

## **Eel Assessment – UK Glass Eels, Gloucester, UK**

### **Assessment against:**

Component 1: Generic Requirements

Component 3: Glass eel buyers

Component 7: Traceability

**Completed by**

Max Goulden

09<sup>th</sup> December 2013

**FINAL**

### **1. Introduction**

This document presents the report completed following the audit carried out under the Sustainable Eel Standard (Version 5, 21<sup>st</sup> June 2013), and Sustainable Eel Methodology (Version 1, 21<sup>st</sup> June 2013) against UK Glass Eels Ltd (hereafter, UKGE). This assessment has been completed against Components 1, 3 and 7 of the Standard only.

The assessment is of the elver buyer UKGE. UKGE buy eels from the River Severn basin and River Parrett fishery (separately assessed under Component 2 of the SEG Standard). Elvers are purchased and stored in tank facilities for on-ward sale to clients.

### **2. The assessment**

The assessor(s) was Max Goulden of MacAlister Elliott and Partners Ltd, who visited UK Glass Eels on the 13<sup>th</sup> November 2013. The visit commenced with a tour of the UKGE facility by Mr Peter Wood (owner of UKGE). This was followed by the assessment of the paper based records with Office Manager, Vicky Hales. A final tour of the facility was conducted by Mr David Blennerhasset (Operation Manager) to answer any final questions of the assessor.

### **3. Client Contact Details**

<b>Client Contact Name</b>	Mr Peter Wood
<b>Client Address</b>	UK Glass Eels Ltd, Over Causeway, Over, Gloucester, GL2 8DB
<b>Client Email</b>	<a href="mailto:peterwood@mailbox.co.uk">peterwood@mailbox.co.uk</a>
<b>Client Phone Number</b>	07785 350661

#### 4. Results of the assessment

The outcome of this assessment is as follows;

UKGE has passed Component 1: Commitment to Sustainability and legality

that UKGE scored 10 **green scores** against Component 3 and therefore **should be considered sustainable under the SEG standard, Component 3: Glass Eel Buyers.**

that UKGE scored 4 **green scores** against Component 7 and therefore **should be considered sustainable under the SEG standard, Component 7: Traceability**

Two recommendations were raised by the auditor;

**RECCOMENDATION 1:** Although average mortality rates are very low it is clear that a spike occurred in correlation with a period of very high supply in the fishery. Should eel catches continue to improve it is likely that this spike may occur on a more regular basis and consideration needs to be given to this (although it is anticipated that the opening of the new tank system will help to dramatically increases capacity at UKGE).

**RECCOMENDATION 2:** It is important that UKGE work on developing a system for further identifying the location of all purchased product to a fishery level. This will provide all with confidence that product that is occasionally bought form outside certified SEG fisheries (for instance North West UK) is not being included in the certified product that is being sold by SEG. A system for ensuring this level of transparency should be installed in time for the 2014 elver season.

#### 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 suspended from any other certification standard?	Enhanced Surveillance	Go to Q2
2	Has the client received a borderline pass <sup>1</sup> for a Component in its previous audit?	Enhanced Surveillance	Go to Q3
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

<sup>1</sup> 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.

	<b>Certification Audit</b>	<b>Year 1</b>	<b>Year 2</b>	<b>Year 3</b>	<b>Year 4 Recertification Audit</b>
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

As the client has been seen to fall into the Standard Surveillance bracket, the next audit will be due on the **13<sup>th</sup> November 2015** (in 2years' time) and shall be an on-site surveillance audit.

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

## 1. Component 1 - Commitment to Sustainability & Legality

<b>1. Commitment to sustainability &amp; legality (See Note 1)</b>	
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 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	<p>UKGE are fully paid up members of SEG and regularly attend and support SEG functions. UKGE are also heavily involved in re-stocking and educational activities in relation to SEG.</p> <p>UKGE is not currently undergoing or has been convicted for breaches of eel regulations (to the assessors knowledge and as confirmed by UKGE).</p> <p>As such, the commitment of UKGE to SEG and sustainability is confirmed as meeting the green indicator for this component and other components can now be assessed.</p>
Score	Green Score Given

