

SEG Recommendations 2024 on the protection of the European eel

Context and aspiration of these recommendations

In this document, the Sustainable Eel Group SEG provides recommendations for improving the protection and accelerating the recovery of the stock of European eel – as of October 2024.

The stock of the European eel is severely depleted, and in recent decades protection programmes have been developed across the distribution area. The Sustainable Eel Group (SEG) is an international, non-governmental organisation promoting the protection and responsible use of the stock by enhancing and accelerating the implementation of these programmes. To do so, we interact with governments, stakeholders of various kinds and other NGOs, with our focus on a comprehensive, integrative approach that involves all parties concerned. In this text, SEG provides science-based advice to all those parties, considering the current trends in the stock and the level of protection achieved, as well as the governance involved in protection policies. For this, we will be guided by the latest available biological information, the Precautionary Approach (with its Guidelines), Good Governance, the adopted protection policies and more.

We pay particular attention to the readability of this text and the logic behind our recommendations, but we minimise justifying every detail with extensive references to earlier documents. Consequently, we hardly document our arguments (we just name them) – only where we need more specific information to make our point, will we provide some further detail. If further explanation is required or statements are disputed, we will be more than happy to explain, to discuss, to interact. After all, it is our core business to interact with others, discussing the protection and recovery of the eel!



(Photograph: Vianney Loizeau)

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Summary

☞ Click on any of the numbered lines below to jump to the relevant section in the text.

1. **Comprehensive policy:** Manage the eel via regional, river-specific management plans, under international coordination (the Eel Regulation) – not by means of uniform, obligatory measures (e.g. the closed seasons, imposed by the Council of Ministers in recent years). Develop a comprehensive policy for all human impacts – not just fisheries. Hence: Eel Regulation is prime, not CFP.
2. **Aims, action target:** Stick to the long-term aim (restoring 40% of the notional pristine stock) and short-term action target (reduce human impacts, to reach 40% survival from the current stock) of the Eel Regulation. In other areas, where no quantified targets have been set yet, adopt relevant reference points – preferably copy those of the Eel Regulation.
3. **Protection status:** The implementation of the Eel Regulation is incomplete. Current protection is below the benchmark set. For that reason alone, recovery of the stock is already highly unlikely.
4. **Deadline:** Set a deadline for achieving the agreed, minimal protection (40% survival) in all management areas: by 2030 the latest.
5. **Restocking:** The transplantation of young eels from areas of high to areas of low abundance might give the stock a major boost, but that positive effect has not been proven. Don't demonise restocking, but do not use it as a substitute for precautionary measures either.
6. **Co-management:** Given the complexity of the Eel Problem and the scattered occurrence in such a vast distribution area, involve stakeholders in design and implementation of protective measures wherever possible.
7. **Manage your expectations:** Accept that recovery of the eel stock will take many decades. Persist in effective protective measures, and don't water down or undermine by repeatedly varying details.
8. **Habitat loss:** Accept that habitat loss might make full recovery unachievable. Hence, focus on the 40% survival target, which remains relevant and effective even in reduced habitats.
9. **Feedback:** Strengthen the feedback on the national Eel Management Plans: provide feedback to Member States on their tri-annual self-assessments and the level of protection they have achieved.
10. **Advisory Committee:** Set up an international advisory committee tasked with this feedback and comprehensive stakeholder-representation at the international level (participants: national governments, and stakeholders of many kinds).
11. **Fishing versus other impacts:** Prioritise reducing non-fishing impacts. Fishing impacts have been reduced substantially in the past years; non-fisheries impacts have hardly been reduced.
12. **International standardisation:** Work towards a standardisation of international policies to protect the eel, using the conceptual framework of the Eel Regulation, and the CMS-area for implementation.
13. **Governance:** Current discussions around eel protection focus on governance, not on the stock status or eel biology - as the above proves. SEG will further elaborate on these governance issues, soon.



