

SEG Feedback to the EC Consultation on 'Preventing Illegal Trade in Wildlife' October 2021

This is the feedback from the Sustainable Eel Group to the EC Consultation 'Preventing Illegal Trade in Wildlife – Revision of EU Action Plan':

https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12675-Preventing-illegal-trade-in-wildlife-revision-of-EU-action-plan_en



The [Sustainable Eel Group](#) (SEG) is the leading Non-Government Organisation in Europe focused solely on the protection, recovery and sustainable use of the protected European eel.

Since 2010, when the CITES Appendix II listing of the eel was followed by the EU decision to impose a zero-import/export quota policy, banning all European eel trade to or from the EU, the level of illegal trade of the juvenile form ('glass eels') of this precious species reached approx. 100 tonnes per year (300 million eels and approx. 20 – 25% of the total stock of this depleted species), to supply the demand from Asian eel farms. This illegal trade has had a direct value of €1000 per kilogramme for glass eels, making the total value €100 million per year. When onward sales and the final retail sales of the grown and processed fish are considered, the total value of this illegal trade has been estimated at € 3000 million per year. By number (300 million fish) and value (€3 billion), it is one of the biggest, most lucrative illegal trades of protected species worldwide (Europol, 2021).

The efforts of the European Commission and Member States, as a result of the 2016 Action Plan to tackle wildlife crime, has had a positive impact on reducing the illegal trade of eels. Whilst levels of illegal trade are, by definition, difficult to measure, indicators from Europol suggest that the level of glass eel trafficking from Europe to Asia in 2020, had reduced to approx. 50% of that in 2016. That was a reduction from about 100 tonnes, (300 million baby eels), with a direct value of €100 million to 50 tonnes (150 million fish), worth €50 million.

This level of reduction is very welcomed, and we applaud the efforts of the EC, members states, Europol and other enforcement agencies in achieving this.

However:

1. this reduced level of trafficking, 50t, is more than the legal market demand (35t) for glass eels for the whole of Europe. i.e. illegal trade is still driving large catches of this protected species; 150 million eels with a black market value of €50 million a year,

2. As the enforcement agencies have become more successful, the organised crime groups have become more resourceful and ingenious – using different methods and trafficking routes. This has made it more difficult for the enforcement agencies to (a) detect the crime and (b) estimate the level of crime,
3. The Covid pandemic of 2020 greatly reduced air travel, and therefore the ability to send glass eels to Asia in passenger baggage. Traffickers therefore adapted to use more air freight – hiding batches of glass eels in consignments of sea food.

Countries participating in countering the illegal trade are:

EU Member States: Austria, Belgium, Bulgaria, Czechia, Denmark, Finland, France, Germany, Italy, Latvia, Netherlands, Luxemburg, Poland, Portugal, Slovakia, Spain.

Non-EU countries: Albania, Bosnia and Herzegovina, Canada, Georgia, North Macedonia, Serbia, Switzerland, United Kingdom. (Source: Europol 2021).

We therefore call upon the European Commission and Member States, and non-EU countries where European eels exist or are traded, to create a new Action Plan to succeed that which expired in 2020. Within that plan we request that the following actions are featured:

1. Increase law enforcement action to further reduce the extent and impact of this crime beyond the current 50% reduction by:
 - (a) increasing the current level of enforcement and collaboration between members states, and enforcement agencies
 - (b) disrupting trafficking networks in non source countries (e.g. Eastern Europe).
 - (c) increasing law enforcement collaboration with other source countries (Northern Africa) and destination countries (Southeast Asia, China, S Korea, Japan)
2. Make efforts to focus on new methods and routes for trafficking
3. Adopt strategies and communications to help judiciaries become more aware of the impact and value of trafficking vulnerable European eels, with the effect of increasing penalties to act as greater deterrent
4. Make greater effort with introducing systems to increase the traceability of wild caught European eels, in support of Article 12 of the 1100/2007 Eel Regulation.
5. Encourage the adoption of the [SEG Standard](#), so that those fishing and trading in eel are doing so to the highest, responsible standards, providing assurance of well-regulated trade and further reducing illegal trade.

Such actions would also further improve the ongoing success of the Eel Regulation, EC 1100/2007.

They would also:

- enhance the economic value of the legal eel catch,
- reduce the detrimental impacts of fishing with illegal methods to other by-catch fish species and the socio-economic impact to other livelihoods,
- reduce the security threat of organised crime,
- very importantly, reduce the health issue of the presence of malachite green (a copper based fungicide) in processed eel fillets that is used by many Asian eel farms.

Source: Europol 2021:

<https://www.europol.europa.eu/newsroom/news/eels-shipped-air-found-in-operation-lake-v>