



Respondee	Category	Comments	SEG Standard Team Comments	How stakeholder comments were used
	Social			
<div style="background-color: black; width: 30px; height: 30px; margin-bottom: 5px;"></div>	Glass eel fishery OP, France	<p>Page 20/21 Composante 1- Exigences de base 1.1</p> <p>Criterion 1.1: Commitment to legality</p> <p>Ce composant suscite de nombreuses interrogations et nous semble être à la fois le plus sensible et le plus difficile à évaluer.</p> <p>Le plus sensible puisqu'un pêcheur qui verrait sa certification SEG suspendue ne pourrait plus vendre sa production (tous les mareyeurs français sont désormais labellisés SEG). Les conséquences peuvent donc être importantes : impossibilité de vendre, et risque d'arrêt de l'activité de pêche selon le niveau de dépendance de ce pêcheur à cette ressource.</p> <p>Et le plus difficile à évaluer car d'une part il existe un gradient d'infractions allant d'une simple erreur sur la fiche de pêche (erreur dans la zone ou dans le code engin ou espèce) jusqu'à une absence totale de fiche de pêche par exemple et d'autre part puisque ces infractions ne sont pas toujours connues. Le risque étant donc de sanctionner les pêcheurs pour lesquels l'information est connue (par voie médiatique ou autre) alors que d'autres ne le sont pas.</p> <p>Nous nous posons également des questions sur la légalité de cette sanction dans la mesure où le pêcheur en infraction serait soumis à une triple voire quadruple peine (sanction pénale, sanction administrative, sanction de l'OP et sanction du SEG...).</p> <p>Besoin d'un éclaircissement sur ce point, seules les sociétés de mareyage, fermes d'élevage, devront fournir un casier judiciaire vierge ? Concernant les pêcheurs professionnels, quel document est attendu ? S'il est demandé un casier judiciaire, cela concernera la personne et non pas le navire. Quid de la légalité de cette demande ?</p> <p>Pour les pêcheurs :</p> <p>Quelle infraction pourrait entraîner la perte de la certification ?</p> <p>Qui devrait informer des infractions constatées ?</p> <p>Nous attirons votre attention sur les procédures déjà mises en place en France en cas d'infraction : suspension de la licence pour une durée déterminée par l'Administration, amendes, point pour le navire et l'armateur pouvant entraîner un retrait du permis de mise en exploitation.</p>		

	<p>L'OP peut décider ne pas attribuer de reliquat de quota, ou d'attribuer un quota diminué selon l'infraction constatée.</p> <p>Les pêcheurs peuvent être sanctionnés de différentes manières, il ne faudrait qu'un retrait de la certification SEG entraîne l'impossibilité du pêcheur de vendre sa production et entraîne la faillite de son entreprise. Notre rôle est d'accompagner, de sensibiliser, de rappeler la réglementation, pas d'empêcher l'activité d'un de nos professionnels.</p> <p>La pêche est déjà fortement réglementée, de plus en plus contraignante, il ne faudrait pas que le SEG soit perçu par les professionnels comme un organisme de sanction.</p> <p>Il est important de préciser quelles sanctions pourraient entraîner la perte de la certification, que les professionnels soient au courant, et que nous puissions les accompagner et les sensibiliser.</p> <p>C'est un travail que nous menons déjà au cours de la campagne pour rappeler la réglementation, la bonne tenue des fiches de pêche, la télédéclaration, etc.</p> <p>Il faudrait peut-être réfléchir à un système d'avertissement pour des infractions modérées. Les pêcheurs restent humains et peuvent commettre des erreurs. Il nous semble important ici de bien peser la sanction compte-tenu de l'infraction et, tout en respectant une certaine fermeté, de rester malgré tout dans une logique d'incitation et de pédagogie pour une amélioration collective.</p> <p>A voir également avec les autorités concernés par les contrôles pour préciser les indicateurs pertinentes et tenter de récupérer l'information de manière exhaustive</p> <p><u>Translation:</u></p> <p>This component raises many questions and seems to us to be both the most sensitive and the most difficult to assess.</p> <p>The most sensitive, since a fisherman whose SEG certification is suspended would no longer be able to sell his produce (all French wholesalers now have SEG certification). The consequences could be far-reaching, with the fisherman unable to sell and the risk of stopping fishing, depending on his level of dependence on this resource.</p> <p>And the most difficult thing is to assess, because on the one hand there is a gradient of infringements ranging from a simple error on the fishing form (error in the area or in the gear or species code) to a total absence of fishing form, for example, and on the other hand because these infringements are not always known. There is therefore a risk of penalising fishermen for whom the information is known (through the media or otherwise) while others are not.</p>	<p>It is important to drive illegality out of the system. So, there needs to be a deterrent and infringements should have an impact. But it also needs to be proportionate.</p> <ol style="list-style-type: none"> 1. We have therefore amended this criterion and will create some guidance to clarify the difference between serious and minor offences. 2. And we have also proposed a draft Group Certification system for fisheries, which gives more control to the local entity. For that to work well would need the range of entities (OPs) to collaborate to create a consistent approach. 3. We can create clarity on these points for fishers, traders, auditors etc – and we'll need to work together. 	
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		<p>1.2. Page 21/22</p> <p>Contribution aux projets de conservation de l’anguille</p> <p>Les pêcheurs participent au repeuplement français, près de 10% de leur sous quota repeuplement est destiné au repeuplement en France, le reste est</p>		

	<p>destiné au repeuplement européen. Pouvons-nous considérer qu'ils contribuent à la conservation de l'anguille ?</p> <p>Le [REDACTED] porte les projets de repeuplement en France depuis 2013, 2% des dépenses annuelles sont supportées le [REDACTED], pouvons-nous considérer que le [REDACTED] contribue à la conservation de l'anguille ?</p> <p>L'OP Estuaires ne participe pas financièrement directement, mais chaque adhérent de l'OP et du [REDACTED], règlent une contribution à ARA France, est-ce que par ce biais l'OP contribue à la conservation de l'anguille ?</p> <p>Le mareyage participe également aux repeuplements, en répondant à des appels d'offres, en assurant la coordination, la livraison, la traçabilité, etc. Est-ce qu'il est attendu une contribution supplémentaire pour que le mareyage réponde pleinement à ce critère ?</p> <p>Translation:</p> <p>Contribution to eel conservation projects</p> <p>Fishermen participate in French restocking, with almost 10% of their restocking sub-quota going to restocking in France, and the rest to European restocking. Can we consider that they are contributing to eel conservation?</p> <p>The [REDACTED] has been responsible for restocking projects in France since 2013, with 2% of annual expenditure borne by the [REDACTED]. Can we consider that the [REDACTED] is contributing to eel conservation?</p> <p>The OP [REDACTED] does not contribute financially directly, but each member of the OP and [REDACTED] pays a contribution to ARA France. Does this mean that the OP contributes to eel conservation?</p> <p>The fish trade also participates in restocking, by responding to calls for tender, ensuring coordination, delivery, traceability, etc. Is an additional contribution expected so that the fish trade can fully meet this criterion?</p>		<p>Included – see Component 1.2, and separate 103a SEG Standard V7.0 Guidance.</p>
	<p>Page 30/31. 2.4</p> <p>Il est indiqué « <i>Les pêcheurs tiennent des registres quotidiens précis de la mortalité, y compris s'ils les conservent temporairement à leur domicile</i> », les pêcheurs assurent une traçabilité : fiche de pêche, télédéclaration, déclaration de viviers de stockage, certains ne gardent que 48h leurs civelles avant le ramassage. Il serait nécessaire de prendre en compte les audits réalisés par rivière et les tests Carmin, pour ne pas rajouter une contrainte supplémentaire.</p> <p>Comme déjà indiqué, il est nécessaire d'accompagner, de sensibiliser, la profession à su faire les efforts nécessaires, il faut que cette certification soit une valorisation du travail accompli par la pêche professionnelle, non un jugement/contrainte supplémentaire.</p> <p>Il est indiqué « <i>Le test Carmin Indigo ou un test similaire indique que la mortalité est en moyenne inférieure à 4 %.</i> »</p>		