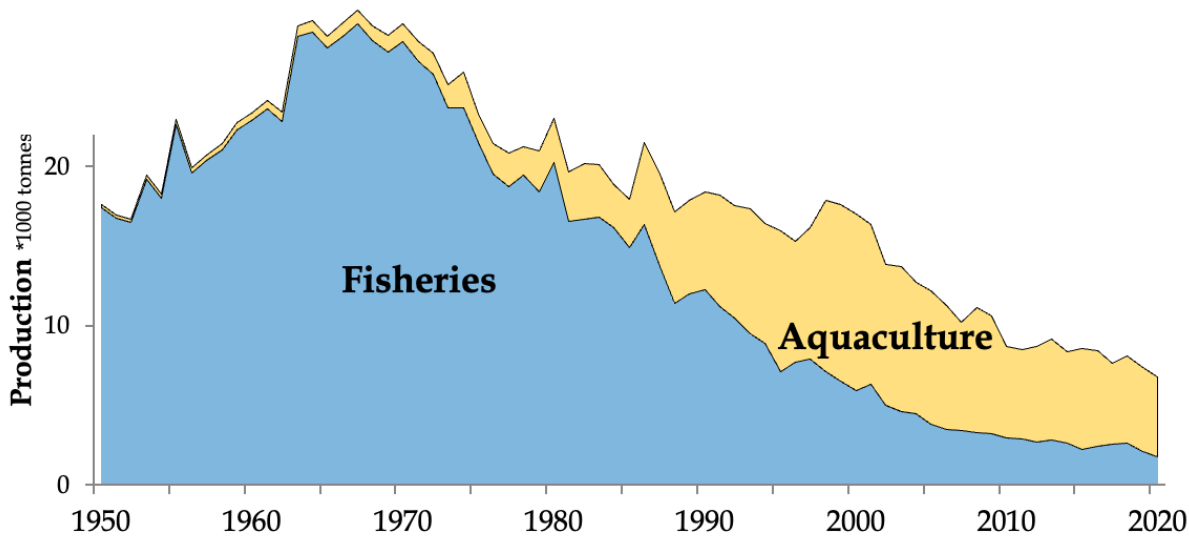


Figure 1 Trend in fishing yield and aquaculture production, over the decades. This graphs shows the European totals (reconstructing the non-reporting countries). Data from ICES (2023) – graph to be updated when new data become available.

Stock status

Following many decades of decline, the eel stock is now at a historical minimum. Landings have been in decline since the mid-1960s; glass eel recruitment since 1980; there is evidence that the stock began diminishing already before 1900 (growing industrialisation, improved water management, developing fisheries, increasing pollution).

After the adoption of protection plans ([Eel Regulation](#) and [CITES](#) in 2007, [GFCM](#) in 2018), the downward trend in glass eel recruitment has halted after 2011. In the years since 2011, recruitment indices varied appreciably around a very low level, but the earlier downward trend has clearly stopped. However, there is no proof that this halting can be directly attributed to those protection plans.

Other stock abundance indices (yellow/silver eel) and landings statistics give a geographically varying picture, as influenced by the past recruitment decline (stock still diminishing), local circumstances (any effect), and recent fishing restrictions (stock increasing).

