POLICY PROPOSAL

Listing all anguillids in CITES Appendix II

Sustainable *Eel* Group

The 2007 listing of European eel (*A. anguilla*) in CITES Appendix II showed how regulation can coordinate trade, strengthen consumer confidence, and give authorities clearer tools for enforcement. Documentation brought transparency to an opaque market, exposed trafficking networks, and produced data to support recovery efforts. The Sustainable Eel Group view is that those benefits should now be extended to the entire genus. Recruitment declines are evident in American eel (*A. rostrata*), Japanese eel (*A. japonica*), and several tropical eels, all under pressure from increased global demand and underground trade. Because glass eels and eel meat are indistinguishable across species, partial listings have left loopholes that traffickers exploit. Furthermore, the EU export ban has demonstrated the potential for pressures to move from one species to the other in the international chain of supply and demand. A genus-wide listing will resolve these issues and provide a framework to protect anguillids as a whole.

Sustainable *Eel* Group Perspective

Background and context

The genus *Anguilla* comprises species on six continents that primarily live in freshwater, but migrate to remote ocean gyres to spawn. Because they cannot be bred in captivity, aquaculture depends on the capture of juvenile 'glass eels' from the wild. Overfishing, habitat loss, and changing ocean conditions have caused significant declines in multiple anguillid eel species in recent years. This has been exacerbated by direct human impacts including barrier construction, hydropower, and a valuable illegal trade.

A. anguilla was listed in CITES in 2009, requiring proof of sustainable use and export permits, but trafficking into the east Asian aquaculture industry has continued. This has generally been attributed to species substitution and mislabelling, which takes advantage of how glass eels and eel meat are difficult to distinguish by sight. DNA testing is expensive and difficult to implement at customs checkpoints.

See pp.11-17 for more information

Proposal and rationale

Building on these findings, Proposal 35, submitted by the EU and co-sponsored by Panama, seeks to extend Appendix II protections to *A. rostrata*, *A. japonica*, and all remaining species in the genus. Its aim is to align the trade management of all anguillids under a single system that ensures international trade takes place only when it can be shown not to threaten the survival of wild populations.

Under this proposal, every eel shipment crossing international borders would be subject to the same safeguards: valid export permits, transparent reporting, and scientifically verified 'Non-Detriment Findings'. By removing the need to distinguish between species, the measure closes loopholes that enable substitution and mislabelling, reduces incentives for illegal trade, and prevents exploitation from shifting between regions or species.

Through this unified approach, Proposal 35 strengthens cooperation between range and consumer States; improves the reliability of data; and provides a practical basis for the sustainable management of a resource that supports ecosystems and communities. In doing so, it promises to deliver broad social, economic, regulatory, and environmental benefits.

See pp.18-25 for more information

Stakeholder implications

Ecological:

- curbs overexploitation and prevents pressure shifting between species.
- improves monitoring and data to guide recovery across range states.
- restores balance in ecosystems that depend on healthy eel populations.

Economic:

- creates a single transparent framework that ensures trade integrity.
- supports long-term jobs and value growth in compliant supply chains.

Regulatory:

- harmonised rules support coordination of customs/fisheries agencies.
- 'legal acquisition finding' prior to export facilitates subsequent import procedures in the receiving country.
- bureaucratic burden and cost linked to DNA barcoding is removed.

See pp. 26-33 for more information

Policy recommendations

The value of Proposal 35 lies not only in the simplification of trade but in creating the conditions for collaboration between fisheries, customs, and conservation authorities worldwide.The listing offers a route to rebuild trust in the supply chain, modernise data systems, and ensure that the benefits from the international eel trade are shared more equitably. By embedding transparency and accountability at every stage, it provides a model for how CITES can facilitate biodiversity protection whilst laying the groundwork for an uptick in sustainable economic activity.

Adoption would reflect a commitment to managing this global resource responsibly. It would ensure future decisions on eel conservation are informed by solid information, clear guidance, and productive coperation between the Parties.

See pp. 34-38 for more information

Yves Goulet

Fisheries Intelligence Expert, Canada

Listing all eel species under CITES is vital to protecting them from illegal trade and aiding global law enforcement efforts in their conservation. It will remove loopholes that smugglers use to launder contraband European eel on global markets, while supporting international compliance, enforcement, and conservation efforts.

Eden Skipper

Māori Advocate, New Zealand

Tuna, New Zealand term for eel, is a unique keystone species not only to ecosystems but to many in Māori culture. As Ngāti Irakehu and Ngāti Makō, we have a proverb to describe the importance of longfin eel to us as a people: 'If the lake is full with eels, if the home resounds with speaking, the land will be inhabited by people'. I commend SEG and the European Union for bringing forward pragmatic options to improve the transparency of trading *Anguilla* species. More pressure on illegal actors is required for the sustainability of the species and the benefit of honest traders who follow the rules. If we do not act now, then we may see the eel disappear in some regions, with considerable socioeconomic implications.

Mohamed Htosh

Fisheries Specialist, Egypt

Our family has fished eels from Lake Idku for three generations. We have seen how this trade can support communities, but only if it is open and honest. An Appendix II listing will help protect the resource that feeds our farms and our future, by keeping illegal fish out of the market and giving fair access to those who follow the rules.

