

Respondee	Category	Comments	SEG Standard Team Comments	How stakeholder comments were used
	Social			
<p>[Redacted]</p> <p>[Redacted]</p>	<p>Fisheries Committee</p>	<p>General</p> <ul style="list-style-type: none"> - France is the main producer of glass eels in the EU; - For more than 15 years, the French fishing industry has been working to raise awareness among fishermen of the need to improve fishing practices in order to optimise the quality of elvers. fishermen to improve fishing practices in order to optimise glass eel quality. quality. As a result of this work, French glass eel fishermen applying for the SEG label, i.e. the majority of active fishermen, are now able to apply for the SEG label. the majority of active fishermen, have now been awarded the SEG label. - The French profession is subject to a particularly strict and diversified framework, which was reinforced in 2023. Any additional constraints added to the existing framework will have a major impact on the future of the fishing industry. <p>impact on the future of the fishery and will be widely misunderstood by the fishermen themselves.</p> <ul style="list-style-type: none"> - In the current situation (monopoly of SEG-labelled glass eel wholesalers), changes in SEG standards are likely to have a major impact on the future of the fishery. <p>changes in SEG standards are likely to generate additional constraints that could affect the balance and sustainability of the French and European sector. Such a prospect would be detrimental to achieving the objectives of the French AMP, the AMP of other Member States and the implementation of population support measures such as restocking. It is important that the ambition given to this exercise of revising the SEG standards must take account of the issues linked to the preservation of the fishing activity, on which Europe's ability to rebuild this stock partly depends</p>	<p>We are trying to keep changes to a minimum, but also to improve assurance standards and the credibility of the SEG standard so as to help protect the fishers from further restrictions and regulations, and also from those who pretend to work to the SEG standard.</p>	<p>No specific issues – just a general comment about potential impact. Limited number of traders (SEG certified) could cause difficulties in the market. Fishers must be SEG certified.</p>
		<p>5.4.4 Repeuplement – Page 12</p> <p>Although restocking is an optional management measure within the European regulation, it is an obligation in France in France (60% of the total annual quota reserved for restocking markets, 5-10% of French production for restocking destined for restocking in France). France is thus the main supplier of glass eel in Europe.</p> <ul style="list-style-type: none"> - Several recent studies, such as ADRAF, 	<p>Whist 60% is 'reserved', it is still not achieved, and there are some (mostly non SEG) who are illegally using the restocking quota for other purposes. The SEG system helps to minimise this and to meet the 60% target.</p> <p>Your recent report is noted, however there are conflicting conclusions</p>	<p>Used these comments</p>

		demonstrate the effectiveness of restocking on resident and downstream resident and downstream	across many studies on restocking /and until there is consensus on the science, SEG will reflect that uncertainty.	
		<p>5.5 « Réapprovisionnement » – Page 14</p> <ul style="list-style-type: none"> - The choice of restocking sites in France and the quantities the quantities that can be restocked are subject to strict in France. - It is stated that the "net benefit for the eel stock eel stock in terms of the success of silver eel spawners is not conclusive": while eel spawning has never been spawning has never been observed in the natural environment, such an impossible to carry out. However, recent studies have demonstrated the effectiveness of restocking (ADRAF study in particular) on the resident and downstream stock. Proposal to change at least "is not conclusive" to "is uncertain". - It is written: restocking "is supposed to be an acceptable technique". But in France restocking is mandatory in any case. - The following recommendation: "Glass eels should only be caught in rivers where the local fisheries authority has scientific that there is a surplus of glass eels. is inapplicable as it stands in view of the inter-annual variations in abundance and the variability variability in the arrival of glass eels during the season. 	<p>Yes, can consider this change of wording.</p> <p>It may be mandatory in France. Not everywhere. The net benefit of restocking is uncertain. But it is accepted at a EMP technique, so SEG accepts it.</p>	<p>Wording changed</p> <p>Where science / fishery authority have assessed that fishing is acceptable. Social/economic aspects need to be considered too.</p>
		<p>9.5 Méthodologie – Page 23</p> <ul style="list-style-type: none"> - We have reservations about carrying out so many audits. In the past, they were carried out every 2 years and now it is hoped that they will be every year. it is hoped that they will be carried out every year. and costly for both the fishermen and the structures. - What's more, if too many fishermen fail to meet the standard and less than 95% of the fishery is considered "responsible", certification will be lost 	<p>We are not proposing audits every year. The 'normal' will continue to be every 2 years as set out in the unchanged risk matrix.</p> <p>Yes, so it is important for the majority of the fishers to operate to the high standards. Like any co-operative.</p>	<p>No changes</p>
		<p>Composante 1 – Critère 1 – Page 17</p> <ul style="list-style-type: none"> - A specific note qualifying the notion of major and minor offences and minor offences and describing the scale of the corresponding penalties. This note make it possible to clearly distinguish between these 2 types of offence. - Failing this, the exclusion rule should only apply to "misdemeanour" convictions and not to convictions for other offences. convictions for "délit" and not for "infraction" (minor errors). offences" (minor errors). - Similarly, how will it be possible to access this information reliably and systematically? information in a reliable and systematic way? 	<p>SEG Standard Revision team is developing guidance and definitions for the team to discuss and approve.</p>	<p>See 103a SEG Standard V7.0 Component Guidance</p>