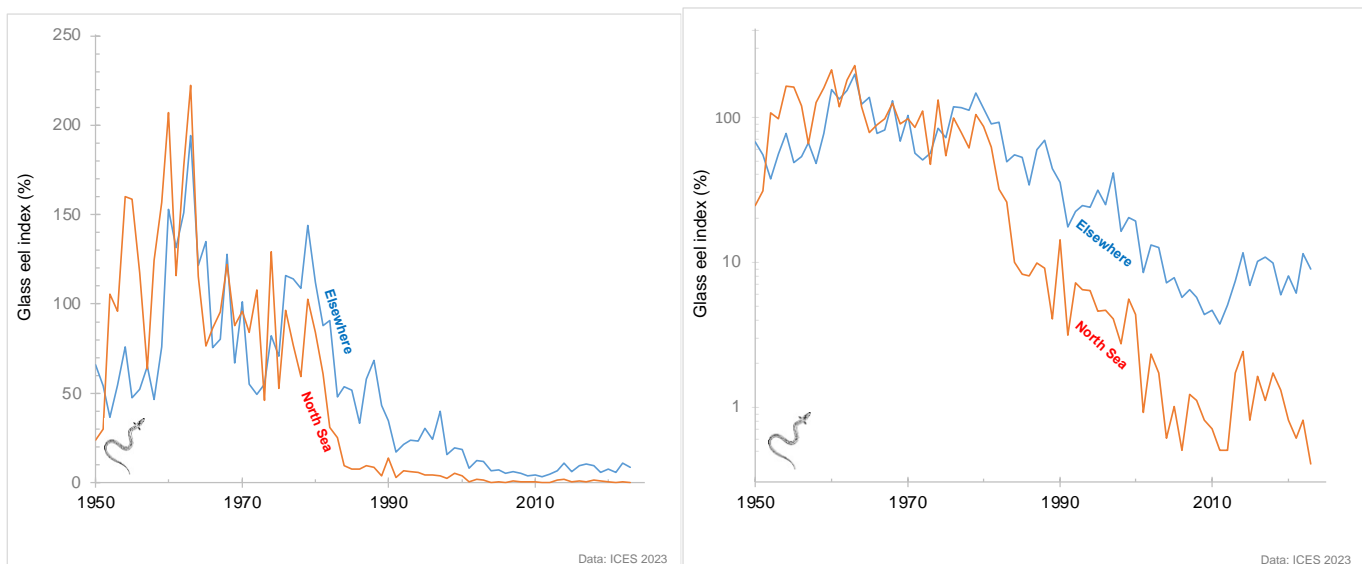


Figure 2 Trends in glass eel recruitment, over the decades. Results are shown for the North Sea area and Elsewhere separately, but that geographical distinction is questionable, and the majority of the stock is in Elsewhere. The left graph shows the trends on a linear scale, which does not enable the evaluation of recent years; the right graph is re-plotted on a logarithmic scale, to facilitate that evaluation. Data from ICES (2023) – graphs to be updated when new data become available.

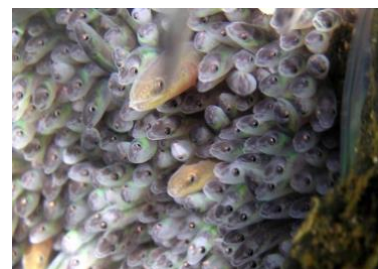
Adopted reference points: aims and action targets

In 2002, EU-Com asked ICES for advice on adequate reference points for the protection and recovery of the stock. Comparing the eel (for which no specific reference points could be derived) to other well-documented fish stocks, ICES (2002) recommended to set provisional targets (as the Precautionary Approach Guidelines require, when no stock-specific reference points can be derived): a long-term target to restore 30% of the notional pristine spawning biomass, adding a safety margin of 20% (because this 30% is a generic value – not eel-specific – and eel-biology is rather deviant). The EU Commission followed this advice in their proposal for the Eel Regulation, but set the safety margin at 10%, thus aiming for a recovery of the stock to 40% (as was indeed adopted).

The current stock is severely depleted, far below the targeted 40% biomass. Recovery will take a long time – decades or centuries – due to the severely depleted status (multi-generational recovery), the biology of the eel (slow growth, late maturation), and the continued and multiple human impacts on the stock (it is unrealistic to suggest that fisheries and other human impacts can be zeroed). Hence, ICES (2002) focused attention on the survival/mortality exerted on the stock in the current, depleted state: it is only through a high survival (low mortality) in the current, depleted state, that the stock will ever be able to recover. A 40% survival is considered to be the minimum survival limit that will allow the stock to recover to 40% of its pristine biomass¹. The Eel Regulation words: “to reduce anthropogenic mortalities so as to permit ... the escapement to the sea of at least 40 % of the silver eel biomass”. SEG is well aware that this is often misread as setting a 40% target for the escapement biomass as action target (which is only realistically achievable over decades/centuries), while the main focus is on reducing mortalities, improving survival here and now! The tri-annual evaluations of the Eel Regulation have indeed considered both the long-term biomass target (an escapement biomass of 40% of pristine) and the short-term action target (a survival of 40%, equivalent to mortality of 60%, equivalent to $\Sigma A=0.92$, equivalent to %SPR=40% - there are many ways to express this).

SEG subscribes to these reference points: a long-term recovery to 40% of pristine, brought about by a reduced human impact that allows 40% of the current potential to survive.

