Responsible Eel Sector	Economic
2.3.1	Percent of Aquatic Habitats in Water Framework Directive "Good Ecological Status"	Healthy Aquatic Habitats	Environmental
3.1.2	Proportion of Certified Operators in Each Sector	Responsible Traders Gain & Maintain Market Access	Economic
3.4.5	Kilometres of River with Freed or Improved Migration	Wetland Habitat Improved Barriers to Migration Reduced	Environmental
3.2.1	Europol annual estimate on no. tonnes glass eel trafficked	Illegal Trade Minimised	Social
3.4.2.1	Value of ESF into Eel Conservation Projects	Stewardship role for fisheries sector results in improved eel conservation	Environmental
4.3.1	Independent Evaluation Reports	Implemented, Effective, Eel Regulations	Social
4.5.1	Indicators of Level of Enforcement Activity (Number of Arrests, Seizures, etc.)	Better Enforcement of Trafficking	Social
4.1	Independent Evaluation Reports	SEG is a Successful Advocate	Social
5.1	Standard is relevant Standard published and readily available and also in different languages. Standard is developed in accordance with the ISEAL Code(s)	Relevant, Accessible and Credible Standard	Social

1.1 Glass Eel Index

Environmental

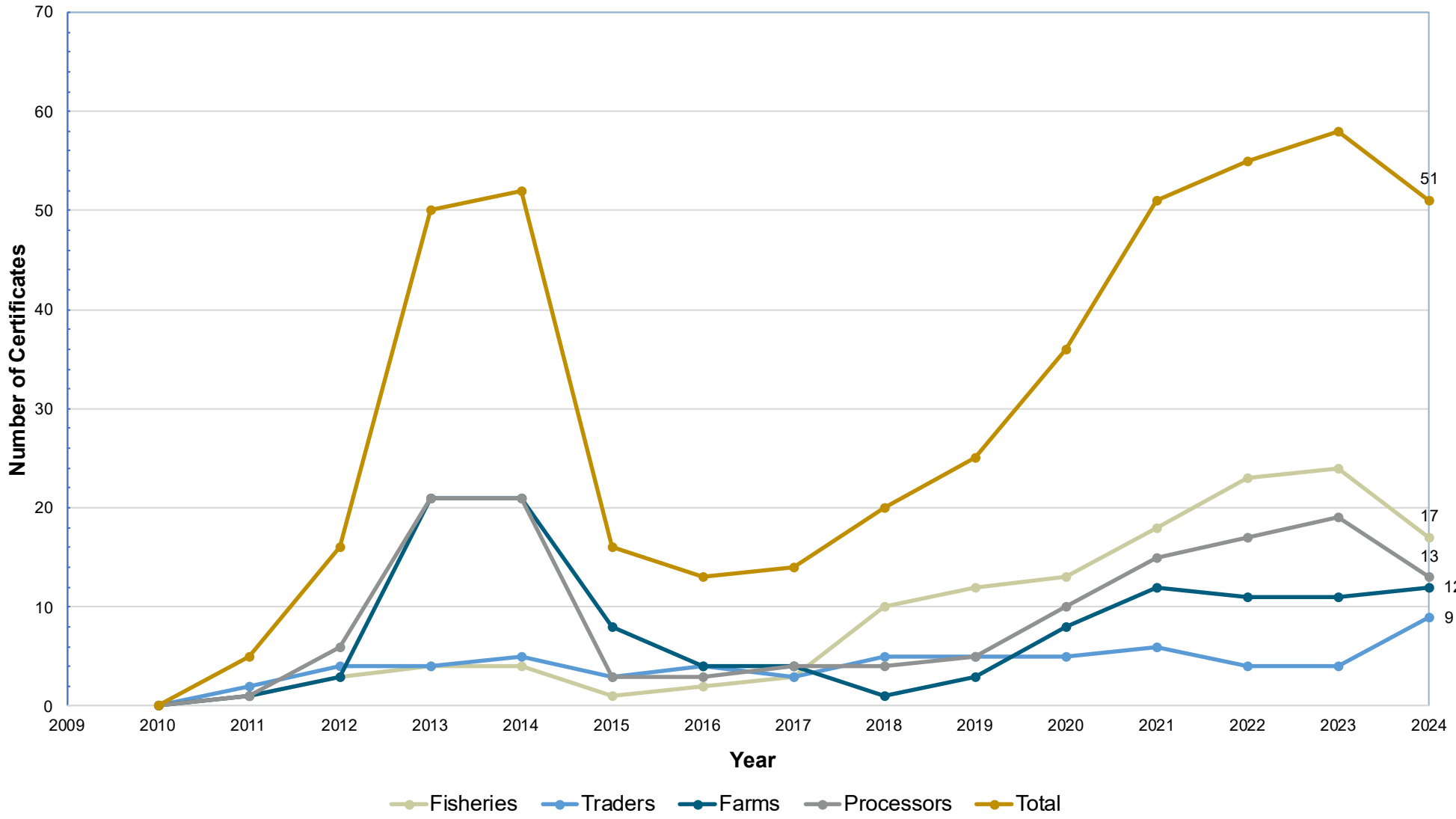


Please note that 'Elsewhere' accounts for over 90% of the recruitment.
Around 1.3 billion is an indicated arrival volume from earlier ICES studies