		Using the press or the network, as is the case today cannot be considered a reliable method, especially reliable method, especially as the consequences for professionals and exposes the SEG itself. French professional French professional structures can in no way the role of monitoring or relaying infringements. The responsibility for monitoring compliance with regulations is the responsibility of the government departments in charge of enforcement. The regulations applicable to elver fishing in France are particularly consistent and strict.	True – this is a challenge to get reliable information. How can authorities and organisations like NCdP assist to get reliable information from the police and other legal authorities?	Guidance developed and published into 103a SEG Standard V7.0 Component Guidance
		<p>Composante 1 – Critère 2 – Page 18</p> <p>The company is a member of an Eel Management Fund or can demonstrate an in-kind contribution to conservation conservation projects. Although we have until 1 to meet this criterion, how can we assess this contribution in kind for the French fishery?</p> <ul style="list-style-type: none"> - According to previous exchanges with the SEG, fishing for restocking in France would not constitute a sufficient contribution as it meets a legal obligation. We would therefore like to know what guidelines being drawn up in order to give our opinion on them. - Does the SEG determine to whom the contribution is paid? - Who is involved: wholesalers, fishermen, organisations, etc.? ... ? - Although restocking is compulsory in France, it is not compulsory for fishermen to finance part of the from their own funds. However, each fisherman pays an individual annual contribution towards restocking to the Ara France association. <p>So it seems to us that eel fishermen (all stages) on the stages) on the Atlantic and Channel coasts are complying with this condition.</p>	<p>The Standard Revision team is developing guidance based on, for example:</p> <ul style="list-style-type: none"> - Time spent by fishers on eel conservation projects – eg. constructing7 eel passes or improving wetlands - Donations of glass eels for local restocking projects <p>No, it is for local agreement, but it must be seen as voluntary – something they choose to do which is above legal requirements, and contributes to eel conservation.</p> <p>Possibly - it will help to know more about the contributions to ARA. Are they voluntary? What level are the contributions? What are they used for?</p> <p>Total 250. Licence from National Comite. An element of the licence contributes to ARA. C 100 / person on Atlantic coast for glass eel.</p>	<p>Guidance developed and published into 103a SEG Standard V7.0 Component Guidance.</p> <p>Licence fee contributions towards restocking agreed as eligible.</p>
		<p>Composante 1 – Critère 3 – Page 19</p> <p>Desire for clarification of the indicator used to determine determining compliance with this criterion</p>	Which part(s) is clarity required? What are you unclear about?	Resolved by correspondence and wording updated
		<p>Composante 2 – Critère 4 – Page 26</p> <p>This criterion is met if the result of the indigo Carmine or similar test indicates an average mortality of less than 4%. As already mentioned the Carmine test can be used to assess the quality of glass eel quality of lass eels, but there is no direct link with mortality mortality as glass eels can survive certain lesions. This depends in particular on the location and intensity of the lesion.</p>	The scientists report that there is a very good relationship between the carmine test, the quality of glass eels and mortality. Yes, location and intensity are important, but we are advised that the test gives a good general indicator.	Wording updated