		<p>Le test Carmin indique les lésions et non la mortalité. Une civelle impactée peut survivre (cf. travaux de Cédric BRIAND sur le sujet). Le Carmin est un indicateur de la qualité des civelles et non de la mortalité (même s'il existe forcément un lien entre les 2).</p> <p>Page 30/31. 2.4</p> <p><u>Translation:</u></p> <p>It is stated that "Fishermen keep precise daily records of mortality, even if they keep them temporarily at home", fishermen ensure traceability: fishing form, remote declaration, declaration of storage tanks, some keep their glass eels for only 48 hours before collection. It would be necessary to take into account the audits carried out by river and the Carmin tests, so as not to add an additional constraint.</p> <p>As already indicated, it is necessary to provide support and raise awareness, and the industry has made the necessary efforts. This certification should be a recognition of the work carried out by professional fishermen, not an additional judgement or constraint.</p> <p>It is stated that "The Carmin Indigo test or a similar test indicates that mortality is on average less than 4%".</p> <p>The Carmin test indicates lesions, not mortality. An impacted glass eel can survive (see Cédric BRIAND's work on the subject). The Carmin test is an indicator of glass eel quality, not mortality (although there is obviously a link between the 2).</p>	<p>The improvements made by the glass eel fishing sector are recognised. But for independent transparency and credibility to others, we need to be sure that there is not a hidden mortality.</p> <p>The SEG Standard Team agreed that this is good practice for fishers to apply.</p> <p>Yes, agreed regarding the Carmin Indigo test. That is why we think it is a good test.</p>	<p>Retained this requirement for records to be kept.</p>
	Economic			
	Eel Trader	<p>Page 34, Criterion 4.9: The risks of trade to non EU countries are adequately mitigated</p> <p><i>'Additional and verifiable assurance processes are put in place to ensure that the trade is made for the intended purpose. For example a consignment could include an independent inspector to accompany and verify that a consignment of glass eels for restocking was fully used for that purpose'.</i></p> <ul style="list-style-type: none"> • If this done for all shipments EU and outside EU that would be fair but to discriminate against non EU countries is simply unacceptable. The risks of illegal trade occurring in the EU has already been demonstrated. EU customers are quite prepared to take glass eels that have been illegally sourced. • The idea that an independent inspector should accompany the goods is totally impractical. We cannot take an extra person in the plane or the lorry. • If it is Russia then making the travel arrangement is complex and bureaucratic. You cannot just walk into the Embassy and obtain a Visa. Fly to Turkey, Moscow. Kaliningrad 	<p>We are proposing assurance measures to increase transparency and the credibility and reputation of SEG certification in response to the risks identified by professional enforcement agencies e.g. Europol. In the current version we have proposed different assurance standards at each the Responsible and Aspiring levels. We will be pleased to consider practical and credible alternatives. Not for SEG to apply additional controls to Cites. Can apply 'remote'</p>	<p>For certified eels might be able to allow trade if CITES allows it. Although to maintain the credibility and reputation of SEG and the SEG standard. Standard team to consider creating a annex with a list of 'high risk' countries as receivers of eels.</p>

		<ul style="list-style-type: none"> • What is the inspector going to do wait in the quarantine over the summer and watch each batch being released?. • What is it going to cost to send someone out to Kaliningrad for 7 -10 days at a time?. 5K or may be more. Not so much for Morrocco but it will be a significant overhead. <p>What is the evidence that legal trade to countries outside the EU are or have been destined for illegal trade.</p> <p>There has to be a better way or simply not be a member of SEG.</p> <p>The project in Kaliningrad is transparent. There is an open invitation to visitors.</p>	<p>assurance methods – e.g. video. Maintain demand for good traceability. Trade to eg Russia is a country policy – not SEG’s responsibility. However, such trade could damage SEG reputation if seen to be done as SEG certified. SEG could therefore apply additional controls to its voluntary scheme. These must be practical.</p>	<p>Standard revision team will consider in-person and remote verification methods for Responsible and Aspiring levels.</p>
	Eel Farmer	<p>Enclosed you find my comments on version 7.0. I had less comments, but please read them carefully as we have built in some unreachable difficulties. Hardly anyone will have 100% of the remaining indicators responsible after passing component 1.</p> <p>As everybody could get the standard with version 6.1, now with 7.0 nobody can.</p>	<p>After consideration of this important point, the Standard Revision team have proposed that, for certification a client must meet:</p> <ul style="list-style-type: none"> - 100% of Component 1 criteria at ‘Responsible’ level - At least 50% of other criteria at Responsible level - No major non-compliances 	<p>Changed as agreed. See section 9.5, and Assurance System</p>
		<p>Page 6 Graphs:</p> <p>Is it possible to use graphs on restocking, landings and aquaculture till 2023? Not only until 2010?</p>	<p>We have been able to update one of the graphs until 2020. The other we didn’t have the new data for, so it has been removed.</p>	<p>One new graph added</p>
		<p>Restocking:</p> <p>My point about restocking would be reworded an included?</p> <p>Stocking Page 14 V6.1:</p> <p>Glass eels are restocked because diluting the species increases the survival rate. In the basis we use a surplus or an abundance of glass eels to be able to collect them and distribute them to healthy food rich waters where they can freely migrate as adult eel for spawning.</p> <p>This point of diluting and increasing the survival rate is constantly forgotten in the discussions about restocking and contribution of the sector. If you should not collect them less eels survive, that is the basis of restocking for the recovery of the stock.</p> <p>Is there a possibility to add this point? Yes. Though it is described earlier in the document.</p> <p>I cannot find it.</p> <p>It is an important reason that ICES is not mentioning or has forgotten:</p> <p>DILUTING GIVES A HIGHER SURVIVAL RATE ALSO IF YOU COLLECT THEM IN PLACES WHERE THERE IS NO ABUNDANCE OF GLASS EELS. It is always good to help them pass the barriers and dilute them to increase the survival rate.</p>	<p>With advice from our key eel scientist, Willem Dekker: The effects of restocking are not scientifically proven and there is still much controversy about its use, We have therefore substantially re-written the section on restocking, and also provided a link to our position statement:</p> <p>https://www.sustainableeelgroup.org/wp-content/uploads/2020/06/SEG-position-on-restocking-June-2020.pdf .</p>	<p>Restocking section substantially updated updated for next draft.</p>

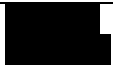
	<p>I hope you can put this reason in as well as it is a very important biological factor.</p>		
	<p>9.3 Page 13 If the board sets this point to the UBO level it has also a risk in it. If we take [REDACTED] as example. If one of our companies is not certified all of the companies are not certified. Also our smokery cannot sell certified eels from other farmers. Our idea was to do this on a level of fishing, collectors, farms or smokeries, but not in the vertical chain. If [REDACTED] loses its certificate we can buy certified glass eels from OP or [REDACTED] and still have a good responsible chain. I think the board should reconsider this point.</p>	<p>This needs further consideration to be practical. Seek commercial and legal expertise input on this.</p> <p>This is challenging because by trying to solve one problem we may be unintentionally causing another problem.</p> <p>We were seeking transparency / responsibility throughout the group of companies so that there could not be any 'hiding' within the group. We are still reviewing this and hope to find a practical solution, supported by guidance, in time for the new standard. We will be pleased to have any practical proposals to solve this.</p> <p>May need a legal definition for this. May need a description of operations and entities as a guidance note</p> <p>The key to (un)lock this problem for entities who are owned by multiple UBO's who for themselves do the daily operation of single entities is likely simple: Each entity acts in only one part of the supply chain. So if one entity is only handling and trading glass eel we have to make clear that their SEG certification is only valid for that. The next entity is farming that is only certified for that. The next entity is processing. So have a point where we can make a "cut" for that entity. In that case expel one entity and send a warning to the remaining UBO's.</p> <p>We should realise that the chosen structure is a very good way to make each UBO aware of the danger of trespassing SEG rules. UBO's who own parts of each entity will ensure each to stick to the SEG rules.</p>	<p>Guidance to be drafted with commercial and legal input.</p>