The eel stock is distributed from the North Cape to the Nile Delta, and in almost all waters in-between; for as far as is known, all of these eels constitute one, single, panmictic stock. The long-term restoration of the common, shared spawning stock in the far-away Sargasso is therefore necessarily a joint and shared international objective, far beyond the competence of each individual country in that vast area. In contrast, achieving the short-term action target – a reduction in human impacts – can be achieved by each country, or each part of the distribution area independently. While the full effect will only be achieved when all countries protect well, each can proceed designing, implementing and verifying the reductions in their impacts by themselves. That is: the 40%-survival-target is the target of choice over the 40%-biomass-aim, because of its superior spatial and temporal characteristics, and its direct relation to implemented management measures. In areas of (historically) very high abundance, density dependent mortality might occur (eg. only a small amount of glass eel will find a place to settle, and that amount is hardly influenced by a preceding fishery on the overabundant glass eel – the fisheries take the glass eel that would have died anyhow). This density dependence is complicating the derivation of the short-term action target (i.e. the 40% survival). If 40% would survive, there would still be far too many eels for the limited places of settlement. It is for this reason, that the Eel Regulation fixes the long-term biomass limit, but refers to the short-term survival limit only



¹ We discuss a survival of 40%, in order to achieve a recovery to 40% of the pristine biomass. At first sight, the 40% survival and 40% recovery might seem rather confusing: two related but different quantities using the same number 40. However, firstly, that congruence in number is not accidental: the survival must be 40% because the aim is to restore 40% of the pristine biomass. Would the aim have been 50% (as ICES initially advised), then a minimal survival of 50% would have applied. Secondly, the aim of full recovery (40% of pristine biomass) will not be reached in our lifetime: it will take many decades/centuries before the stock can fully recover, even if human impacts would be completely zeroed. Consequently, the 40% survival is a practical limit, guiding our actions – but the 40% of pristine biomass is a rather hypothetical long-term aim, absolutely not relevant for our actions (except that it sets the number 40, which then copies into that 40% survival limit).

indirectly (as the mortality/survival that ultimately enables the long-term objective). Since the current stock is severely depleted – and will remain so for many years to come – SEG considers this reasoning about density dependence rather academic. Moreover, where major density dependent effects exist, the targets for habitat restoration and those for fishing pressure would be strongly linked (loss of habitat then results in loss of carrying capacity, loss of settlement places, which in turn then justifies a higher exploitation – one human impact justifying another, apparently).

It would simplify discussions, to focus attention on the action target of 40% survival to achieve a long-term recovery to 40% spawning biomass, and to postpone any discussion of density dependence until and where it has been proven to occur.

The reference points advised by ICES (2002) and adopted in the Eel Regulation are in line with the Precautionary Approach and Guidelines. In the years since their adoption, they have been challenged and re-considered, but no better-argued alternatives have been proposed. Therefore, **SEG recommends to reaffirm the Eel Regulation’s long-term objective (recovery to 40% of the notional pristine abundance) and short-term action target (reducing mortality to enable the recovery, that is: 40% of the current potential escapement survives). Additionally, SEG recommends to align other eel protection policies (CMS, national) with these reference points.** ↑



Choice of management measures

In general, any management measure that leads to an increased escapement of silver eels towards the ocean can be chosen. In almost all cases, this will boil down to measures that reduce the human impacts on the stock, such as fishing restrictions (of any kind), reduced use of water flows (for irrigation or hydropower generation), eel ladders and the like that restore the migration routes, and more. In all cases, these measures should be proven to increase silver eel escapement, or reasonable proof of principle should be available. Under the Eel Regulation, the choice of measures is delegated to the national government, responsible for the national Eel Management Plan(s). This allows them to select the best, most effective and acceptable methods, fit to the local circumstances, and to embed these into a comprehensive policy.

SEG recommends to abstain from international, compulsory measures (such as the closed season imposed by the EU Council in their annual fishing opportunities decisions recently), which breach the Eel Regulation and undermine the national responsibility for protecting the eel. ↑

In cross-border management units, of course, the relevant management plan and all management measures must be well co-ordinated. Otherwise, there are little or no management measures, that necessarily require cross-border co-ordination – except for restocking (and trade-tracking/tracing in support of other, national measures).