		Composante 3 – Critère 1 Catch quotas and other applicable fishing restrictions are respected". In France, there is no quotas for yellow and silver eels in France. If no member country has introduced quotas, this provision can be deleted. this provision can be deleted.	A good point. This could be removed, however there might be quotas in other countries so if the reference is kept, it will be relevant where there are quotas.	Used these comments
		Composante 4 – Critère 7 - Page 33 If the objective is to require that the rate of glass eels marked in accordance with the restocking protocol, this criterion is not very clear	Which part(s) of the wording are unclear?	Resolved by correspondence and wording updated
	Economic			
	Eel Farmer	We can put Criterion 5.2 in the standard as you proposed to my opinion.	Noted, thank you. That will remain then.	Used these comments
		For criterion 9.3 on page 13 I would like the commission for the standard to reconsider and put the complete certification for all companies for 1 UBO horizontally and not vertically in the chain of custody.	We are actively considering the UBO issue and will draft guidance / a definition for further consultation and agreement.	UBO definition agreed and put in Standard at 9.3
	Eel Trader	I have some concerns about the discriminatory approach that is proposed for trade between third countries when compared to the EU. Where is the evidence that third countries are more likely to engage in illegal trade than EU countries? There are historical reports of illegal trade in France, Spain, Poland, Lithuania, Belgium, Greece, Netherlands and Bulgaria. As to risks identified by enforcement agencies these risks need to be specific, documented, have clarity, transparency and not secreted as classified intelligence reports if they are to be used to control exports. . SEG cannot assume non-EU countries are third rate countries that do not have the same level of robustness as EU countries. As to the requirement that the donor country meets the 60% glass eel restocking target this is not being achieved in the EU. It would appear that the UK (a third country) is the only country that is achieving this. If additional and verifiable assurance processes are to be put in place to ensure that the trade is made for the intended purpose then it should be the same for all countries including the EU. Using an independent inspector in-person is not a practical solution. It is a huge bureaucratic overhead that is not going to deliver the necessary outcome concerning reputational risk. It is proving difficult enough to manage a third-party auditor for the standard.	The ultimate destination for illegal trade are third countries in Asia, often via third countries, but originating in EU and range states. It is well known in the sector, including by you, that this is how it operates and that some trading routes are favoured (= 'more risky'), than others. SEG is drafting a risk matrix to help to manage this more transparently. It is not discrimination – it is managing by a risk based approach. Enforcement agencies don't publish their intelligence. The restocking rates are applied equally and according to the Ee Regulation target. We disagree. There have been invitations to offer a more practical solution but nothing has been received. SEG has included a 'virtual' assurance mechanism.	Risk Management guidance developed and published into 103a SEG Standard V7.0 Component Guidance.
	Producer of eel feed	Criterion 5.2 The minimum certification we require from our suppliers is Marin Trust, so this would be fine for us to deliver the maximum feed score. Most is MSC certified.	Good, thank you. The current description can stay then.	No change needed