Mike Baltzer

Director of Conservation, UK

Eels offer the most extraordinary examples of global connectivity in nature. All species are included in the 'SHOAL Priority Fishes List' of the world's most threatened fishes. Unfortunately there are few examples of holistic conservation and fisheries management and efforts largely remain absent, fragmented, or uncoordinated. Conservationists, land managers, fisheries managers and commercial stakeholders need to work together across international borders to ensure not just the survival of these remarkable fishes but also the economies that rely on them and the habitats that support freshwater biodiversity. Conserving eels and their habitats is one of the greatest conservation challenges of our generation. One we cannot fail to succeed at.

General considerations

What problem does the listing address?

It closes the loopholes that have enabled illegal European eel exports to move through unlisted channels, restoring legality and confidence in the global eel trade.

Why list the entire genus?

All *Anguilla* species enter the same international supply chain, and yet they are visually indistinguishable as glass eels or meat. A genus-wide listing is the only enforceable way to guarantee legal sourcing.

Is implementation complicated?

No. The proposal builds on established CITES systems, centred on designated authorities, electronic permits, and harmonised trade codes. Capacity building and technical support is always available.

Why act now?

Eel stocks remain depleted, illegal trade persists, and consumer markets are demanding transparency. Acting now aligns international trade with credible conservation and secures the eel's future.

Why not wait for other options?

Appendix I, a motion proposed for European eel in the past, would end all trade, placing undue pressure on other species. The Appendix III listing for the Dominican Republic will trigger CITES and associated procedures for all eel trade. Moving eel to Appendix II now provides certainty and consistent rules for everyone involved.

Social considerations

Will this stop people from trading eels?

No. Trade continues for operators who can demonstrate legality, ensuring that compliant fishers and farmers maintain market access while illegal actors are excluded.

How will local livelihoods be affected?

By eliminating illegal competition, the listing protects legitimate jobs in fishing, aquaculture, and processing which might have been lost through localised Appendix I controls. It encourages investment in transparent, socially just enterprises.

Will producers have time to adapt?

Yes. CITES are proposing an 18-month delay to implementation to allow governments, customs officials, and the sector to adapt to the new measures.

Will it complement existing local efforts?

Yes. It strengthens them by providing an internationally recognised platform for border control, data exchange, and certification, reinforcing instruments such as the EU Eel Regulation and CMS initiatives.

How does it protect vulnerable regions?

By implementing common rules in all countries, it prevents illegal trade from concentrating in developing countries.

Economic considerations

What is the scientific justification?

Recruitment and stock indices have shown a protracted decline across the board. Where data is more limited, due to limited historical demand, there is evidence of pressures starting to mount. The precautionary approach requires action where the future is uncertain, and a genus-level listing delivers a clear remedial solution.

How will it help eel populations recover?

Listing all species regulates exploitation pressure across the genus, prevents demand from shifting between species, and ensures that management measures benefit the whole population complex.

What are the wider ecological benefits?

Healthy eel stocks improve freshwater and marine ecosystems by restoring their role as predators and prey, contributing to biodiversity and ecological balance.

How will progress be monitored?

Through reductions in illegal trade, improved alignment between reported trade and verified production, and expanded datasets that inform adaptive management.

Will this contribute to knowledge?

Yes. Standardised reporting under CITES will generate trade and population data for otherwise-understudied tropical *Anguilla* species, filling critical information gaps for future management of the stock.

Environmental considerations

Will the listing affect trade value?

It may impact short-term compliance costs, but by stabilising markets, it builds long-term value through consistent, traceable, and legally verified supply.

How will it benefit the sector overall?

Transparent global trade rules strengthen traceability, protect legitimate operators from unfair competition, and improve access to high-value, certified markets.

Will markets become more predictable?

Yes. Consistent regulation creates confidence among buyers, suppliers, and investors, leading to more stable prices and reduced volatility in supply chains.

How does this support development?

By formalising trade and improving governance, the listing encourages sustainable investment in eel farming, processing, and management, linking conservation with durable economic growth.

Will this affect consumer access to eel?

No. Consumers will still be able to buy eel, with the added assurance that it comes from a legal and well-managed source. term access for compliant operators.

BACKGROUND AND CONTEXT

The condition of the freshwater eel trade

Eels in the genus *Anguilla* are distributed widely across the world, inhabiting rivers, estuaries and coastal zones on five continents (Fricke et al., 2024). Their biology is unusual, linking ocean gyres and inland waterways into a single, interconnected ecosystem. Each individual is born in a remote ocean gyre, where it drifts for months as a transparent larva before entering rivers and lakes. It remains in freshwater for decades, and then undertakes a final migration of thousands of kilometres back to sea to spawn once and die. This catadromous and semelparous life cycle leaves populations vulnerable at every stage, for barriers to migration, pollution in freshwater systems, fishing mortality across multiple life stages and climatic changes that disrupt ocean currents all have the capacity to reduce survival and weaken reproduction (Jacoby et al., 2015).

PICTURED LEFT

An unusual example of vacuum-packed silver eels being transported illegally in passenger luggage.