Restocking

The practice of transporting young eels (glass eel) from areas of high abundance to areas of low abundance – most often transplanting to other countries – has been practised for nearly two centuries. Though it is evident that restocking leads to increased abundance in the destination area, and that these eels do increase the silver eel escapement, there are concerns whether transplanted eels might be able to navigate back to the spawning area successfully. This is a serious argument questioning restocking as a conservation measure, but actually, it is no argument against restocking itself.

In the absence of conclusive evidence pro or con on the oceanic migration (of both restocked and naturally immigrated eels),

SEG recommends to follow the Guidelines for the Precautionary Approach (FAO 1996): “Do not use artificial propagation [and by implication: restocking] as a substitute for precautionary measures”. ↑

This implies that restocking can be considered permissible, but – independent of that – the protection level (in both source and destination area) must reach the agreed minimum protection (40% survival), even without the potential contribution from restocking. If restocking indeed adds to the spawning stock (and as said: there is no evidence pro or con to that), it could be a very direct measure to boost the stock considerably. To remain on the cautious side, however, we recommend to ensure the minimal protection adequately, even when discounting the restocking. In short: use restocking if you wish, but don't make it the vital cornerstone of your protection.



Protection achieved

The level of protection achieved in different countries is only known from their tri-annual self-assessments under the EU Eel Regulation. There is no stock-wide assessment of the stock, and it is unlikely that such can ever be achieved. In the GFCM-area, the management plan has set no protection targets (actions are defined, but no targets set), making it impossible to evaluate the outcomes against the objectives. For the national reporting under the Eel Regulation: not all countries have reported comprehensively and some have not reported at all; no independent verification of the self-assessments has taken place.

In previous years, the EU-Commission has issued a Special Request to ICES to evaluate the tri-annual national self-assessments against the criteria of the Eel Regulation. The resulting advice (ICES [2012](#), [2018](#), [2021](#)) provided a critical evaluation of the information available. The 2024 reporting is not available yet, and we therefore postpone discussing latest results. Assuming that no miraculous changes have occurred recently, we discuss the overall picture emerging from the previous tri-annual evaluations. For the time being, we refrain from evaluating and recommending on individual Member States, because we consider that such an evaluation should not be a one-way process, but a joint effort of all Member States and involved stakeholders together (see below, under Governance).

Though some countries report a human impact on the stock on the good side of the agreed limit (60% impact = 40% survival), most report that their eels are not adequately protected. More protective measures are required to achieve the level of protection (40% survival) agreed, especially concerning the non-fishing human impacts. As long as the minimal protection is not achieved (or the achievements cannot be evaluated), it is not to be expected that the stock will recover – and indeed, most observed trends in abundance and yield indicate no significant recovery, in accordance with the short-falling protection.

SEG recommends to implement the Eel Regulation as adopted, and to achieve the required minimal protection of 40% survival in all areas (as covered by the EU Eel Regulation, the GFCM management plan, and the independent national plans). Additionally, SEG suggests to adopt a deadline for achieving this minimal protection in 2030 the latest (#EelDeal2030). ↑

SEG notes that (most) countries have conducted their tri-annual self-assessments, but that a critical view on individual country's achievements is lacking, no effective feedback is provided, and no self-correction by the countries involved occurs. This is further discussed under the heading 'Governance', below.

Short-term expectations

Over the decades, most time series have shown a rather gradually developing trend. The year-to-year variation paled in comparison to the long-term decline of the stock. Since the management of the stock primarily addresses those long-term trends, there is little purpose in updating all management information (graphs, tables, advices, views, what more?) on an annual basis – the situation will not change fundamentally (and if the advice does, that questions the advice). Obviously, the field-monitoring needs to go on, but there is no need to review that information extensively every year, if nothing really changes. Actually, small variation in annual recommendations currently distracts attention from the real issues: multi-annual implementation problems of the adopted regulations and some structural shortcomings of the regulations themselves.

SEG recommends to focus attention on a better implementation of the Eel Regulation and other eel protection policies, not on the details of latest assessments and dubious alternatives to the Eel Regulation. ↑

SEG itself will re-iterate its current advice, adjust and correct it if needed, will push for a better implementation, but SEG will advocate against any new brooms.



