ASSOCIATION OF NATIONAL ORGANISATIONS
OF FISHING ENTERPRISES IN THE EU

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RE: Letter on eel fisheries ban in Union waters

Dear Mr Kiisler, Dear Mr Tamm,

The Commission has recently proposed a ban to fish for European eel (Anguilla anguilla) of an overall length of 12 cm or longer in Union waters of the ICES area and in the Baltic Sea and distributed a proposal for a common declaration on further measures including bans of fisheries in lakes and rivers.

Europêche supports the activities to improve the state of the eel abundance in European waters. We welcome measures of the eel management plans especially restocking, catch and carry initiatives, etc. Fishermen invest a lot of time and money to make use of the funding opportunities provided by the European Union. They are the main drivers of the process that leads to a stabilization of eel occurrence. A ban on fisheries would be counterproductive and terminate their activities immediately.

We are in a state where we notice different intensities of implementation of the eel plans in different Member States. Some are more successful than others. Particularly grave is the illegal export of glass eel to Asia; problem which still persists. Europêche argues that the termination of illegal exports and more restocking should be the priorities for eel management, not a blanket ban.

In this context, we are appalled and fail to understand why the Commission now proposes such dramatic measures against the eel fisheries; even more when no impact assessment on the socio-economic consequences of such a proposal has been carried out. Similar exercise, irrespective of the legislative procedure, also happened when the Commission proposed a ban on eel fishery in the Baltic. Furthermore, the Commission simply ignored the running stakeholder consultation process since they launched their proposal without having analysed the views of those heavily impacted by this radical measure, i.e. Baltic Advisory Council and North Sea Advisory Council.

The Commission should see and understand that such a way of acting has a dramatic impact on fishermen heavily dependent on the eel fishery in general and especially on small scale coastal fishermen in the Baltic who are already suffering from a heavy decrease of the cod fishing opportunities. They only managed to save their companies last year thanks to the income obtained from the eel fishery and direct marketing of this high value product.

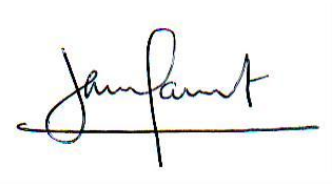
The CFP shall contribute to a fair standard of living for those who depend on fishing activities, particularly small scale fisheries companies.

In view of the above, **Europêche urges to maintain the present catch levels in the eel fisheries and proposes the following measures instead of a total ban**:

- Better implementation of the eel management plans in Member States which fail to reach the targets of escaping silver eel;
- More effort to terminate the illegal export of glass eel to Asia;
- Reduction of the mortality of glass eel in abstractions of cooling water for industry and power plants;
- Reduction of predation by cormorants;
- Improvement of habitat quality for eel (removal of migration-blockers);
- Improvement of research on reproduction of eel in farms

We trust you can take these comments into consideration during the upcoming negotiations on fishing opportunities for 2018.

Yours sincerely,



Javier Garat
President of Europêche