Because reproduction occurs only once and at the end of life, additional mortality has repercussions that extend across entire cohorts and can diminish recruitment for many years to come. The scale of the decline is stark and consistent across species and geographies:

- *A. anguilla* has lost more than ninety per cent of its recruitment since 1980 and is listed by IUCN as critically endangered (Pike et al., 2020b).
- *A. japonica*, once a focus for Asian aquaculture, has declined by fifty per cent since 1969 and is listed as endangered (Pike et al., 2020a).

- *A. rostrata*, assessed as depleted in the United States and threatened in Canada, is formally categorised as endangered (Pike et al., 2023).
- Analysis of *A. bicolor* in Indonesia revealed a swift stock depletion, shifting from a healthy state in 2011 to a deep red zone in 2015–2018, prompting calls for immediate protective measures (Nugroho, 2024).
- Several tropical species, including *A. borneensis* and *A. luzonensis*, are already considered threatened, while many others remain data deficient even as they enter international markets (Stuart et al., 2024).

Although the trajectory of each species differs, the overall pattern is unmistakable. Temperate species have undergone dramatic declines over the past half century, and as they have faltered, markets have increasingly targeted tropical populations. **The absence of comprehensive data does not reduce this risk but rather amplifies it, for the greatest exploitation often occurs where monitoring and governance are at their weakest.**

A MARKET DEPENDENT ON WILD JUVENILES

The international demand for eel meat is centred in East Asia, where it is considered a delicacy and forms the basis of high-value aquaculture production. Unlike most other farmed fish, anguillid eels cannot be bred

Restocking activities **3%**	
Legal catch + trade **4%**	
Unregulated trade **7%**	
Illegal catch + trade **16%**	
	Free immigrants **70%**

at scale in captivity, which means that every farm continues to depend on the capture of wild juveniles to seed production (CITES, 2025). *A. japonica* was the primary seed stock until its recruitment collapsed; *A. anguilla* then filled the gap until the 2010 European Union export ban curtailed trade. American eel has become the primary target for farmers in the years since, with exports from Canada and the Caribbean increasing sharply (TRAFFIC, 2025).

BOTTOM LEFT

Direction of travel for glass eels arriving on the European continent, according to a Sustainable Eel Group report.

Because juveniles are indistinguishable by eye and processed products provide no reliable clues, enforcement cannot rely on morphology. Document checks have therefore become the main mechanism of control. The problem is that paperwork can be falsified with ease, and that DNA barcoding, though accurate, is expansive and impractical for routine deployment (Silfvergrip, 2009). Unsurprisingly, fraud and substitution have flourished in these conditions, with *A. anguilla* frequently misdeclared as *A. rostrata* or *A. japonica* to bypass restrictions (CITES, 2025).

This fragility is evident in the instability of markets themselves. Prices for glass eels fluctuate sharply, rising and falling in response to seizures, quota changes or regulatory interventions. In Canada, landed prices for elvers increased more than tenfold between 2009 and 2023, reflecting both scarcity and speculative demand (DFO, 2025). For legitimate operators such volatility generates uncertainty, while for regulators it raises enforcement costs and undermines confidence in legitimate supply chains, creating a system that is both high in value and persistently unstable.

ILLEGAL TRADE AND ORGANISED CRIME

The most striking expression of this instability has been the growth of a vast and highly organised illegal trade. Trafficking of European glass eels alone has been valued at more than three billion euros annually, placing it among the most profitable wildlife markets in the world (Europol, 2025). Before 2020, the Sustainable Eel Group estimated one hundred tonnes of glass eels were trafficked each year, equivalent to hundreds of millions of pieces, with routes stretching from Europe and Africa to Asia (SEG, 2024).

Since then, between fifteen and twenty-five tonnes have been intercepted annually, a figure that represents only a fraction of the trade (Europol, 2021). The patterns of this illicit commerce are consistent and revealing:

- live eels are concealed in freight consignments and passenger luggage;
- falsified paperwork disguises protected species as unlisted stock;
- illegally caught juveniles are laundered via aquaculture operations;
- trade routes, product ranges, and suppliers are rapidly adjusted when enforcement pressure intensifies in a particular regions (TRAFFIC, 2025).

The impacts are severe for markets and local communities. Illegal trade destabilises lawful supply chains by diverting juveniles away from legitimate operators, inflating costs for those who comply with regulations and exposing them to extreme volatility. Farmers in Asia and Africa face abrupt shortages when illicit networks manipulate supply, while communities in source and transit regions, particularly in the Caribbean and West Africa, experience the corrosive effects of organised crime, corruption and in some cases violence. Such impacts persist long after consignments have moved on, eroding governance and leaving small-scale fisheries and local economies vulnerable to exploitation (TRAFFIC, 2025).

The decline of anguillids must be understood not as a collection of discrete local problems but as a single integrated crisis that transcends borders and species. Aquaculture sustains global demand but remains wholly dependent on wild juveniles. Species are interchangeable in markets but cannot be reliably distinguished in practice by frontline enforcement. Systems of documentation are open to falsification, and organised crime exploits these weaknesses with efficiency. National bans, regional quotas and single-species listings have not reduced pressure but instead displaced it.