Environmental				
Version: 7.0 draft 2	NGO	<p>Dear SEG,</p> <p>Thursday d.d. 26th July 2023, ██████ 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 31st for giving comments to the published Version 7.0 draft 2 including a weekend. Hereby some comments.</p> <p>Several items:</p> <p>Quote letter:</p> <p>██████: Especially in the throughput legitimacy we are not convinced the SES label is at a level it should be, as confirmed in the attached research report.</p> <p>Answer SEG: The report was prepared by trainee students. We identified a number of flaws and errors but were not permitted to provide those comments by the commissioners of the report, ██████ prior to publication. There are many points in the report which we find helpful and are using to improve, but there are also many errors which reduces the report's credibility'</p> <p>Reaction ██████:</p> <p>Please see annex I, SEG was permitted to provide comments. We even made sure you had the opportunity to give more detailed feedback. Instead giving detailed feedback, you asked us to use it as input for the standard. ██████ is still waiting for the elaborate comments on the report. E.g. on items like this:</p> <p>'A more concerning issue regarding throughput legitimacy is the possible high influence of third-party discourses on the decisions taken by SEG. SEG is involved with the commercial sector through representation in their Board and through the targets of their certification scheme.</p> <p>For example, some stakeholders perceive that SEG excludes the inputs from certain stakeholders regarding their standard.</p> <p>Furthermore, this is reinforced by the funding between SEG and ESA via DUPAN. SEG is 50% funded from ESF which in turn is also partially funded by DUPAN, who sit on the board of SEG. This brings into doubt the procedural fairness in deliberation, for example, the role of the commercial sector in influencing decisions taken by SEG. MSC encountered a similar issue with its partnership with Unilever when the latter was perceived as being dominant in developing MSC and ultimately led to minimal willingness to apply the MSC label by external groups (Bernstein, 2011). In response, MSC reviewed their own governance structure and made changes to improve the transparency towards stakeholders (Bernstein, 2011).</p> <p>Therefore, SEG may encounter a similar problem of perception with their relationship with organizations representing the commercial sector when aiming to enhance the legitimacy of the SEG Standard in the near future.'</p> <p>██████ also added a disclaimer when we published the report online:</p>	<p>Your reply to our comments was not needed for the next round of consultation so it has not affected the process.</p> <p>Most of the comments in this 'general' section comments aren't directly relevant to the content of the new versions of the standard.</p> <p>As advised previously, it has not been called SES since before June 2018.</p> <p>SEG was willing to reply to the authors of the report, so that they might be able to include our comments in the report, however we were informed that there was no more time to be able to comment to the authors directly.</p> <p>Which stakeholders perceive this? We record, review in the Revision team and publish all comments and how they are considered.</p> <p>We are open and transparent about our Board membership, we have recorded Conflicts of Interest and how we manage them. SEG is deliberately composed equally of representatives of Social, Environment and Economy to represent the 3 Brundlandt sustainability pillars, also aligning with ISEAL principles.</p> <p>No commercial interests are involved with decisions on certification.</p>	<p>Used: we can't have scientific certainty yet. Hopefully we can in your future and we will commission studies for that.</p> <p>So, have removed some claims, eg. 'positive contribution' and focused on 'best practice' / responsible.</p> <p>No changes to the standard recommended or made.</p> <p>No changes to the standard recommended or made.</p> <p>No changes to the standard recommended or made.</p> <p>No changes to the standard recommended or made.</p>