## 2. Component 3: Glass Eel Buyers

<b>1. Mortality in storage facility</b> ( <a href="#">See Note 5</a> )														
<b>Weighting: 2</b>														
green score indicator	Mortality rate over the season is less than or equal to 2% on average.													
amber score indicator	Mortality rate over the season is less than or equal to 5% on average but greater than or equal to 3%													
red score indicator	Mortality rate over the season is greater than 5% on average.													
Discussion	<p>Mortality records were assessed during the audit for all sources of eels. Average mortality figures are provided below for the 2013 season.</p> <p>Severn and Wye Rivers- 3.40% Parrett River – 0.32% Civelle Durabale (France) – 0.015% <b>Total Average for the Season – 1.25%</b></p> <p>Average mortality rates for the 2013 season are seen to be below the 2% average at 1.25 and as such a Green score is provided. It is noted that the Severn and Wye caught elvers showed higher than average mortality, due in most part to the large quantities of elvers experienced during the height of the season (see recommendation made by the auditor)</p>													
Score	Green Score Given (Weighting x 2)													
<b>2. Mortality during transport and initial holding if transported to farm</b> ( <a href="#">See Note 9</a> )														
<b>Weighting: 2</b>														
green score indicator	Mortality during transport and for the first week at the farm is less than or equal to 1.5% on average.													
amber score indicator	Mortality during transport and for the first week at the farm is less than or equal to 3% on average but greater than or equal to 2% on average.													
red score indicator	Mortality during transport and for the first week at the farm is more than 3% on average.													
Discussion	<p>In order to assess the mortality rates for the first week at the farm, two buyers of UKGE elvers were contacted. The mortality rates they experienced from UKGE elvers are shown in the table for 2012 and 2013.</p> <table><tr><td></td><td colspan="2"><b>Mortality (% in first 8 days)</b></td></tr><tr><td><b>Farm Company</b></td><td><b>2012</b></td><td><b>2013</b></td></tr><tr><td>Scandinavian Silver Eels</td><td>0.13%</td><td>0.34%</td></tr><tr><td>Jupiter Eels</td><td>1.8%</td><td>1.3%</td></tr></table> <p>As an average across the two it is clear that mortality rates are below the 1.5% average and so a green score has been awarded for this principle.</p>			<b>Mortality (% in first 8 days)</b>		<b>Farm Company</b>	<b>2012</b>	<b>2013</b>	Scandinavian Silver Eels	0.13%	0.34%	Jupiter Eels	1.8%	1.3%
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Score	Green Score Given (Weighting x 2)													

<b>3. Water quality</b>	
<b>Weighting: 1</b>	
green score indicator	A system is in place that is expected to keep key water quality parameters within suitable tolerances for healthy eel survival (e.g. Ammonia, Suspended Solids, pH, Oxygen) AND water quality management procedures are in place including regular monitoring of relevant parameters which shows that water quality is always high and stable AND water quality monitoring is linked to an alarm-based system in the event of a sudden drop in water quality AND the facility operates a back-up system to ensure that water quality will not adversely affect survival rates in the case of a power supply failure.
amber score indicator	A system is in place that is expected to keep key water quality parameters within suitable tolerances (e.g. Ammonia, Suspended Solids, pH, Oxygen) AND water quality management procedures are in place and there is regular monitoring of relevant parameters which shows that water quality is always high and stable.
red score indicator	No water quality monitoring occurs AND/OR water quality is not held regularly at levels which are considered suitable for healthy eel survival.
Discussion	<p>UKGE operate a semi-intensive re-circulation system for eels including biological, mechanical and UV treatment systems. Water monitoring is done automatically for oxygen, pump failure and water temperatures with back-up systems provided for all crucial systems. Other water quality parameters are not regularly treated but are managed through regular husbandry and health checks of the stock.</p> <p>Water quality systems are in place and UKGE report on NH<sub>4</sub>, NO<sub>2</sub>, NO<sub>3</sub>, O<sub>2</sub> and pH on a weekly basis.</p> <p>As such an Green score is provided for this parameter.</p>
Score	Green Score Given
<b>4. Biosecurity is present and disease is treated rapidly and appropriately</b>	
<b>Weighting: 1</b>	
green score indicator	An effective and documented biosecurity plan (including the washing and disinfection of equipment) is in place AND records are available showing regular monitoring of health and possible signs of stress (including the completion of periodic microscope parasite checks) AND records are maintained in relation to the name, administrator, amount, dates and reason for use of any medicines and/or chemicals used in the facility AND the use of chemicals follows legal requirements of the appropriate EU regulations and of the country concerned.
amber score indicator	The facility follows bio-security measures (including the washing and disinfection of equipment) although this is not documented AND eels are regularly monitored for health and possible signs of stress (although this might not be documented) AND records are maintained in relation to the name, administrator, amount, dates and reason for use of any medicines and/or chemicals used in the facility AND the use of chemicals follows legal requirements of the appropriate EU regulations and of the country concerned.
red score indicator	The facility operates no bio-security measures (including the washing and disinfection of equipment) AND/OR there is no checking of the eels for health and possible signs of stress AND/OR records are not maintained with regards to the use of medicines and/or chemicals AND/OR legal requirements of the appropriate EU