			This way you can expel multiple entities in one group who do the same part of the chain. F.E. one UBO can not have a group of ten “smokehouses or other parts of the CoC” and make not all SEG certified.	
		<p>Page 14 and 15: Applicants must achieve 100% remaining indicators as responsible, this is not a normal situation. I don't believe anyone will pass. We now jump from 50% to 100%. I think we should work with 3 levels: 70-80% standard 80-90% good 90-100% super The board can do better I think. We have already changed component 1, we should not make it impossible to succeed, but show how responsible companies are after passing component.</p>	<p>As described above, after consideration of this important point, the revision team have proposed that, for certification a client must meet:</p> <ul style="list-style-type: none"> - 100% of Component 1 criteria at 'Responsible' level - At least 50% of other criteria at Responsible level - No major non-compliances. 	Updated – see above and in new draft
		<p>Criterion 1.1: Responsible indicators: The organisation does not have any charges..... This point has to be left out. If we eg. Not want a company to have a SEG certificate we start a charge against them, even if we know we will lose. And what if the party who is under charge wins after usually 5-7 years. He was not able to have the certification. In the end this is not a fair point.</p>	<p>We have made substantial changes to this section to make it fairer but also robust. We will be drafting some more detailed guidance to support it further.</p> <p>We are talking about legal charges actually laid by the legal system – not an accusation by a rival. However, for the Team to consider: Do we have sanctions for only when there are convictions, or also when there are legal charges laid by prosecutors? Agreed: 1. Depend on decision points by others: (a) Charged, (b) Convicted. 2. Set out sanctions in advance, graded according to severity. Make clear in Standard that entity must inform us if any charges / investigations and to answer the questionnaire and our enquiries – otherwise will be suspended. Look at MSC example. Set different times for severity / multiplicity of offences – 3 and 1 years (minor) a fishing season)? Will need a table published and consulted. Consider system of 'strikes' too.</p>	Included – see Component 1.1, and separate 103a SEG Standard V7.0 Guidance.

		<p>Criterion 1.2: We should exclude fisheries, specially glass eel fisheries. As we would pay 2% of our turnover we will have to pay a huge amount and what about the turnover of other species in the company. I think the board should rethink about this point. The idea is that we want organisations to pay who are not part of ESA or ESF, but ESA and ESF are set up for selling eel to the consumer. As it is written it is too complicated with at least 2% of the turnover or 20% of the CRP. I proposed to change at least the % to promillage and for the turnover in eel products, but the board has to check this point and exclude the fisheries who are not selling eel products to the consumer.</p>	<p>This section has been substantially changed to: (1) recognise if/when operators are paying their ESF membership fees and (2) until there is a France ESF, to recognise voluntary conservation work by fishers in lieu of any financial contribution. Guidance is being developed.</p>	<p>Agreed to recognise fishers' licence fee contributions to restocking.</p>
		<p>Component EEL BUYING AND TRADING Criterion 4.7: target % of glass eels This criterion has to be reconsidered. This criterion is made for England where they have no separation in quota and the traders have to fulfil (or keep) this target. In France there is a consumption quota and a restocking quota and we cannot put the responsibility extra to the dealers to keep the 60%. As the destination of the glass eels is set. Therefore we should in this point distinguish between the countries and if there is a different quota for the 2 it is arranged by law.</p>	<p>This has been changed as suggested – to be compliant with the quota system.</p> <p>Agreed: Do via the quota system where there is one (eg different for UK). SEG to influence govts to increase markets for restocking. Fishing to order is best – eels are earmarked for their purpose in advance. Need low price for glass eels to enable restocking at an affordable price. Grants for restocking need to be made available sooner.</p>	<p>4.7 amended as suggested.</p>
		<p>Component EEL FARMING Criterion 5.7: The organisation provides eels for restocking. This point should not count for farms who only produce fingerlings. As the fingerlings are sold to farms who have to prove the 10% restocking. We are counting double here and there should be an exception for farms who only produce fingerlings.</p>	<p>Agreed. An exception clause has been put in to account for this.</p>	<p>This exception has been added</p>
		<p>Criterion 5.8: This is not correct and my earlier comments were: This is a strange criterium as it is written. Eels for restocking should reflect 100% of the age group of the whole farm? This means as the mean weight of the whole farm 100 gram is that you are not able to restock the small eels. As stated before governments determine the size of fingerling restocked (only in Sweden not).</p>	<p>We have adopted your suggestion and put 1 year and 1.5 years as the responsible and aspiring levels.</p> <p>The use for restocking of any earmarked eels for consumption can be seen as a net positive action. As long as we stick to the mentioned</p>	<p>Have applied as suggested: 12 months for responsible, 18 months for Aspiring</p>

		<p>We should state here that eels that are restocked should not be older than 1,5 year after glass eel intake.</p> <p>We want to prevent sales of slow growers and we do that by stating max 1,5 year old.</p> <p>I look forward to the new adjusted version and hope for the one that is possible to fulfil.</p>	<p>transition period. (period of storage / ongrowing)</p>	
	Smoker	<p>Page 6. Graphs</p> <p>These images b) and c) is there more update info available ? These graphs are over 12 y old.</p> <p>Most restocking programs in EU restarted their effort after 2010. So more recent data must be available.</p>	<p>With Willem Dekker's help we have updated one graph to 2020. Data wasn't available for the other graph, so it has been removed.</p>	<p>Have one graph updated</p>
		<p>Page 9. Restocking</p> <p>Text is lacking crucial information on restocking:</p> <p>Where glass eel restocking takes place as an eel management plan measure, it is done to increase the stock and will increase the number or migrating silvers. Restocking will therefore take place in waters where migration to the sea is as easy as possible for the silvers. Otherwise, humans will have to assist with trap, transport and release programs.</p> <p>Glass eels for stocking are sourced from areas where large(r) numbers occur. Density-dependent mortality can be countered by spreading glass eels over a larger area. This will reduce food competition and the influence of predators. A larger number of glass eels will grow into yellow and silver eels. Transferring glass eels to areas with sufficient food supply and implementing a quota and controlled fishery for yellow and silver eels will lead to an increase in the number of glass eels migrating to the sea. Where barriers prevent migration, more attention will need to be paid to assisted migration.</p> <p>I think it is wise to talk on the aspect of density dependent mortality and predation reduction as a welcome side effect of restocking. As this aspect is lost in scientific world. Just for internal info: RAVON did research at a sluice in the south of the Netherlands: (https://www.rijkswaterstaat.nl/nieuws/archief/2023/07/de-bathse-spuisluis-belangrijke-voordeur-voor-trekvis) They calculated around 536,500 glass eels arrive there. Only 19% made it through. So 81% got lost somewhere ! By assist migration (restocking) of the 81% (434,565 psc) could be given opportunity to grow on. Using the 12% ratio survival to silver a stunning 52,147 psc would make it to silvers. So this effort is never shown by the opponents of assisted migration (restocking).</p>	<p>With advice from our key eel scientist, Willem Dekker: The effects of restocking are not scientifically proven and there is still much controversy about its use, We have therefore substantially re-written the section on restocking, and also provided a link to our position statement: https://www.sustainableeelgroup.org/wp-content/uploads/2020/06/SEG-position-on-restocking-June-2020.pdf .</p>	<p>This section re-written and reviewed with Willem Dekker's help to reduce the amount of text, and to ensure scientifically accurate.</p>
		<p>Page 9. ESFs</p> <p>What about in contributions kind? We have to have an answer / solution for that....</p>	<p>This section has been substantially changed to: (1) recognise if/when operators are paying their ESF membership fees and (2) until there is a France ESF, to recognise voluntary</p>	<p>The concept added. Guidance to be produced</p>

