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To the attention of
Lorella De La Cruz Iglesias
Head of the Aquaculture Team
DG MARE
Rue Joseph II, 99 - 1000 Brussels

Brussels, 29 August 2022

Subject: AAC Position on the ICES Evaluation of the national eel management plans progress reports

Dear Mrs De La Cruz Iglesias,

After an extensive internal debate, the AAC expresses the following position on the ICES advice on eels management¹, both on the basis of the ICES report itself and on the data and observations available to the members of the AAC's Working Group on Finfish.

There is a common basic understanding between the members representing the sector operators and the other interest group's members on the following elements:

- They note the incomplete success of the measures put in place by the EU for the recovery of eel;
- They acknowledge that the eel has a role to play in the ecosystem recovery of biodiversity;
- They underline the strong impact of illegal fishing, trade and unreported catches and other anthropogenic activities such as hydroelectric production, toxic pollution in the reduction of the eel population in the different stages (from larvae to reproducers);

The AAC therefore recommends by consensus:

¹ https://ices-library.figshare.com/articles/report/Request_for_technical_evaluation_of_the_Eel_Management_Plan_progress_reports/19902958



1. An intensification of the fight against illegal, unregulated and unreported fishing of eels and eel trade between the Member States and Third Countries;
2. Vigorous steps should be taken to facilitate the natural migration of eels up rivers and to reduce the mortality caused by hydroelectricity production, toxic pollution and other anthropic activities;
3. An intensification of research efforts on eel biology and its interactions with the environment;
4. The recognition of the importance of small-scale fishing and eel farming in European cultural traditions

It should also be noted that on the other issues touched by the ICES advice such as: restocking, predator control, the opportunity to carry out in-depth studies on eel reproduction and the need to maintain the fisheries activity to support restocking and eel farming, the AAC members' opinions are partially divergent. However, the members from both stakeholders' groups considered important to deepen the Commission's analysis of the issue before adopting further rules.

We thank you for taking our concerns into account. We remain available to be consulted at any further stage of this process.

Yours sincerely,



Javier Ojeda
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