	regulations and country concerned are not met for the use of medicines or chemicals.
Discussion	<p>UKGE have a thorough and documented bio-security plan and elvers are regularly monitored for stress and health condition. No drugs are generally used due to the low period of time (on average three days) that elvers will spend in the system.</p> <p>A green score is given for the very thorough bio-security plan that is in place at the facility.</p>
Score	Green Score Given
<b>5. Handling and welfare</b> (see <a href="#">notes 10</a> and <a href="#">11</a> )	
<b>Weighting: 1</b>	
green score indicator	Systems are in place and the facility is designed to keep handling to an absolute minimum AND documented procedures are in place for handling, and handling, where necessary, is careful AND the infrastructure is designed to avoid injuries, and so that the use of nets is rarely necessary. When used, nets are small-mesh (1mm maximum) AND eels are moved without being allowed to dry out.
amber score indicator	The facility may not be optimally designed, but systems are in place to avoid handling as much as possible within the constraints of the facility AND handling, where necessary, is carefully planned and executed AND the infrastructure has been optimised as far as possible to avoid injuries AND nets are small-mesh (1mm maximum) AND eels are moved without being allowed to dry out.
red score indicator	Excess, poorly planned or careless handling is likely to result in additional mortality.
Discussion	<p>UKGE operate an effective system for the handling of elvers at all times. Nets are not used with the system designed to allow drainage of elvers into required containers whenever possible. The system infrastructure is well suited to minimising stress and damage to elvers.</p> <p>A documented handling procedures is in place and maintained by UK Glass Eels</p>
Score	Green Score Given
<b>6. Transport</b> ( <a href="#">See note 12</a> )	
<b>Weighting: 1</b>	
green score indicator	Transport is carefully planned to minimise travel time AND packing is done in a way that minimises handling, time and stress AND eels are kept cool and wet with an adequate supply of oxygen.
red score indicator	The above criteria are not met.
Discussion	<p>UKGE take great care during transport to maximise eel survival. Packaging is done in an organised and well thought out manner which ensures that eels remain cool and wet during transportation. Whenever possible, UKGE own transport is used, including the companies own plane which minimises transportation time dramatically.</p> <p>A green score is provided for UKGE in relation to transportation systems</p>
Score	Green Score Provided
<b>7. The required percentage of glass eels from the fishery is being used for restocking</b> ( <a href="#">See Note 13</a> )	



Weighting: 2	
green score indicator	The buyer can provide documented evidence that <u>he has sold</u> at least the required target percentage of its glass eels from the latest season for the primary purpose of conservation / escapement.
amber score indicator	The buyer can provide documented evidence that the <u>has made</u> at least the required target percentage of its glass eels from the latest season available for the primary purpose of conservation / escapement, OR the buyer can provide documented evidence that it has made available glass eels to the maximum level possible within the constraints of the implementation of the EMP in that country OR that the buyer can provide credible evidence that re-stocking will occur in the forthcoming season.
red score indicator	The buyer does not make nor has no evidence to show that he has made the required target percentage of its glass eels available for restocking in the last year.
Discussion	<p>UKGE is heavily involved in re-stocking processes both through the sale of elvers and through voluntary re-stocking programmes.</p> <p>UKGE are required to provide 60% of all elvers for restocking. Records provided to the assessor show that of the 9,748 kg of elvers sold during the 2013 season, 5794kg were sold directly for restocking. This equates to 59.44% of the total elver population for the year.</p> <p>In addition to this, UKGE have made a large number of contributions to local school education programmes and also voluntarily to Ireland for restocking processes.</p> <p>With this in mind it is considered highly likely that over the 60% required has been sold or donated for restocking and as such a green score indicator is provided.</p>
Score	Green Score Indicator (Weighting x 2)

