



Sustainable
Eel Group

Theory of Change

Our Aims, Objectives and
Strategies

The Sustainable *Eel* Group

Theory of Change

Versions Issued

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1. Introduction and purpose

The stock of European eel (*Anguilla anguilla*) is severely depleted; its population has fallen by 90% since the 1960s/70s and it remains in a critical state ([EU 12610/22](#)). It was once extremely abundant and widely spread across its range from North Africa, through Europe and Scandinavia, and supported extensive fishing, associated trade and livelihoods.

The European Commission created the Eel Regulation, [EC 2007/1100](#) in 2007 for the purpose of the protection, sustainable use and recovery of the European eel.

This Theory of Change describes the aims, objectives and strategies of the Sustainable Eel Group to support the eel's recovery and the Eel Regulation.

This is a substantial revision of our original [Theory of Change](#), created in 2016. It reflects an evolution of our thinking in preparation for a substantial revision of the [SEG Standard](#), being revised in 2023.

2. Our Statement of Change and Sustainability Impacts

Our vision. We wish to see:

Biologically safe wild eel populations, distributed throughout their natural range, fulfilling their role in the aquatic environment, recovering in line with the protection targeted by the EC Eel Regulation.

Our sustainability impacts in support of that change:

Social

- Greater engagement of all stakeholders interested in the European eel
- Illegal eel trade is minimised (ultimate goal is 0%)
- An increasing proportion (ultimate goal 100%), of eel fishing, trade and consumption demonstrates its commitment to protection and sustainable use by meeting the SEG standard
- The Sustainable Eel Group is a successful advocate of eel protection, sustainable use and recovery with governments and stakeholders

Environmental

- Protection for the European eel achieves the target of 40% survival
- Barriers to migration are removed or adequately mitigated, initially to meet the 25,000km river target in the [Swimways Network](#) by 2030
- Wetland habitats are restored to increase the quantity, quality and connectivity of the aquatic environment for eels

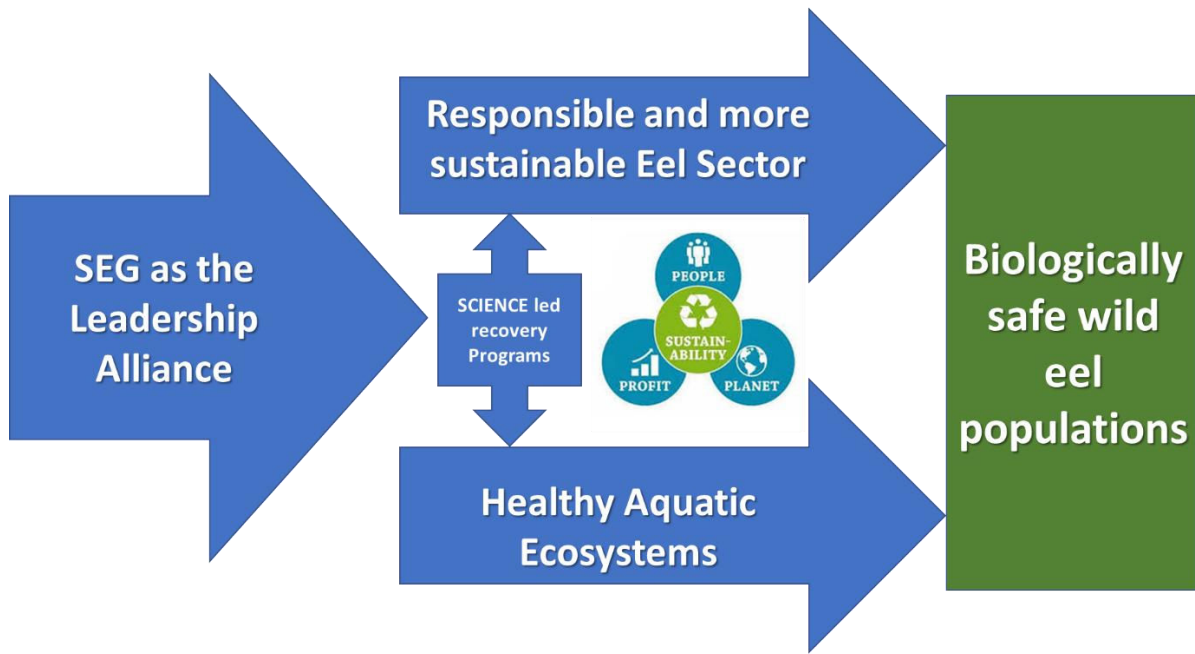
Economic

- The damaging effects of water operations* to eel populations are minimised,
- The livelihoods of those that fish and trade responsibly in eel are maintained

