

# CITES Review of the implementation and effectiveness of the Appendix II listing of the European eel

## Notification No. 2018/018, 1 February 2018



### Response by the Sustainable Eel Group

26 February 2018

#### The Sustainable Eel Group

We are a Europe-wide collaboration of scientists, conservation groups, the commercial sector and policy advisors, dedicated to the recovery of the European eel. We are a not-for-profit, non-government organisation (NGO). With an office in Brussels and membership across Europe and beyond. SEG's Vision, Mission and strategies are defined in more detail in our [Theory of Change](#). Our work is designed to support CITES and the European Union, aiming for the protection and sustainable use of the stock of European eel. For more information, see [www.sustainableeelgroup.org](http://www.sustainableeelgroup.org).

#### Positive Effects of the Listing

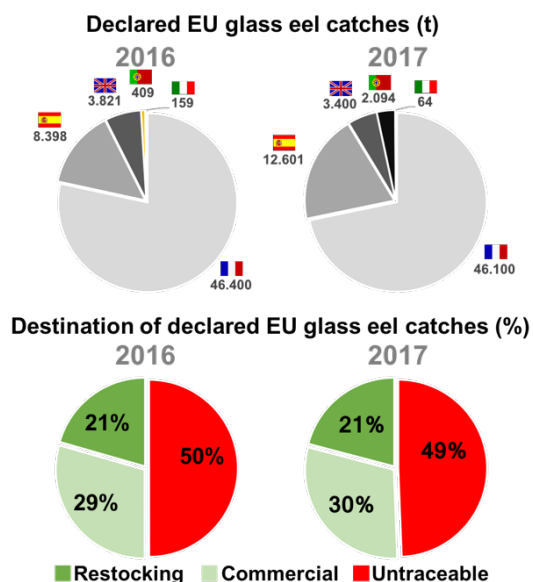
The listing under CITES Appendix II of the European eel was welcomed, given the decline in and status of eel populations. It had the effect of complementing the EU Eel Regulation and confirming that the eel was a species that required protection through a range of controls on fishing, trade, and habitat improvement. Via the [Council Regulation \(EC\) No 338/97](#) and the associated implementing regulations on wildlife trade, it confirmed to member states, authorities and fisheries that eel fishing and trade should be carefully regulated. The result being that the impact of trade of European eel is assessed on an annual basis by the Scientific Review Group of the EU Wildlife regulation. Since 2010 the conclusion has been that it is not possible to demonstrate that trade in European eel is non-detrimental to the survival of the species. This has stopped legal trade outside the EU to Asian markets, but not affected the movement of European Eels within the EU for conservation measures (restocking).

#### Negative Effects of the Listing

An unintended consequence of the resulting trade ban has been the development of illegal exports. This is another example of where trade bans alone are not enough for protection of species, but dependent on proper enforcement and accompanying conservation measures.

Legal glass eel exports from Europe to Asia in the pre-ban era were vast in late 1990s and early 2000s (up to 185 t in year 2000) but decreased to about 60 t in 2008. Not much is known about potential trafficking in the early years after the EU export ban came into force in 2010. Possibly, exports never stopped but remained totally hidden. What we do know is that the price per kilogram paid in Europe as well as Asia is strongly related to the global availability of glass eels. If there is a shortage of Japanese glass eels in Asia (as in 2013 and 2018) prices paid in Asia for European eel vastly increase. In January 2018, Asian wholesalers were ready to pay >6,000 EUR per kilogram for European glass eels.

Current prices paid for illegal exports of a minimum of 30 tons indicate that the benefits now outweigh the risks involved in illegal acts. This has had consequences on the legal market. Illegal traders pay higher prices to fishermen, knowing they can sell for higher to an illegal Asian market. Having made good profits from illegal trade, the illegal traders can then afford to supply to the legal internal EU markets at a loss. That out-competes the legal traders who are then squeezed out of the market.



In 2016, 17.4 t were used for aquaculture in Europe and 19.1 t in 2017. The amount used for restocking was significantly lower in both years: 12.2 t in 2016 and 13.4 t in 2017. In both seasons, we could not determine the destination of about 50 % (30 t) of the declared European catches. Considering that 1 kg of European glass eels consists of 3,500 individual fish, the vanished 30 t of eels, this amounts to 105 million eels. Access full SEG report here: <http://www.sustainableeelgroup.org/wp-content/uploads/2018/02/SEG-Report-2018-1-V1-1.pdf>

Figure 1: Glass eel catches and destinations. Catch data were extracted from WGEEL reports 2016 and 2017. Source: SEG-Report-2018-1-V1

## Conclusions

- Despite the CITES listing, European eels continue to supply a high demand in Asia
- Fishermen are tempted to sell to the illegal trade
- The eels caught are of lesser quality (fished less carefully) as the drivers are quantity and value
- Fewer eels of lesser quality are available to the restocking market in the EU
- Criminals make hundreds of millions of Euros in profit. See [SEG-Report-2018-1](#) for estimated values based on different scenarios.
- Legitimate traders are put out of business
- Existing traceability systems are not sufficiently implemented to fully trace all eel trade
- Inadequate enforcement in the field and customs controls have allowed illegal traders to exploit the increased demand for eels outside the EU, and from Asia (China) in particular. Lack of collaboration between member states and enforcement agencies has exacerbated this failure.
- This had led to continued high exploitation of European eel.
- This has also led to reduced eel being available for restocking, a recovery measure necessary to reach the goals of the national eel management plans of the EU member states

## Recommendations

SEG makes the following recommendations to improve the objectives of the CITES Appendix II listing for the European eel, with the **principal objective to aid its recovery**:

- Put in place obligations or agreements for collaboration between enforcement agencies to tackle illegal trade in source, transit and demand countries
- For member states to collaborate more effectively to be able to guarantee supply and a fair price to traders and fishermen for eels for restocking
- For member states to fulfil their obligations under the Eel Regulation to introduce adequate traceability systems. This will urgently require a European-wide, harmonised system.
- For member states to insist on documented proof that glass eels were caught and handled with minimal mortalities during fishing, holding and transporting, and that every stage of the supply chain is fully traceable - especially with shipments between member states

Note. this position statement is being provided to the relevant government department of each member state and also direct to CITES. It is also published on the SEG website at:

<http://www.sustainableeelgroup.org/wp-content/uploads/2018/02/SEG-response-to-CITES-No.2018-018.pdf>