

Versions Issued

Version	Date	Description of Amendment	Approved by:
1.0	October 2022	First version	D. Bunt, Director of Conservation Operations
2.0	23 June 2023	Substantial revision to align with ISEAL Assurance Code of Best Practice	SEG Board
2.1	20 July 2023	Updates following stakeholder consultation	A. Kerr, Chair of Board
2.2	16 November 2023	Clause 4.8 added, amends to 4.9	SEG Board
2.3	1 December 2023	Minor amendments following further checks and feedback	A. Kerr, Chair of Board
2.4	17 December 2024	Substantive review following a year of operation	SEG Board

This document is the property of the Sustainable Eel Group. It is effective from the date above.

1 Purpose and scope

- 1.1 This procedure is for entities seeking group certification to the SEG Standard as it describes the requirements for group certification.
- 1.2 The only 'groups' in the SEG Standard System identified so far are fisheries.
- 1.3 This procedure is also for approved CABs who shall refer to it and verify its application during assessments of groups.
- 1.4 It is a component of the [202 SEG Assurance System](#), the relevant extracts of which are in section 5.

2 Definitions

- 2.1 A fishery is a collection of fishers who fish in a defined area. Not all fishers in a fishery are required to join the group in order for certification to proceed, but it shall only apply to those fishers who have applied to be part of the certified fishery and have agreed to its terms.
- 2.2 The entity applying for group certification is the organisation which oversees the group; also known as the fishery leader or group manager.
- 2.3 The requirements for the client, as a group, as referred to in the SEG Standard and Assurance System, shall be fulfilled by the entity applying for certification on behalf of the fishers.

3 Rationale

- 3.1 The reasons for creating requirements for group certification are:
 - a. efficiencies in having one entity oversee and provide guidance to fishers on conformance;
 - b. providing greater likelihood of and assurance of conformance to the standard by fishers that work as a group;
 - c. decreasing the unit cost of certification; and
 - d. increasing fishers' access to certification.

4 Group requirements and assurance

- 4.1 The entity (organisation applying for certification) applying for certification shall be **legally registered or officially recognised**.
- Guidance: Entities which could be considered as the applicant include organisations such as traders or local fishery co-operatives and associations.
- 4.2 The entity applying for certification shall **define the area covered by the certification**.
- 4.3. The entity applying for certification shall have a **legally binding agreement** with each of the fishers in the group. In France this is known as an '*Attestation d'Honneur*'. The agreement requires that the fisher agrees at least to:
- Comply with Components 1 and 2 of the SEG Standard;
 - be subject to a Group Internal Procedure implemented by the entity applying for certification;
 - be subject to external third-party audits conducted by a SEG approved CAB;
 - take measures, as directed by the entity, to address non-conformances identified in internal assessments and/or non-conformances identified by the CAB;
 - provide documentation relevant to conformance to the SEG Standard, as requested; and
 - agree to be bound by the [105 SEG Standard Terms and Conditions](#).
- 4.4 The entity applying for certification shall develop and effectively implement a **Group Internal Procedure** to include:
- A process for **evaluating new fishers** before they join the group to ensure they do not have any existing major non-conformities with the SEG Standard;
 - Conducting internal assessments** of the ongoing conformance of the fishers according to the fishery rules and Components 1 and 2 of the SEG Standard and apply sanctions as outlined in 4.5 below;
 - Ensuring the fishers **fish within the area defined** in 4.2;
 - Requirements for fishers to make themselves **available for an audit** or provide valid proof of unavailability;
 - Ensuring that all **fishers come into conformance** with any non-conformances identified by the SEG CAB during an external audit;
 - Keeping records**;
 - Providing all** fishers a copy of the SEG certificate and the [105 SEG Standard Terms and Conditions](#).
 - A process for **removing members** from the group for non conformances (see also 4.5 below) or not being available for an audit (see 4.4 d above); and
 - A process for members to **return to the group**, if permitted, after being removed, according to the timescales in 4.5 a. – c. below.
- 4.5 The Procedure shall include the following **sanctions for non-conformances**:
- Where a fisher has a minor non-conformance*, they shall be given 1 month for correction, after which if the non-conformance remains the fisher shall be removed from the SEG certified list until correction.
 - Where a fisher has a major non-conformance*, they shall be removed from the SEG certified list immediately, until it is corrected.
 - Where a fisher has two minor non-conformances in the same season, they shall be removed from the SEG certified list for the remainder of the season.
 - Where a fisher has two major non-conformances in the same season, they shall be excluded from the SEG certified list for remainder of the fishing season and the following season.