2.2.1 No. SEG Certified Operators

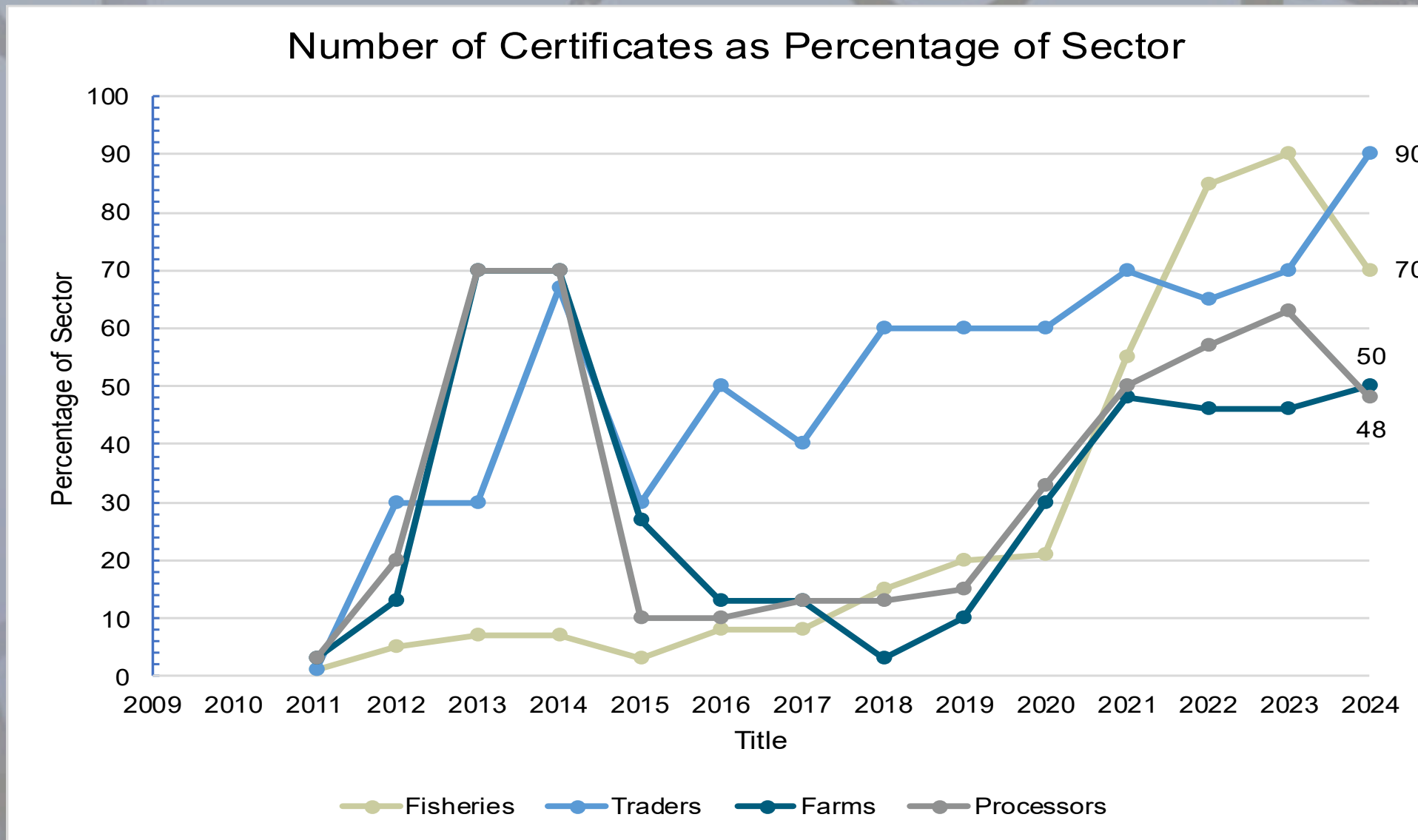
Economic

Total Certificates in Place



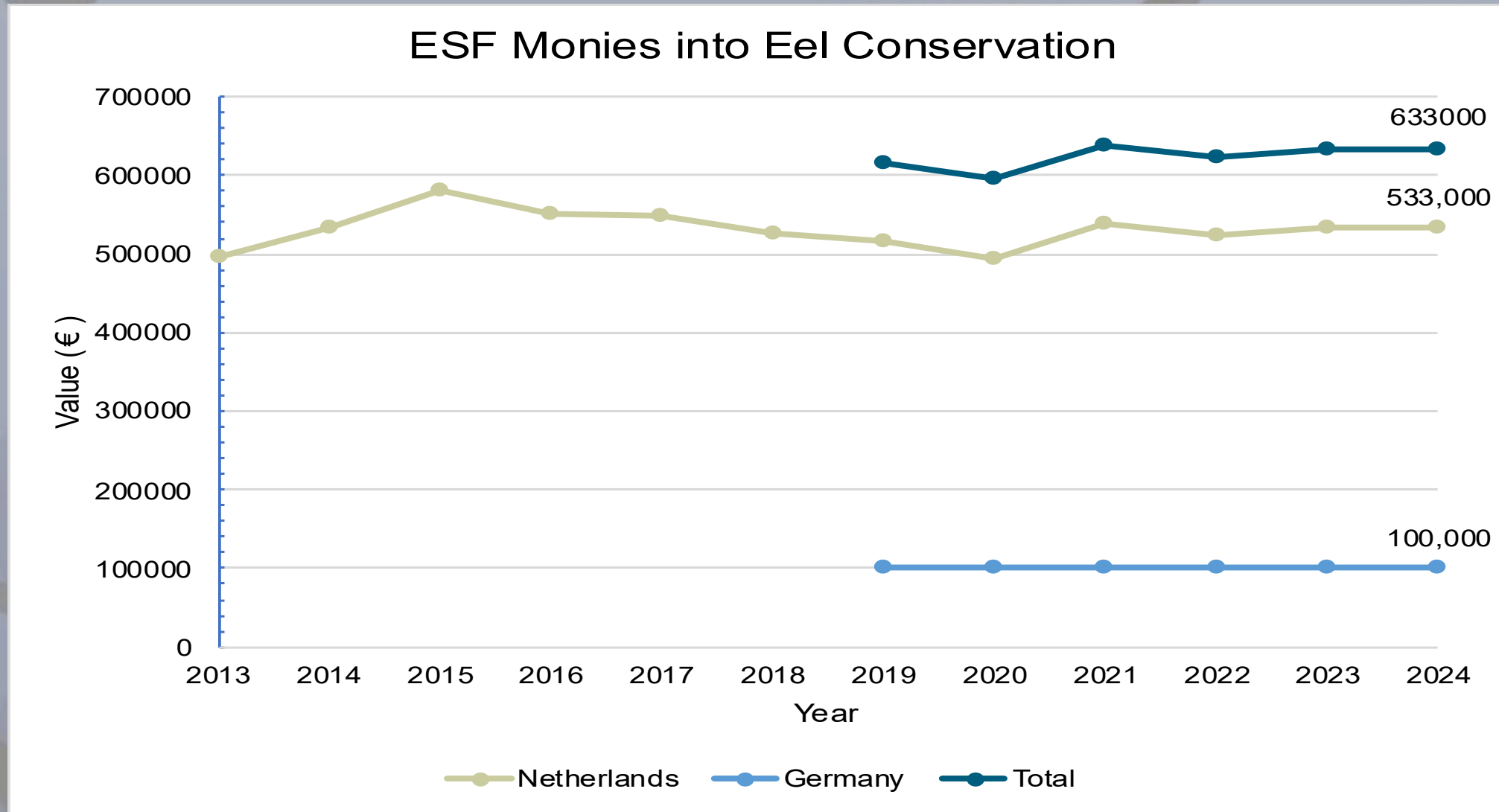
3.1.2 Proportion of Certified Operators in Each Sector

Economic



3.4.2.1 Value of ESF Into Eel Conservation projects

Environmental



Criterion	Description and RAG
Relevant Standard	<ul style="list-style-type: none"> • V7.0 produced in Nov 2023 after 3 rounds of consultation with 850+ consultees in 2023. • Now V7.5 after ongoing updates
Accessible Standard	<ul style="list-style-type: none"> • Available on the SEG website at: https://www.sustainableeelgroup.org/download/ • Available in 5 languages: DE, EN, ES, FR, NL.
Credible Standard	<ul style="list-style-type: none"> • ISEAL Community Member since September 2019 • ISEAL Code Compliant May 2025 • Suspended September 2025 for several non-compliances

