

# 2023 Annual Report



This is our annual report for 2023 and the first to report so comprehensively on the range of our aims and activities. Whilst it focusses on 2023, in part for our 2024 annual general meeting, it also presents and discusses trends from our formation in 2009, reports on some notable activities started in 2024, and looks to the future.



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# **Executive Summary**

SEG was founded 15 years ago with the intention of helping to organise interested and committed people from all walks of life that desire to see the recovery of the European eel. At the first meetings, the name was chosen, and the original aims and objectives were developed. These have stood the test of time and are also core to the SEG ASBL model that was adopted and endorsed from 2018.

From the outset, SEG sought to use the Brundtland definition of sustainability as a guiding light to help maintain the direction of travel on what we rightly thought would be a long journey. 50- to 100- year timelines were envisaged by the truly wise, who more fully understood the complexity of eel - a complexity evident not only in its life cycle, but also in the politics that surround such an international species.

We have come a long way, and in this report, we are highlighting the direct and indirect impacts that we have all contributed to making in the year 2023. Ours is a holistic approach, and all parts link with one another.

Thank you for all your work and contribution towards recovery.

# Highlights of 2023

The highlights of SEG's work for 2023 are as follows:

First, the importance of SEG delivering on its Potsdam 2016 goal of being the leadership alliance for eel. SEG's success in this area is clear, shown - for instance - in the Parliament vote in support of the Ruissen report in 2023 and in the <u>EU policy document</u> on implementation of the Eel Regulation in 2024.

Second, the increasing role of the SEG Standard in fighting glass eel trafficking. The Standard has reduced the grey area between the illegal and legal eel trade, enabling enforcement agencies to concentrate their efforts on the areas of greatest risk. In 2023, there were 256 arrests – a new record. Many trafficking supply chains are now broken. A recent report published by University of Hull International Fisheries Institute (HIFI) explores the impact of SEG on reducing illegal, unregulated and unreported (IUU) fishing and trafficking of the European eel. Third, demonstrating how to rebuild a lost eel relationship in communities that were once eel heartlands. Eel can link to the wider environmental agendas, and the evolution of SERP (the Somerset Eel Recovery Project) is evidence that there is a



grassroots, social dimension to eel recovery that could very well be replicated elsewhere.

Fourth, and most importantly for long-term eel recovery, is the priority now being given at an EU level to river and wetland restoration. The <u>'Swimways Project'</u> is focused on such habitat restoration work with an additional 25,000 km target by 2030. It is led by <u>Wetlands International European Association</u>, where SEG is a founding member and has been able to promote the importance of eel as a keystone species and an indicator of ecosystem health.



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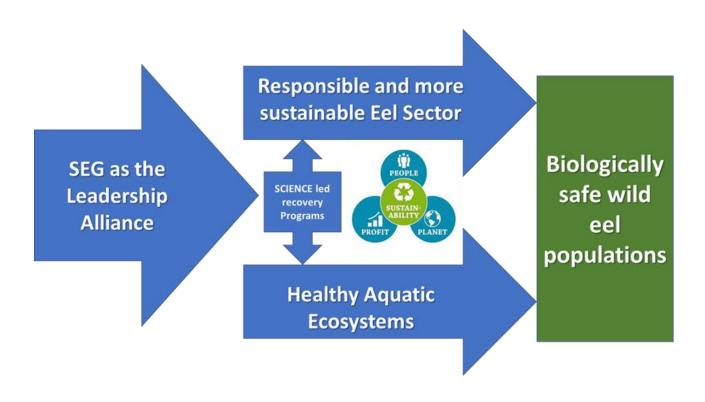
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# SEG's Theory of Change

In 2023, SEG reviewed its Theory of Change, as an essential part of our review of the SEG Standard. The full revised Theory of Change document is available to read <a href="https://example.com/here.com

The following diagram summarises the desired change: the outcome of 'biologically safe wild eel populations,' with the strategies and enablers intended to achieve it:



**Our vision.** The desired change we wish to see:

Biologically safe wild eel populations, distributed throughout their natural range, fulfilling their role in the aquatic environment, recovering in line with the protection targeted by the EC Eel Regulation.



# Our sustainability impacts in support of that change, based on the <u>Brundtland</u> themes:

#### **Social**

- Greater engagement of all stakeholders interested in the European eel
- Illegal eel trade is contained to less than 15% (ultimate goal 0%)
- An increasing proportion of eel fishing, trade and consumption demonstrates its commitment to protection and sustainable use by meeting the SEG standard (the ultimate goal is 100%)
- The Sustainable Eel Group is recognised as the successful advocate of eel protection, sustainable use and recovery with governments and stakeholders

#### **Environmental**

- Protection for the European eel achieves the target of 40% survival
- Barriers to migration are removed or adequately mitigated, initially to meet the additional 25,000km river target in the <u>Swimways Network</u> by 2030
- Wetland habitats are restored to increase the quantity, quality and connectivity of the aquatic environment for eels

#### **Economic**

- The damaging effects of water operations\* to eel populations are minimised,
- The livelihoods of those that fish and trade responsibly in eel are maintained

# Monitoring, Evaluation, and Learning

The Monitoring, Evaluation, and Learning (MEL) component of the <u>ISEAL Codes</u> requires that members "compile, analyse, and produce reports on the results observed through performance monitoring at least once per year for internal purposes."

This annual report is one such 'MEL' report. As such, it is structured according to the Theory of Change above and, emanating from that, a series of performance indicators. These are listed and explained in more detail in <u>Appendix 1</u>.



<sup>\*</sup> pumping, navigation, flood management, hydropower, pollution discharges etc.

# SEG as the Leadership Alliance

# Advocacy

#### #EelDeal2030

<u>#EelDeal2030</u> is the campaign developed and promoted by SEG from 2022 in response to partial and inconsistent implementation of the Eel Regulation. Overall, the Eel Regulation has played a key role in increasing protections for eel, and since its implementation, the decline has halted. However, the Regulation has a few primary shortcomings, including:

- Implementation by Member States has had insufficient emphasis on the nonfisheries impacts, and
- 2. Implementation by Member States has been inconsistent, and most have not set sufficient measures to provide the 40% survival target required, or set a deadline by which to do so.

#EelDeal2030 seeks to motivate the correct implementation of the Eel Regulation. The Regulation enables long-term and interdisciplinary thinking, and it has helped stabilise the eel stock after a century or more of slow decline and then the rapid or steep 30-year decline 1980 - 2010 - an indicator that suggests the Eel Regulation to be working.

So, with #EelDeal2030, SEG aims to reboot the motivational spirit, the transboundary focus, and interdisciplinary approach of the Eel Regulation, and to improve the feedback mechanism between EU-COM and Member States so that mortality impacts are addressed by each country implementing practical measures to provide the 40% survival target level of protection for eels.

The reductions in fishing pressure achieved over the past years now need to be complemented by an increased emphasis on river and wetland habitat restoration with links to the Green Deal and the Water Framework Directive (WFD). The implementation of measures by 2030 that will credibly lead to achieving the target of 40% survival for all Eel Management Plans needs to be achieved in order to make the Eel Regulation's ambition of 40% silver eel escapement a reality.

# Ruissen Report

The <u>Ruissen Report</u> was adopted by the PECH Committee of the European Parliament, upon recommendation of rapporteur Bert Jan Ruissen. Like #EelDeal2030, it emerged in response to persistent reports of inconsistent



implementation of the Eel Regulation. Ruissen wrote this report after consulting SEG and others.

Interestingly, the Ruissen Report recognises the role of commercial and recreational fishers to act as "guardians and 'eyes and ears' of our seas and rivers." These fishers gather information about illegal fishing, environmental health, and local attitudes towards eel, and they support local economies, fishing heritages, and investment in eel conservation. It helps bolster the holistic vision for balancing the social, environmental, and economic factors of eel conservation.



## **EU Policy on the Implementation of the Eel Regulation**

On 24 July 2024, the EU published the policy document titled, "Implementation of the Regulation establishing measures for the recovery of the stock of European eel," wherein they report on successes and shortcomings in the implementation of the Eel Regulation, as well as suggest possible measures for more effective implementation.

