

Eel Assessment – River Severn Basin and River Parrett, UK, Glass Eel Fishery

Assessment against:

Component 1: Generic Requirements

Component 2: Glass eel fisheries

Component 7: Traceability

Completed by
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FINAL

1. Introduction

This document represents the report completed following the 2013 audit carried out under the Sustainable Eel Standard (Version 5, 21st June 2013), and Sustainable Eel Methodology (Version 1, 21st June 2013) against the River Severn Basin and River Parrett Glass Eel Fishery . This assessment has been completed against Components 1, 2 and 7 of the Standard only.

The assessment is of a hand net elver fishery located in the River Severn Basin and on the River Parret. This can be split into two distinct areas.

The first area is defined by the UKs River Severn District Eel Management Plan. It consists of an area of 21,590km² and includes a total River length of over 7,000km. The main rivers located in the basin and of importance for this assessment are the River Severn, Wye, Usk and the Welsh Valley Rivers (Rhymney, Ebbw, Taff and Ely). Only elvers caught (by hand-net) from water bodies within the River Severn Basin can be considered as covered by the first area of this assessment.

The second area is defined as the River Parrett, which is located in Somerset and is covered by the South West River Basin Management Plan. Only elvers caught by hand-net or using the approved ‘moored and floating method’ from the River Parrett are covered by the second area of this assessment.

The elver fishery in the Severn Basin and Parrett river has been operating for generations and consists of a hand net fishery only (no boat fishing is allowed for elvers). The season runs between the 15th February and the 25th May only and all fishermen are required to be licenced by the Environment Agency (and to follow the byelaws as set out by the EA). Fisherman provide

glass eel catches in the main to the UK Glass Eel company located near Gloucester (see separate SEG assessment).

2. The assessment

The assessor was Max Goulden of MacAlister Elliott and Partners Ltd, who visited the River Severn Basin and River Parrett elver fishery on the 13th November 2013. The visit was held, in the majority, at the UK Glass Eel Ltd facility in Over near Gloucester. The audit included interviews with River Severn basin and River Parrett fisherman. Mr John Boarman was interviewed on the 13th at his home on the River Severn. A further interview was conducted with Mr Chris Durn on the 29th November 2013.

The fishery audit is organised by Mr Peter Wood of UK Glass Eels Ltd (the vivier for the region) and he acts as the client contact for this assessment.

3. Client Contact Details

Client Contact Name	Mr Peter Wood
Client Address	UK Glass Eels Ltd, Over Causeway, Over, Gloucester, GL2 8DB
Client Email	peterwood@mailbox.co.uk
Client Phone Number	07785 350661

4. Results of the assessment

The outcome of this assessment is as follows;

The River Severn Basin and River Parrett glass eel fishery has passed Component 1: Commitment to Sustainability and legality

that the River Severn Basin and River Parrett glass eel fishery scored **5 green scores** and **4amber scores** against Component 2 and therefore **should be considered sustainable under the SEG standard, Component 2: Glass Eel Fisheries.**

that River Severn Basin and River Parrett glass eel fishery scored **4 green scores** against Component 7: Traceability and therefore **should be considered sustainable under the SEG standard, Component 7: Traceability.**

5. Next Audit

At the completion of the audit the client was assessed against the risk assessment set out in the Methodology. This is set out in the table below.

Question	Performance of Client At Audit	Yes	No
1	Has the client been part of any external investigation which may be of concern to SEG AND/OR been	Enhanced Surveillance	Go to Q2

	suspended from any other certification standard?		
2	Has the client received a borderline pass ¹ for a Component in its previous audit?	Enhanced Surveillance	Go to Q3 SEE BELOW*
3	Does the client only buy and sell product (does not physically handle it?)	Minimum Surveillance	Go to Q4
4	All other scenarios	Standard Surveillance	Go to Q5

	Certification Audit	Year 1	Year 2	Year 3	Year 4 Recertification Audit
Minimum Surveillance	On-Site Audit	Remote Audit	Remote Audit	Remote Audit	On-Site Audit
Standard Surveillance	On-Site Audit	No Audit	On-Site Audit	No Audit	On-Site Audit
Enhanced Surveillance	On-Site Audit	On-Site Audit	On-Site Audit	On-Site Audit	On-Site Audit

*The fishery has scored 4 amber and 5 green scores for Component 2 in this assessment which means that the requirements as set out in the Methodology would place this fishery on enhanced surveillance. It is this assessors view however that the fishery is being well managed and continues to improve across the majority of components. As such it is recommended to the SEG certification Committee that this fishery remains on standard surveillance (unless any evidence of a change to the fisheries status comes to light to the contrary in the convening period).