Long-term expectations

The long-term objective of the EU Eel Regulation 2007, as well as that of the GFCM Eel Management Plan 2018, is to recover the stock (enabling to provide and maintain high long-term yields). That is: the main aim is a long-term, multi-decadal goal. To achieve that long-term goal, human impacts must be reduced (to a minimal level that allows the stock to recover (or better), i.e. at least 40% survival), and that protection level must be maintained for many decades to come. It is unlikely – or stronger: it is unimaginable that the stock will fully recover earlier.

SEG recommends to manage the expectations: the recovery of the eel stock requires steadfast protection programmes, and patience to wait for the full recovery for as many decades as it will take. This implies a prime focus on implementing the short-term action targets, and to evaluate the effectiveness of the protective policies on these too. ↑

A major elephant in the room: The ultimate objective of the eel protection policies is to safeguard a minimal spawning stock that produces an (almost) full next generation of recruits (c.f. Brundtland). For that purpose, a proximate action target is set at lowering human impacts so that at least 40% survives (which – in turn – allows the stock to recover over the decades, to the 40% of pristine).

One of the (potential) causes of the decline of the eel stock, is the quantitative and qualitative loss of eel habitats. This habitat loss reduces the eel stock, and in particular reduces the biomass of silver eels being produced from the river. This questions whether a recovery to 40% of the notional pristine biomass is still achievable at all – it seems highly unlikely that major human settlements (eg. all coast-near cities) will be given up to enable the eel to recover. Without major habitat restoration, the 40% of pristine stock abundance might be impossible to achieve. At first sight, this questions the adequacy of the reference points advised in ICES (2002), and adopted in the Eel Regulation. For the current, severely depleted state of the stock, however, the advice remains to achieve 40% survival or more, despite the potentially limited production due to major habitat-loss. The long-term biomass target (40% of the notional pristine biomass) might be unattainable, but the short-term action target (40% survival from the current stock) remains valid. Fulfilling the 40% survival will – in the long run – achieve the maximum biomass achievable in the restricted habitats, whatever that maximum in the restricted habitat might be.

SEG recommends to prioritise the achievement of the 40% survival target, realising that recovery to 40% of the biomass might be unachievable from the restricted habitats that currently remain. ↑

Considering the effect of habitat loss, there is one practical consequence for today's management. Where major habitats are lost, eels will concentrate in downstream areas, enabling a more profitable fishery there. This can easily lead to a situation where the fishery is justified by the habitats lost, and the habitat loss is justified by the presence of the intense fishery. One human impact justifying the other, and vice versa. Clearly, this circular line of reasoning is to be avoided.

Governance

The bad state of the stock and the downward trends in abundance have been well noted since the late-1990s; protection policies have been adopted in 2007 (and later) and implemented since. Yet, in the 17 years following, protection levels have remained below par: the stock is currently not sufficiently protected, and hence the intended recovery does not take place yet. In public debates and governmental discussion, much attention is drawn to the latest abundance indices, and the absolute low level of the stock (raising the hypothetical question whether extinction is nearing), while the main issue clearly is not in the biological state of the stock (which has not fundamentally changed since the late-1990s, except for the stabilisation in recruitment since 2011), but in the governance of the protection policies (here and now). If not better implemented, and not better improving survival, the eel protection plans remain a dead letter for the eel. Under the Eel Regulation, responsibility for the overall achievement of adequate protection resides with the national governments. Though they have produced tri-annual self-assessments, rather little adjustments have been made to improve survival, while in many cases insufficient protection has been achieved. The ability to self-correct appears to be weak, and external feedback is needed. At current, cross-correction or international feedback are effectively lacking. Hence, the mandatory nature of the Eel Regulation is effectively replaced by a voluntary self-assessment-without-consequences, in a confusing process.