TIMELINE and notes of SEG's Suspension by ISEAL

- 5th Sept SEG sends final Consultative Draft Paper on managing the start of the 2026 Season
- 5th Sept someone makes a complaint to ISEAL – SEG not aware until 7th Oct
- 16th Sept SEG receives a '**letter of suspension**' stating '**widespread system failure**' - there was no investigation or request for info to SEG prior to the suspension decision
- 2nd Oct tweets on Social Media of the suspension start
- 4/5 October PW writes to NL Farmers revealing his knowledge of the complaint and indicating the undermining of the relationship between SEG and ISEAL
- 7th October ISEAL write to SEG saying they had received the 'information' on 5th September
- 24th October ISEAL accepts the SEG proposed remedial plan, subject to conditions
- 28th October SEG replies to agree in principle (depending on costs)
- SEG will soon publish Suspension report: How and why SEG was suspended; What SEG is doing to resolve the matter; Implications and timelines

Suspension by ISEAL

How / why it happened

- A draft procedure was developed to fast-track expired Glass Eel Fishery certifications for the 2025/26 fishing season. Would have temporarily allowed 'Conditional Certificates'
- It wasn't implemented
- However, it didn't follow our Procedures – which were ISEAL code compliant

What SEG is doing & other conditions for reinstatement

- Remediation Plan – to include Review of governance and decision making procedures
- Supply chain audit October 2024 – October 2025
- Assessment to full, new ISEAL Code (would have been required anyway)
- Timescale: 6 – 12 months

Major blow to billion-euro glass eel trafficking networks

The latest iteration of **Operation LAKE**, which ran from October 2024 to June 2025, uncovered large-scale trafficking networks and disrupted the flow of live eels destined for illegal farms in Asia.

The operation led to:

16,131 inspections carried out across Europe

26 arrests

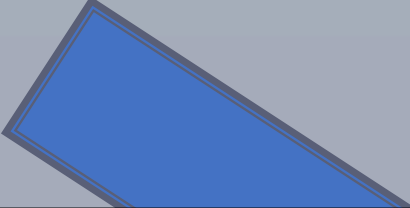
22 tonnes of glass eels seized




International TOTALS since start of Op LAKE (8 years)

- Over 850 arrests
- 109 tonnes of glass eels seized or prevented from being smuggled

“Minor Punishment with few arrests – irresponsibility rewarded”



Pre 2010	Unregulated trade to Asia with vast exploitation risking extinction
2010 - 2015	Largely Ineffective Enforcement
2015 – 2020	The rise of both the SEG Standard and effective enforcement
2020 – 2025	Extensive Enforcement Actions and International Collaboration



850 Arrests with up to
5 Year Prison Sentences

Five years in prison for French eel traffickers

The Sustainable Eel Group applauds the dismantling of an extensive eel trafficking ring by French customs.



Sustainable *Eel* Group

[sustainableeelgroup.org](https://www.sustainableeelgroup.org)

Thursday 10 April 2025

<https://www.sustainableeelgroup.org/wp-content/uploads/2025/04/Trafficking-gang-arrested-1.png>

In the FAO production database, there are eleven possible species-specific '3-alpha codes' for anguillid eels, and one code for the genus *Anguilla* spp., that can be used when reporting production data to FAO. The majority of anguillid aquaculture production 2014–2023 was recorded as *A. japonica* (98%), while for capture production, captures were mostly recorded under either *Anguilla* spp. (51%) or *A. anguilla* (42%).