The lesson is that fragmented measures perpetuate the cycle of substitution, fraud, and depletion, ensuring that conservation gains in one jurisdiction are undone in another. Without a coherent framework that treats the genus as a whole, the trajectory will remain one of progressive decline, in which biodiversity is further eroded, lawful operators are destabilised and illicit networks continue to profit. Only a comprehensive approach offers the prospect of stabilising trade, protecting vulnerable populations and ensuring that international markets operate in support of conservation, communities, and legitimate economic activity.

SPECIES	PROTECTION	IUCN STATUS	DISTRIBUTION
Anguilla anguilla	Appendix II	Endangered	Temperate
Anguilla australis australis	-	Near threatened	Subtropical, temperate
Anguilla australis schmidtii	-	Near threatened	Subtropical, temperate
Anguilla bicolor bicolor	-	Near threatened	Tropical
Anguilla bicolor pacifica	-	Near threatened	Tropical
Anguilla bengalensis	-	Near threatened	Tropical
Anguilla bengalensis labiata	-	Near threatened	Tropical
Anguilla borneensis	-	Vulnerable	Tropical
Anguilla celebesensis	-	Data deficient	Tropical
Anguilla dieffenbachii	-	Endangered	Temperate
Anguilla interioris	-	Data deficient	Tropical
Anguilla japonica	-	Endangered	Temperate, subtropical
Anguilla luzonensis	-	Vulnerable	Tropical
Anguilla marmorata	-	Least concern	Tropical
Anguilla megastoma	-	Data deficient	Tropical
Anguilla mossambica	-	Near threatened	Tropical
Anguilla obscura	-	Data deficient	Tropical
Anguilla reinhardtii	-	Least concern	Tropical
Anguilla rostrata	-	Endangered	Temperate, subtropical

PROPOSAL AND RATIONALE

Listing all anguillids in CITES Appendix II

For this year's CITES Conference of the Parties, the European Union has submitted Proposal 35, co-sponsored by Panama, which seeks to list all species of the genus *Anguilla* on Appendix II of the Convention (CITES, 2025). Appendix II does not impose a ban on trade. On the contrary, it introduces a system of permits and reporting requirements to ensure that any international transaction is legal and sustainable, with the exporting Party required to make a formal 'Non-Detriment Finding' before shipments can proceed. In practical terms, this means that every international consignment of eels, whether live glass eels, frozen meat, or processed fillets, would be subject to the same set of conditions and could be monitored consistently across jurisdictions.

PICTURED LEFT

Eel meat and processed eel products are difficult to distinguish by sight. DNA barcoding can be used, but its cost can be prohibitive.

The proposed listing does not alter the structural dynamics of the trade but aligns it with the established system of CITES controls. Countries that wish to export eels would need to issue permits confirming that the specimens were legally acquired and that the trade would not be detrimental to the survival of the species in the wild. Importing countries would check and record these permits, preventing substitution and mislabelling and ensuring traceability across the supply chain (CITES, 2025). The design of Appendix II regulation provides several practical advantages:

- It removes the need for customs officers to verify compliance for a single CITES-regulated species (*A. anguilla*), which may be falsely

declared and/or concealed within unregulated, non-CITES shipments.
- It creates a standardised system of documentation, enabling data to be collated globally, closing gaps in knowledge that hamper assessment.
- It strengthens the position of countries with weaker enforcement, or limited access to DNA barcoding facilities, as the uniform application of CITES rules provides a legal basis for refusing undocumented shipments.
- It supports legal operators by ensuring that competitors cannot undercut them through the use of unregulated or illegally sourced stock.

In this way the proposal gives the international market greater credibility and predictability. By providing a framework for monitoring, it allows aquaculture, fisheries, and the seafood trade to continue while creating the conditions in which sustainability can be demonstrated and enforced. In a move guided by economic pragmatism, the implementation date has been set for eighteen months after adoption, allowing governments and industry time to adjust their procedures (CITES, 2025).

WHY A GENUS-LEVEL APPROACH IS NECESSARY

The rationale for a genus-level listing is rooted in science, but also enforcement experience. All anguillid eels share the same basic life cycle and face similar threats: populations are highly migratory, crossing multiple jurisdictions, and can only be managed effectively through coordinated international action (Jacoby et al., 2015). The listing of *A. anguilla* in Appendix II in 2007 illustrates the point. While the measure succeeded in reducing illegal exports from Europe, it also had the unintended effect of redirecting demand towards *A. rostrata* in North America and to tropical species in Africa and the Pacific. Without addressing the genus as a whole, every regulatory success has only been partial, and each gain in one region has been offset by new pressure in another.