SEG recommends to strengthen the feedback on the Eel Regulation and on the national Eel Management Plans, by means of an international advisory committee specifically for the Eel Regulation, in which both Member States' governments and stakeholders may participate. This committee should be tasked with providing feedback to national Eel Management Plans and their evaluations, as well as advising on the progress at the international level. ↑

In national management plans under the Eel Regulation, fishing restrictions have been implemented in many areas. Measures to reduce non-fishing impacts have been far less elaborated, while the impact of the non-fishing human activities is at least in the same order of magnitude as fishing. It is unlikely that unilateral reductions in the fisheries – without substantial simultaneous reductions in the non-fishing impacts – can lower the total mortality enough to achieve a significant recovery. Moreover, the single-sided implementation sets the societal support for the adopted protection policy at risk. In the GFCM plan, the unilateralism is even structurally embedded, which questions the plan fundamentally.

SEG recommends to prioritise reducing non-fishing impacts in the coming years, in all areas and policies, and – where needed – stimulate the technical developments required to do this. ↑

The eel stock is distributed from the North Cape to the Nile Delta, and in almost all waters in-between; for as far as is known, all of these eels constitute one, single, panmictic stock. For a single, shared stock, the policy to protect and restore is necessarily defined at the international level, setting long-term aims and short-term action targets, shared by all. However, an 'average habitat' for the eel is small, within a single river, in one country with its characteristic geography and climate conditions – and with its distinctive human impacts and local stakeholders. That is: the implementation of protective measures is necessarily achieved locally, in a national management plan. Hence, the Eel Regulation sets uniform long-term aims (recovery to 40% of the pristine biomass) and short-term action targets (a survival of 40%), but leaves the elaboration and implementation to national Eel Management Plans. Combining shared objectives with localised action, the



Eel Regulation thus takes the benefit of both the target-setting international scale and the effective decentralised implementation – it addresses the fractal dilemma adequately.

The implementation of the Eel Regulation has stimulated many parties to contribute to the protection of the eel stock. Amongst others, the Sustainable Eel Group (SEG) has taken the initiative to develop a voluntary Standard for Responsible Eel Fishing. This enables the fishers – scattered over all habitats across the EU - to prove that they operate responsibly, within the constraints of the Eel Management Plans. As such, the SEG Standard achieves an element of co-management throughout the commercial eel sector in Europe. Other elements of co-management are found in e.g. the Declaration of Intent (Avsiktsförklaringen, 2010-2017) between the Swedish government and the main hydro-power companies; and more. SEG considers this element of co-management, and active stakeholder-involvement of utmost importance to achieve effective protection, and SEG therefore opposes the recent Council decisions to close fishing seasons, which have clearly undermined the involvement of many stakeholders across the continent.

SEG recommends to give precedence to the well-designed Eel Regulation over other, less-applicable policies; to decentralise the implementation to Member States; to refrain from central interventions (subsidiarity); and to strengthen the involvement of stakeholder sectors (co-management). ↑

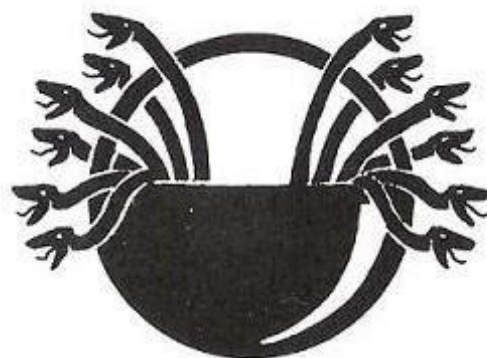
Coherence of policies

The eel stock is distributed from the North Cape to the Nile Delta, and in almost all waters in-between; for as far as is known, all of these eels constitute one, single, panmictic stock. It is not known to what degree which parts of the continental distribution area (or even all parts) contribute to the spawning process (other parts might constitute a dead-end diaspora), and it is therefore essential to protect them all on a precautionary basis. As it now happens, different areas in the distribution are governed by different policies (EU Eel Regulation, GFCM, some national plans, more), of different quality (with/out explicit and quantified aims and targets, with/out monitoring and feedback, with/out an integrative approach to multi-impacts, etcetera), with different aims and actions, different governance processes, different ambitions, and more. As a consequence, it will not be possible to attribute a coming success or failure of the recovery to any of those policies, and it will not be possible to provide feedback, evaluation and adjustment to the policies, or the specific measures taken.