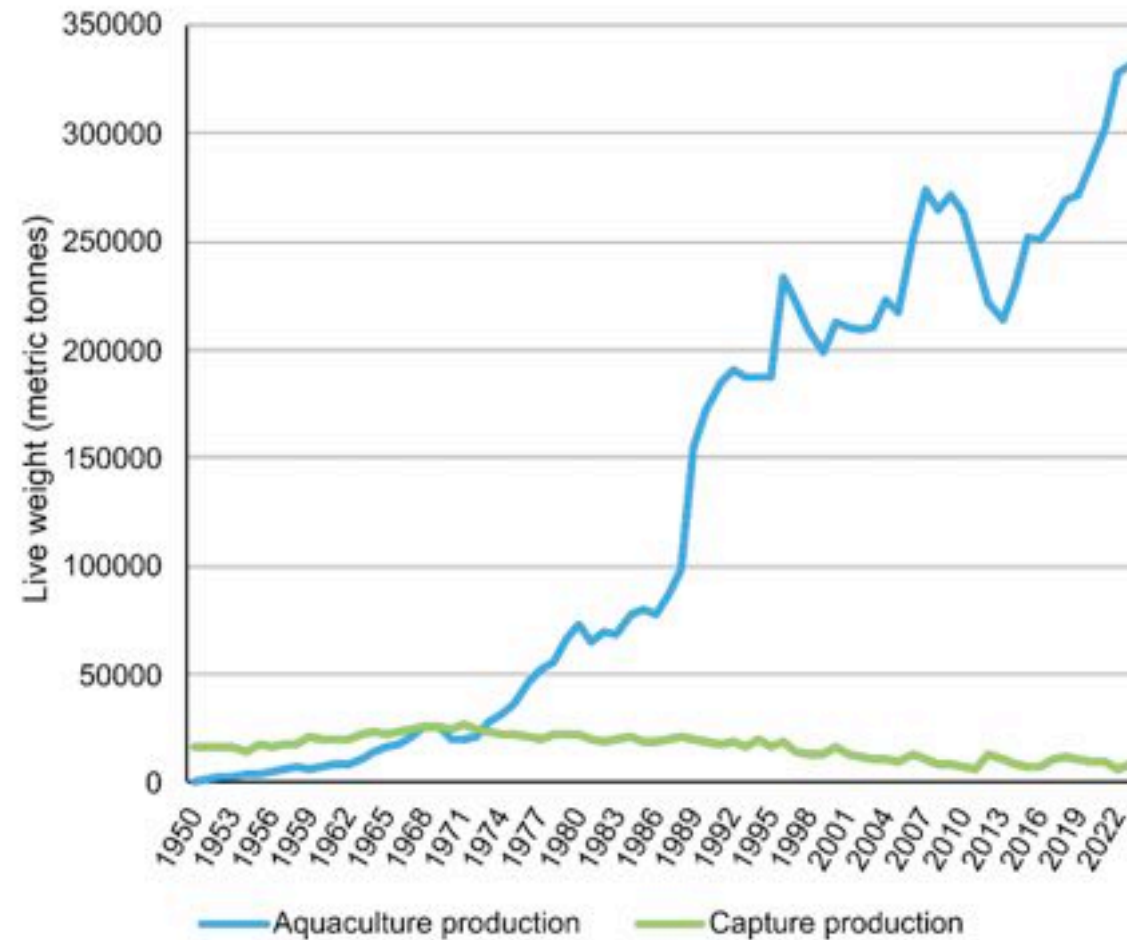
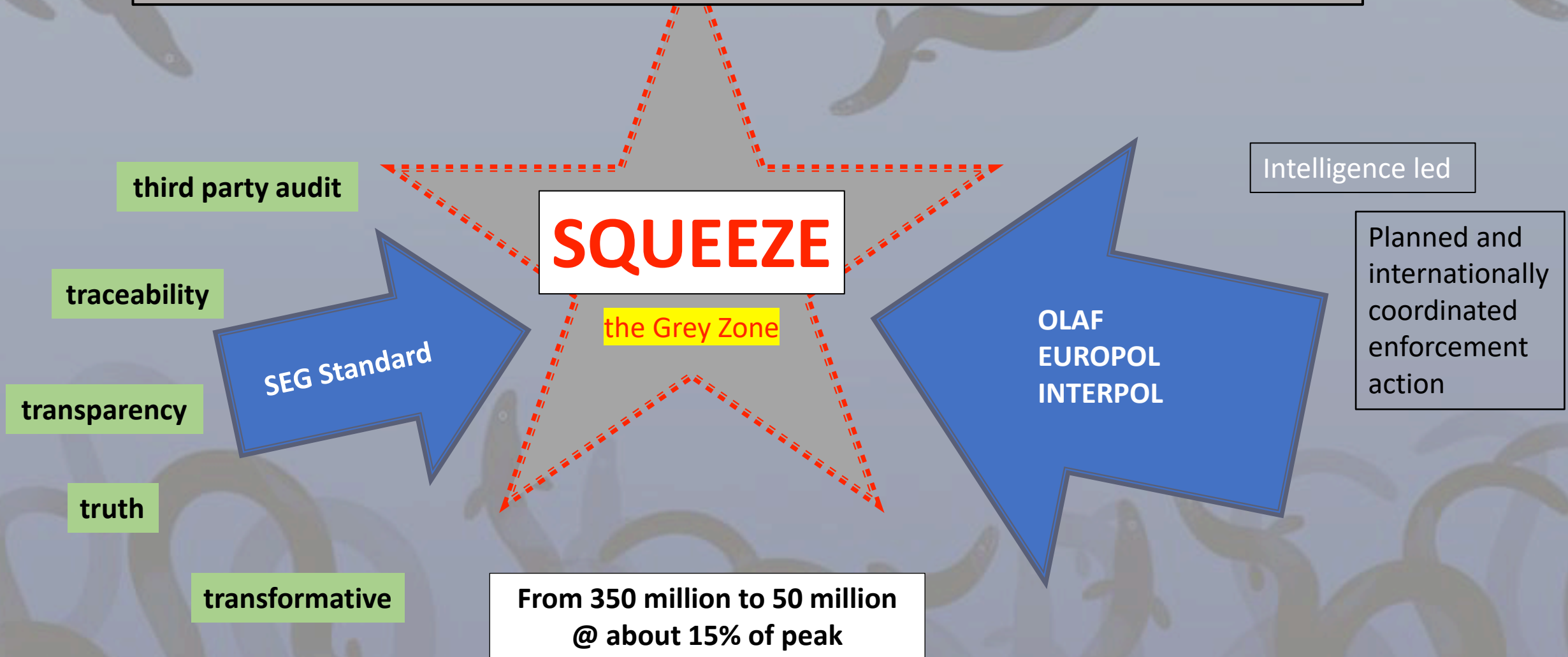