			conservation work by fishers in lieu of any financial contribution. Guidance is being developed.	
		<p>Page 14. Achieving 100% Responsible indicators</p> <p>100% for everything? Responsible indicators do you mean component 1? No minors in that part is a first step to get certified.</p> <p>In that case I say yes if it is the whole set of rules please take in mind that every sceme I know from ASC/MSC/IFS/BRS have a 100% goal but you can pass with less. SEG must find a way to act with non critical minors</p>	<p>After consideration of this important point, the revision team have proposed that, for certification a client must meet:</p> <ul style="list-style-type: none"> - 100% of Component 1 criteria at 'Responsible' level - At least 50% of other criteria at Responsible level - No major non-compliances. 	Changed as agreed
		<p>Page 18 ESFs.</p> <p>Mention the membership of the ESA (Eel Stewardship Association) for branche organisations at EU member state level.</p>	This section has been substantially changed to: (1) recognise if/when operators are paying their ESF membership fees and (2) until there is a France ESF, to recognise voluntary conservation work by fishers in lieu of any financial contribution. Guidance is being developed.	To be changed as agreed, and guidance developed.
		2% is a lot. I think you mean 2/00	OK, then we must suggest a level that is equivalent to the ESF contributions, and encourages ESF membership	Amended
		<p>A company is member of branche organization in a EU memberstate that is part of the ESA and the company makes contribution to ESF.</p> <p>Is this achievable for independent fishermen?</p>	<p>We should consider an equivalent / alternative method for fishers.</p> <p>See agreement made above</p>	Amended. Guidance to be developed for in-kind contributions needed. Now in 1.2 of 103a Guidance for Standard V7.0 Components.
		<p>Page 20. Exceptions '<i>Clients who hold a recognised Chain of Custody standard (e.g. MSC, ASC), shall be deemed to meet this criterion</i>'</p> <p>Why ? Every company must do it !</p>	<p>MSC CoC is at a higher level than SEG's Traceability criterion, so we are saying, if you have MSC CoC already, we don't have to audit you for this.</p> <p>Or do you disagree? Are there parts where SEG's system is better – eg. identifying where the restocking and consumption quotes are being mixed?</p>	Original proposal to be retained.
		<p>Page 24. Criterion 2.1 – Sustainable Indicator</p> <p>Serious? Is this achievable on short notice? Who is responsible for achieving the individual company or state?</p>	With advice from our key eel scientist, this has now been removed and substantially changed.	

				Substantially amended from previous version
		<p>Page 26. Criterion 2.4</p> <p>Did we ever think on circularity? A dead eel is not direct lost. Eel is a cold blooded specie so when treated well it can be eaten by mankind. Once an eel is dead we have to use it as much as possible. Can this be brought in? It counts even for dead glass eels as it does for bigger ones.</p>	We do say they can be used in the supply of Angulas	Updated as suggested
		<p>Page 27. Biosecurity</p> <p>Change the following order. Mostly they fish in the same water.</p>	Agreed. Done	Updated as suggested
		<p>Page 33. Criterion 4.7</p> <p>Glass eels earmarked for restocking should be used for that purpose 100% It is only in UK where there is no differentiation between the quota restocking / human use. As UK is no longer in trade with EU this Article should be rewritten.</p> <p>In Denmark there is a company that only grows on eel for restocking. So is this Article clear enough for them?</p>	This has been changed as suggested – to be compliant with the quota system.	Updated as suggested
		<p>Page 34. Slow growers</p> <p>Can we make a max number of months for the transition into restocking material? So 18 month or lesser number?</p> <p>So we can provide glass eels stay to long in the systems and we avoid a cumulation of slow growing eels over the years being sold in one batch at a certain time.</p>	We have adopted a suggestion and put 1 year and 1.5 years as the responsible and aspiring levels.	Updated as suggested
		<p>Page 38. Criterion 6.1</p> <p>Again we have to ask ourselves, who is responsible state or individual company?</p>	This section has been substantially changed, as for Glass eel fishing	Updated as suggested
		<p>Page 40. 7.1</p> <p>Due to EU rules and regulations the bigger companies are all certified as food producer by EU member state authorities. They have a EU food processor facility number</p> <p>A set of rules to follow that go beyond and further than most people can imagine. So if a company has an official EU food processing plant number it is achieving the criteria of 7,1</p>	Agreed.	The criteria have been amended as suggested.
	Eel Farmer	<p>General suggestion</p> <p>I would run an extra spell check over the whole text and look specifically for commas and double words.</p>	We will check it carefully before final publication. It will be published by a professional publisher.	Checked before next version and final publication
		<p>5.5 Restocking, Page 10</p>	We will expand this a little to include some important points but we don't want the chapter to be too big, so have	Section updated, and reference to


		“..a dedicated Article on restocking”, I would suggest to add the relevant article.	referenced and provided a link to the separate document.	our position statement provided.
		Criterion 5.9: Biosecurity Is present and disease is treated rapidly and appropriately Responsible indicators: “UV is used at an appropriate level and separation between tanks”, I don’t understand what is meant with the separation between tanks? I would suggest to take that part out.	Will make clearer or remove.	Have used: ‘UV is used at an appropriate level to control diseases’ in the Responsible indicator only.
		<i>I also agree with the feedback points of [REDACTED]’ feedback points (see above)</i>	Noted, thank you	See above how we have used [REDACTED] (eel farmer) comments
		Restocking: My point about restocking would be reworded and included? Stocking Page 14 V6.1: Glass eels are restocked because diluting the species increases the survival rate. In the basis we use a surplus or an abundance of glass eels to be able to collect them and distribute them to healthy food rich waters where they can freely migrate as adult eel for spawning. This point of diluting and increasing the survival rate is constantly forgotten in the discussions about restocking and contribution of the sector. If you should not collect them less eels survive, that is the basis of restocking for the recovery of the stock. Is there a possibility to add this point? Yes. Though it is described earlier in the document. I cannot find it. It is an important reason that ICES is not mentioning or has forgotten: DILUTING GIVES A HIGHER SURVIVAL RATE ALSO IF YOU COLLECT THEM IN PLACES WHERE THERE IS NO ABUNDANCE OF GLASS EELS. It is always good to help them pass the barriers and dilute them to increase the survival rate. I hope you can put this reason in as well as it is a very important biological factor.	The effects of restocking are not scientifically proven and there is still much controversy about its use, We have therefore substantially re-written the section on restocking, and also provided a link to our position statement: https://www.sustainableeelgroup.org/wp-content/uploads/2020/06/SEG-position-on-restocking-June-2020.pdf	Section on restocking to be rewritten
	Environmental			
	[REDACTED]	Thank you for the opportunity to input to the review of the SEG Standard. The team have reviewed and discussed draft version 7.0 and, in many cases, feel our specific responses to previous calls for input, still apply and there is still a significant lack of support/evidence for the fundamentals of the Standard, and in some cases it is contradictory to present knowledge/scientific advice.	Thank you. We have reviewed carefully as we have developed the next version. Could you identify which fundamentals of the standard you feel there is significant lack of support or evidence for? And where is it contradictory?	Text has been reviewed for this. Use this comment to [REDACTED] to ask / check if improved.
		‘Responsible’ and ‘sustainable’ seem to be used almost interchangeably which causes confusion. It has to be explicit that the Standard does not	We have reviewed to try to ensure lack of confusion and inter-use between	

