

May 19, 2017

Identification number:
514687319814-91

Baltic Sea Centre's reply to DG MARE's consultation on the Roadmap of the Evaluation of the Eel Regulation

We appreciate the initiative of the Commission to assess existing Eel Management Plans (EMPs) on a national level; we think it is a necessary step to ensure recovery of the European eel. The eel stock is in crisis due to many causes, which have led to a severe decline in recruitment. Because continuous reductions in recruitment will give rise to even lower amounts of adult eels in future generations, we now need to increase the escapement of adult eels from all kinds of habitats. Otherwise, the species is seriously threatened as the next generation of recruitment will be even lower.

The national EMP, formulated at the request of the European Commission, should thus ensure the fulfilment of the aims declared at the political level. Too many times are the management objectives confounded by the conflict between conserving the species and the fishery, so the prioritisation is unclear. Therefore, we suggest that:

- Due to the acute status of the European eel, we should prioritise actions that intend to increase the present escapement.
- Management efforts focus on achieving the conservation objective rather than mitigating the negative consequences of the fishery.
- The basic assumptions and estimates are uncertain. Uncertainties should not give room to continue the fishery.

It is essential that the external evaluation process of ICES advice as well as of Member States' reports is achieved independently and competently. Which is then important to keep in mind when identifying the ideal consultancy to carry out this work.

There is further a lack of judicial instruments to enforce measures that could protect the eel from becoming virtually extinct. As eel management includes other areas than managing fisheries, a strong push towards policy coherence is needed both at national level and EU level.

It is vital that the practice of restocking with glass eels and elvers (i.e. translocation of wild fish) as a conservation measurement is scrutinised. The protective value of restocking eels from glass eel rich areas around the Bay of Biscay to other parts of Europe still has to be evidenced. The number of eels that will eventually take part in the spawning is unknown, and this type of action should be less prioritised. The practice of stocking young eels above hydro-electric power plants should be banned as turbine mortality is high. Long-term actions should instead focus on habitat restoration, for instance, by removing obstacles in rivers.

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