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from : Latvian delegation

to : Working Party on Internal Fisheries Policy

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 Latvian delegation on the subject mentioned above.

Latvia's comments concerning the Presidency questions on proposals for a Council Regulation establishing measures for the recovery of the stock of European eel

Latvia considered the working document from the Presidency 13139/05 PECHE 203 on the measures planned for the recovery of the stock of European eel and provides the following comments and answers to the questions:

1. Do you support in principle a one-step-approach for measures to protect European eel?

Latvia supports the introduction of one-step approach, which will include short-term and long-term measures. The situation with eel stocks in recent period of the history (the time frame of 40 – 50 years) has substantially declined and the stocks might be considered as critical (depleted). Therefore it is clear that the emergency measures should be introduced and implemented like a package of a specific measures for the improvement of this situation in the future.

2. Can you agree with the definition of the objective (40% escapement) and the definition of the reference as outlined?

Latvia accepts the necessity to ensure at least 40% escapement of silver eel. However, it should solely be related to the water bodies, in which the natural eel migration is currently observed and possible.

In addition, Latvia would like to point out the difficulties that will emerge due to the establishment and calculation of the 40% escapement. Latvia has no data on specific proportion of silver and yellow eel in catches during all the previous periods. The Latvian fishing legislation does not prescribe such distribution and registration. Therefore, considering the measures to be taken in Latvia, the only source of information for ensuring 40% escapement of silver eel is a biological data. As concerns the coastal fisheries, Latvia could accept the average data of 30 years as an average base number for fixing the indicators. In its turn, the situation of eel catches in inland waters of Latvia began to worsen only after 1999. As well as, it is unclear how to ensure this 40% escapement limit, if minor and major power plants and dams obstruct the eel migration passages.

3. Do you feel that the focus on management plans on MS level linked to the envisaged sanction system is the appropriate management tool?

Latvia proposes a precautionary approach to the preparation, introduction and implementation of the plans. The “paper” plan itself does not provide effective action for recovery of the eel stocks, because it is unclear who will perform control and monitoring on efficiency of different plans, of their introduction and implementation in particular Member States. However, generally Latvia supports the elaboration and implementation of the plans.

4. Do you share the point of view that the export of glass eel needs to be addressed in a Regulation? If so, do you support the approach as described in the paper?

Latvia considers that the inclusion of the glass eel into the CITES list might be effective, because of specific limited quotas for glass eel export.

The possibility for trading in glass eel outside the borders of natural habitat area that will not be ceased and will continue might be considered as a crucial minus of the emerging regulation.

However, if the CITES list includes the eel as a species itself, in all its development phases the problems will be caused to fishers, fish processors and traders, because of necessity to verify the production legality in each stage.