Figure 2. Wild capture and aquaculture production (in metric tonnes, live weight) of 'Anguillidae' (taxonomic code: 1430020) reported to the FAO 1950–2023.

Counter Trafficking



Pau • Bayonne

**Elver trafficking:
suspended prison
sentence and heavy
fines requested against
Basque fishmonger**



Glass eels, or elvers, are the subject of international trafficking.

Paul Nicolai

Published on Tuesday, September 23, 2025 at 8:59 p.m.

Court Judgement Bordeaux 18 December

**Three series
of Court
cases that
SEG is aware**

Glass eel trafficking:

- Court of La Roche-sur-Yon 23 September 2015
- prison sentences requested for ten people
- Court judgement set for 15th December

The 12 names involved in the affair have gone to the judge in Bordeaux during August 2025 for trial in 2026: offences trace back over many years. Some have been convicted before





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UNDER THE RADAR

Eel-egal trade: the world's most lucrative wildlife crime?

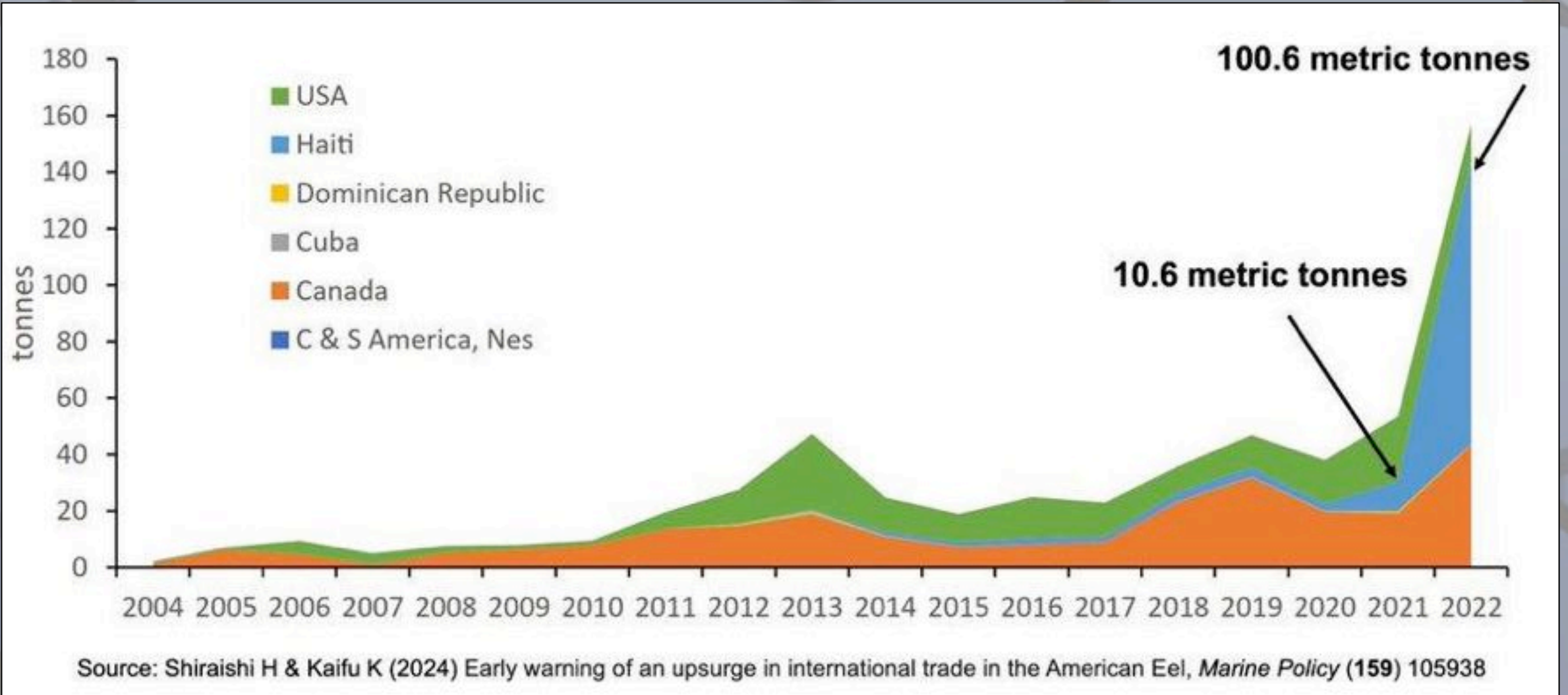
Trafficking of juvenile 'glass' eels from Europe to Asia generates up to €3bn a year but the species is on the brink of extinction