The policy document developed from the Ruissen Report touches on multiple indicators of eel stock recovery to assess Eel Regulation impacts. For instance, it notes that "the decline in stock recruitment for glass and yellow eel has halted since the adoption of the Eel Regulation," which suggests preliminary success for the Eel Regulation. Alongside this, it cautions against complacency, as the long lifespans of eel make short-term trends inconclusive, and even where stock decline may be slowing momentarily, much more is needed – and will be needed over many decades – to recover the eel population.

Of particular significance is the document's emphasis on a holistic approach to eel stock recovery. It stresses that "managing the eel stock is too complex for a one-sided



marine-oriented approach," highlighting that "basing this management solely on control of annual fishing opportunities does not properly take into account important factors such as migration barriers, habitat quality and illegal catches and trade." It lauds the Eel Regulation's multifaceted approach, reminding that in its implementation, "far too little attention has been given thus far to non-fishery anthropogenic mortalities."

Furthermore, it asserts that "commercial and recreational fishers have an important role to play in gathering data and being the guardians and 'eyes and ears' of our seas and rivers, which is an asset in the fight against illegal, unreported and unregulated (IUU) fishing." It also locates sustainable fishing activities directly within the three dimensions of the Brundtland definition of sustainable development, stating that "eel fisheries carry out a small-scale, artisanal activity and are often located in rural and remote areas, where commercial and recreational fishers play an important economic, environmental and social role." Because of this, it stresses that where more restrictions are placed on fisheries, this is done in a "holistic way."

It gives strong suggestions on non-fishing factors of eel mortality, calling on Member States to "remove obsolete dams and other barriers to create solutions that allow species migration as a matter of urgency" and to "make fish safety and welfare a mandatory requirement for new water pump and hydro-power station installations and for old ones when they are replaced." It emphasises the importance of coordinated and transnational action regarding eel migration. It also encourages greater investment in other threats such as pollution, parasites, and predation.

It commends the increasingly strong, coordinated measures against IUU fishing and illegal trade, while reminding that yet more action is needed in this area. The document directly mentions SEG for the role it has played in improvements in this area. It states:

Improved transparency and traceability for caught glass eels is an important way of combating IUU practices and that certification schemes, based on independent verifications and internationally agreed standards, are an important tool to ensure the legality of catches; adds in this regard that the contribution of schemes such as the Sustainable Eel Group looks promising...

Although the Sustainable Eel Group was specifically mentioned in this section, the entire report reflects the open and transparent influence SEG has had on eel thinking in the European Union. Many of the conclusions align with the positions published by SEG beforehand. In line with SEG's advocacy, this document assesses the recovery of the European eel through a holistic lens, encouraging a coordinated strategy that both stretches across national borders and across social, economic, and environmental dimensions of recovery. It gives significant attention to both fisheries and non-fisheries impacts and to be science-based, ambitious and realistic.



### ICES Report on the status of the stock, and annual advice on management

The International Council for the Exploration of the Seas (ICES), jointly with the European Inland Fisheries and Aquaculture Advisory Committee and the General Fisheries Commission for the Mediterranean (the latter two regional fisheries management bodies under FAO), annually report on the status of the eel stock and the human impacts affecting it.

The main documentation is provided in the report of their joint Working Group on Eel WGEEL, and advice on fishing opportunities and conservation in the annual ICES Advice. The reports of WGEEL and ICES have been instrumental in the discussions about eel protection policies, the awareness raising, and the development of the Eel Regulation. Especially the 1998 Advice - which drew attention to the poor state of the eel stock and gave advice to compile a recovery plan based on regionalised management plans - and the 2002 Advice - which provided reference points for the protection and recovery of the stock, aiming at long-term recovery to 30-50% stock biomass by reducing anthropogenic impacts in all areas - were milestones in the development of the Eel Regulation.

Since the adoption of the Eel Regulation in 2007, ICES has distanced itself more and more from the Eel Regulation, without explanation or argument. While in earlier years – shortly after 2007 – the Advice indicated that details of the Regulation needed to be worked out and the relation to the 'precautionary approach' verified, later Advice denied that the Eel Regulation hinges on the regional approach and the reference points advised by ICES (1998, 2002). Latest Advice – since 2014, and even more so since 2021 – advocates to close all fisheries completely, and to zero all other human impacts on the stock.

SEG considers recent <u>ICES Advice</u> on the stock to be unproductive, because it cannot realistically be implemented (closing fisheries will result in major poaching and trafficking; zeroing water management and hydropower impacts will come at extreme costs for human livelihood). Accepting that neither fishing nor other human impacts can be effectively zeroed, there is an urgent need to know what reduction is absolutely necessary to sustain the stock. That line of reasoning boils down to the 2002 Advice, on which the Eel Regulation was built.

Moreover, the current Advice is not in line with the Precautionary Approach (no reference points; no translation into implementable measures; not respecting political decisions taken, thereby questioning the division of competences between science and policy making). While SEG considers the separate ICES Advice on the Eel Regulation (upon special request from the EU Commission) to be valuable and informative, SEG calls upon ICES to reconsider their whole-stock Advice for eel the soonest.



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### SEG as a Successful Advocate

Indicator 4.1 of the MEL Plan requires reporting on the success of SEG's advocacy. The Ruissen Report draws heavily on SEG's input, suggesting that our opinion is respected and that our influence was successful.

In 2023 SEG commissioned Hull University to undertake an independent evaluation of SEG's impact on eel trafficking and illegal eel fishing. <u>That report was published in early September 2024.</u> It gives great attention to the perspectives of diverse and key stakeholders on the influence of SEG. It states:

One of the clear messages emerging from those interviewed for this report was that SEG was the foremost voice for eel on the European stage. Their work has delivered a working and credible standard for responsibility in the sector and has influenced policy in the reinforcement of the Eel Regulation and effective counter-trafficking enforcement. SEG is perceived as one of the few organisations influencing for responsible use of eels as well as on wider sustainability issues (i.e. renewed focus on EU Eel Regulations and other sources of eel mortality rather than just closing the fishery). If SEG were not to have existed or were not pursuing their current strategies it is likely possible that the following situations may have arisen:

- Eel sector remained fragmented and disparate with limited regional coordination and inconsistent regulations and implementation.
- No development or implementation of traceability within glass eel trade significant blurring of legal and illegal trade.
- The reliance on "top down" regulation of the fishery and enforcement being imposed on the sector.
- Prevalence of the "green" policy agenda and increased pressure to close the eel fisheries in Europe thus driving all trade into the black market.
- The shifting of the policy agenda away from the holistic implementation of the EU Eel Regulation and the wider protective/recovery measures it supports.

Whilst it is not clear to what extent any of these situations may have developed or been realised it is likely that without SEG the level of protection for eel would be weaker than it currently is.

The Hull University report is another independent indicator of SEG as a successful, open and transparent advocate. Section 2.3.3 of the report describes the extent to which the SEG Standard has been adopted by the commercial eel sector. That indicates SEG's successful influence amongst fishers, traders, eel farmers, restockers and processors - particularly in the glass eel supplied market. We have started to have an influence on yellow and silver eel fishers and aim to increase this over coming years.



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# Responsible Eel Sector

### SEG Standard

The SEG Standard was first introduced in 2011. It is a voluntary 'sustainability standard', developed, owned and managed by SEG to provide the opportunity to those operating in the commercial eel sector to show that they are working responsibly, to a code of good practice, to the highest standards, and to increase their contribution to the protection of the European eel.

#### **SEG Standard Review 2023**

The SEG Standard underwent a substantial review in 2023, five years after the last update in 2018. Following the ISEAL code for standard setting we undertook three rounds of consultation, each time inviting our 850+ stakeholders to comment. The revision team included several new people independent of the SEG Board, with balanced representation the from environmental, scientific, social and commercial sectors.

Consultation started in February and the new standard, version 7.0, was <u>published</u> on 20 November 2023.

Whilst updating the standard, we also reviewed and updated key parts of the supporting SEG Standard System. For example, the Theory of Change, the Assurance System and the Monitoring, Evaluation and Learning System. All were updated following the <a href="ISEAL Codes of Good Practice">ISEAL Codes of Good Practice</a> and are available on the <a href="ISEG Website">ISEG Website</a>.