- e. Where 25% - 50% of fishers are non-compliant (minor or major) at any one time, the organisation applying for certification shall report itself to the CAB for consideration for a minor non-compliance and a possible temporary suspension from certification whilst a Corrective Action Report (CAR) is issued by the CAB and resolved. When resolved to the 0 – 25% level, the CAR will be regarded as resolved and the certificate re-instated.
- f. Where more than 50% of the fishers are non-compliant (minor or major) at any one time, the organisation applying for certification shall report itself to the CAB for withdrawal from SEG certification until the issues are resolved to the satisfaction of the CAB. When resolved to the 0 – 25% or 25 – 50% levels, the outcomes at e. above shall apply.

*** For Guidance on major and minor non-conformances, see:**

[103a SEG Standard V7.0 Component Guidance](#); see Criterion 1.1

5. CAB Procedures (taken from [202 Assurance System](#)):

- 5.1 The aim of a Group audit is to verify the established management system of the fishery and verify a sample of fishers / locations / types of fishing included in the fishery.
- 5.2 The auditor(s) shall verify that:
 - a. There is group manager / fishery leader for the fishery who is responsible for internal control and individual site conformity.
 - b. the fishery has several fishers, locations for fishing, or fishing methods; i.e. more than one entity in the group,
 - c. the group manager has an up-to-date list of fishers, locations and fishing methods,
- 5.3 The auditor shall audit the group manager and a sample of fishers. The sample size shall be determined by using Table 3.
- 5.4 In developing the sampling strategy, the auditor shall prioritise, as applicable, the following objectives:
 - a. **maximum representation of variability** within the sample (for example, if there are fishers departing from different locations a sample across locations may be taken); or
 - b. **maximum potential of identifying non-conformances** which might be present (if there is a known problem, for example, with a fishery with several locations a sample may focus on a particular location);
 - c. **randomization**, where possible, of the sample of fishers observed (for example, if there are three fishers departing from the same high risk location, a random sample amongst them shall be chosen).
- 5.4.1 It may not be possible to address all three sampling objectives simultaneously.
- 5.4.2 In all cases, the sampling strategy, including the rationale and objectives sought, shall be outlined in the audit report.
- 5.5 Stratification shall take place where the fishery can be classified into distinct sub-groups, i.e. different fishing methods and/or recognised different fishery boundaries. If stratification is required, auditors shall follow the sampling procedure for each sub-group independently.
- 5.6 The auditor shall verify that the group manager undertakes an internal review of the performance of each farm/site at least annually to assess the effectiveness of the documented procedures and the conformity of the sites against the SEG Standard and that appropriate non-conformities are issued.
- 5.7 The auditor shall verify that the group manager can monitor eel catches, submitted catch records and onward sales or eels from the fishery.
- 5.8 [From 5.12.8 of the Assurance System]: The following shall apply when non-conformances are found in samples of groups:

- a) *Non conformances by less than 25% of fishers in the sample shall result in the provision of a CAR requiring resolution within 12 months to maintain certification. If not resolved in that time the certificate shall be suspended.*
- b) *Non conformances of 25 – 50% of fishers in the sample shall result in a CAR requiring resolution within 3 months to maintain certification. If not resolved in that time the certificate shall be suspended.*
- c) *Non-conformance by of more than 50% of the fishers in the sample shall lead to a CAR requiring resolution within 1 month to maintain certification. If not resolved in that time the certificate shall be suspended.*