		represent a sustainable off-take – indeed it is likely to be difficult to determine what this looks like for any eel species.	'sustainable' and 'responsible' and will do so again. If you notice any specific examples then please let us know and we will correct. We have made it clear that the standard is positioned to be 'responsible' and that 'sustainable' or 'sustainability' is in the future.	Text has been reviewed for this.
		Clarity is needed around level of contribution to the Eel Stewardship Fund for fisheries that adopt the standard and, despite statements made about stocking in the standard, the main activity supported by ESF appears to be stockings rather than 'protection', so there is an inconsistent message here.	We are developing guidance for the level of different types of contribution. ESF funding is used for restocking, scientific research, helping silver eels pass barriers, eel passes and to support funding for SEG. See also: https://www.esf.international/	Text has been reviewed for this, and guidance for contributions has been developed.
		At present it appears that much of the Standard is defined within SEG by the board, which only includes allies/paid employees and therefore has no independence. While this process of input by stakeholders is useful, we suggest an independent review board, outside of this process is needed in order to guide the development of the Standard.	As always intended we have expanded the membership of the SEG standard revision team to include a wider range of representation. The membership of the team is included in the attached.	Have sent the new SEG Standard Revision team composition
		General Dear SEG, Last Thursday d.d. 26 th July 2023, I received an email in which you reacted to Good Fish extensive and comprehensive comments on the SEG Standard, version 6.1 and supporting documents we have you send on 5 March 2023. This was only 4 days before the deadline of the 31 st for giving comments to the published Version 7.0 draft 2 including a weekend. I think you can understand that we haven't got time to react on those comments properly but we are hoping to do so within a few weeks. I hope you allow that our reaction to this will also be incorporated as comments for this published version.	Thank you. We did not need you to respond to our comments on the previous version and are pleased that you have been able to comment on the new standard version. We will consider all comments for the new standard.	Have / will consider all comments in consideration of further drafts.
		Page 4 'The aim of the SEG standard is to:- • Define criteria by which each step in the chain of custody in the commercial eel sector can be assessed for its responsible minimisation of negative impacts and contribution to protection and recovery of the eel population.' ██████████: I think this is a good statement, it is more neutral and contains no false ambitions.	Noted, thank you.	Used these comments
		Page 5. You mention 'f) define and certify higher standards of practice than just following the law,' ██████████ advises consumers whether or not they can eat a fish. We hoped (and still hope) that SEG will develop a standard that goes beyond 'Best Practices'. Although we do recognize the importance and impact of Best	Catching and eating eel is legal. We provide standards that are <u>much beyond</u> the law and 'best practice' to maximise protection whilst still enabling some catch and consumption.	Used these comments

		Practices, increased traceability and that the entire process will be conducted according to ISEAL, it is simply not enough for the eel to advise the consumer to eat SEG eel. Good Fish expects more than 'define and certify higher standards of practice than just following the law,'. If we put this standard against the Seafood Guide's yardstick, it still scores 'red'. 'Doing more than the law' is not enough to classify it as sustainable fish. We still follow the standard to see if we - if people consume eel, they would do better to buy SEG certified eel.	We are doing this within the ISEAL codes of practice and, if you accept ISEAL, we hope you, like others, will accept SEG certified.	
		Page 5 You mention 'Geographically, it covers the natural biological range of the eel in its continental phase, from North West Africa, to the Mediterranean, to the whole of Europe, to the North Cape of Scandinavia. Illegal trade transcends those boundaries – routes are via European and North African outlets mostly to the Far East; predominantly China.' ██████████ Good that the label is not only for countries in the EU.	Thank you. Yes, it has always been for all countries with eel. We have an operator in Morocco that is SEG certified.	Used these comments
		Page 5 You mention 'If nothing had changed then extinction would have loomed eventually.' ██████████ found it positive that SEG finally recognizes that eel can go extinct. Good Fish believes that extinction is still lurking. Look at this article: https://www.nature.com/articles/s41893-023-01156-y The level of glass eel entry is very low and the various factors of human impact are increasing. For example, PFAS problems are major in the Netherlands and this is not yet taken into account. I share the opinion of the SEG that fisheries are not primarily responsible for the decline of the eel, but this seems to be the only button we can turn if we want to see a recovery in the short term. The migration barriers will only really be adjusted in decades, PFAS pollution will also remain for decades. So if we want to save the eel now, we should not only reduce the entire fishery even more and only use it as Eel Rangers. Fishermen must carry out government-funded recovery measures to maximize eel stocking over the next 10 years.	Any species could go extinct. We recognise that eel could go extinct if nothing is done. But the eel is a long way from extinction and a lot has been done – but more still needs to be done. The article you provide is for 'blue foods' generally, not specifically for eel. Glass eel arrivals were estimated by ICES in 2017 at 1.3 billion. There are many estuaries on west coasts that receive many more glass eels than are needed to fully populate their catchments – 10x more in some cases (eg. Parrett, UK). The fisheries 'button' has already been pressed very hard and we must now press the other buttons harder. Yes, we would like to see more restocking at to meet the 60% Eel Regulation target, but we believe that fishing is now at acceptable and responsible levels (9% of the stock for consumption). Here you argue for more restocking and elsewhere you say that the effectiveness of restocking is not proven. What is your position?	Used these comments

		<p>Page 6 You mention ‘Since 2011, the 30-year decline in recruitment has come to a halt, and both the North Sea index and the Elsewhere index now vary on a low level, with little trend.’ ██████ believes that extinction is still lurking. Look at this article: https://www.nature.com/articles/s41893-023-01156-y The level of glass eel entry is very low and the various factors of human impact are increasing. For example, PFAS problems are major in the Netherlands and this is not yet taken into account. I share the opinion of the SEG that fisheries are not primarily responsible for the decline of the eel, but this seems to be the only button we can turn if we want to see a recovery in the short term. The migration barriers will only really be adjusted in decades, PFAS pollution will also remain for decades. So if we want to save the eel now, we should not only reduce the entire fishery even more and only use it as Eel Rangers. Fishermen must carry out government-funded recovery measures to maximize eel stocking over the next 10 years.</p>		<p>Used comments from above as the comments from █████ are the same as above.</p>
		<p>Page 6. You mention ‘This timing strongly suggests that the change in trend might be related to the implementation of protective measures under the Eel Regulation, but a causal link cannot be proven or disproven.’ ██████ suggests another, less subjective text, like ‘A causal link between the change in trend and the implementation of protective measures under the Eel Regulation cannot be proven or disproven.’ It is not that e.g. a NGO likes to disprove a link between protective measures under the Eel Regulation and glass eel trend, it is just that at the moment it is impossible to scientifically find a causal link.</p>	<p>We understand your point. Our words are clear that there is not a scientific causal link. However, there is a close connection. We have changed our wording to remove the more subjective term ‘strongly’.</p>	<p>Use these comments and amended the sentence to remove ‘strongly’.</p>
		<p>Page 7 You mention ‘Application of the SEG standard by itself, therefore, does not guarantee to achieve adequate protection - a sustainable fishery or recovery – on its own; the commercial sector is not able to achieve these shared objectives. While contributing to the shared objectives as a responsible actor, the certified commercial sector cannot be held responsible for the net outcome as influenced by all parties. It is only in the national Eel Management Plans and the Eel Regulation, that all factors and all actors can be addressed, and therefore, it is only at this level that the net outcome can be evaluated. Whilst the Eel Regulation and many EMPs permit the continuation of eel fishing, this standard is designed to require the most responsible practices across the eel fishing and supply sector such that, where fishing and trade are permitted, standards are raised and avoidable impacts are minimised. Aiming for a responsible commercial sector and subscribing to the governmental policies to protect and restore the stock, we expect the commercial sector to contribute fully to the national management plans and live up to the consequences for their practices.’</p>	<p>The SEG standard sets the adequate protection as far as the fisheries can provide it. The eel, unlike other fisheries (with standards by MSC) is</p>	<p>Used these comments</p>