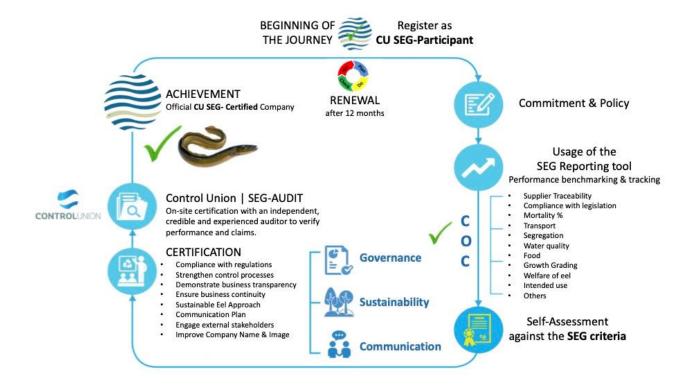
## **New Conformity Assessment Body**

Also in November, SEG appointed a new Conformity Assessment Body (CAB): <u>Control Union Certifications</u>. SEG is the owner of the SEG Standard and is responsible for its content. But to ensure independence and objectivity, a professional, qualified 3<sup>rd</sup> party CAB is preferred. SEG will only perform the role of



certification body as it has done previously, as a contingency arrangement in an emergency, for example in the unplanned absence of a CAB.

The following diagram shows how the independent CAB functions in relationship to SFG:



In this model, the certification process is as follows:

- SEG sets and owns the Standard
- Clients apply for certification and first complete a full self-evaluation before being audited
- An independent, qualified auditor appointed by the CAB completes an assessment of the applicant's compliance with the SEG Standard and completes an audit report.
- On review of the audit report, the CAB issues either a certificate or a 'non-compliance' report, with time-limits for completion of improvements in order to achieve certification.
- Certificates are valid for four years, subject to there being an interim surveillance audit (usually after two years) and also to other <u>terms and</u> conditions.
- SEG maintains a register of certifications.



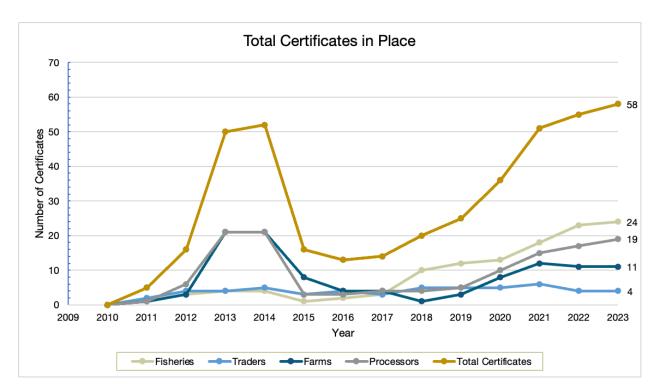
## **Certified Suppliers**

Indicators  $\underline{3.1.2}$  and  $\underline{3.1.2}$  of the MEL Plan require reporting against "Number of Certified Operators" and "Proportion of SEG Certified Operators in Each Sector," respectively.

At the end of 2023:

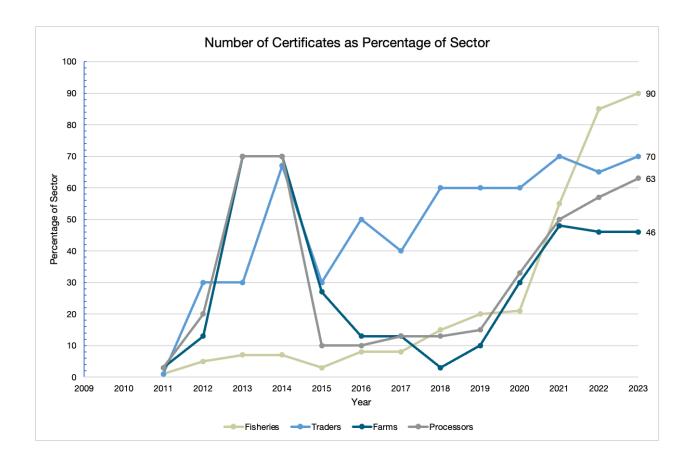
- 90%\* of glass eel fishers were SEG certified, across 24 fisheries
- 70% of eel traders were SEG certified, numbering 4 certificates
- 46%\* of eel farms were SEG certified, numbering 11 certificates
- 63%\* of processors (e.g. eel smokers) are SEG certified, numbering 19 certificates

The graphs below illustrate the steady rise in the extent of SEG certification since the Standard was introduced in 2011:





<sup>\*</sup>Percentage of sector data reported with 80% accuracy. Number of certificates data reported with 100% accuracy.



As a result of the steady increase in certification, at the end of 2023:

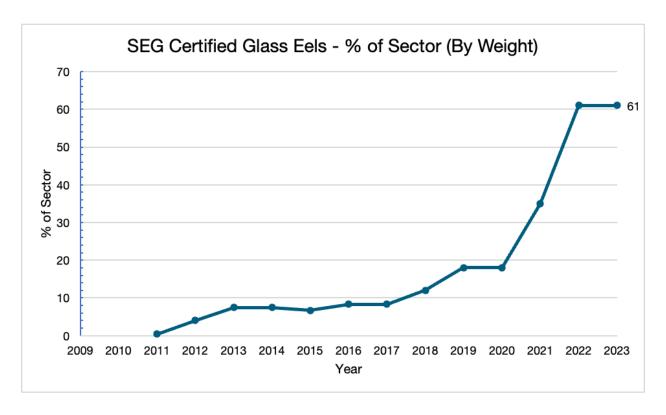
- 61% of glass eels from fishers were traded as SEG certified, totalling 36667 kilograms\*
- 61% of traded glass eel was SEG certified, totalling 36667 kilograms\*
- 80% of farmed eel was SEG certified, totalling 40 tonnes\*\*
- 67% of processed eel sold was SEG certified, totalling 2000 tonnes\*\*

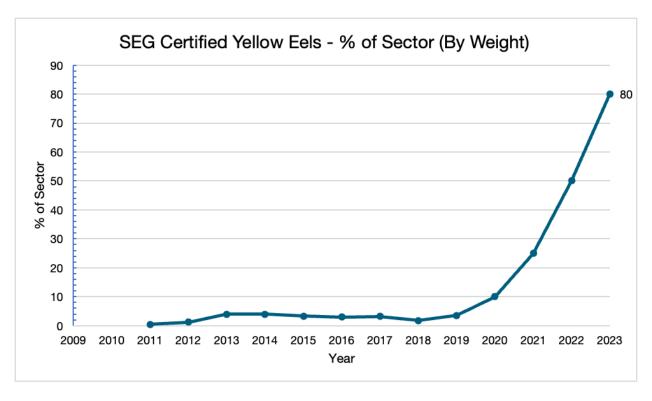


<sup>\*</sup>Fisheries and traders figures reported with 95% accuracy

<sup>\*\*</sup>Farms and processors figures reported with 90% accuracy

The graphs below illustrate the steady increase in the sector seeking and gaining SEG certification since the SEG Standard was introduced in 2011:







It is clear that the glass eel sector of the market has increasingly accepted and required SEG certification in both the consumption and restocking sectors. This is because:

- Retailers and consumers are increasingly seeing the need for a quality mark assurance of a responsibly sourced and traceable product,
- especially one that shows a re-invented commercial sector providing stewardship for a vulnerable species,
- and whereby they can be assured of receiving better quality eels those that have been caught and handled with the highest standards of welfare and with better survival rates.

To date, there has been little interest and demand for certification in wild yellow and silver eel fisheries. This is because most of these fishers do not sell to commercial retailers - where there would be tighter regulations - but to local markets where there is less demand for certification. Some Dutch yellow eel fishers and some Danish silver eel fishers have started to show an interest in the SEG standard. We will continue to encourage them to pursue this and we hope that this will lead to certification and then increasing demand for certification in this sector.

There has also been little demand by those undertaking restocking to be certified for their restocking operations. We sought and gained feedback on this during the consultation for the 2023 SEG Standard review. Most operators did not see the need to be certified, but most now do specify the requirement for SEG certified eels in their contracts. We will continue to work with this sector to ensure that the Standard can work best for them, and more importantly for eel recovery.

# **Trafficking**

Prior to 2010, European glass eels were traded for the growing demand for eel farming in Asia, without regulation. In 2007, European eel was listed in Annex II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). The listing came into effect in March 2009. Since 2010, the EU has banned the trade of European eel outside of the EU.