As the client has been seen to fall into the Standard Surveillance bracket, the next audit will be due on the 15th November 2015 (in 2 years' time) and shall be an on-site audit.

The tables below give the standard and a rationale for the score given. The score is highlighted in the appropriate colour

1. Component 1 - Commitment to Sustainability & Legality

1. Commitment to sustainability & legality (See Note 1)	
green score indicator	All trading and commercial relationships are aligned with SEG goals AND the organisation has declared to the assessor any historic conflicts of interest with regard to eel sustainability AND there is no evidence of illegal trading and/or of circumventing the EU Eel Regulation AND any evidence of illegality by commercial partners or other organisations is immediately reported to the appropriate authorities.
red score indicator	The organisation or a member of the organisation has been arrested on suspicion of illegal buying, holding, selling or trading of eels in the last 12 months, AND/OR for

¹ A borderline pass is considered a pass that occurs when one less amber indicator is received then would be required to fail (i.e. 5 Green indicators and 4 Orange indicators) or when a company is certified with equal number of orange and green indicators.

	failure to declare eel fishing or trading activities appropriately to the authorities, AND/OR for other serious breaches of national or international eel regulations; AND/OR credible sources suggest that the organisation has been involved in serious breaches of national or international eel regulations in the last 12 months (the above applies to close business partners of the organisation, which members of the organisation must reasonably have known about, without the organisation informing the appropriate authorities); AND/OR the organisation is involved in activities which put in serious question their commitment to sustainability.
Discussion	The River Severn Basin and River Parrett glass eel fishery can be seen to be well aligned to the SEG Goals. The fishery is well managed and regulated and uses only the sustainable hand net method of fishing. The fisheries have shown limited prosecutions for illegal activity in the 2012 season despite high levels of monitoring by the Environment Agency.
Score	A green score is provided for the River Severn Basin and River Parrett glass eel fishery against Component 1 of the standard and the assessment is allowed to continue to preceding Components.

2. Component 2: Glass Eel Fisheries

1. The management target (40% escapement or otherwise) is being achieved (See Note 2)	
Weighting: 2	
green score indicator	The Eel Management Plan is approved and there are good data which shows with reasonable confidence that the EU silver eel escapement target is being achieved in the eel management district.
amber score indicator	The Eel Management Plan is approved and there is evidence that it is being implemented.
red score indicator	The Eel Management Plan is not approved AND/OR there is little evidence of it being implemented AND/OR key parts of it are not being implemented AND/OR there is strong evidence of widespread non-compliance which is undermining implementation.
Discussion	<p>This fishery relates to two separate eel management plans, one for Severn River Basin District, which covers the majority of the eel fishery and one for the South West River basin District, which covers the River Parrett only.</p> <p>Both Eel Management Plans were approved and published in 2010.</p> <p>For the Severn River Basin Eel Management Plan, ICES completed a working group report on the progress of the EMP following an ICES Data call. In their report they found that the silver escapement in the Severn River Basin remains below the 40% escapement target. Again, the data used to calculate this is seen to remain uncertain and requires further work, especially in relation to anthropogenic mortality which lacks data.</p> <p>For the South West River Basin District Eel Management Plan the situation, as reported by ICES, remains much the same as for the River Severn, with the 40% escapement target not being met.</p>

	<p>What is clear is that the Environment Agency has commenced the implementation of mitigation measures for the Eel Management Plans for both the Severn and Parrett, with the introduction of a number of 'eel passes' around the basin, increased monitoring of the elver fishery and further restocking efforts.</p> <p>It is clear that the green score is not yet achievable but that current work suggests that the management plan is being implemented and an amber score is therefore provided.</p>
Score	Amber Score Provided (2 x Weighting)
2. The fishery is well-managed (See Note 3)	
Weighting: 2	
green score indicator	Fishers are licensed and provide logbook data AND data on catch and effort are collected and analysed regularly by the management agency (at least annually at the end of the season), AND data are made available to the management agency at any time if required AND data are considered to be accurate, useful for statistical purposes and provide a comprehensive picture of the glass eel fishery under assessment AND fishermen only use legal gear AND enforcement is in place throughout the fishing area with no evidence of systematic non-compliance.
amber score indicator	Fishers are licensed AND data on catch and effort are collected and analysed regularly by the management agency (at least annually at the end of the season) AND data are considered to be accurate and provide enough information on the glass eel fishery under assessment for management and to track annual trends in glass eel arrival AND fishermen only use legal gear AND there is no evidence of systematic non-compliance.
red score indicator	There is evidence of illegal fishing that may adversely affect the fishery AND/OR data are not collected on catch and effort AND/OR data are too inaccurate or partial to provide enough information for management AND/OR there is evidence of systematic non-compliance in the fishery (e.g. widespread use of illegal gear, misreporting of catches, failure to respect quotas, closed periods or other management regulations, or other).
Discussion	<p>The management system used on the River Severn Basin and River Parrett glass eel fisheries can be described as well-defined and implemented.</p> <p>The fishery is fully licenced through the Environment Agency, has a set season and is well policed by the authorities. This includes regular bailiff activity (with thermal imaging capability), use of police helicopters (albeit rarely). Prosecutions have declined in recent years.</p> <p>All licenced fishermen are required to provide catch data to the Environment Agency on a seasonal basis. Failure to do so can result in a fine and not being able to gain a licence for the following season. UK glass eels are also required to provide catch data to the EA for all elvers bought to the facility. This requires the catch to be tallied against the relevant licences number (ensuring that all fishermen are correctly licensed).</p> <p>Gear used must meet the regulation set by the EA. The depth of the bag must not exceed 1 metre, must be constructed of whole netting and cannot be more than 1 metre wide and 1.25 metres in length (excluding the handle which cannot be more than 3</p>