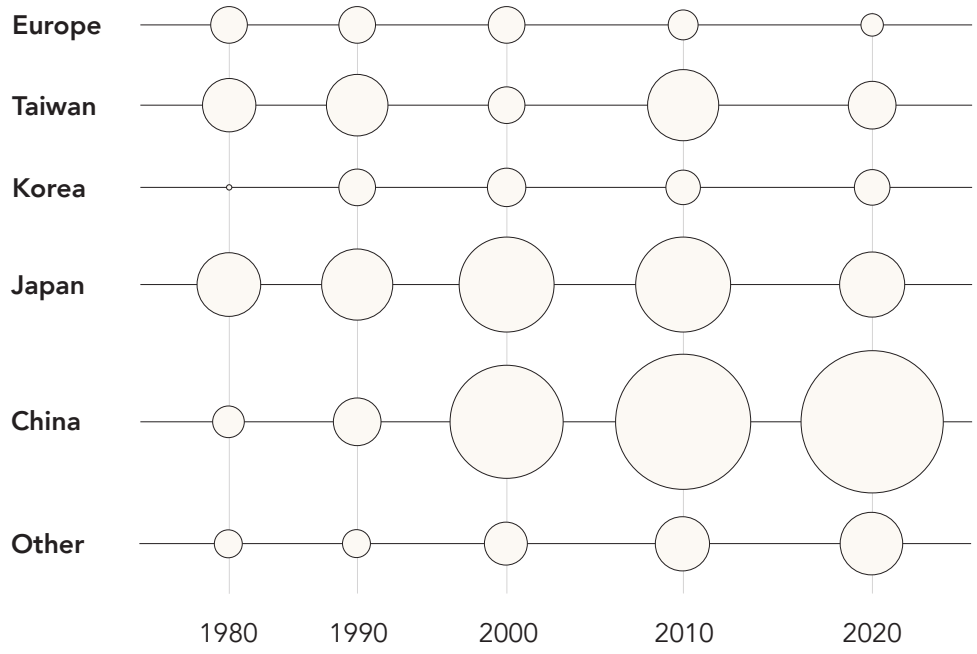
The European experience offers a clear precedent for what coordinated action can achieve. The EU Eel Regulation provided the first legally binding recovery framework for *A. anguilla*, requiring all Member States to develop and implement Eel Management Plans with the goal of achieving at least 40% escapement of adult eels to the sea. These plans combined measures such as fishery closures, habitat restoration, turbine mortality reduction, and restocking to address human-induced pressures along the

eel's range. Crucially, the Regulation established the administrative basis for the CITES Appendix II listing of *A. anguilla* later that same year. Together, these instruments demonstrated that a well-structured, multi-jurisdictional approach can reduce illegal trade, improve traceability, and strengthen management when supported by enforcement and reporting tools.

The genus-level listing addresses these lessons directly by creating a level playing field. It closes the loopholes traffickers exploit, ensures conservation gains are not undermined by substitution, and

PICTURED BELOW

The direction of travel for glass eels arriving in EU waters, based on recent research by the Sustainable Eel Group.



provides a global standard for trade. By unifying regulation, it enables enforcement agencies to concentrate on verifying documentation rather than attempting the impossible task of distinguishing species by sight. It also generates a dataset of international flows that can be used by scientists and policymakers to track trends, anticipate risks, and evaluate management measures. In this sense, the proposal is not an abstract regulatory exercise but a practical response to the realities of the trade. It reflects the lessons learned in Europe, where coordinated measures have shown that targeted management can reduce mortality, enhance enforcement, and sustain legitimate activity when paired with rigorous monitoring. Extending these principles through a genus-level CITES listing would provide the same benefits globally, aligning trade regulation with conservation in a coherent and enforceable framework.

THE ESSENCE OF THE PROPOSAL

What defines the proposal is not restriction, but a common language, allowing governments with very different levels of capacity to participate in trade on equal terms. Appendix II provides a clear template: exporting states issue permits, importing states verify them, and the data generated become part of a global record. In practice this means that authorities are no longer asked to make visual judgements and can instead apply a single, universally accessible rule: without a valid permit, the shipment cannot proceed. The essence of the measure can be set out in plain terms:

- It creates a baseline for trade, irrespective of species or product form.
- It embeds legality and traceability in every cross-border movement.
- It generates a coherent dataset that can be used to monitor volumes, assess risks and inform localised, national, or international policy.
- It aligns the trade with a broader body of CITES regulation, integrating it into a system that has been tested across hundreds of other species.

In essence, the proposal draws upon an existing framework that is already embedded in international law and adapts it to a group of species whose biology and trade characteristics make fragmented regulation unworkable. The listing confirms that all anguillid eels are to be treated under the same rules, recorded through the same mechanisms, and assessed against the same criteria. By establishing this clarity, it sets the

PICTURED BELOW

Modern green water culture system

PICTURED ABOVE

A sizeable indoor eel farm in Japan

THE CASE IN FAVOUR

Social, economic, and environmental benefits

PICTURED LEFT

Fishers and farmers have taken the lead on conservation initiatives in the European Union