In subsequent years, the high and previously legal demand for eel encouraged the development of a significant illegal trade in European eel. This is estimated to have reached a peak in the 2016/17 season when Europol estimates that 100 tonnes of glass eels (300 million fish) were trafficked to Asia. That number is approximately double the total legal catch in Europe and a significant 23% of the <u>ICES estimated</u> total stock of 440 tonnes.

Since 2016 SEG has worked hard to ensure that the European Commission is aware of the extent and impact of eel trafficking on this vulnerable species, with the aim of securing resources, commitment and co-ordination across the range of enforcement



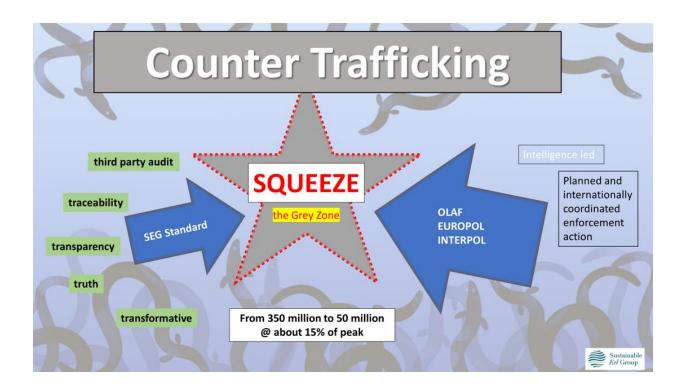
agencies in Europe. For the 2022/23 season Europol estimates that the level of trafficking had reduced from 100 to 20 tonnes, an 80% reduction and a saving of 250 million glass eels.

#### **Number of Arrests and Seizures**

MEL Indicator 4.5.1 requires reporting on anti-enforcement activities, such as the number of arrests and seizures.

In 2023 the greatest number of illegal trafficking seizures were recorded to date. In the prior six years, there were a total of 750 arrests, with a total of 26 tonnes or 80 million glass eels seized from the illegal trade. In 2023 alone, there were 256 arrests, with 8 tonnes or 25 million glass eels seized.

These numbers illustrate the substantial increase in counter trafficking measures in the past decade. The SEG strategy and contribution of reducing the 'grey area' is often explained using this diagram:





2023 data on seizures and arrests are illustrated below:



# **External Evaluation Report**

In 2023, SEG commissioned an external independent evaluation report on its impact on "Illegal, Unregulated and Unreported (IUU) Fishing and Trafficking of the European Eel." The report was commissioned to Hull Institute Fisheries International, part of Hull University, UK. The report is available <a href="here">here</a>.

The following are extracts from the Executive Summary of that report:

'Since 2016 SEG has made stopping the illegal trafficking of European eel a priority in its activities. In 2007, the decision was taken to place European eel on Appendix II of species under CITES legislation, which led to the prevention of exporting glass eels from the European Union. Despite this, evidence from international trade records and wildlife crime enforcement datasets has revealed a vast level of continued international trade of European eel (including glass eels, live eels and eel meat) and a significant level of "Illegal, Unreported and Unregulated" (IUU) fishing and trafficking of glass eels, the majority of which appear to be supporting eel farming and consumption of eel in east Asia (including specifically China). Estimates by Europol and SEG indicated illegal trafficking and IUU in the region of 100 tons / 300 + million glass eels a year in 2018. After significant enforcement action between 2016 and 2020, SEG reported estimates



of the level of glass eel trafficking to have reduced from 300+ million eels to around 50 million glass eels (estimated range of 15 to 25 tonnes): an approximately 80% reduction. There are many players involved in anti-trafficking and therefore many contributions to achieving that reduction in illegal exploitation and trafficking. SEG believes it has played a major part in this, particularly through raising awareness, campaigning, information sharing and the implementation of the SEG Standard.

Fundamentally, SEG is an NGO which is not directly involved in enforcement of counter-trafficking of European eel. However, they have developed a role in alerting, negotiating and publicising in the enforcement sphere. Since 2015 SEG has undertaken a lead on highlighting and reporting on IUU fishing and trafficking of glass eels and in 2016 made counter trafficking a priority as stated in their 2016 declaration. As counter-trafficking is a multi-actor international network and SEG are not an enforcement agency it is difficult to directly attribute the changes in the trafficking sector and the successes of enforcement actions to the role played by SEG. Most of the reported reduction in trafficking is clearly due to the extent and international nature of the concerted enforcement actions.

However, SEG is now positioned as a focal voice in the debate and drive for a responsible sector. Their direct liaison with enforcement agencies and their representations to those acting in the EU policy sector have undoubtedly influenced the movement to prioritising wildlife crime involving the trafficking of eels. Much of the impact of SEG through actions relating to the Standard and their role in monitoring, alerting and negotiating is clearly substantiated. The species-specific focus of SEG has elevated illegal trafficking of eels in the policy agenda and has complemented the activities of other organisations working in wildlife crime more generally. Furthermore, the progress towards a certified responsible sector and the development of a network within it has likely contributed to the reduction in illegal fishing and exports, an increased awareness of where and how illegal activity is taking place and through the implementation of the SEG Standard a reduction in the grey area between legal and illegal eel trade.'

# Trade to Russia

Due to the CITES and EU regulations, the European eels cannot be traded across the EU border. This means that EU states can only trade in eel within the EU, and non-EU states with other non-EU states (provided an appropriate 'Non-Detriment Finding' has been approved and other permitting conditions are met).

Since the Russian invasion of Ukraine in 2022, Russia has been subject to a series of trade sanctions by each EU and non-EU countries. As Russia is a non-EU state, eels cannot be traded with Russia from the EU under existing regulations, but the trade sanctions also mean that certain services to include provision of assurance for sustainability standards cannot currently be provided. This means that certification to the SEG Standard cannot be assured for any trade of eels to Russia, because Control Union who acts as the SEG's Conformity Assessment Body (CAB), is unable to provide



assurance on e.g. traceability of onwards sales of eels, once in the Russian Federation.

For this reason, to align with the stance on sanctions on trade to Russia, and also as SEG is an EU registered organisation, SEG issued statements in November 2022 on <u>Trade of Eel from non-EU Countries</u> and in January 2024 its <u>position on SEG</u> certification of trade to Russia.

The effect of this is that SEG cannot currently award certification to any applicant which is engaged in the trade of eels to Russia and Belarus and/or which will rely on auditing services in Russia and Belarus to provide assurance to the SEG standard.

SEG acknowledges that this implies that legal trade from non-EU countries to Russia cannot be combined with a SEG certificate, and that this may have particular consequences in countries moving from within-EU to outside-EU, such as the UK. However, the vast majority of the eel stock being inside the EU, as well as SEG Certificate holders, and with SEG operating within EU legislative frameworks, SEG must give priority to its EU considerations.



# Healthy Aquatic Ecosystems

Having access to diverse, plentiful good quality aquatic habitats is necessary for a healthy eel stock and is therefore one of our primary aims. SEG addresses aquatic ecosystem health by supporting the actions of partners and advocating for policy changes rather than developing our own actions.

### Percent of Aquatic Habitats "Good Ecological Status"

<u>MEL Indicator 2.3.1</u> requires reporting against the percent of aquatic habitats in Europe deemed to be in "good ecological status" as required and measured by the <u>Water Framework Directive (WFD)</u>.