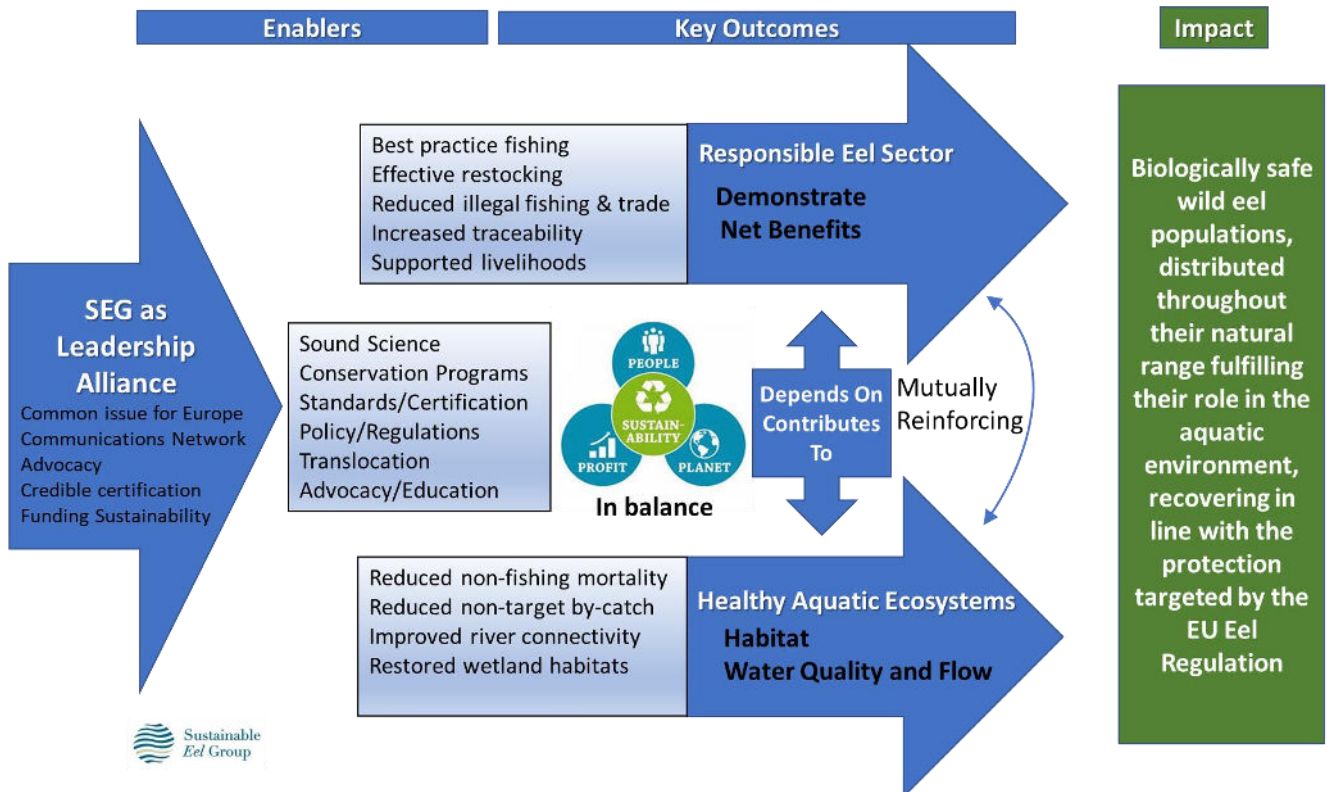
* pumping, navigation, flood management, hydropower, pollution discharges etc.

These objectives and their causative effects are reflected in the following diagrams:

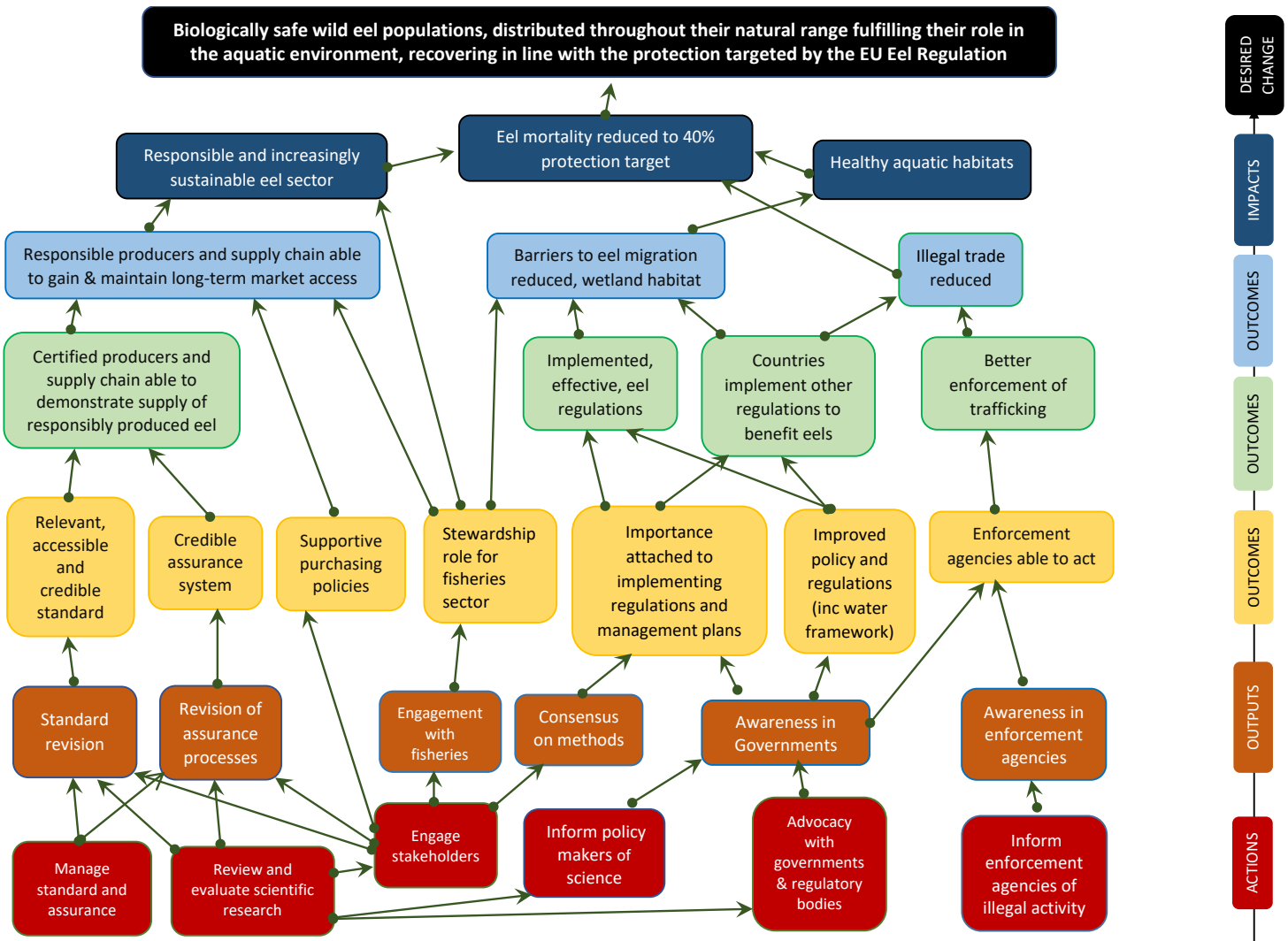
Summary:



And in more detail:



In further detail with causal links:-



- Major assumptions (a full list in the MEL Plan)**
- 40% protection target level set by ICES will lead to eel recovery over several (3 – 4) eel generations
 - Recovery can take place faster than impacts of Climate Change, which could accelerate in the next 50 years
 - Governments don't stop all eel fishing and trade; the Eel Regulation framework continues
 - Other protective legislation is progressed and implemented properly, e.g. Water Framework Directive
 - Non EU countries have sufficiently protective similar legislation (e.g. the UK, post-Brexit)

- Enabling environment**
- Monitoring, evaluation and learning of the SEG system
 - Good human resources and management
 - Good financial management
 - Good governance
 - Adequate funding
 - Willing and able partnerships
 - Governments, agencies, NGOs and companies implementing the Eel Regulation

3. Our strategies

These are our strategies that describe and explain the key elements in the summary diagram above:

SEG as the leadership alliance – advocacy, influencing and collaborative working

- SEG aims to be highly influential with the European Commission and national governments on their policies that affect the aquatic environment and the eel,
- We are a small NGO and work in partnership with a balanced collaboration of scientists, conservationists, governments, other NGOs and the eel fishing and trade sectors to influence, gain funding and manage projects that will directly help eel populations or scientific knowledge, and to present its views in the most compelling way,
- We promote and support scientific research to enhance knowledge to make healthier aquatic ecosystems for eels and other species, and to improve the SEG standard and other policies to build a more sustainable eel sector.