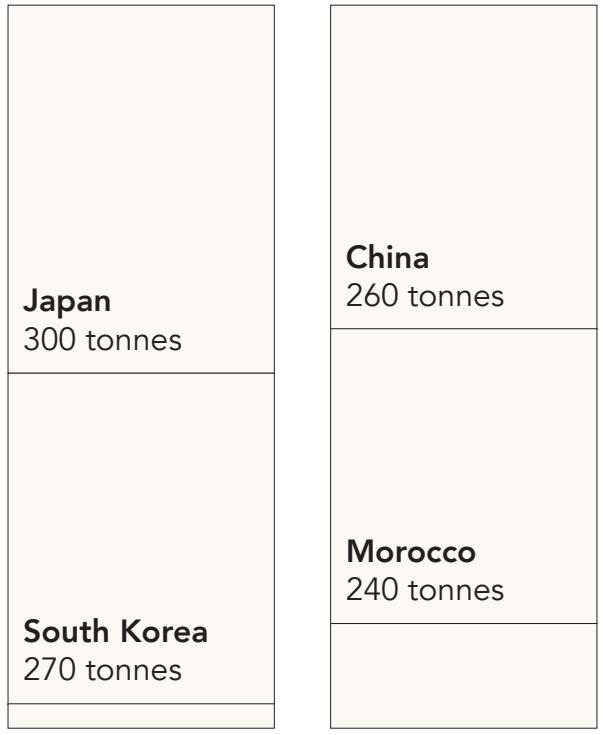
The Sustainable Eel Group invites governments to consider not only the mechanics of a genus-wide Appendix II listing but also the wider benefits that such a measure can deliver. The question is not simply whether regulation is possible, but whether it provides advantages that extend beyond conservation and sustainable fisheries management to the stability of markets, the security of communities and the credibility of international governance. The reasons for support are multiple, encompassing ecological necessity, economic resilience, social and political gains, and the generation of reliable knowledge on which future commercial decisions can be based.

WINS FOR CONSERVATIONISTS

The first and most compelling reason to support Proposal 35 is ecological necessity. Anguillids have suffered sustained declines, placing them among the most threatened of all commercially traded fishes. Their complex, panmictic life cycle links distant habitats and nations, meaning that no country can safeguard its stocks in isolation. As Dekker (2000, 2016) has shown, recovery depends on the interplay between large-scale coordination and small-scale implementation, a lesson clearly demonstrated in Europe. The EU Eel Regulation provided a continent-wide framework, while national Eel Management Plans translated it into locally relevant actions. Together, these measures achieved substantial reductions in fishing mortality –

PICTURED BELOW

Comparison of live eel imports (left) and exports (right) in 2020, based on data from the Sustainable Eel Group. Statstical mismatches of this nature concern trade analysts.



Sweden by nearly ninety per cent, Italy by more than half – and curtailed illegal trade (European Commission, 2023). This experience proves that coordinated governance, when rooted in local management, can deliver real results. A genus-level CITES listing would extend that proven model globally: establishing a shared baseline for protection while leaving room for national adaptation, and ensuring that the recovery of one species or region is not undermined by illegal or unregulated exploitation elsewhere.

By ensuring that every international trade flow is subject to the same level of scrutiny, Proposal 35 would prevent vulnerable tropical species from becoming the next target of substitution while also reinforcing the protection already granted to the critically endangered *A. anguilla*, the natural target of mislabelling and substitution efforts (TRAFFIC, 2025).

The recovery of the stock, and the fishery it supports, requires greater consistency, and only a more comprehensive approach can provide it.

WINS FOR THE SECTOR

A second reason to support the proposal lies in the economic benefits genus-level protections confer. The current trade is characterised by volatility, with prices rising and falling unpredictably in response to enforcement actions or regulatory changes, and legitimate businesses bearing the cost of uncertainty. Farmers, traders and regulators alike face disruption when illegal networks manipulate supply, diverting glass eels from lawful operators and destabilising markets. Equally, certian markets get shut out of the picture with little notice, either as a result of enforcement operations or erratic changes in patterns of black market supply and demand. By creating a uniform system of documentation and oversight, the genus-wide listing would reduce this instability and provide lawful businesses with a more predictable operating environment (CITES, 2025; SEG, 2024). The specific economic benefits can be understood as follows:

- Legal operators would gain protection against competitors who mislabel products and source seed stock illegally to undercut prices.
- Standardised reporting and permitting would reduce transaction costs by streamlining procedures and ensuring access to controlled markets.
- Transparent supply chains would offer producers access to high-value markets where certification and traceability are required by buyers.
- By linking compliance with market access, the system would incentivise sustainable practices and support long-term investment in the sector.

In this way the proposal does not impose a burden on trade but rather secures its future, ensuring that revenues are captured by lawful operators and not siphoned away by criminal networks. The economic rationale for support is therefore not separate from the ecological one but closely aligned with it, since stable markets depend on sustainable stocks.