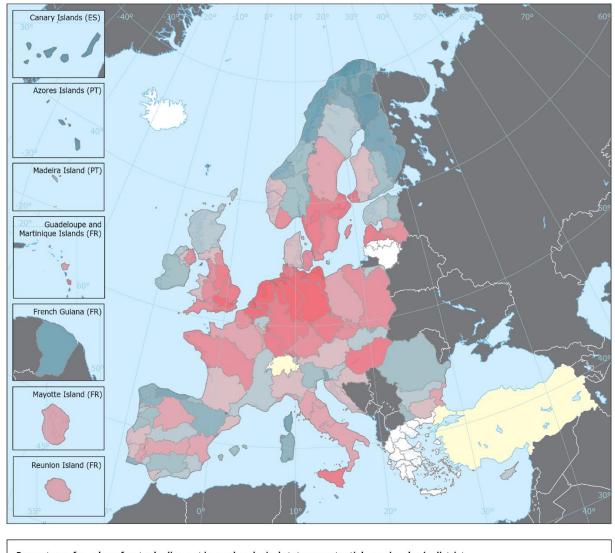
There were no recent data on this indicator for 2023 by the time of publication of this report. However, there is information available on prior trends, which merit inclusion in this report. The <u>WISE-Freshwater webpage on surface water ecological status</u> states:

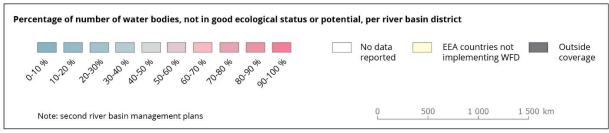
Ecological Status assessments are performed by all EU Member States every 6 years, in 2009, 2015, and 2021. On the scale of Europe, around 40% of the surface water bodies are in good or high ecological status, with lakes and coastal waters having better status than rivers and transitional waters. The overall ecological status has not improved since 2009 but it has improved for some biological quality elements between 2009 and 2015. The results of the 2021 assessments are not yet known.

We will publish updated information on the ecological status of aquatic habitats in Europe when such data is available.

The map below shows the ecological status of water bodies throughout Europe, based on the second river management plans and therefore the 2015 assessment cycle:







(WISE-Freshwater 2024)



#### Improvements to Aquatic Habitats

<u>MEL Indicator 3.4.1</u> requires reporting against "Hectares of Aquatic Habitat Improved" and <u>3.4.5</u> requires reporting "Kilometres rivers with freed / improved migration."

Data for each of these indicators from 2023 is limited. However, there is information available on prior trends, which merit inclusion in this report. For instance, in 2021, Living Rivers Europe published an analysis of 2022-2027 draft river basin management plans. The assessment concluded that "commitments to achieving the WFD objectives by 2027 (20 years after the adoption of the Directive) have not increased, although there were some exceptions." A number of topics are incorporated in this assessment, including, but not limited to: hydropower, water allocation and abstraction control, removal and adaptation of barriers, and economic instrumentation and adequacy of budget.

Another relevant report for MEL Indicators 3.4.1 and 3.4.5 was <u>published by Dam Removal Europe in April 2024</u>. The report concludes that in 2023, "at least 487 barriers were removed in 15 European countries," which represents "a 49.8% increase from the previous year." This number is an all-time high.

Of barriers removed, 46% were weirs, 36% were culvers, and 12% dams. Ramps, sluices, and fords composed much of the remaining removed barriers.

Close attention to aquatic habitat indicators such as these, as well as close attention to the impact of partner's actions and policy changes on such indicators, will continue to influence SEG's approach, as the status of aquatic habitats is a necessary component to eel recovery in Europe.



# Healthy Wild Eel Populations

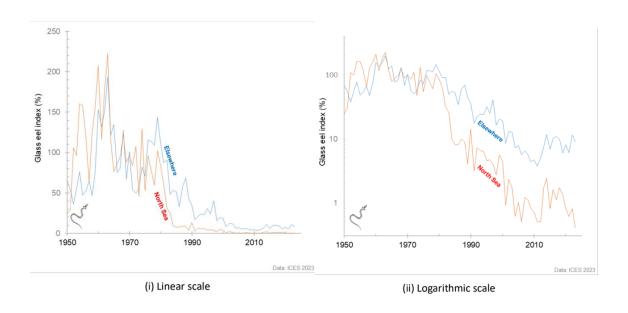
#### Glass Eel Index

<u>MEL Indicator 1.1</u> requires reporting against the Glass Eel Index, the key indicator of glass eel abundance (recruitment) used by ICES. Those are presented in the graphs below.

Around 2011, the prior 30-year decline in recruitment came to a halt, and current recruitment is 1-10% of the 1960 - 1970's level. Both the North Sea Index and the Elsewhere Index - indexes tracking glass eel recruitment in various parts of Europe - now vary on a low level, with little trend.

Though recruitment trends stabilised after 2011, the levels of recruitment are much lower than historical levels and have not yet recovered. The North Sea area has seen a greater decline in recruitment than other parts of Europe. These "other parts of Europe" comprise 90-95% of total recruitment.

The timing of the stabilisation of the decline in glass eel populations suggest it might be related to the implementation of protective measures under the Eel Regulation, but a causal link cannot yet be proven or disproven.



(data from ICES, 2023)

# **Overall Silver Eel Escapement**



Indicator 1.2 of the MEL Plan requires reporting against silver eel escapement, an important indicator of the health of the eel stock. Silver eel escapement indicates how well eels have survived in continental waters, whether protective measures are working and whether habitat quality and accessibility are improving. Hence Eel Management Plans, required under the Eel Regulation, were required to be formulated with the target of achieving 40% silver eel protection and escapement.

However, data on silver eel escapement are currently unreliable. This is for a number of reasons, such as:

- The eel stock changes over decades, if not centuries, and it is therefore difficult to draw conclusions from the relatively few years of current data,
- Trends in escapement are volatile and therefore unclear, in comparison to recruitment trends, which are more stable and allow for more conclusions to be made (see next graph over),
- "Pristine conditions" are difficult to define,
- Escapement trends are the result of both oceanic recruitment (common all over Europe) and local impacts (varying by country), whereas recruitment trends are a nearly sole result of oceanic trends, with only minute local influence before data is collected),
- National stakeholders tend to interpret national data opportunistically,
- Individual series hardly make any sense, without elaborating the national circumstances.

As silver eel escapement data is so unreliable, SEG will not be reporting it as a key indicator for the foreseeable future.



#### ICES SCIENTIFIC REPORTS 05:98

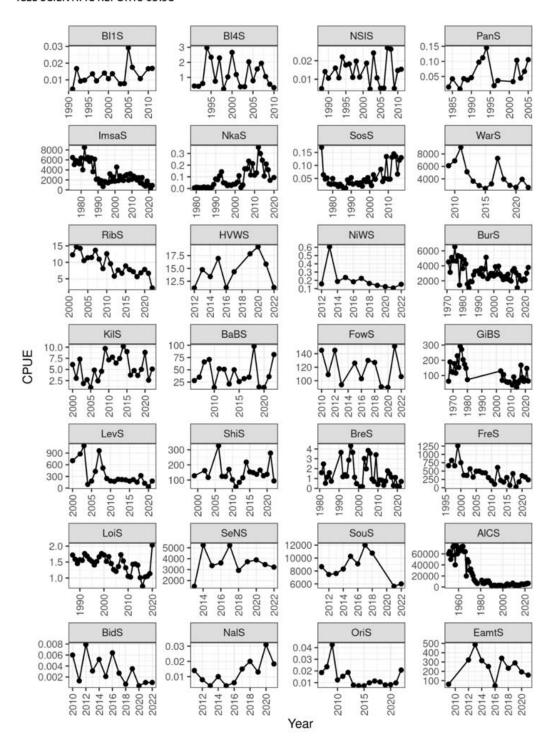


Figure 2.30 Silver eel time series that were used in the trend analysis.

Silver eel time series data used in trend analysis (ICES 2023)



### **Increased Eel Survival to 40% Target**

<u>Indicator 2.1 of the MEL Plan</u> requires reporting on eel survival being increased towards the 40% target required in the Eel Regulation. Data for this are available from the tri-annual self-assessments under the Eel Regulation. Latest available data are from <u>2021</u>, and the updated data for 2024 will be available at the end of this year.

Regrettably, not all countries have reported, and available reports do not always contain all required information (the 3B &  $\Sigma A$  indices). Analysis of the available estimates over the period 2012- 2021 indicates that total anthropogenic mortality  $\Sigma A$  is above the critical level of .92 (equivalent to 40% survival) in many areas, but is lowering due to reductions in fishing pressure  $\Sigma F$ .

Regrettably, not all countries have reported, and available reports do not always contain all required information. Analysis of the available estimates over the period 2012-2021 indicates that total anthropogenic mortality is above the critical level of  $\Sigma A$ =0.92 in many areas - meaning that the goal of 40% survival has not been met - but is lowering due to reduction in fishing pressure.

