



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

The Director-General

Brussels,  
MARE.A.2/BVT

**Subject: AAC Recommendation on the recovery of eel stock**

Dear Mr Brian Thomsen,

I would like to thank you for your mail of 30<sup>th</sup> October 2024 including the “*Recommendation on the recovery of eel stock*”.

The Commission acknowledges that the European eel stock remains in a critical condition because - as confirmed by the scientific advice - eel fishing is currently unsustainable and eel farming relies on wild catches since eels cannot reproduce in captivity. We do recognise, as highlighted by the AAC, the impact of illegal fishing, trade and unreported catches, pollution of waters and other anthropogenic activities in the reproduction of the European eel population as well as the impact of predators on eels.

We take note of diverging opinions between the AAC sector organisation members and the AAC representatives of the Other Interest Groups. The AAC sector organisation members’ share the opinion that aquaculture can and must play an important role in restocking, such as managing the transition from glass eels collected on a quota basis to (yellow or) silver eels that are more resilient and suitable for inclusion in nature.

Managing such a quota system in eel farms is an interesting tool, and we would invite the AAC to provide us with more details on this system. We further take note of the views of the AAC representatives of the Other Interest Groups about the welfare and ecological risks of restocking outweighing the benefits and that the ICES recommendation for a fishing ban should be enacted.

The Aquaculture Advisory Council specifically recommends the European Commission

- *To reinforce the implementation of Regulation 1005/2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and*

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*unregulated fishing for eels, including eel trade between Member States and third countries;*

The legal scope of the IUU regulation (1005/2008) covers fish caught in marine waters and then imported into the EU from third countries. So, while the imports of fish require a catch certificate, that requirement only applies in so far the fish is caught in marine waters. On the other hand, there is no requirement for a catch certificate when the fish is caught in fresh water or if the fish stems from aquaculture production obtained from fry and larvae (Annex I of the IUU regulation), neither for intra-EU trade (between Member States), which the IUU regulation does not cover.

Therefore, as the imports of European eel to the EU is not permitted since December 2010 and the IUU Regulation does not cover intra-EU trade, the recommendation does not seem to be relevant in the current extra-EU trade regime of European eel.

- *To develop EU funding for research efforts on eel biology and its interactions with the environment that allow the identification of effective recovery techniques.*

EU funds are available for research (e.g. Horizon Europe and LIFE) and for the improvement of scientific knowledge under the Common Fisheries Policy (through EMFAF). A relevant example is the DIASPORA project (*Diadromous Species: moving towards new Paradigms to achieve holistic scientific Advice*) that started in June 2024 funded by EMFAF direct management and aims to provide tools to enhance the coherence of scientific assessment process for European eel and Atlantic salmon to better inform regional management.

Horizon Europe topics are typically broad and non-prescriptive and under the “Mission to Restore our Ocean and Waters by 2030”, a topic on protection and restoration of migratory fish habitats (HORIZON-MISS-2024-OCEAN-01-02) is expected to fund two projects in the frame of the Danube River basin lighthouse.

The Commission is aware that more work and resources are needed, and we encourage Member States to optimise the use of funding opportunities at national and regional level.

More generally, and echoing this AAC recommendation, Member States are encouraged to take more efforts in implementing the actions of relevance to eel protection and management under the EU Marine Action Plan.

Let me recall that our technical workshop on migrating silver eel capture and release, organised in April 2024 within the context of this Action Plan, served as a valuable forum to exchange on this important topic, where issues of restocking, science and funding were also touched upon.

Ultimately, a recovery of European eel stock, a critically endangered species, is a longer-term process and depends on coordinated actions that decrease eel mortality and enhance the escapement of adult eels to the open sea and then to the Sargasso Sea for spawning. There is a need to intensify efforts to safeguard this critically endangered species and to ensure in the future sustainable fishing and aquaculture in line with the Common Fisheries Policy.

I am looking forward to our continued fruitful cooperation. Should you have further questions on this reply, please contact Ms Julia RUBECK, coordinator of the Advisory

Councils (Julia.Rubeck@ec.europa.eu; +32.2.296.88.89), who will forward them to relevant colleagues.

Yours sincerely,

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