		<p>■ finds it positive that the SEG recognizes that it cannot guarantee sustainability for the eel but that it describes practices for the eel sector to become more sustainable.</p> <p>At the same time, this is what differs SEG from MSC and this is also the reason why there will be hardly any NGO supporting the message to consume SEG certified eel. The standard guarantees no adequate protection as the commercial sector is not able to achieve this.</p>	<p>much more heavily affected by environment and habitat issues. Those make perhaps 90% of the impact on the eel. So closing all eel fisheries will have little impact on eel recovery.</p>	
		<p>Page 7</p> <p>5.2 Impacts on the eel in a multi-actor system</p> <p>■:</p> <p>In this chapter it is noted that the SEG standards sets minimal conditions for responsible exploitation. As ICES advice still recommends zero catches in all habitats, this should be reflected in some capacity in the standard. For instance, by setting a maximum amount of catches or by requiring a gradual reduction in catches.</p>	<p>We have added a reference to the ICES position in section 5.2 . We have also published our position statement that discusses it in more detail. See: https://www.sustainableeelgroup.org/wp-content/uploads/2021/11/SEG-considers-Zero-Catch-advice.pdf</p> <p>It is the responsibility of respective governments and agencies across Europe to set improvements and catch limits to achieve the 40% level of protection required by the Eel Regulation in their EMPs. Individual fishers (the ones being certified by us) cannot set or enforce quota for river systems, but they can live up to quota set by their government. We continue to campaign for those EMPs to be fully implemented by 2030 (achieving 40% survival) so that the stock can start recovering more quickly in the near future.</p> <p>What we can say, is that in the part of the eel fishery that we understand best, the glass eel fishery, there is an annual legal catch of circa 60 tonnes, 50 tonnes of which is SEG certified. That 50 tonnes is 11% of the estimated stock (in 2017) of 440 tonnes. Of that 50 tonnes, 20 tonnes is used for consumption. That is 4.5% of the stock – representing 4.5 mortality or 95.5% survival.</p>	<p>Used these comments</p>
		<p>Page 7</p> <p>5.3 The journey towards sustainability</p> <p>■: In this paragraph is it noted that the SEG standard describes “good practice” and “responsibility”, the chapter notes that sustainability for</p>	<p>That is our name, to indicate our aim and vision for the future. We make it clear that our standard is about ‘Responsible’ and nowhere do we</p>	<p>Used these comments</p>

		<p>eel is in the future. However, the organisation is named the Sustainable Eel Group. It implies that the certification already guarantees sustainability.</p>	<p>claim or suggest that the certification guarantees 'sustainable'. In English, and using ISEAL definitions, the SEG standard is a 'sustainability standard' (that is different from 'sustainable'). In our new labelling logo we use the term 'eelgroup', so there is no word 'sustainable'. We hope that this helps to avoid any confusion of interpretation on packaging.</p> 	
		<p>You mention 'In this phase, it is important to apply an exploitation level that allows the stock to recover. To this end, the European Commission received advice from ICES (in 2002), which recommended to aim for a spawning stock of 30% of the notional pristine level (i.e. 30% of high recruitment and no anthropogenic mortality). For precautionary reasons (due to the many uncertainties around eel) a more vigilant level of 50% was recommended. The EU Council subsequently decided to aim for 40%, in between the advised 30% and the more vigilant 50%.</p> <p>For the stock to recover to this 40% level, it will be necessary to reduce anthropogenic mortalities (to 60% mortality, i.e. a survival of 40% - or better). The Eel Regulation has set no time-limit for this recovery (i.e. getting to 40% survival will do). SEG considers this to be a weakness in the Eel Regulation, and advocates to reduce mortalities to the required limit, by 2030.'</p>	<p>You have provided our comments here only without yours. Did you mean to provide a comment from [REDACTED]?</p>	<p>Asked [REDACTED] if they want to comment – did not respond to this.</p>
		<p>Page 8</p> <p>You mention 'This standard is therefore positioned to be a code of conduct for a responsible eel sector, to help reverse the decline of the eel, on the journey towards sustainability and full recovery.'</p> <p>[REDACTED]: you are able to make a claim that this standard is positioned to be a code of conduct for a responsible eel sector but it is not yet scientifically proven you will be able to help to reverse the decline of the eel due to that, you should not make this last claim.</p>	<p>That is the <u>aim</u> of the standard, we are not claiming that it has happened yet. We have amended the wording to say that the standard provides the commercial sector the opportunity to play its part in adequate protection, to assist recovery</p>	<p>Used these comments</p>

		<p>You mention 'For the stock to recover to this 40% level, it will be necessary to reduce anthropogenic mortalities (to 60% mortality, i.e. a survival of 40% - or better)'</p> <p>I don't understand this part of the sentence: <i>to 60% mortality, i.e. a survival of 40% - or better</i>. Can you explain what you mean to achieve?</p>	<p>Unlike what most people involved with the eel protection policies think, the main aim of the Eel Regulation is action-focused: to reduce human caused mortalities (to a level that will allow the stock to recover). This boils down to a very concrete action target, of max 60% mortality (i.e. 40% survival). For a fuller description of this, we refer you to our position statement: https://www.sustainableeelgroup.org/wp-content/uploads/2021/11/SEG-position-on-protection-and-recovery-Fall-2021.pdf</p>	<p>Used these comments</p>
		<p>You mention 'The Eel Regulation has set no time-limit for this recovery (i.e. getting to 40% survival will do). SEG considers this to be a weakness in the Eel Regulation, and advocates to reduce mortalities to the required limit, by 2030.'</p> <p>█: Fully agree that this is a weakness in the Eel Regulation. █ doesn't care how this reduction is managed (by tackling barriers of reducing fisheries). Only 2030 is just 7 years from now, how do you want to achieve the reduction if you don't want to reduce mortality via a reduction in fisheries as normally, within 7 years, hardly any barriers will be tackled plus look at this article: https://www.nature.com/articles/s41893-023-01156-y</p> <p>More threats caused by human impacts will have a negative impact on the eel. We should do much more to reduce mortality.</p>	<p>If the Eel Regulation is being properly implemented by all members states by 2030 it will have a much greater effect on eel protection and recovery. Tackling fisheries further can have little additional effect now. 60 tonnes of glass eels are now caught (7 years ago 100 – 150 tonnes of glass eels were caught so fishing impacts have reduced by up to 60%). 60 tonnes represents 14% of the 2017 estimated stock of 440 tonnes. 20t of that is for restocking, so 40t for consumption is 9%.</p> <p>The eel population is reduced by 90% and eels have lost access to 90% of habitats. It is clear that habitat loss is the major problem, so continued efforts, via the Eel Regulation to improve habitats will make the biggest difference to the eel stock. Fishers have made their contribution. It is time for others and society to make theirs.</p>	<p>Used these comments</p>
		<p>You mention 'Although we advocate to fulfil the required reduction in anthropogenic mortalities by 2030, that time-limit is not part of our standard, because setting this additional requirement would disturb the level playing field between the fisheries and other human impacts. As described in 5.2 above, fishing mortality is one of many impacts of anthropogenic impacts on the eel population.'</p> <p>█:</p>	<p>Our standard has immediate time limits, and where there is a transition period we make clear what those are. We have previously published our targets for some aspects of the standard, for example for the glass eel market to be 90% SEG certified by 2028.</p>	<p>Used these comments</p>