Although the trend is in the right direction (countries have developed and implemented their management plans), it is concerning that minimal protection has not yet been achieved in many areas, and that attention is so much focused on reducing fisheries further, while the reported estimates do indicate that the non-fishing impacts ( $\Sigma$ H)-alone are often already above the critical limit of 0.92. Noting this shortfall, SEG has initiated the #EelDeal2030 campaign.



# Enabling environment

For any organisation to be successful, it must have a supportive and productive enabling environment, such good governance, competent personnel, and adequate funding. Here we report on some key developments in 2023.

#### Governance

The SEG Board met formally three times during the year, as well as bi-monthly Zoom meetings, and had one strategy workshop. One new Board member, <u>Mike Baltzer</u>, was appointed from <u>SHOAL Conservation</u>.

The <u>Governance Summary Document</u> was prepared and published to the SEG Website.

A major governance process of this year was the revision of the SEG Standard. This involved three stakeholder consultations and a new, more independent and balanced Revision Team, leading to the publication of the 7th version of the SEG Standard in December 2023. Each consultation involved some 850+ stakeholders drawn from the three constituencies: Social, Economic, and Environment. The consultations were all conducted in accordance with the SEG Standard Setting procedure and ISEAL Standard Setting Code. The feedback and responses can be read on the SEG website.

#### **ISEAL**

A major driver in our Governance is our status as Community Member of ISEAL and our commitment to follow its codes of good practice and conduct.

The <u>ISEAL Alliance</u> (International Social and Environmental Accreditation and Labelling Alliance) is the global membership organisation for ambitious, collaborative, and transparent sustainability systems. It drives collective efforts to tackle the most pressing sustainability issues and create a world where markets are a force for good.

In 2019, SEG was approved as an Associate Member of ISEAL and in 2021 that transitioned to the new category of 'Community Member'. As a Community Member, SEG is committed to improving our system by using the <u>ISEAL Code</u> as a reference point for good practice.

ISEAL's Code Compliant members go further, committing to adhere to the ISEAL Code, a globally recognised framework that defines practices for effective and credible sustainability systems.



### **Green Claims Directive**

In March 2023, the European Commission adopted the <u>Green Claims Directive</u> (GCD). It aims to help empower consumers in the green transition by enforcing safeguards against greenwashing. It regulates the use of sustainability labels and bans certain practices related to premature obsolescence - or built-in failure - of consumer products.

The main reforms of the directive are:

- A ban on the use of unsubstantiated, generic environmental claims such as "environmentally friendly," "natural," "biodegradable," and "eco."
- A ban on the use of claims such as "climate neutral" that suggest that a product
  or service has a neutral, reduced, or positive impact on the environment due to
  emissions offset schemes.
- Regulated use of sustainability labels, given the confusion caused by their proliferation and lack of appropriate comparative data - under the new rules, only sustainability labels that are based on official certification schemes or by official certification bodies are allowed in the EU.

#### Certification Process

- The directive highlights the criteria and who carries out the audit
- The certification process must be transparent and carried out only by an independent, recognized, and accredited certification body
- Prohibits the use of certifications with "aggregate scoring," meaning individual points which determine the certification level to an average overall score.

Under the requirements of the Green Claims Directive, auditors must be accredited by national authorities. Therefore, the Conformity Assessment Body (CAB) performing assessments and awarding certificates according to the SEG Standard must be legitimate. The Control Union (CU) has thereby been selected/appointed as the CAB for SEG.

The SEG Standard is the only eel production certification programme currently in compliance with EU regulations on Green Claims. Therefore, no company trading eel can make claims such as "responsible" unless they are certified by SEG. GCD does not have a direct relationship with ISEAL; The <a href="International Accreditation Forum">International Accreditation International Accreditation International Accreditation International Accreditation International Accreditation International Int



sustainability systems. The GCD states that audits must be by an accredited body and assessment criteria must be science based.

# Corporate Sustainability Reporting Directive

On 5 January 2023, the <u>Corporate Sustainability Reporting Directive (CSRD)</u> went into force. The directive "modernises and strengthens the rules concerning the social and environmental information that companies have to report," and it expands the list of large companies and SMEs required to complete such reporting. CRSD reporting must be carried out according to European Sustainability Reporting Standards (ESRS) and in cooperation with the <u>European Finance Reporting Advisory Group</u> EFRAG.



# The Correct certification and you are properly certified!

- · SEG owns the programme and criteria.
- SEG guides eel companies related in interpreting the criteria, without going into "consulting".
- · SEG does not conduct audits.
- SEG audits are managed by Control Union Certifications B.V. as the official "Conformity Assessment Body" (CAB) in Europe according to ISO/IEC 17065-1 Conformity Assessment.
- Control Union Certifications carries out the audits completely independently of SEG
- Control Union Certifications provides the SEG Certificate to eel related companies.
- Control Union Certifications is an accredited certification body, accredited by the Dutch Council for Accreditation (RvA) and included in the IAF MLA.
- Control Union Certifications' auditors are professional auditors who must meet strict quality standards and professionalism and conduct audits in line with the level required by the Dutch Accreditation Council (RvA) according to ISO 19011:2018.
- · Your company complies with the EU Green Claims Directive | ESGD | CSRD
- SEG is a ISO14024 Type I Certification in compliance with EU Regulations.
- Your company uses the appropriate accredited certification body.
- Your company cannot be accused of Greenwashing because of the incorrect level of accreditation of your certification body.



SEG's Governance continues to evolve to reflect its growing significance and stakeholder reach. The SEG Chairman uses this slide to describe the complex set of relationships and legal influences that surround and shape the SEG voluntary network.





### **New Team Members**



**Alexander Barty** 



**Emily Ostler** 

Alexander became involved with the Sustainable Eel Group in 2020, at which point he was conducting a survey of Meare Fish House in Somerset for the University of Oxford. He initially worked on the Nikkei memory capture project: collecting, collating, and interpreting oral histories from elver men, eel fishermen and artists inspired by the European eel. Over time, he migrated towards a communications role, deploying his experience copywriting for architecture and heritage conservation purposes. His upcoming PhD thesis considers how cultural output shaped the trajectory of water engineering policy in England's inland fishing communities.

Emily joined SEG as a volunteer on the eDNA and Wilder Wedmore projects in 2023, and has returned in 2024 as a researcher, writer, and content creator for SEG. She holds a master's degree from Harvard Divinity School, where she researched the spiritual dimensions of human relationships with nature. She has worked on conservation projects around the world, focusing on issues such as sacred land protection, sustainable agriculture, and environmental education.





Mike Baltzer

Mike is a conservation biologist with over 30 years of experience primarily in Asia, Africa and Europe. He began his career undertaking and leading biological inventory expeditions in Uganda, Vietnam and Indonesia. He has since specialised in leading very large, complex, multi-country focused conservation programmes for various organisations. For more than 18 years, he worked for WWF as the Conservation Director for their Greater Mekong Programme, Director (CEO) of the Danube-Carpathian Programme and the global Lead for their tiger programme for the last nine years with WWF.

In 2018, Mike conceived, launched and became the Executive Director of a new global initiative and partnership called SHOAL, committed to ending the extinction of freshwater species.



# Finance

SEG continues to be financed by a combination of:

- Donations by members
- Grant funding
- Contributions from the <u>Eel Stewardship Association</u>

Here is a summary of our income & expenditure in 2022 & 2023:

Sustainable  Eel Group	Accounts	,	All figures EUR		
Profit & Loss	2023		2022		
	Total debit	Total credit	Total debit	Total credit	
Core ESF & Similar contributions		199,449.87		212,647.06	
Denmark		0.00		5,000.00	
Germany		38,663.53		41,882.40	
Netherlands		160,786.34		165,764.66	
Sweden		0.00			
UK		0.00			
Donations		56,264.07		4,755.06	
Grants/ projects Income		11,311.89		12,669.45	
Total Income		267,025.83		230,071.57	
Personnel and Finance Office	213,632.38		162,957.60		
Partner funding (Wetlands International)	100.00		2,966.52		
Office, Phone, Travel & Accommodation	19,641.65		9,221.00		
Professional Fees	66,883.05		43,319.24		
Accountancy costs	6,273.56		5,842.70		
ISEAL membership fees	6,844.34		7,885.05		
Standard Certification	15,864.40		1,036.92		
ISEAL consultancy	36,862.61		14,022.27		
Legal fees	1,038.14		14,532.30		
Project costs	16,195.68		14,086.14		
Public affairs & PR	1,372.29		567.51		
Other / Misc / Meetings/ Bank charges etc		267.025.02	3,228.23	222 274 56	
Total	323,307.46	267,025.83	236,346.23	230,071.56	
Balance		-56,281.64	42 024 40		
Creditors payment - Restucturing	222 207 40	45,637.31	42,931.18	220 071 50	
Total including restructuring	323,307.46	312,663.14	279,277.41	230,071.56	
Balance		-10,644.32		-49,205.85	



### **Environmental Impacts**

Our environmental impacts are described above in 'Healthy Aquatic Ecosystems' and 'Healthy Wild Eel Populations'.