		<p>'Reactie van de SEG</p> <p>Het rapport is een uitgebreid onderzoek dat uitgevoerd wordt binnen de 6 weken die studenten krijgen. Het rapport is geen publicatie van de WUR zelf. Het eindrapport is gepresenteerd aan de SEG. Zij geven aan de opmerkingen uit het rapport mee te nemen, waarvan ze denken dat de uitkomsten valide zijn, maar ze staan ook kritisch tegenover enkele uitkomsten van het onderzoek. De SEG is constant bezig met het verbeteren van hun standaard, waardoor er toegewerkt wordt naar een ISEAL waardige standaard.'</p> <p>[The report is a comprehensive study conducted within the six weeks students are given. The report is not a publication of the WUR itself. The final report has been presented to the SEG. They indicate that they take the observations from the report on board, which they think are valid, but they are also critical of some of the outcomes of the survey. The SEG is constantly improving their standard, working towards an ISEAL worthy standard.].</p> <p>See: https://www.goodfish.nl/duurzame_standandaard_voor_paling/</p> <p>Quote letter:</p> <p>'One Board member is also a member of the Board of Dupan. Conflicts of Interest are declared so that they are transparent and managed. The assessment and certification process is by a 3rd party independent CAB and there is no procedural influence. Our income and funding are declared and published.'</p> <p>Reaction [REDACTED]:</p> <p>However, by mapping resource dependencies within the policy domain of eel regulation, it seems that DUPAN, as a part of ESA has created a strong resource coalition of important stakeholders from the commercial sector, with an addition of SEG as a conservation organization. This does warrant the question in what way ESA, or DUPAN itself is able to determine outcomes with the help of their available resources as relates to eel management, SEG or their Standard. In addition, it appears that DUPAN has the power to shape the rules of the game. This tends to blur the overall transparency and impartiality and create instability in this arrangement because of reduced stakeholder involvement. Due to the perception of high involvement of stakeholders from the commercial sector for funding and decision making at SEG, the legitimacy of the SEG Standard could be impacted.</p> <p>It is our role like all other NGOs with a Seafood Guide. We are the watch dogs in the society and it is our role to be critical about MSC and ASC to make sure the standard at the end is robust and reliable.</p> <p>Quote letter:</p> <p>'We agree it is difficult to make predictions of future impacts. But we are setting best practice and hope / expect that positive impacts will follow, and that those will be demonstrated in time. Results of studies are mixed, so it cannot be said that 'restocking doesn't support the wild eel population'. It has shown to do so in at least Sweden and Germany and increasing signs that the yellow eel population is recovering in the Netherlands'</p> <p>Reaction [REDACTED]:</p>	<p>As described above, SEG has representation from all sectors: Environment, Social and Commercial All have important and equal value, input and representation and no one Board member has the 'power to shape the rules of the game'. Further, the SEG Standard Revision team has the primary task of drafting the standard, with a greater number of independent and balanced representation.</p> <p>We have listened to many comments from you and many other stakeholders, as we continue to do in this consultation process.</p>	<p>No changes to the standard recommended or made.</p> <p>No changes to the standard recommended or made.</p> <p>SEG and the revision team have used many comments from this Stakeholder.</p>
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		<p>'Increasing signs'? Do you have a scientific reference for this? Yellow eel population is always enhanced because of restocking as this has been the reason for restocking. Do you have a scientific for the claim that the increased yellow eel population in the Netherlands due to restocking contributes to the entire eel population? If not, I prefer that you make an assumption instead of saying that there are 'signs'.</p> <p>Suggestion: 'Restocking is a controversial theme in the conservation of the eel. No clear consensus has been reached about the effectivity of restocking on the eel population. This is mainly due to the large variety of aspects that need to be taken into account such as restocking location, eel weight and mortality during transport. Its effectivity is really place dependent. The higher intensity of glass eel movements result in higher mortalities, higher chance of mislabelling and data loss. Unnecessary mortality is very least desired for a species that is critically endangered.</p> <p>Having said this, we assume that '</p> <p>Quote letter:</p> <p>'The Sustainable Eel Group (SEG) is developing a sustainability standard that claims to support eel stock restoration. ██████ believes that if the standard meets certain conditions, it might potentially contribute to eel restoration.</p> <p>What are those conditions?</p> <p>Reaction ██████:</p> <p>The condition is a science-based plan that is not only Best Practises and beyond the law, but a good plan that includes fisheries practises but has more positive impact on the eel stock.</p> <p>Quote letter:</p> <p>'We publish our key decision making processes, eg. in Standard Development & Revision procedure (on developing the Standard) and in the Assurance System (for decisions on certification)</p> <p>What do you think there should be an objection procedure for? For issuing certificates? We could consider this in future, however, at present, many NGOs object to the principle of eel fishing, so would probably object to all decisions? '</p> <p>Answer ██████:</p> <p>Objections often result in more accurate assessments and better action plans that help the fishery improve its sustainability.</p> <p>For example, a consortium of eNGOs across Europe initially objected to the certification of the North Sea Brown Shrimp Fishery. Their concerns were successfully resolved through talks between all parties without the need for a formal hearing. This led the fishery to commit to additional actions to minimise the impact on habitats, protected areas and bycatch species. The fishery also agreed to improve its data collection methods around bycatch and try out underwater release methods to improve survival rates.</p> <p>See: https://www.msc.org/what-you-can-do/engage-with-a-fishery-assessment/msc-objections-procedure-what-you-need-to-know</p>	<p>We will identify and quote the scientific sources.</p> <p>We have substantially re-written the restocking section – see draft 3 that was presented in September 2023 for comment.</p> <p>We will consider the input of stakeholders to decisions on the issuing of certificates in the future. Currently decisions are made by the independent CAB.</p>	<p>Section 5.5 in the Standard: Restocking, has been substantially rewritten</p> <p>This will be considered in the future.</p>
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	Pag. 4	<p>'Our Mission To provide the respected leadership alliance that enables and promotes the joined-up conservation and management of the eel in the Member States of Europe and across the eel's range, linking all interests in an open and effective process to achieve SEG's Vision.'</p> <p>██████:</p> <p>Over the past years, we have not experienced an open and effective process.</p> <p>'The standard is designed to ensure that implementation at the level of each individual certificate holder has a positive contribution to eel populations.</p> <p>██████: we fully disagree with this claim.</p> <p>The standard is Best Practice but it is still not proven that the fisheries has a positive contribution to eel populations. Contrary, it is recommended to stop fisheries. The certified fisheries at the moment can only claim that their practises might be beyond the law but that is not the same as a positive contribution to eel populations.</p>	<p>See comments above.</p> <p>You are commenting on a previous draft of the standard. We don't claim that certified fisheries have a positive contribution to eel populations. This has changed in the last draft. We have amended to: <i>'define how implementation at the level of each individual certificate holder is responsible, in the light of SEG's sustainability objectives'</i></p>	<p>No changes to the standard recommended or made.</p> <p>Wording was changed at review for draft 1</p>
	Pag.5	<p>You mention 'Enable operators to demonstrate high and responsible standards and their commitment to sustainability,'</p> <p>██████ advises the following 'Enable operators to demonstrate high and responsible standards and their commitment to sustainability.'</p>	<p>You are commenting on a previous draft of the standard. In the current draft we say <i>'provide the possibility for operators to demonstrate high and responsible standards.'</i></p>	<p>Wording was changed at review for draft 1</p>
	Pag. 6	<p>You mention 'In the planning and execution of measures for the protection and sustainable use of European eel, management must therefore take into account the diversity of regional conditions (ICES 2017).'</p>		

