



**COUNCIL OF
THE EUROPEAN UNION**

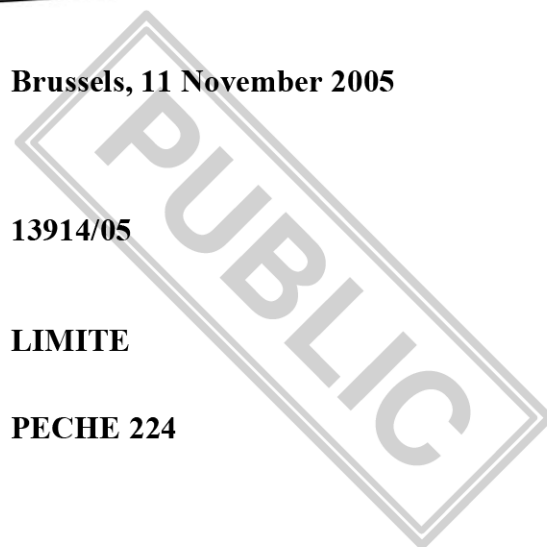
Brussels, 11 November 2005

**Interinstitutional File:
2005/0201 (CNS)**

13914/05

LIMITE

PECHE 224



NOTE

from : Permanent Representation of the Czech Republic to the European Union

to : General Secretariat of the Council

No. Cion prop. : 13139/05 PECHE 203 - COM(2005) 472 final

Subject : Proposal for a Council Regulation establishing measures for the recovery of the stock of European eel

Delegations will find attached written comments from the Czech Republic on the above-mentioned subject.

Comments of the Czech Republic on a proposal for a Council Regulation establishing measures for the recovery of the stock of European Eel (doc. No 13139/05).

The Czech Republic welcomes a proposal for a Council Regulation establishing measures for the recovery of the stock of European Eel of the species *Anguila anguilla* (doc. No 13139/05).

The Czech Republic closely monitors a current situation and problems related both to propagation and migration of European Eel. There is no doubt that the current situation is serious, thus it is vital to enhance measures for eel protection and a recovery of the stock.

Delegations of the Member States presented on WP on fisheries on 6 October 2005 comprehensive arguments which gave a good picture of the seriousness of the situation. Given a full support to them, we would like to draw the attention to a specific aspect which also critically affects level of the stocks, which is, in fact, that scientific research has not succeeded yet in artificial spawning of eel, so the stocks can be recovered only by means of juvenile imports from original resources. Also, it is still unclear where precisely eel propagation happens and whether this process is dominated rather by a population either from North America or from Europe.

We are of the opinion that eel should be protected especially by setting up the minimal length for fish, to retain and to land eel and also by limiting the time for fish, to retain and to land eel in the period when eel migrates backward into seas.

As far as the Czech Republic, fishing, retaining and landing of eel is banned in the period from September 1 to November 30.

As to the Commission effort to achieve a reasonable economic use of eel, the Czech Republic fully supports such an idea and consequently agrees with explanatory memorandum and points 1.3 and 1.4. therein in particular.

However, in our opinion, two major issues are not addressed in the proposal: firstly, we lack a proposal for a measure which would introduce principal changes in the existing glass eels trade trends and, secondly, a proposal for a measure for bringing in a systemic protection of migrating adult individuals.

The Czech Republic is prepared, in a constructive way, to contribute to a discussion on the Regulation proposal. However, we deem that, in order to achieve the main aim of the proposal, i.e. to promote reasonable use and management of eel population, some amendments to the proposal are necessary to be incorporated therein (see below):

1. Eel management

- To establish binding rules for fish, to retain and to land eel in seas and river systems, which would aim at comprehensibly established measures in accordance with scientific advice in individual areas where the actual backward migration of eel occurs. It is essential to implement such measures that will allow eel to successfully reach spawning ground.

- To prohibit eel fishing, landing or retaining in first 15 days of each month is not both sufficient and efficient as there is an extreme increase in a migration potential in certain phases of month that takes 15 days. Within such an administratively established period, it may happen, on the contrary, that the largest part of migrating population could be caught.

- To limit in general eel length for fish, to retain and to land between 45 – 55 cm.

- To limit in general fishing, retaining and landing of glass eel.

- To restraint or to set up a quota for glass eel sales for other purposes then reintroduction.

- To establish restrictive rules for eel sport fishing.

2. Supports

- To bring in a financial support for promoting eel reintroduction into river systems as well as to enhance a reconstruction of water flows (such as building or renewal of fish passages).

3. Accompanying measures

- To establish quotas for MS for glass eel purchase for the purpose of its reintroduction in river systems.

- To establish quotas for MS for glass eel purchase for the purpose of its subsequent production for human consumption.