### Social Impacts

### Community Engagement

In 2023, SEG further explored possibilities for promoting eel protection through the social theme of Brundtland. Much of SEG's work is underpinned by the notion that human relationships with the eel are crucial to their long-term survival, and it has started to test this with a few projects focused on strengthening these relationships at a localised level in Somerset, England - projects which have been productive, inspiring, and informative with regards to SEG's mission, aims and methods.

These community engagements evolved when SEG partnered with local organisers to facilitate eel education and ground-up conservation activities. The Somerset Levels is an ideal location to commence such engagement for multiple reasons, including its longstanding and continuing tradition of elvering and yellow eel fishing, the historic abundance of eels in rivers, wetlands, and lakes, and a fading memory of the local importance of eel. It is a place wherein the relationships with eel were strong and culturally important but are now nearly lost.

### Wilder Wedmore

Described by organisers as a "jam-packed festival covering many walks, talks, workshops and stands all about nature," Wilder Wedmore was a festival organised by the local community through <u>Green Wedmore</u>, in Somerset, England and held from the 9th to the 11th of June 2023.

Organisers of the Wilder Wedmore Festival joined forces with SEG to spur public awareness of the eel's history and current situation in the area. This included:

- A booth with SEG handouts and a tank of elvers, run by SEG representatives who were able to answer questions for attendees
- Presentations by Andrew Kerr on the history of eel fishing in Wedmore, as well
  as the current status of eel in the face of wetland drainage, hydropower, and
  other ecological manipulations in recent centuries
- Results of the eDNA survey highlighting the presence or absence of eels throughout the Somerset Levels, proving the profound disconnection in the waters
- Community release of elvers into local river systems.



### Somerset Eel Recovery Project (SERP)

The Somerset Eel Recovery Project (SERP) emerged from the Green Wedmore Wilder Wedmore Festival in 2023. There, local residents and community activists Geoff Carss and Vanessa Becker-Hughes considered the possibility of a joint initiative between Green Wedmore and the Sustainable Eel Group. They envisioned a group dedicated to carrying out activities which would advance social, environmental, and economic change on behalf of recovering European eel populations in the Somerset Levels. In July 2023, the <u>SERP Charter</u> was released.

SERP carries out a number of grassroots activities focused on advancing social, environmental, and economic change on behalf of recovering European eel populations in the Somerset Levels. They work with key local organisations including Somerset Wildlife Trust, Natural England, the Environment Agency, the Somerset Drainage Boards, and the Wildfowl and Wetlands Trust, among other interested parties.

In 2023, SERP planned a more ambitious programme for 2024, most of which - at September 2024 - has been delivered. The most significant of this was the expansion of the <u>Eels in the Classroom project</u> to 59 classrooms on the Somerset Levels, which attracted extensive media coverage. Further plans and ambitions continue to develop for 2025 and beyond.

#### **Eels in the Classroom**

In 2023, SEG collaborated with Wilder Wedmore, Bristol Avon Rivers Trust, South East Wales Rivers Trust, East Mercia Rivers Trust, South Cumbria Rivers Trust and Gloucestershire Wildlife Trust to provide eels to 23 schools across England and Wales. The goal of the initiative was to inspire and educate young people in the eel's biology and conservation.

After a few weeks in the classrooms, the eels were released to local rivers. SEG worked with various television, <u>online news</u>, and social media outlets to ensure maximum publicity for the programme and steer attention towards eel recovery in the Somerset Levels.

### **Trafficking**

One of SEG's primary impacts in the social dimension of eel recovery has been by influencing increased action against the illegal trade in eel. This is discussed in detail on pages 18 - 21 of this report.



### **Economic Impacts**

### Responsible Operators Maintain Market Access

### Proportion of SEG Certified Operators in Each Sector

<u>Indicator 3.1.2 of the MEL Plan</u> requires reporting against the proportion of SEG certified operators in each of the four primary eel sectors: fisheries, traders, farms, and processors.

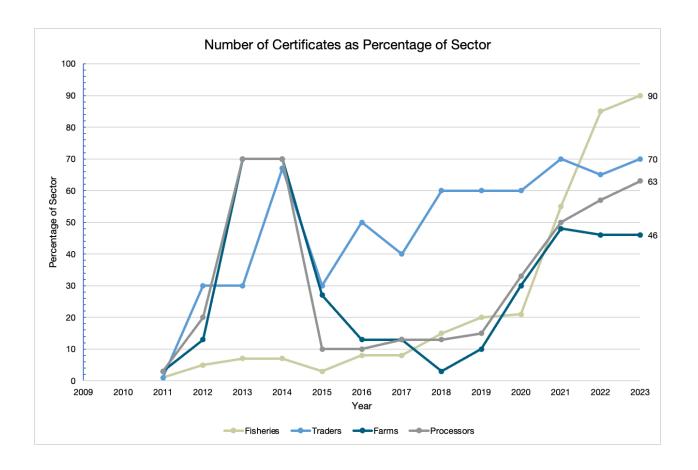
In 2023, SEG certified operators as a percentage of each sector were as follows:

- Fisheries: SEG certified eel fishing operations constituted 90% of all eel fishing operations
- Traders: SEG certified trading operations constituted 70% of all eel trading operations
- Farms: SEG certified eel farms constituted 46% of all eel farming operations, amounting to 80% of total farmed eel
- Processors: SEG certified eel processing operations constituted 63% of all eel processing operations\*

The graph below illustrates the year-by-year trend in this data.

\*Note: These figures are best estimates and can only be reasonably reported with 80% accuracy.





The number and proportion of certified glass eel fisheries and fisheries increased substantially in 2022 when one major trader in France made a commitment to future trade of 100% SEG certified eels. As a result, sufficient SEG certified glass eels would be available to supply the legal market in Europe. Consequently, in November 2022, SEG made the policy announcement that by June 2023, any SEG certified operator must purchase 100% SEG certified eels.

The United Kingdom has previously been a significant supplier of glass eels, exporting around 5 tonnes per year for restocking and consumption contracts in Northern Ireland and Europe. When the UK left the European Union on 31 January 2020, trade of eels between the UK and the EU was no longer permitted. This has had a serious impact on:

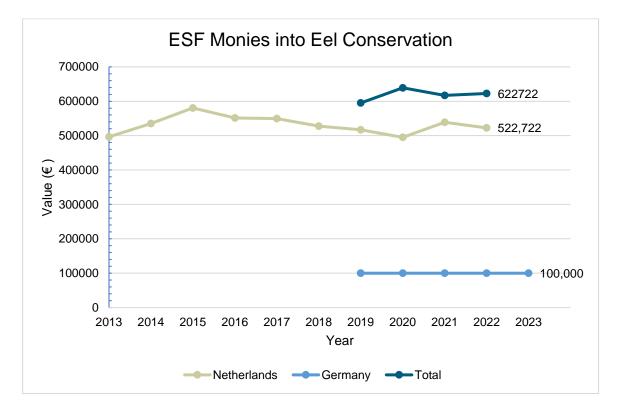
- 1. The glass eel fisheries of England and Wales. Traders have since been exploring non-EU markets such as Morocco, Tunisia, Russia and East Asia.
- 2. The import of SEG certified eels from farms in the EU for supply of eel e.g. smoked eel to UK retailers and restaurants. This has now been resolved with the import of SEG certified farmed eel from Morocco.



# Value of ESF funds directed into habitat improvement, restocking, and barrier mitigation

<u>Indicator 3.4.2.1 of the MEL Plan</u> requires reporting on the value of <u>Eel Stewardship Fund (ESF)</u> monies directed into habitat improvement, restocking, and barrier mitigation. The ESF helps finance many activities contributing to eel recovery stock. Contribution to eel conservation projects is a requirement for certification under the SEG Standard.