WINS FOR LOCAL COMMUNITIES

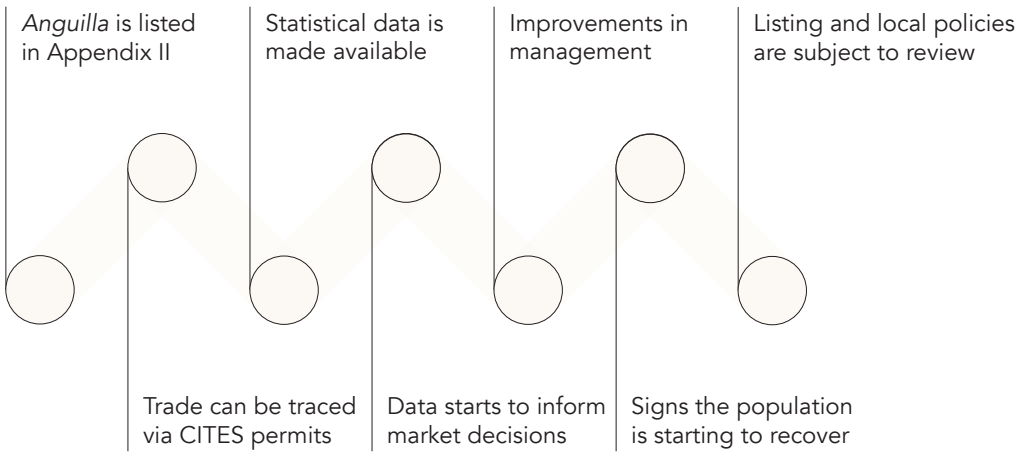
The third dimension of the case for support is social and political. Illegal trade in eels has been closely associated with organised crime,

corruption and violence in source and transit regions, particularly in the Caribbean, Canada, and parts of Africa and the Pacific (TRAFFIC, 2025). Communities dependent on small-scale fisheries have seen their livelihoods undermined by predatory networks that exploit weak governance and limited enforcement capacity, with profits diverted into illicit circuits that often overlap with drug trafficking, human exploitation, and other forms of transnational crime. For this reason, the consequences are not confined to economics but extend to the erosion of trust in institutions, the weakening of legitimate governance, and the entrenchment of insecurity.

PICTURED BELOW

How the listing could support science and conservation

Indigenous groups, artisanal fishers, and small-scale community enterprises are among those most exposed, as their access to lawful markets is often undercut by criminal intermediaries who impose themselves on supply chains and reap disproportionate profit while leaving behind social disruption. In developing countries the problem is especially acute, for enforcement resources are limited and the influence of transnational gangs is often most corrosive at the local level, where communities have few alternatives and little protection. Without coherent oversight, these groups are left vulnerable to both exploitation and displacement,



while decisions made elsewhere about species-level listings and partial controls impose costs without addressing the root cause of trafficking.

WINS FOR SCIENCE AND POLICY

The proposal would generate substantial gains in knowledge and monitoring. One of the consistent challenges in managing anguillid eels has been the absence of reliable data, particularly for tropical species where scientific assessments are either incomplete or entirely lacking (Stuart et al., 2024). Without systematic reporting, it is impossible to know the scale of exploitation, the structure of markets or the long-term impacts on populations. By requiring documentation for every international movement, a genus-wide listing would create a global dataset that could be used by scientists, policymakers and enforcement agencies alike. The benefits of such information can be summarised clearly:

- Comprehensive trade records would enable more effective stock assessments and thus improve the accuracy of non-detriment findings.
- Data on volumes, origins, and destinations of travel would help identify emerging risks from smugglers before they become crises.
- Transparent reporting and more accessible catch data would enhance confidence among consumers, regulators, and the industry itself.
- Collaboration between countries through the CITES framework would encourage investment in monitoring and research capacity.

In this respect the proposal is an investment in knowledge. It provides the information needed to assess market and population trends and manage stocks responsibly. This means anticipating shifts in demand and ensuring conservation and trade policy are informed by a robust evidence base.

Taken together, the ecological, economic, social, and scientific arguments form a compelling case for support. The proposal does not ban trade but aligns it with a system that has been tested for decades, ensuring that all transactions are legal, sustainable and transparent. It provides a framework in which lawful operators can thrive, illicit networks can be constrained, and policymakers can base their decisions based on reliable data. Most importantly, it closes the loopholes that have undermined previous efforts and ensures that protection applies across the genus as a whole, thereby addressing the problem at its true scale.

OPPOSITION AND REBUTTALS

A response to the claims made by Parties opposed

While Proposal 35 has gathered strong support from the European Union, its co-sponsor Panama, and a growing coalition of range states, some Parties have expressed concerns about the proposal. Their arguments tend to fall into three main categories: that the measure would create an excessive burden of bureaucracy; that the scientific evidence is insufficient to support its requirements; and that its adoption at the CoP could serve as a step towards ending all trade. Each of these claims demands rigorous examination.

PICTURED LEFT

A. anguilla fisheries in Europe and Africa continue to thrive, their legitimacy reinforced by Appendix II.

THE BUREAUCRACY QUESTION

Critics sometimes argue that a genus listing would create unnecessary bureaucracy, delaying shipments and overburdening authorities with limited enforcement capacity. In reality, the opposite is true. Appendix II is an established and practical instrument that has been applied successfully to thousands of species and is designed to be simple. It requires only that exporting states issue exports permits and importing states verify them (CITES, 2025). In the case of *Anguilla*, a genus-level listing would in fact streamline procedures. Uniform documentation ensure the same regulatory requirements for different species that are visually indistinguishable, facilitating front-line trade inspections that are currently looking for the presence of one species being falsely declared to avoid controls. This would reduce paperwork, speed up inspections, and eliminate the need

for laboratory verification altogether. The lookalike problem, in which species are misdeclared to evade customs controls, has been recognised within CITES for many years and addressed through similar genus-level listings. Appendix II protections have been extended to all rosewoods and to all bears, including those not under direct threat, precisely because their parts and derivatives could not be reliably distinguished in international trade (CITES, 2020). The same line of reasoning applies to freshwater eels: without consistent rules across the genus, enforcement officials are expected to make distinctions that are impossible in practice:

- The same documentation applies to every eel species and product, eliminating complexity associated with glass eels and *unagi kabayaki*.
- It creates a consistent baseline that allows enforcement officials in all countries, regardless of capacity, to refuse undocumented shipments.
- It levels the playing field by removing the incentive to reroute shipments through countries with less established DNA barcoding activities.