		<p>██████: Due to that, it is good to have an objection possibility. Explanation already mentioned earlier in document.</p>	<p>We will consider the possibility for other stakeholder input to certification process as an improvement to our assurance processes in the future.</p>	<p>We will consider the possibility to consult stakeholders in 2024</p>
	Pag. 6	<p>You mention ‘To reverse the decline and achieve recovery, ICES advice is to reduce all anthropogenic impacts to as close to zero as possible.’</p> <p>I would suggest to replace this with the most recent advice: ICES advices that when the precautionary approach is applied, there should be zero catches in all habitats in 2023</p>	<p>We have amended the reference to ICES advice and our position on that on page 7.</p>	<p>We have amended the reference to ICES advice and our position on that on page 7.</p>
	Pag. 7	<p>You mention ‘the sector can make a positive contribution to eel populations.’</p> <p>I disagree as there is no proof for this except a theory of change based on the assumption that restocking has a positive impact on the stock and that there is an abundant of glass eels in some regions.</p> <p>I would suggest to formulate it the following: ‘all fisheries at all stages has a negative impact on the eel population but through this standard fishers can make a positive contribution to eel population in relation and compared to the present Eel regulation’</p>	<p>You are commenting on a previous draft of the standard. We no longer state this.</p> <p>You now suggest that a positive contribution compared to the eel regulation can be claimed, and have removed the burden of proof.</p>	<p>Wording at draft 1 retained.</p> <p>Wording at draft 1 retained.</p>
	Pag 13	<p>There is no ‘surplus’ if the ICES advice is to stop all fisheries. Glass eels can swim for e.g. 2 years before they ‘settle’.</p> <p>If the surplus is being used for restocking in inland waters with an eel fisheries, this ‘surplus’ will be lost forever. If the ‘surplus’ is being restocking in areas where there is no fisheries, there is still doubt of the impact but at least the surplus is not fished for human consumption.</p>	<p>You are commenting on a previous draft of the standard. We no longer describe a ‘surplus’</p> <p>Many eels are stocked where there are not fisheries. Where there are fisheries not all eels are caught so they will contribute to silver eel escapement. And in the mean time they contribute to the biodiversity of the environment.</p>	<p>Wording at draft 1 retained.</p>
	Pag 14	<p>You mention ‘In addition, organisations are encouraged to make direct or indirect financial contributions to Eel Stewardship Funds (ESFs) to progress projects that improve habitats and migration pathways for eels.. ‘</p> <p>██████ remark: The finances within the Eel Stewardships Fund is unclear and not transparent. NGOs are not able/invited to assess if the financial contributions are being used for progress projects (instead e.g. marketing for eel consumption). It might be useful to suggest to encourage organisations to make direct or indirect financial contributions to other organisation with projects that improve habitats and migration pathways for eels.</p>	<p>The new standard talks about in-kind and financial contributions to eel conservation projects – not just ESFs.</p>	<p>New Guidance: 103a SEG Standard V7.0 Component Guidance published with new Standard</p>