		You mentioned the lack of a time limit in the EU regulation as a weakness, but subsequently do not include a time limit in your own standards.	We have been making clear over the past 2 years that we want Member States implementing the Eel Regulation properly by 2030 – this we believe is the greatest contribution to eel recovery and protection there could be.	
		<p>You mention '5.4.1 Reducing illegal fishing and trafficking</p> <ul style="list-style-type: none"> The SEG standard aims to discourage illegal fishing and trafficking by excluding those from certification who have been prosecuted for illegal eel trade (as courts often don't ban operations at sentencing). <p>██████████: I agree that is helping, but what I miss is that the SEG is looking for a solution on what the SEG traders should do with the glass eels they can't sell for restocking. Are these given away for free? See 5.4.3 Fishing handling survival, what is happening with the 38 tonnes? that hasn't been used to reduce the quota, were they restocked for free?</p> <p>You said that this is not up to your standard to solve but a glass eel trader and fisherman are responsible for the full 100% of the glass eels they have caught and traded. I think you should explain in your standard what happens with the glass eels that will not be sold for restocking.</p>	<p>SEG certified traders have legal markets for the fish they buy – stocking and consumption. As illegal traders have reduced, fewer fish are being caught as there is reduced demand. Hence an increasing proportion of the supply chain (fishers and traders) are SEG certified and fewer glass eels are being caught.</p> <p>Yes, we can do that and have made an amendment. Most of the small amount that is 'spare' currently goes for consumption as 'Angulas' in Spain. We would like to see this continue to reduce.</p>	<p>Used these comments</p> <p>Used these comments</p>
		<p>You mention '5.4.3 Fishing handling survival '</p> <p>██████████: It's a good thing that the survival rate goes to 2%. If a trader sells his SEG glass eel as SEG glass eels, is he also allowed to sell glass eels to non SEG traders? How much could his mortality rate be for non-certified clients? I'm asking as mortality during transport/handling is a good way to sell the glass eels that 'died' on the black market. I assume the mortality of glass eels for the whole company should be less than 2%.</p> <p>Ps: 4% is still high, can't the mortality rate not become 3 of 2 %?</p>	<p>We are trying to encourage and move towards a 100% SEG certified market, however we cannot legally specify where SEG certified traders can sell to. Yes, we believe that some traders have sold "eels that died" in the illegal market. However SEG certification is creating better traceability so this is reducing.</p> <p>We will require continuously improving survival. In 2009 (pre-SEG) it was recorded as 42% Catching 60 tonnes of live glass eels now saves an additional 40 tonnes that previously died. In SEG certified fishers survival is higher than non-certified. So, SEG certification is making a significant contribution to the reduction in number of eels that are caught and therefore protection to the stock.</p>	Used these comments
		<p>Page 9</p> <p>You mention 'The increased local stock contributes to the local biodiversity, constitutes a major food item for natural predators, and may contribute to the</p>	We recognise and make it clear eels play an important part of the freshwater biodiversity and wildlife –	Used these comments

	<p>local fishery (provided that that fishery itself is responsible and properly managed).' ██████████: very nice of SEG to make sure predators like cormorants can feed on restocked eel.</p>	<p>not just for the recovery of eels themselves or for human consumption. They contribute to environmental, social and economic values – the three sustainability pillars.</p>	
	<p>You mention 'may contribute to the local fishery (provided that that fishery itself is responsible and properly managed).' ██████████: the only purpose of restocking has always been to contribute to the local fishery and I don't understand why (provided that that fishery itself is responsible and properly managed) this needs to be added here.</p>	<p>Restocking has also been for eel conservation and recovery purposes – i.e. to increase the escapement of silver eels.</p>	<p>Used these comments</p>
	<p>'5.4.4 Restocking' ██████████: What I miss is the difference between restocking for contribution to the local fishery and restocking for maximum impact for nature conservation. Here something should be added about the specific conditions an area needs to have in order to qualify for restocking. Most importantly a connection to the open sea, so they have the possibility to migrate.</p>	<p>Thank you. These are part of the Restocking criteria (Component 6). However, we have also updated Restocking section and included your suggestions.</p>	<p>Used these comments</p>
	<p>Page 10 You mention 'In the mid-1800s, nobody believed that you could keep young fish alive over long distances in a stage coach - but the glass eels did survive.' ██████████: An interesting anecdote, but nothing more than that. I think this is a non-argument for convincing people 'But so far all of this has turned out to be untrue: restocked eels behave almost identically to natural recruits.'</p>	<p>Your opinion is noted. You have given contradictory views on restocking above. What is your position?</p>	<p>Used these comments</p>
	<p>Page 11 You mention 'Moreover, we expect all applicants to be law-abiding, living up to whatever additional conditions are set by the national government.' ██████████ Sensible statement but does not add much. I expect everyone to be law-abiding.</p>	<p>We expect everyone to be law abiding too. However, we recognise that the real world isn't like that. We use this to make clear that illegal operators aren't welcome in our system, so they are clear they must stay legal if they want the SEG certification.</p>	<p>Used these comments</p>
	<p>You mention 'We consider it our role, to set criteria for responsible restocking, for minimal mortality during fishing, transport and release, and for full traceability of all these catches.' ██████████: we hoped you had considered your role larger than this as it is not enough to save the eel.</p>	<p>This will play a big part as the standard, to drive a responsible eel sector, is one of several of our strategies to save the eel. i.e. our role IS bigger than this: As you may have will have seen from our Theory of Change, our other main strategies are: (1) to influence improvements to eel habitats, (2) to reduce illegal trade and (3) to provide influence, leadership and advocacy for governments to implement the best policies and legislation for eel and</p>	<p>Used these comments</p>