	<p>metres in length). Licensed gear is required to carry a tag provided by the Environment Agency and gear must be held at all times (although an exception has recently been made by the EA on the River Parrett. Here a 'moored and floating method' has been approved by the authorities.).</p> <p>All catch data is analysed by the Environment Agency. Catch data from the fisherman continues to be inconsistent however and differs from the catch data provided from the buyer. This means that the data, although suitable in general terms to allow for management of the fishery cannot be described as 'accurate, and providing a comprehensive picture of the fishery'. As such, an orange score is provided here.</p>
Score	Amber Score Provided (2 x Weighting)
3. Mortality during fishing is minimised (See Notes 4 & 5)	
Weighting: 2	
green score indicator	Fishing is by hand-held nets OR fishing from vessels meets the following criteria: i) fishing is at slow speed (anchored in current or speed of no more than 1 knot relative to water); ii) haul duration is on average no longer than 20 minutes, with the maximum duration not more than 30 minutes; (iii) mesh size of cod end no greater than 1mm (iv) rest of the net designed such that glass eels do not become trapped or abraded; v) vivier tank on board and in use; AND fishermen can demonstrate that the mortality rate of the catch over the duration of holding in the storage facility is <4% for each batch captured.
amber score indicator	Fishing from vessels meets the following criteria: i) fishing is at slow speed (no more than 1.5 knots relative to water); ii) maximum haul duration no longer than 30 minutes; iii) mesh size of cod end no greater than 1mm; iv) rest of the net designed such that glass eels do not become trapped or abraded; v) vivier tank on board and in use; AND fishermen can demonstrate that the mortality rate of the catch over the duration of holding in the storage facility is <8% for each batch captured.
red score indicator	The fishing technique does not meet the amber requirements, AND/OR mortality rate in the storage facility exceeded 8% for one or more batches in the last 12 months.
Discussion	<p>All fishing on the River Severn Basin and River Parrett glass eel fishery is completed by hand nets. Fishermen use a unique system to provide elvers to the buyer in the form of trays which contain a maximum of 1kg of Elvers each.</p> <p>Fisherman report that mortality rates are lower than 1% during time in the storage facility. Figures from the buyer, UK Glass Eels Ltd though show that these are a little higher than this. On average mortality from the Severn and Wye rivers for the 2013 season was seen to be 3.4% while for the Parrett it was only 0.32%. on closer inspection it can be seen that generally batches experience 0% mortality but that occasionally a batch may experience a higher mortality. Only in one case in mid-season did the mortality rate exceed 7% with a figure of 9.42% obtained due to the huge amount of elvers collected during one evening and the facility operating at capacity. This needs to be considered by all parties should fishing continue to improve during the season but is not felt to justify providing anything but a green score for this Principle (due to the isolated incidence of this one high mortality percentage).</p>
Score	Green Score Provided (2 x Weighting)
4. The fishery has negligible impacts on by catch species (See Note 8)	
Weighting: 1	