Pag 15	<p>You mention 'Whilst stocking is an accepted measure in the EU Eel Regulation, and this standard seeks to support the regulation, it is assumed to be an acceptable technique. The standard sets criteria for doing it responsibly, and according to best practice.'</p> <p>██████ has respect for this open and honest statement. Good Fish also understands this decision from your point of view. Nevertheless, we would have like to see a standard that went further than best practise to tell consumers that this is a sustainable caught eel.</p>	<p>We hope that as the eel population recovers, at some point in the in future we can describe a standard that can claim 'sustainably caught eel'.</p>	<p>No changes to the standard recommended or made.</p>
Pag 15	<p>'You mention 'In developing this standard, we have referred to other respected fisheries standards operated by the Marine Stewardship Council (MSC), and the Aquaculture Stewardship Council (ASC) and adopted good practice from them.'</p> <p>Good practice for feed can be easily copy-paste but this hasn't been done.</p> <p>Good practice for objection with MSC is also not taking into account.</p>	<p>You are commenting on a previous draft of the standard. We now refer to MSC and ASC certified feed.</p>	<p>Criterion 5.2 of the standard recognises ASC, MSC and Marin Trust standards.</p>
Pag 19	<p>You mention 'For at least the past 12 months: the organisation has not been found guilty for any offences relating to eel fishing or trading.'</p> <p>12 months is not a long time, I would recommend at least 3 - 5 depending how severe it was. It is really hard to get caught so if someone is found guilty, already in 1 year he can join the label? I don't think you get reliable people in your standard.</p>	<p>You are commenting on a previous draft of the standard. We now describe three years.</p>	<p>Timescales have been increased, and there is further guidance in 103a SEG Standard V7.0 Component Guidance</p>
Pag 20	<p>You mention 'Eel Stewardship Funds (ESFs) have been set up and are convenient mechanisms for companies, organisations or individuals to make financial contributions to eel conservation projects and a hence a positive contribution for the eel.'</p> <p>Who decides which project have a positive impact? How transparent is ESF and why should this be limited to ESF and not to other organisations?</p>	<p>The ESFs have their own and individual governance and decision making.</p> <p>The new standard talks about in-kind and financial contributions to eel conservation projects – not just ESFs.</p>	<p>See further guidance in 103a SEG Standard V7.0 Component Guidance</p>
Pag 20	<p>You mention 'at least 20% of its corporate responsibility programme to projects that make a positive contribution to eel conservation or population enhancement, such as Eel Stewardship Funds, River Restoration projects, conservation and education projects.'</p> <p>Do you have a definition what a corporate responsibility programme entails? If a CR programme is small or has not meaning, what is 10% of a none defined programme.</p>	<p>We don't have definitions at present. It will be for the CAB to assess. If they require guidance then we will develop it.</p>	<p>To develop if needed.</p>
Pag 33	<p>You mention 'There are good data which show to the satisfaction of the fisheries authority that the EU silver eel 40% escapement target (40% B0) is being achieved for the river or in the eel management district.'</p>	<p>You are commenting on a previous draft of the standard. See new criterion 2.1: Responsible:</p> <ul style="list-style-type: none"> • Fishing is in an area permitted by the fisheries authority (working to its Eel Management Plan) and 	<p>Wording at draft 1 retained.</p>