### 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 ( <a href="#">See Note 20</a> )	
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	When eels are purchased a note of the licence of the fisherman is collected. Currently though no-check is completed to ensure that all incoming products are from a certified eel fishery directly. In practice, UKGE very rarely receive any product from outside the certified Severn Basin and Parrett basin. With the introduction of the new traceability requirements in this standard though it is required that UKGE tighten up on the procedures in place going forward to ensure that an assessor can be shown categorically the fishing area (Severn basin etc...) of all incoming elvers
Score	Green Score Provided but with a recommendation

<b>2. – Separation and Segregation of Product</b> ( <a href="#">See Note 21</a> )	
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	The traceability system described in Principle 4 of this component ensures that all batches can be tracked from start to finish and separation of non-certified eels provided as and when required.
Score	Green Score Provided
<b>3. – Outgoing Product</b> ( <a href="#">See Note 22</a> )	
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"> <li>Any product labelling shall be accompanied by the ‘SES’ logo.</li> <li>Products shall be accompanied by an invoice which: <ul style="list-style-type: none"> <li>Includes the prefix ‘SES’ in the product description;</li> <li>Includes a record of the volume/quantity of product and to whom it was sold;</li> <li>Includes the certificate code on the invoice</li> </ul> </li> <li>The certificate code must be clearly related to the certified product only</li> </ul>
amber score indicator	<p>The above requirements are met except that:</p> <ul style="list-style-type: none"> <li>Products have not been correctly labelled through the invoice</li> </ul>
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	<p>UKGE provide a ‘Certificate of traceability’ whenever certified product is sold. This includes the client details, invoice number and weight of product sold as well as the SEG Certificate number and SEG logo.</p> <p>A green score indicator is provided here.</p>
Score	Green Score Provided
<b>4. – Record keeping and documentation</b> ( <a href="#">See Note 23</a> )	
green score indicator	<ul style="list-style-type: none"> <li>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</li> </ul>



	<p>back to water, a time period (maximum duration one month) and specific fisherman/vessel.</p> <ul style="list-style-type: none"><li>▪ The organisation operates a system that also allows for the completion of a batch reconciliation of eel product by weight over a given period.</li><li>▪ The organisation maintains records for a minimum of three (3) years.</li></ul>												
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	<p>UKGE operate a good traceability system for elvers from receipt to sale. On receipt a ticket is provided to the fisherman and a note made on the stock spread sheet of the amount of elvers entered into the reception tank. This is added to by further quantities until a batch reached a level which is ready to be moved to the storage facility. This is completed and a note made of the tank that the batch has been transferred to. From here a note of all mortalities and sales (quantity in kg) from each tank is completed on a daily basis.</p> <p>This system allows for the tracking of all products from ticket through batch to sale is possible</p> <p>A mass balance reconciliation was completed and is summarised below for the 2013 season;</p> <table><tr><th>Elver Source</th><th>Bought (kg)</th><th>Sold (kg)</th></tr><tr><td>Civelle Durable</td><td>2998.34</td><td>2800</td></tr><tr><td>Parret</td><td>3,501.68</td><td>3200.47</td></tr><tr><td>Severn and Wye</td><td>4321.01</td><td>4175.94</td></tr></table> <p>This shows that for all sources less product has been sold than bought at UKGE.</p> <p>Records are maintained at UKGE indefinitely.</p> <p>A green indicator score is provided for this principle.</p>	Elver Source	Bought (kg)	Sold (kg)	Civelle Durable	2998.34	2800	Parret	3,501.68	3200.47	Severn and Wye	4321.01	4175.94
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Score	Green Score Provided												