green score indicator	The fishery has a negligible impact on by-catch AND by-catch is returned to the water alive as gently and rapidly as possible.
amber score indicator	The fishery has low-level impacts on by-catch AND by-catch is returned to the water alive as gently and rapidly as possible.
red score indicator	The fishery has a severe impact on by-catch AND/OR by-catch is discarded dead
Discussion	<p>By catch in the fishery is considered to be very low with only the occasional salmonid, shrimp or fish fry being caught within the hand nets. Generally all by-catch is returned to the river directly in good condition and UK Glass Eels also operate a holding tank for any by-catch that reaches the facility to be held in (to then be returned to the river).</p> <p>No specific quantitative assessment of by-catch has been completed but it is clear that the impacts are negligible.</p>
Score	A green score is provided
5. The fishery has negligible impacts on rare or other protected species	
Weighting: 1	
green score indicator	The fishery has no direct interactions resulting in mortality or injuries with other species that are considered vulnerable, threatened, endangered or are protected under national or international law.
amber score indicator	Interactions, resulting in mortality or injury, with other species that are considered vulnerable, threatened, endangered, or are protected under national or international law, are rare and have no overall measurable impact on the population.
red score indicator	The fishery has interactions resulting in mortality or injuries, with species that are considered vulnerable, threatened, endangered or are protected under national or international law, which may have an impact at the population level.
Discussion	The River Severn Basin and River Parrett glass eel fishery can be seen to have no direct interactions resulting in injury or mortality with other species.
Score	A green score is provided
6. The fishery has negligible impacts on habitats	
Weighting: 1	
green score indicator	The fishing gear does not cause any damage to the bottom.
amber score indicator	Damage to the bottom by gear is limited or minimal.
red score indicator	Damage to the bottom by gear is frequent or widespread.
Discussion	The hand held nets and/or the 'parrett fishing method' do not generally touch the bottom. Even in doing so though the damage to the bottom would be extremely low
Score	A green score is provided

3. Component 7 - Traceability

This section is valid for any client taking ownership of SEG certified product and who wishes to sell it as such.

1. - Incoming Product (See Note 20)	
green score indicator	The organisation/fishery operates a system which allows incoming eel products to be traced back to a certified source.
red score indicator	The organisation/fishery is unable to demonstrate that product can be traced back to a certified source.
Discussion	All fishermen are required to be licenced for a certain area and this licence number is provided to the buyer. Since the whole basin is being assessed it is unlikely that fisherman would completed fishing outside the certified area
Score	Green Score Provided
2. – Separation and Segregation of Product (See Note 21)	
green score indicator	The organisation operates a system which ensures that the product remains separated at all stages from arrival to dispatch from non-certified eel products AND the organisation ensures that any products wishing to make a claim as certified do not contain any non-certified eel-based ingredients.
red score indicator	The organisation has no system in place to ensure that certified and non-certified product remains separate at all stages OR non-certified and certified products have become mixed OR certified products (or products wishing to be certified) contain or could contain non-certified eel-based ingredients
Discussion	All elvers caught are covered by this assessment. No separation is therefore required at the fishery level
Score	Green Score Provided
3. – Outgoing Product (See Note 22)	
green score indicator	<p>The organisation only labels certified products with the ‘SES’ ecolabel once it has been approved to do so through the signing of an ‘SES’ ecolabel licence agreement.</p> <p>All product to be sold as certified by an organisation meets the following criteria:</p> <ul style="list-style-type: none"> Any product labelling shall be accompanied by the ‘SES’ logo. Products shall be accompanied by an invoice which: <ul style="list-style-type: none"> Includes the prefix ‘SES’ in the product description; Includes a record of the volume/quantity of product and to whom it was sold; Includes the certificate code on the invoice The certificate code must be clearly related to the certified product only
amber score indicator	<p>The above requirements are met except that:</p> <ul style="list-style-type: none"> Products have not been correctly labelled through the invoice
red indicator	Products or product invoices have been labelled as SES with the words SES or the SES Eco label despite not being completely derived from a certified source.
Discussion	The system employed on the River Severn Basin and River Parrett glass eel fishery does not include any invoicing. Product is directly delivered to the

	vivier, weighed and a ticket provided. Since the fisherman fish in only assessed areas and do not catch any non-certified product a green score is felt justified here.
Score	Green Score Provided
4. – Record keeping and documentation (See Note 23)	
green score indicator	<ul style="list-style-type: none"> ▪ The organisation operates a system that allows the tracking and tracing of all eel from purchase to sale and including any steps in between. In the case of live eels this should include the ability to track each eel in each batch delivered to a buyer to be connected back to a water, a time period (maximum duration one month) and specific fisherman/vessel. ▪ The organisation operates a system that also allows for the completion of a batch reconciliation of eel product by weight over a given period. ▪ The organisation maintains records for a minimum of three (3) years.
orange score indicator	The above requirements are met except that records have been maintained for less than three (3) years
red score indicator	The organisation's tracking and tracing system shows evidence that certified and non-certified product have become mixed AND/OR batch reconciliation records are unable to confirm that outgoing quantities are in line with incoming quantities.
Discussion	This process is controlled fully by the vivier. Again a green score is provided since no mixing can occur anyway.
Score	Green Score Provided