SEG recommends to work towards a standardisation of the different international policies, in which the strong elements of all are maintained (including quantified aims and targets, deadlines, feedback, integrative approach, etcetera). ↑

The EU Eel Regulation is the oldest, and most complete policy. The CMS-plan covers the largest area (nearly the whole distribution), but is lacking key elements, making it a toothless instrument.

SEG recommends to develop the CMS-plan further, by copying the remaining elements from the Eel Regulation (explicit and quantified aims and action targets), and adding some missing elements (evaluation and feedback mechanisms, structural stakeholder involvement at the international level). Once that is done, the CMS-plan would constitute an overarching policy, that would embrace, rather than replace, the other, regional policies. ↑



Individual policies in some further detail

The EU Eel Regulation, 2007. This Regulation sets a long-term aim (recovery to an abundance of 40% of pristine) and short-term action target (reducing human impacts to a level that enables that recovery), addressing the different human impacts (fishing, water management, habitat loss and more) in an integrative way. The implementation developed rapidly after the Regulation had been adopted, but is now faltering, and no deadline has been set for achieving the minimal protection level – ambitions are abating. If no deadline is set, and if the minimal protection level is not achieved, the state of the stock will likely deteriorate further, and the Eel Regulation and the eel stock will have been wasted.

Considering the Eel Regulation, **SEG recommends to set a deadline, by 2030 the latest, for achieving that minimal survival of 40% in all countries. Additionally, we recommend to create a structural feedback mechanism, by means of an international advisory committee specifically for the Eel Regulation, to act as a watchdog on the required minimal protection level.** ↑

The EU Council of Ministers annually decides on fishing opportunities for stocks under the Common Fisheries Policy CFP. In 2017, they adopted closed periods for the eel fisheries in marine waters, which periods have repeatedly been modified in later years. The CFP is narrowly focused on marine fisheries, and the adopted closures thus apply to the marine parts of the stock only. An unsubstantiated and unevaluated measure, addressing only one of the impacts, in a relative minor part of the stock – SEG questions the relevance of and the motivation to take this measure fundamentally.

To the EU-Council of Ministers, **SEG recommends to end this incoherent interference of the Council in the adopted policy (the Eel Regulation. Mind you: a Council Regulation), because it undermines the effectiveness and motivation for the more elaborated and substantiated Eel Regulation so strongly.** ↑

The CITES listing of the eel in Appendix II in 2007 regulates (reduces) the uncontrolled import/export of eel, and that contributes to the overall protection of the stock. In itself, however, CITES does not aim to protect/recover, and does not set targets or initiates actions. Therefore, the CITES listing of the eel falls outside the scope of this text.

The GFCM eel management plan (2018) addresses the fisheries in the Mediterranean, but does not address any other human impact on the eel. Although the plan is designed to provide and maintain high long-term yields, it does not quantify its aims, nor derives concrete action



targets – focus is on taking pre-specified actions, rather than achieving specific outcomes. Without that, there is no justification for the actions taken, and the narrow focus on just one impact (fishing) is not in agreement with the declared social and economic principles. No deadlines are set, and no structural evaluation-and-improvement is foreseen.

Considering the GFCM Eel Management Plan, **SEG recommends to adopt an integrative approach, addressing fisheries, water management, habitat loss and more; to develop concrete aims, well-quantified action targets, including an explicit deadline; to relate the management measures taken to these aims and targets quantitatively; and to consider how to evaluate and provide feedback to the actions taken.** ↑

CMS. In addition to the above policies, CMS is developing its own action plan for the eel. This plan has been under construction for a range of years, but no final version has been adopted yet. The latest draft version (as SEG has seen) lacks a quantified aim and action target, a deadline, and a feedback mechanism, making it a toothless instrument. However, the CMS-plan covers (almost) the whole distribution area of the eel, and therefore is the instrument of choice to develop a more uniform approach to protection across the whole distribution area, once its structural shortcomings have been addressed.

Considering the discussions in CMS, **SEG recommends to develop the CMS-plan further, by copying the remaining elements from the Eel Regulation (explicit and quantified aims and action targets), and adding some missing elements (evaluation and feedback mechanisms, structural stakeholder involvement at the international level).**

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