		<p>██████ recommends a minimum of: ‘There are good data which show to the satisfaction of the fisheries authority that the EU silver eel 40% escapement target (40% B0) is being achieved for the river or in the eel management district in a pristine situation.’</p>	<p>• The catch quotas and other applicable fishing restrictions are being observed (have been in compliance over the past 4 years) ‘</p>										
Pag 39	<p>We suggest for sourcing sustainable feed ingredients. So include the ASC Feed Standard ASAP instead of IFFO.:</p> <p>Criterion 4.3 Source of marine raw materials</p> <p>Note: In November 2016 ASC published an Interim Solution for ASC Marine Feed Ingredients, which will replace indicators 4.3.1, 4.3.2 of this Standard. This solution applies to all ASC’s Standards, which have indicators for marine raw material origin, including this ASC Salmon Standard . This interim solution will apply until the ASC Feed Standard will be available or until further official and public notice by ASC.</p> <table border="1"> <thead> <tr> <th>INDICATOR</th> <th>REQUIREMENT</th> </tr> </thead> <tbody> <tr> <td>4.3.1 Timeframe for all fishmeal and fish oil used in feed to come from fisheries⁶⁴ certified under a scheme that is an ISEAL member⁶⁵ and has guidelines that specifically promote responsible environmental management of small pelagic fisheries</td> <td>see note above</td> </tr> <tr> <td>4.3.2 Prior to achieving 4.3.1, the FishSource score^{66, 68} for the fishery(ies) from which all marine raw material in feed is derived</td> <td>see note above</td> </tr> <tr> <td>4.3.3 Prior to achieving 4.3.1, demonstration of third-party verified chain of custody and traceability for the batches of fishmeal and fish oil which are in compliance with 4.3.2.</td> <td>Yes</td> </tr> <tr> <td>4.3.4 Feed containing fishmeal and/or fish oil originating from: by-products⁶⁷ or trimmings from IUU⁶⁸ catch or from fish species that are categorized as</td> <td>None⁷⁰</td> </tr> </tbody> </table> <p>⁶⁴ This standard and standard 4.3.2 apply to fishmeal and oil from forage fisheries, pelagic fisheries, or fisheries where the catch is directly reduced (including krill) and not to by-products or trimmings used in feed.</p> <p>⁶⁵ Meets ISEAL guidelines as demonstrated through full membership in the ISEAL Alliance, or equivalent as determined by the Technical Advisory Group of the ASC.</p> <p>⁶⁶ Or equivalent score using the same methodology. See Appendix IV-3 for explanation of FishSource scoring.</p> <p>⁶⁷ Trimmings are defined as by-products when fish are processed for human consumption or if whole fish is rejected for use of human consumption because the quality at the time of landing does not meet official regulations with regard to fish suitable for human consumption.</p> <p>⁶⁸ IUU: Illegal, Unregulated and Unreported.</p> <p>⁷⁰ For species listed as “vulnerable” by IUCN, an exception is made if a regional population of the species has been assessed to be not vulnerable in a National Red List process that is managed explicitly in the same science-based way as IUCN. In cases where a National Red List doesn’t exist or isn’t managed in accordance with IUCN guidelines, an exception is allowed when an assessment is conducted using IUCN’s methodology and demonstrates that the population is not vulnerable.</p>	INDICATOR	REQUIREMENT	4.3.1 Timeframe for all fishmeal and fish oil used in feed to come from fisheries ⁶⁴ certified under a scheme that is an ISEAL member ⁶⁵ and has guidelines that specifically promote responsible environmental management of small pelagic fisheries	see note above	4.3.2 Prior to achieving 4.3.1, the FishSource score ^{66, 68} for the fishery(ies) from which all marine raw material in feed is derived	see note above	4.3.3 Prior to achieving 4.3.1, demonstration of third-party verified chain of custody and traceability for the batches of fishmeal and fish oil which are in compliance with 4.3.2.	Yes	4.3.4 Feed containing fishmeal and/or fish oil originating from: by-products ⁶⁷ or trimmings from IUU ⁶⁸ catch or from fish species that are categorized as	None ⁷⁰	<p>You are commenting on a previous draft of the standard. We now say:</p> <p><i>Fish meal/oil in the feed (including juvenile feeds) is certified by MSC, ASC or the MarinTrust or shown in some other way to be from responsible or sustainable sources.</i></p>	<p>Wording at draft 1 retained.</p>
INDICATOR	REQUIREMENT												
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Pag 40	<p>You mention ‘Criterion 5.3: Feed is used as efficiently as possible ‘</p> <p>██████: I repeat the same remarks as I did in the previous periods: At the consultation period 1 June – 31 July, █████ 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</p>	<p>We consulted with ASC and leading eel farmers and found that there was no recognised standard for eel production at present. We will stay in</p>	<p>We will look to revise this further in 2025</p>										

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.’ 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’.

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.)

FFDRs indicator for Salmon – ASC:

Criterion 4.2 Use of wild fish for feed⁶²

INDICATOR	
4.2.1	Fishmeal Forage Fish Dependency Ratio (FFDR _m) for grow-out (calculated using formulas in Appendix IV- 1)
4.2.2	Fish Oil Forage Fish Dependency Ratio (FFDR _o) for grow-out (calculated using formulas in Appendix IV- 1), or,

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,’

At the moment, your feed standard is not set up in line with this ambition.

contact and incorporate this when developed.

Pag 37

You mention ‘Criterion 5.6: Grading, slaughter and transportation are carried out with respect to welfare ‘
XXXXXXXXXX: Very good!

This is the same as your previous comments.

No change required.