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A popular delicacy in Japan and China, European eels have declined in numbers by more than 90% since the 1970s (Image credit: Illustration by Julia Wytrowski / Getty Images)

SEG's work on CITES Appendix 2 for COP20 is confirming this rise in Rostrata



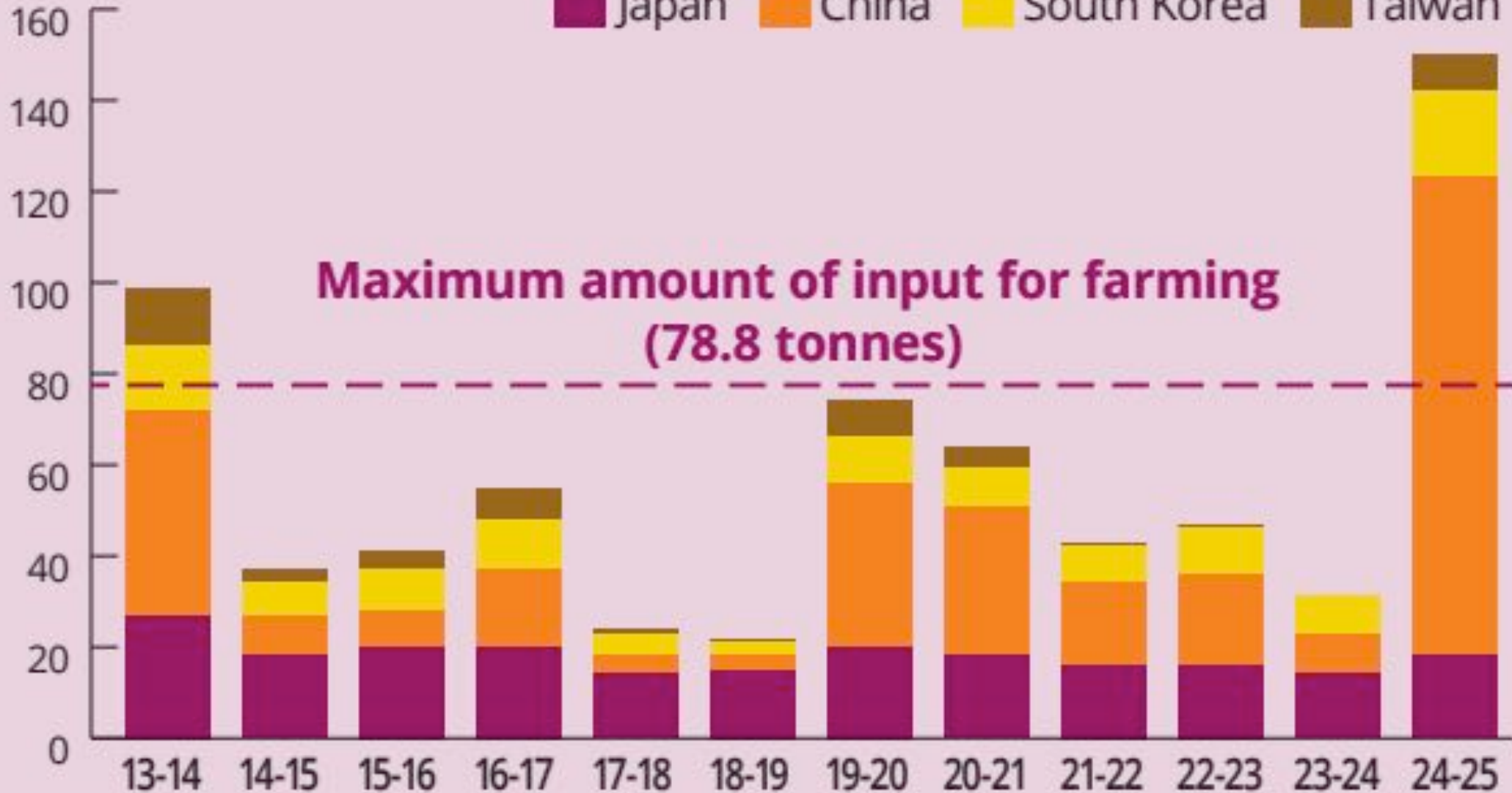


WWF Image of Rostrata trade to Asia is Glass Eels

Tonnes

Japan China South Korea Taiwan

Maximum amount of input for farming
(78.8 tonnes)



