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NOTE

from : Permanent Representation of Finland 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 Finland on the abovementioned subject.

Reference: Establishing measures for the recovery of the European Eel,
COM(2005) 472

Subject: WRITTEN COMMENTS FROM FINLAND ON THE PROPOSAL FOR A
REGULATION

The European Commission has drafted a proposal for a Regulation establishing measures for the recovery of the stock of European eel. In the draft it is proposed that from the first to the fifteenth day of each month it shall be prohibited, with some exceptions, to fish for eel, and that the Member States shall be obliged to draw up eel management plans. The plans are to set out means of permitting the escapement to the sea of at least 40% of the biomass of eel, relative to the estimate of the eel stock in the absence of influence from human activities.

In Finland nowadays eels are found naturally on our coasts. Because of obstacles to eel migration, young eels are no longer found upstream in our rivers. The most recent observations date from 2001. On the other hand, there is a long tradition of restocking with eels in Finland. In the main, glass eels are introduced into inland waters. The eels available for fishing in Finland are almost entirely the result of this restocking.

Since the 1980s, eel fishing has not been commercially significant. For recreational fishing, long lines, small nets, rods and torch fishing are used. The fishing is concentrated on yellow and silver eel. Restocking with eels is primarily based on imports of glass eels; there is no commercial eel farming in Finland.

The Commission proposal on the recovery of eel stocks is based initially on a 50% prohibition on fishing for adult silver eels in inland waters. This cannot be regarded as reasonable. Recovery measures within European Union territory must extend to all stages of an eel's development. Glass eels only rise in sufficient numbers into inland waters in the River Severn in the United Kingdom and in the major rivers flowing into the Bay of Biscay. On the other hand, because of the intensive fishing at sea, insufficient glass eels rise into the Baltic area. The Commission has not paid any attention to the management of glass eel fishing at sea. It is even probable that the increase in the number of glass eels resulting from the severe restrictions in inland waters will increase fishing for them at sea.

The recovery of eel stocks should first concentrate on the restocking of glass eels in natural waters from which there is unrestricted access to the sea, and on restricting catches of glass eels. For the recovery of fish stocks in general, it is important to restrict catches of young individuals. In a second phase the restocking should be extended to natural waters from which there is limited access to the sea. At the moment large-scale restocking is not even possible, because there are not enough glass eels to be had. Because of strong demand, prices have also risen. To make restocking possible, the catching of glass eels for food must be severely restricted. These measures are entirely missing from the Commission proposal.

In Finland, private owners of lakes etc. have stocked our inland waters extensively with eels. The intention of this restocking has been to have something to catch from those waters. Some of these inland waters provide access to the sea and a certain proportion of the eels will migrate from them. However, if fishing activity were to be reduced by 50% as the Commission proposes, it would probably put an end to restocking by private water owners. This would again have a negative effect on eel stocks.

On these grounds, Finland proposes that the Commission's draft on the recovery of eel stocks be amended firstly to place the main emphasis on fishing restrictions at sea and in particular the catching of glass eels for food. Secondly, the objectives of the management plans should include large-scale restocking, firstly of natural waters from which there is unrestricted access to the sea, and secondly of waters from which access to the sea is limited. Finland also considers that the proposed measures should only affect commercial fishing.