The graph below shows the ESF monies directed into eel conservation projects by year, for each the Netherlands and Germany, where data is available.



Amounts for the Netherlands are based on the assumption that 90% of ESF income, or payments from the sector, is devoted to conservation projects.

Amounts for Germany can be divided into roughly three categories: restocking, which receives the highest proportion of funding (approximately €70,000 per year); eel research projects, such as those at the Potsdam Institute of Inland Fisheries (approximately €20,000 per year); and trap and transport (approximately €10,000 per year).



### Other MEL Indicators

### **Independent Evaluation Reports**

<u>Indicator 4.3.1 of the MEL Plan</u> requires reporting on independent evaluation reports that speak to the implementation and efficacy of SEG's strategies.

The <u>Poseidon Report</u>, <u>Ruissen Report</u>, and <u>Parliamentary vote</u> are all independent evaluations that reference SEG's contribution to the protection and recovery of the European eel.

In 2023, SEG commissioned an independent evaluation by Hull University into its impact on Trafficking and IUU fishing. This was <u>published in September 2024</u>. These are discussed in more detail <u>elsewhere in this report</u>.

### Relevant, Accessible and Credible Standard

<u>Indicators 5.1.1 and 5.1.2 of the MEL Plan</u> require reporting against the relevance, accessibility, and credibility of the SEG Standard, including in terms of its compliance with the ISEAL Code.

The SEG Standard underwent a significant revision in 2023. It was developed by a team of independent specialists, incorporating a large number of comments from a diverse range of stakeholders.

The new, version 7, was published in November 2023. It is available in several different languages on the SEG website, accessible <u>here</u>.

The Standard gains credibility by:

- Being developed according to the <u>ISEAL Code of Good Practice for Standard</u> Setting
- Being supported by range of governance procedures as logged in our <u>SEG</u> <u>Standard System</u> (most developed according to the ISEAL codes)
- Audit and certification are managed by an independent <u>Conformity</u> Assessment Body
- The Standard is well recognised and respected in the market. There are 58 certificates in place and these cover approximately 90% of glass eel fishers, 80% of farmed eel, 75% of restocked eel, and 67% of consumed eel.



### **Moving Forward**

During 2024, a new Parliament was elected and a new Fisheries Commissioner appointed. At SEG, we do not expect this to lead to a change in the fundamentals – Eel Protection comes directly from the Eel Regulation that has been firmly endorsed by the Ruissen Report and is confirmed by both the vote in the European Parliament and the decisions made at the Council of Ministers. This led to EU ComPolicy Direction:

P9 TA(2023)0411 - Implementation of the Regulation establishing measures for the recovery of the stock of European eel - European Parliament resolution of 21 November 2023 on the implementation of Council Regulation (EC) No 1100/2007 establishing measures for the recovery of the stock of European eel (2023/2030(INI)) (sustainableeelgroup.org)

The Green Deal 2030 will focus investment and energies of Member States towards improving European freshwater habitats. This investment is vital for eel recovery. While the sector's reinvention around the SEG Standard must continue and do its part in eel protection, without the river and wetland restoration, there will be no meaningful recovery.

The outstanding work from enforcement agencies throughout Europe needs to be maintained so that the last of the trafficking gangs are closed and the eel sector is viewed rightly as a major contributor to recovery. The role of the SEG Standard in this shift is vital, as it enables a level playing field where the responsible can compete honestly in what had become a twisted and corrupted market.

For SEG, this means moving forward in its leadership role for many decades to come. Succession Planning and improved application of the ISEAL Code are vital next steps on the journey to #EelDeal2030 being realised. Only then will the words 'eel is recovering' start to have greater meaning.

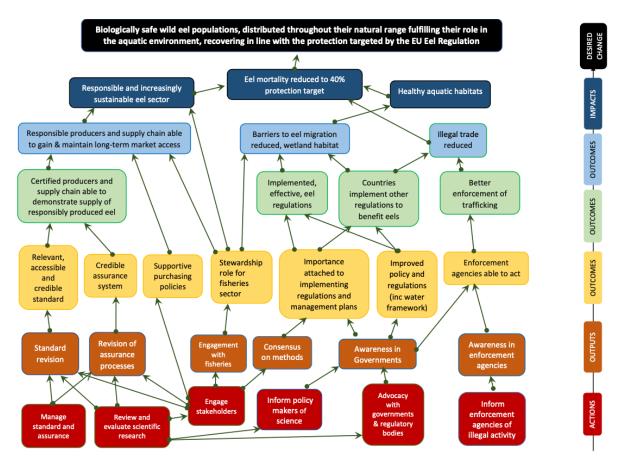


## Appendix 1: Monitoring, Evaluation and Learning (MEL) Reporting and Measures 2023

In 2023, as part of SEG's ambition to align itself more closely with the <u>ISEAL Codes of Good Practice for Sustainability Systems</u>, we expanded our <u>Monitoring</u>, <u>Evaluation and Learning (MEL) System</u>.

As a part of this, we developed and consulted on a <u>MEL Plan</u>, is to identify which measures and methods we will collate and report on how SEG evaluates its effectiveness against its intended sustainability impacts, and then learns and adjusts to keep making improvements.

The diagram below is a more detailed analysis and breakdown of SEG's Theory of Change. By understanding how our activities are intended to lead to outcomes and impacts, we can explore, test and measure if and to what extent they are showing success. For a fuller explanation and a full set of proposed measures and indicators, please see our MEL Plan.



SEG does not currently have the resources to measure every identified indicator, so we have to prioritise and measure those that are most important at present. In 2024,



SEG undertook a consultation exercise on the MEL Plan, the result of which was to focus on the following key performance indicators for the immediate future. Those are as follows:

- 1.1 Glass Eel Index
- 1.2 Overall Silver Eel Escapement
- 2.1 Eel Survival Increased to 40% Target
- 2.2.1 Number of Certified Operators
- 2.3.1 Percent of Aquatic Habitats "Good Ecological Status"
- 3.1.2 Proportion of SEG Certified Operators in Each Sector
- 3.2.1 Europol Indicators on Trafficking Levels
- 3.4.1 / 3.4.5 Swimways / Kilometres of River Opened
- 3.4.2.1 Value of ESF into Habitat Improvement, Restocking, Barrier Mitigation
- 4.1 SEG A Successful Leader and Advocate (From Hull and Ruissen Reports)
- 4.3.1 Independent Evaluation Reports (Poseidon, Ruissen, Parliamentary Vote)
- 4.5.1 Anti-trafficking Enforcement Activities (Number of Arrests, Seizures, etc.)
- 5.1.1 / 5.1.2 New standard available, designed according to ISEAL codes



### References

### **BBC:** Somerset Wildlife Group to Release Millions of Eels into Rivers

https://www.bbc.com/news/uk-england-somerset-65858826

### **Conformity Assessment Body (CAB)**

https://www.sustainableeelgroup.org/seg-standard-2-2/conformity-assessment-body/

#### **Control Union**

https://www.controlunion.com/certification-programs/

### Dam Removal Europe: Dam Removal Progress 2023

https://damremoval.eu/dre-report-2023/

#### **EFRAG**

https://www.efrag.org/en

### #EelDeal2030

https://www.sustainableeelgroup.org/wp-content/uploads/2022/12/5-Points-for-Council-December-2022.pdf

### **Eel Stewardship Fund (ESF)**

https://www.esf.international

### Eel Stewardship Fund (ESF) Eel Stewardship Association

https://www.esf.international/eel-stewardship-association/

### **European Union: Corporate Sustainability Reporting Directive**

https://finance.ec.europa.eu/capital-markets-union-and-financial-markets/company-reporting-and-auditing/company-reporting/corporate-sustainability-reporting\_en

### **European Union: Green Claims Directive**

https://environment.ec.europa.eu/topics/circular-economy/green-claims\_en\_

### **European Union: Water Framework Directive**

https://environment.ec.europa.eu/topics/water/water-framework-directive\_en



### European Union: "Implementation of the Regulation establishing measures for the recovery of the stock of European eel"

https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=OJ:C\_202404214

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