			habitat protection. Hence, for example, our major focus is on proper delivery of the Eel Regulation by 2030.	
		<p>Page 17</p> <p>You mention 'Criterion 1.1: Commitment to legality'</p> <p>██████████: How does the SEG plan to handle with the eel mafia? Just looking at the quotes below, there is a large black market when it comes to illegal trafficking eels. How does the SEG plan to support fishers that may have ended up involved with these activities and cannot get out? It is well known that once you dealt with criminals/mafia, it is incredible hard to step out. Good Fish is supporting this part of the whole SEG standard but we realise that this sector cannot be compared by increasing the traceability of a fisheries like e.g. cod in Norway where there is not such a huge pressure from a billion dollar illegal sector aiming at the same product.</p> <p>Furthermore, does the SEG believe that fishers will be able to obtain a price premium after receiving certification? This latter could help discourage people from ending up in in this business.</p> <p>"Several criminal networks are responsible for trafficking these fish from Europe to Asia. EU nationals are largely responsible for illegally fishing the young eels in European waters while those from destination countries in Asia arrange logistics and transportation."</p> <p>"Among the 256 arrested were Chinese, Malaysian, French, Spanish and Portuguese nationals, including "two high-value targets", said Europol."</p> <p>"These successes substantially disrupt the organised criminal networks involved in this multi-billion euro activity.</p> <p>"The trafficking of glass eels is one of the most substantial and lucrative illegal trades of protected species across the globe, with illegal profits estimated to be up to €3 billion in peak years," it added.</p> <p>https://www.euronews.com/2023/06/29/eel-smuggling-ring-busted-by-european-police</p>	<p>SEG has been working with the European Commission and European enforcement agencies to tackle illegal eel trade. Europol reports that exports to Asia decreased by 50% (100 tonnes to 50 tonnes) between 2017 and 2022. There were 256 arrests in 2023 and a major network has been broken up. So, we believe that collective efforts to tackle illegal trade have been effective so far. We will maintain that pressure.</p> <p>SEG certified fishers have sometimes enjoyed an increased price from some buyers. Perhaps the greatest attraction has been assurance of trade when certified, as more and more of the market for each consumption and restocking are asking for SEG certification</p>	Used these comments
		<p>Page 19</p> <p>You mention 'This new standard, V7.0, requires those trading via the glass eel supply chain, to be handling 100% SEG certified.'</p> <p>██████████: If there is no market for restocking, what is the procedure that happens with the glass eel reserved for restocking? Will there be no fisheries and/or will the glass eel put back by the glass eel fishers? I see no procedure on this item.</p>	<p>This isn't needed as there is a growing market for restocking. And we will continue to influence the EC and other governments to develop policies to increase the restocking market to reach the 60% target.</p>	Used these comments
		<p>Page 22</p> <p>You mention 'Traceability – sale to certified buyers. There is an obvious temptation to sell to buyers who will offer the best price. That price is determined by the market and the illegal market often offers a higher price. To aid traceability and increase assurance of a traceable supply chain, it is</p>		

	<p>preferable (but not mandatory) that certified fisheries only sell to certified buyers. Other mechanisms such as tele-declaration systems are also being used to improve traceability and therefore discourage and also measure the extent of the illegal markets down to the fishery level.'</p> <p>██████████: The other mechanisms that are used can be further clarified to present all the things that are being done. What GF is wondering about, also mentioned in part above, is what happens to the glass eel that dies during transportation? It would be good to implement a system in which it is required to store these in for example a freezer. This way a biological accounting system.</p>	<p>If they die at the fishery, they are often frozen and sold for consumption. If they die in onward transportation they are usually disposed of. In the SEG system all are accounted for via the Traceability criterion.</p>	<p>Used these comments</p>
	<p>You mention 'There will inevitably be some mortalities and those can be kept, frozen and supplied for an albeit diminishing market in eating glass eels.'</p> <p>██████████ Is this a normal practise? I can't believe that anyone would sell fish that died during transport for consumption!! If e.g. 10% of a batch of glass eels died during transport, that you still use the 10% glass eels for consumption?</p> <p>I would prefer to suggest freezing the glass eel that die in the process, to register it and to burn it as it has no stimulans to neglect the glass eel.</p>	<p>Yes, this is quite normal practice in France and has been for a long time. It is only from the fishing mortality – not from any onward transportation.</p>	<p>Used these comments</p>
	<p>You mention 'In France, the most significant glass eel fishery, comprising 80% of the European market, the authorities set a quota for catch and sale for each restocking and consumption each year. There is a legal requirement to observe those quotas (and, for example, it is unlawful to sell fish for consumption that were due for restocking) and auditors have an important role to play, through analysis or records, that quotas are being properly used.'</p> <p>██████████: [no response provided so far]</p>	<p>What is your reply to this as it seems to have not been included?</p>	<p>Have asked GF if they wish to provide a comment. – Not since replied.</p>
	<p>Page 24</p> <p>██████████: The standards for glass eel fisheries contain standards on bycatch of these fisheries. In these standards phrases like "a low rate of by-catch" and "a low rate of discard injury" are used. No percentage is specified which can be problematic as each assessor can have their own definition of low.</p> <p>Furthermore, some mortality occurs after release. This is in not incorporated into the standard.</p>	<p>We have been in contact with the auditors and who are also ecologists and have the most experience of this and asked for their expertise to improve the definition to apply in the next version.</p>	<p>Used these comments Asked FishPass consultancy for any suggestions which were incorporated into the next draft.</p>
	<p>Page 25</p> <p>You mention '• The amount (weight) and proportion (%) of glass eels caught from each certified and non-certified fisheries will be monitored. The proportion from certified fisheries increases from 5% to 90% between 2018 and 2028.' ██████████: What is the situation now and what is the plan to get 90% certified. E.g. are they are getting a higher price? As also mentioned above, the illegal market can offer high prices for glass eel. Therefore this scheme needs to present a strong alternative.</p>	<p>It was 85% in 2023 so is getting closer to our target more quickly. Enforcement to tackle illegal trade, assurance of sales via the certified route and demand from customers have caused this.</p>	<p>Used these comments</p>

		<p>Page 36</p> <p>You mention 'Criterion 5.3: Feed is used as efficiently as possible ' [REDACTED]: I repeat the same remarks as I did in the previous period:</p> <p>At the consultation period 1 June – 31 July, [REDACTED] already suggested the following: 'Feed component of the standard should not only include FCR. Fish In Fish Out (FIFO) ratio should be estimated for both fish oil and fish meal according to Jackson (2009). Ideally Forage Fish Dependency Ratio (FFDR) should be estimated similar to how this is done in the ASC standards, e.g. the 2012 salmon standard Appendix IV1.'</p> <p>The reaction of SEG was 'Feed conversion ratio criteria were provided from expertise within the eel farming sector.' GF sees this not as an appropriate answer for a label going for 'Best practices'.</p> <p>We again recommend to set up criteria in line with the ASC. FCR is not an appropriate way of measuring impact. (and if SEG would still want to use the FCR, 2.0 can be easily met with high quality feed including high FO and FM content. This might mean a high FFDR ratio.)</p> <p>See also pag 11 'In developing this standard, we have referred to other respected fisheries standards, for example the Marine Stewardship Council (MSC), the Aquaculture Stewardship Council (ASC) and the Marin Trust and adopted good practice or translocated criteria from them. Where appropriate we aim to be compatible with existing standards rather than develop new ones,'</p> <p>At the moment, your feed standard is not set up in line with this ambition.</p>	<p>The feed ratios have been changed between in version 7.0 to that suggested by an eel farm.</p> <p>We have made contact with the ASC to see if an equivalent can be found for the eel. We are also consulting of course with the eel farming sector. If we can find a new feed standard it is likely to need some time for the sector to transition to it. We also wrote to you on 22 August about this as part of that consultation.</p> <p>This is the view of a major eel farmer:</p> <p>There is no feed standard for eel made by ASC. We can study how we can adjust the paragraph to a more comparable situation to the ASC standard, but I would propose to do it for the next version as it will take some serious time form us.</p> <p>The discussion of FIFO in stead of the FCR is because ASC wants to limit the use of marine sources. In eel feed we are still using the largest part as marine sources, so this would have an serious impact on our eel production, not to say that it is impossible but we have to develop new feed together with our feed suppliers.</p> <p>Our 2 feed suppliers in Europe are 100% ASC next year so, we could implement this in our standard. I would propose from 2025 instead of 2024.</p> <p>I propose to keep the standard as it is right now. We have made some serious changes and the first step was that members who do illegal things lose their standard or cannot get it. So the next development should be equalise our standard with ASC or other standards. My advise is to make a small group of people from the sector who can develop this for the next version.</p>	<p>We are consulting further on this. With eel farmers, ASC and [REDACTED] to try to form a best view.</p>
		<p>Page 37 You mention 'Criterion 5.6: Grading, slaughter and transportation are carried out with respect to welfare ' [REDACTED]: Very good!</p>	<p>Thank you for commenting on this. This criterion was in version 6.1 and there is no proposed change.</p>	<p>Used these comments</p>