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MEDAC ADVICE ON THE EUROPEAN EEL

This advice is in response to the request made by the letter sent by Director General Charlina Vitcheva (Ref. ARES(2021)7633619- 10/12/2021) regarding the International Council for the Exploration of the Sea (ICES) advice published on 4 November 2021 for the entire natural range of European eel (*Anguilla anguilla*).

The MEDAC does not share the EC's concern about the ICES advice of 4 November 2021 for the entire natural range of European eel *(Anguilla anguilla)*[1]. The change in formulation is related to a will from ICES to harmonize its various advice, and in no way reflects a drastic change in the eel stock. The methodology used does not currently allow all the mortality factors affecting eels to be considered, and the rewording of the advice cannot therefore be used to implement additional management measures on eel fisheries.

The ICES wording "*zero catches*" is related to the application of the precautionary approach as defined by ICES. In the ICES nomenclature, eel is assessed as a category 3 stock, with a current biomass level considered to have a significant probability of being below a biomass limit Blim. According to ICES guidelines, for category 3 stocks with a biomass level below Blim, ICES applies the precautionary approach, which states that catches should be reduced to zero (ICES, 2021). Thus, this change in wording does not reflect a significant change in the status of the eel stock compared to previous years, but simply an application of the ICES precautionary approach.

Furthermore, the MEDAC points out that the rewording of the ICES advice contributes to the over-representation of the fisheries factor in relation to other anthropogenic factors, which distorts the message compared to what prevailed at the time[2]. As a reminder, previous ICES advice recommended that "*all anthropogenic impacts (including those from recreational and commercial fisheries, hydropower, pumping stations and pollution) that reduce the production and escapement of silver eels should be reduced to zero or kept as close to zero as possible*" (ICES, 2020). This more balanced phrasing does not focus on the fishing factor alone, but considers all anthropogenic impacts affecting eels. Wishing to avoid any misinterpretation of the 2021 advice and considering that the state of the stock and its recommendations have not changed in the recent period, ICES is

[1] EAA, MedReAct and WWF position is to follow the ICES advice and to forbid the taking and selling of eels in all its life stages.
EAA's eel position with more details is here: www.eaa-europe.org/positions/eel-2018.html

[2] MedReAct deems that further measures to minimize other anthropogenic mortalities, from migration barriers, pollution and habitat loss, for example, are also urgently needed.

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considering splitting its 2022 advice into two separate parts: one dealing with fishing opportunities and the other with non-fishing mortality factors.

Thus, the members of the ICES Eel Working Group are currently working on the other factors of eel mortality, and the first conclusions should be available in 2027 (WKFEA, 2021). For example, in some areas, eels suffer from parasites *Anguillicolla crassus* and/or pollution from hazardous substances (e.g. dioxins, PCBs), which kill them before or during their migration to the spawning grounds in the Sargasso Sea. In Europe there are more than a million-man made obstacles[3] – dams, weirs hydropower – which make it very difficult or impossible for eels and elvers to enter many rivers or to spread in the river systems and lakes. Manmade obstacles in the rivers force eels to congregate in front of and behind the obstacles making them easy prey for cormorants and other predators. All anthropogenic impacts (e.g. caused by hydropower, pumping stations, and pollution etc.) that limit the colonization of aquatic environments and the increase of the population and escapement of silver eels should be reduced to – or kept as close to – zero as possible. In fact, it is emphasized that professional eel fishing has achieved the objectives set by the European eel regulation, limiting them to the provisions already collected in the Eel Management Plans (EMP), therefore MEDAC believes that any additional management measures on fishing, in addition to being inefficient in the absence of other measures on other mortality factors, it would have significant socio-economic implications for the European fisheries and aquaculture sector[4].

Despite its revised wording, the 2021 ICES eel advice, with its strictly marine fisheries-based vision, does not allow for the development of an ecosystem approach for eel. Thus, it cannot constitute a basis for the management of this species at the scale not only of its distribution area, but also in the Member States.

The MEDAC calls on the EC to introduce *ad hoc* ecosystem-based management approach for eels, as defined in the Marine Strategy Framework Directive (Directive 2008/56/EC), promoted by the Common Fisheries Policy (CFP) (Article 4.9) and the European Eel Regulation (EC1100/2007). The ecosystem approach involves the implementation of measures that address mortality factors other than fishing and a cross- sectoral management by DG MARE and DG ENV. This implies a real commitment from the EU and the Member States to implement measures aimed in particular at restoring ecological continuity, water quality and habitats, which has not been done in a sufficient and credible manner under the Water Framework Directive (WFD).

Contribution received by the French professional sector referring to the situation of the professional fishing:

"In 2021, in France there are 745 fishing companies authorized to carry out commercial fishing for one or more eel stages in the maritime and/or river areas, and at least as many induced jobs. 350 tons of yellow and silver eels and 49 tons of glass eels were landed by these fisheries in 2020 for a

[3] www.sustaineurope.com/interview-with-dam-removal-europe-20180224.html

[4] WWF would like to add to the record that a socio economic analysis to assess the impact of zero catches as per ICES advice, would be necessary to undertake and adjust any management measure.

total revenue of over €11 million. A majority of these enterprises rely on eel for more than 50% of their total annual revenue.

Any further restriction on professional fishing (not to mention a total closure on fisheries) would spell the end of the existence of a whole part of the profession and will lead to serious problems within the sector in the very short term. These decisions, will imply the following consequences:

- Irreversible destruction of jobs linked to small-scale fishing, in rural communities where it provides many indirect jobs in the local economy. A total closure of European eel fisheries would result in a loss of **almost 50 million euros per year** (*Hanel, R. et al 2019)*[5]
- Development of illegal trade and poaching, already stimulated by the ban on exports outside the EU (an INTERPOL estimation put the value of the **illegal trade at nearly 3 billion euros**);
- Catastrophic economic consequences for the northern European aquaculture sector, which is 100% dependent on the supply of wild glass eels. A closure of the European glass eel fishery would result in a **direct loss of 37 million euros in revenue for this sector** (*Hanel, R. et al, 2019).*

Finally, the MEDAC stresses that professional eel fishing has achieved the objectives set by the European Eel Regulation. The MEDAC advocates a *status quo* on the measures applied to the professional fishing sector, limiting them to the provisions already collected in the Eel Management Plans (EMPs) as long as the objectives of reducing the other mortality factors have not been reached.

The MEDAC recalls that any additional management measure on fishing, in addition to being inefficient in the absence of other measures on the other mortality factors, would have significant socio-economic implications for the European fishing and aquaculture sector.

[5] Hanel, R., Briand, C., Diaz, E., Döring, R., Sapounidis, A., Warmerdam, W., Andrés, M., Freese, M., Marcelis, A., Marohn, L., Pohlmann, J.-D., van Scharrenburg, M., Waidmann, N., Walstra, J., Werkman, M., de Wilde, J., Wysujack, K. 2019, Research for PECH Committee – Environmental, social and economic sustainability of European eel management, European Parliament, Policy Department for Structural and Cohesion Policies, Brussels