A responsible and sustainable eel sector

- The SEG standard is designed to promote and assess sustainability and best practice in the eel fishing and trade sector via a voluntary certification scheme for assured, traceable ‘responsibly sourced eel’,
- The SEG certification scheme provides assurance and choice to traders and consumers who wish to buy responsibly and so encourage further adoption of this sustainability standard,
- This promotes more sustainable forms of fishing with reduced mortality, reduced illegal trade, restocking to EC target levels and contribution to the recovery of the eel population,
- This encourages the sector to take on the role of Eel Stewardship.

Healthy aquatic ecosystems

- Dams, weirs, sluices, culverts, and drainage systems mean that the eel cannot access the great majority of the freshwater habitats it once could. Pumps, power stations and hydropower suck in, and kill or damage glass eels and elvers as they migrate into rivers and yellow and silver eels as they migrate within freshwater and ultimately return to the sea. Wetlands have been drained and rivers canalised so that the available habitat is often less or even unsuitable for eels,
- So influencing, collaboration and partnership projects characterise our work to remove barriers, assist migration, screen pumps and improve aquatic habitats to help the eel’s recovery.

Support to the Eel Regulation

- A key underpinning strategy is to support the holistic approach to eel recovery as set out in the European Commission’s Eel Regulation 2007/1100.
- The Eel Regulation is the most important piece of legislation to effect the eel’s recovery. The [Poseidon review](#) published in 2020 reported it to be effective, apart from the differing levels of commitment of Member States to implement it fully, and the effectiveness of their eel management plans.
- That is why our [#EelDeal2030](#) campaign is pressing for all members states to have effective plans in place by 2030, and there to be a robust feedback mechanism of monitoring and improvement

organised by the European Commission. The need for more concerted action to implement the regulation was agreed at the EC's [AGRIFISH Council meeting of 26 September 2022](#).

- SEG is supportive of the Eel Regulation because:
 - (1) There is sound science by ICES and the Precautionary Approach behind it, with the aim to achieve the target of 40% eel survival, enabling the European eel population to recover over generations;
 - (2) Whilst there is a common centralised objective, the regulation provides distributed control requiring and allowing subsidiarity at member state level to create their own eel management plans to achieve the 40% survival target, specific to the social, environmental and economic requirements of their country;
 - (3) It aims for a comprehensive policy, addressing both fisheries and non-fisheries issues without precedent.

Reference: Dekker, 2019: Annex 10, Working paper – Precautionary management of the European Eel. Joint EIFAAC/ICES/GFCM Working Group on Eels, Bergen (Norway), 27 August–2 September 2019. ICES / WGEEEL.

- Our support to the Eel Regulation is therefore a major foundation of our strategies for eel protection and recovery. We overtly support the Eel Regulation in our strategies and statements and underpin it by testing its application by operators in our SEG standard certification scheme.