The measure provides support to enforcement officials, governments, civil society, and the commercial sector. Capacity building and technical assistance are routinely offered through the CITES framework, and NGOs including the Sustainable Eel Group have already committed to supporting community groups with training and implementation (SEG, 2024).

THE SCIENTIFIC EVIDENCE QUESTION

Opponents have occasionally claimed that a lack of scientific certainty undermines the proposal, particularly with respect to tropical species for which data remain limited. They argue that without precise knowledge of recruitment or stock size, it will be impossible to make the required non-detriment findings (Pike et al., 2020b). This argument confuses the purpose and intention of Appendix II. The system does not mandate precise quotas or exhaustive biological studies before trade can continue. It requires only that exporting states use the best available evidence to determine that trade will not threaten the species' survival, and it applies the precautionary approach where information is incomplete (ICES, 2002).

The absence of systematic data is an argument in favour of, not against, the proposal. By requiring permits for every shipment, Appendix II generates a comprehensive dataset that can be used to track volumes,

sources and destinations. Without such a framework, trade remains opaque, uncertainty persists, and exploitation proceeds unchecked. In other words, there is no potential for improving the quality of data we use to inform decisions about fisheries management and conservation.

It is worth noting that when global agreement has been out of reach, individual countries have sometimes used Appendix III to impose national controls. Recently, for example, the Dominican Republic wrote to the Secretariat of its decision to list its own *A. rostrata* stocks, with considerable implications for customs in other countries. These measures are generally regarded as effective within their respective borders, reducing immediate environmental impacts, but they cannot substitute for genus-level protections. On the contrary, they contribute to the displacement effect: trade shifts to countries or species that remain unlisted, rewarding illegitimate operators who exploit weaker governance structures.

THE ENDING-ALL-TRADE QUESTION

A final concern raised by opponents is that Appendix II listing may represent the first step towards prohibition, creating pressure for a future move to Appendix I, which would end trade of all forms. And yet, this argument confuses improved oversight with restriction. Appendix II is explicitly designed for species that are in trade but require monitoring, and many high-value commodities, including rosewood, crocodilians, and other reptiles in the pet industry, have remained under Appendix II for decades without progressing to Appendix I. Elevation occurs only where evidence demonstrates that trade is directly driving extinction risk and where Parties fail to demonstrate sustainability (CITES, 2020).

The experience of the European eel demonstrates the reality. When *A. anguilla* was listed on Appendix II in 2007, the measure did not end trade but provided the legal foundation for the European Union to introduce the Eel Regulation in 2009. That framework required Member States to implement national management plans, monitor fishing mortality, and report on progress. According to the Sustainable Eel Group's High Integrity Supply Chains report, more than sixty per cent of the European glass eel fishery and over eighty per cent of farmed eel in the EU are now certified under the SEG Standard, with full traceability from capture to consumer

(SEG, 2024). Illegal exports, once measured in hundreds of millions of glass eels each year, have been reduced by an estimated eighty per cent since the peak of trafficking in 2018, largely because lawful supply chains became clearer, enforcement improved, and the risks of laundering increased (SEG, 2024).

A genus-wide Appendix II listing does not foreclose trade but creates the same conditions that have proved effective in Europe: the removal of illicit competition, the creation of traceable and higher-value supply chains, and the empowerment of communities or traditional actors that rely on the fishery. The suggestion that oversight inevitably leads to prohibition is contradicted by experience. In reality, it is only through oversight that trade can be secured for the long term, protecting both ecosystems and the communities and businesses that depend upon them.

When examined closely, the objections to Proposal 35 do not appear to stack up: the bureaucracy claim ignores the fact that Appendix II has long been used to address the very lookalike problem that plagues eel enforcement; the argument about scientific evidence confuses precaution with paralysis, overlooking that Appendix II is designed precisely to generate the data that are lacking; the suggestion that the measure is a prelude to prohibition misrepresents the nature of Appendix II, which is intended to regulate trade sustainably rather than eliminate it. The choice before Parties is therefore straightforward: a fragmented regime will continue to reward substitution, laundering, and exploitation, while a genus-wide listing will provide the coherence, transparency, and market predictability that conservation, governance, and commerce require.

The Sustainable Eel Group urges Parties to the Convention to adopt Proposal 35, recognising that only a genus-wide Appendix II listing can support conservation, close enforcement gaps, and give the legitimate eel trade the credibility it deserves.

TOP LEFT TO BOTTOM RIGHT

Eels prepared as food in Japan, Malaysia, New Zealand, Netherlands, and the United Kingdom.