- **15 Year Anniversary: Coffee Table Book**
- **SEG Recommendations 2025 (ref ICES)**
- **Cites App2 COP20**
- **Trafficking impacts**
- **European Commission**



CITES – protect by regulating trade

Appendix I – stop international trade

Appendix II – regulate international trade – paperwork, Non-Detriment-Finding

European eel on Appendix II, other eels not listed

EU-DG Environment proposed early in 2025:

Proposal a: Promote Eur eel to Appendix I, end fishing – no support, not pursued

Proposal b: All eel species on Appendix II – regulate and protect all, look-a-like's

SEG opposed proposal a. SEG often disagreed with DG Env.

SEG supports proposal b, organises a “side-event”, cooperates with DG Env

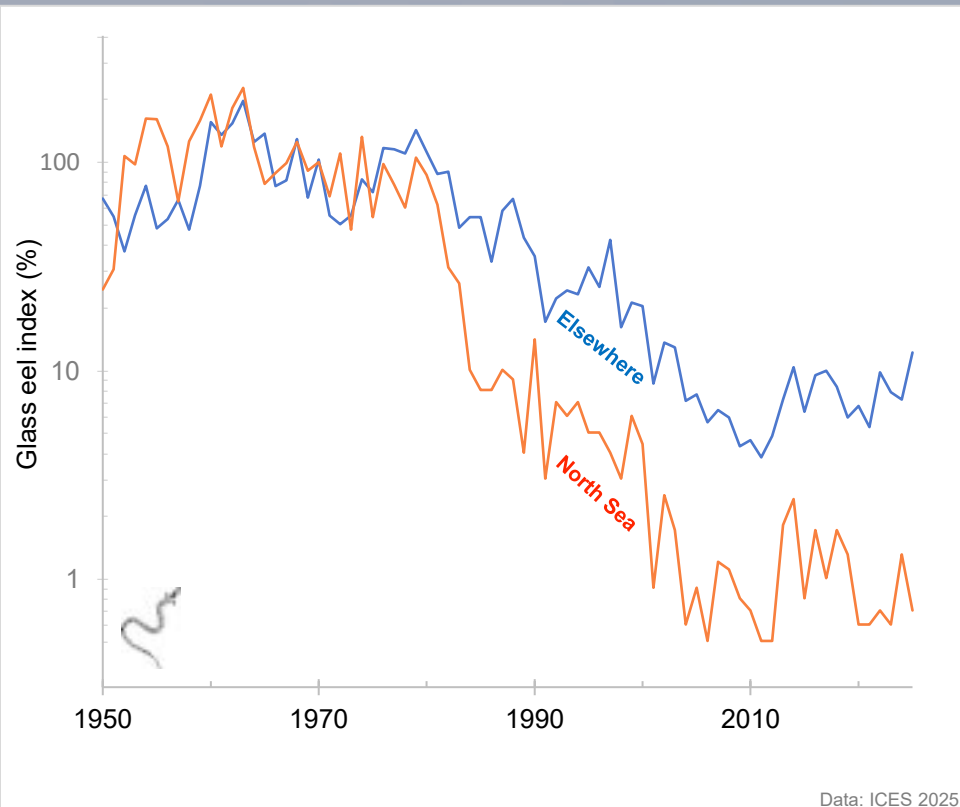
👉 Read the SEG website on the CITES convention – informative, inspiring.

<https://www.sustainableeelgroup.org/cites/>

ICES advice

Annual advice: zero fishing, zero other impacts – unchanged, uninformative, unrealistic

ICES also evaluated implementation of Eel Regulation: protection still below threshold, and reporting is increasingly incomplete. No follow-up!



SEG:

- Each year, same advice – not productive.
- Unrealistic advice serves nobody.
- SEG is happy that decline stopped, but we aimed for more than “stopped”.
- Biological status & advice is not the issue - It is all about governance, implementation.
- SEG advocates EelDeal2030 (protected in 2030)
- SEG advocates an Advisory Committee Eel (countries, stakeholders) to improve governance

Process:

- Annual System Review Oct – Nov
(review of all work performance indicators etc. Learning
- Review of progress with 2025 business plan
- Recommendations
- Budget and costings
- Determines priorities and work plan for 2026
- Will be published early 2026



SEG to CITES COP20 Samarkand in support of listing all Anguillids at Appendix 2

“We have had an extraordinary 15 year journey and our leading eel role at COP20 demonstrates SEG’s competence and authority”

Andrew Kerr SEG Chairman

6. Any other business?