Sustainable Development

Brundtland Convention

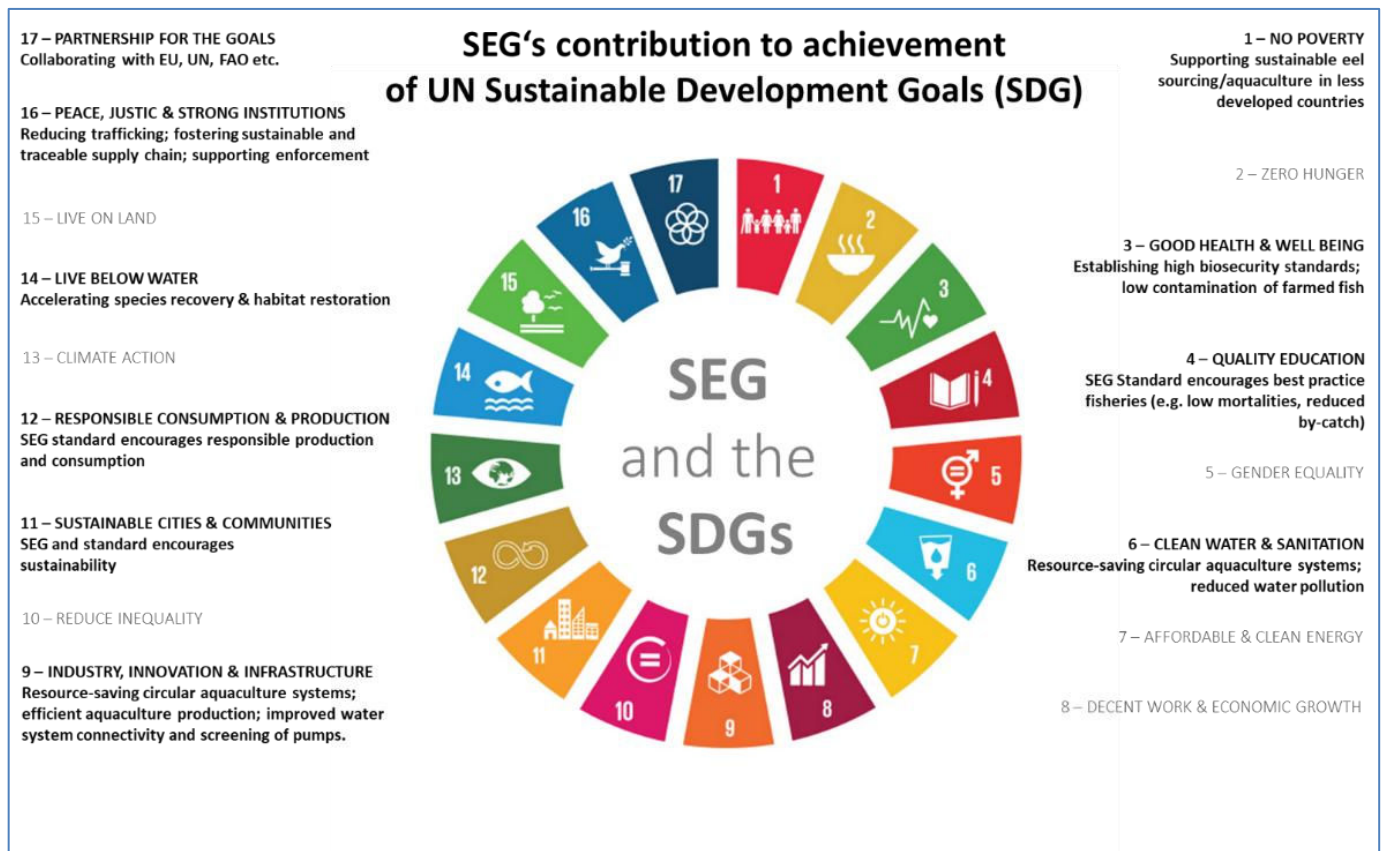
SEG considers its outcomes, or sustainability impacts in a holistic approach, to balance the three pillars of sustainability according to the [Brundtland Convention](#), i.e. Social, Economic & Environmental; or People, Profit (prosperity) & Planet:



The SEG standard is one of our tools to promote the development of a responsible and ultimately sustainable eel sector. It aims to help meet our overall vision / statement of change (see above) and directly or indirectly supports all of our sustainability impacts.

United Nations Sustainable Development Goals

As well as considering the Brundtland Convention, SEG also aims to support the [United Nations' Sustainable Development Goals](#) (SDG) as follows:



The European Green Deal

SEG also supports the [European Green Deal](#), in particular, Preserving Biodiversity and Ensuring the Sustainability of our Blue Economy and Fisheries Sectors.

To support this, SEG has its [#EelDeal2030](#) campaign for full and effective implementation of the Eel Regulation.

4. Measuring the intended change

Measuring the intended change is necessary to identify:

- (1) whether our actions, direct or indirect, are having any impact on eel protection, sustainable use and recovery, and
- (2) which actions are most and least effective, so that we can adjust to have greatest impact.

We will use a range of methods to monitor and evaluate the effectiveness of our strategies. Some we are directly responsible for and have our own data – e.g. the number of SEG standard certificates in place, the number of eels involved, the size of the market covered. Others we have little direct influence or data, e.g. the impact on illegal trade, the number of barriers removed or area of wetland restored. There we will join others to influence change, and will use the information from others, e.g. Water Framework Directive, Amber and other initiatives, to monitor the improvement to the aquatic environment and the extent to which water undertakers apply eel-friendly operations.

As well as our own monitoring, we will commission independent reviews and reports to evaluate the impact of our strategies in achieving our sustainability objectives.

Measures, targets and a monitoring, evaluation and learning plan to underpin the sustainability impacts outlined in section 2. above is described in more detail in [301 SEG Monitoring, Evaluation and Learning Plan](#).