



**COUNCIL OF  
THE EUROPEAN UNION**

**Brussels, 6 February 2006**

---

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

---

**5988/06  
ADD 5**

**LIMITE**

**PECHE 26**

**PUBLIC**

**NOTE**

---

from : Permanent Representation of Estonia 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 Estonia on the above-mentioned subject.

**Estonian written comments on proposal for a Council Regulation, establishing measures for the recovery of the stock of European eel (COM (2005) 472)**

Estonia agrees that in situation where eel stocks have dramatically declined, the EU should take significant steps to manage the stock in the manner, which would guarantee the conservation of the stocks.

At the same time, it is not possible for Estonia to support the existing proposal, because the implementation of the primary measures leads to the cessation of fisheries in Estonian inland water bodies, where for many years eel has been restocked and where the main fishing gear is trap net.

In situation, where the codend of trap nets should be opened during the first 15 days of each month, the fishermen will lose all of their catches. If our coastal fishermen, who are using trap nets in their small-scale fishery, would follow these rules, then it would involve extreme economic difficulties for them.

**Estonia is aware of necessity of conservation measures, but these measures have to be proportionate and reach the requested targets.**

**1. Estonia does not agree with the above mentioned general closed period for 15 days in the beginning of each month, because the main gear used in our coastal fishery is the trap net and it is not reasonable to take it out of water after every fifteenth day.** The requirement to open the codend every month for 15 days is not justified, because fishermen would lose half of their income. This measure is not reasonable in regions where eel constitutes only a small part of the catch of the trap. Furthermore, it would be more reasonable to allow to fish eel, in rivers where the escapement of eel is blocked by dams of hydropower stations, to recover costs what fishermen have made for restocking.

**Instead of the 15 days closure Estonia could support the allocation of fishing days for each Member State for one year. The closed period should then be established by Member State, taking into consideration its natural and regional conditions.**

**2. Estonia would also apply for a special status, from fishing limitations and 40% escapement margin of eel, for the Basin of Peipsi Lake, until the studies that clarify the escapement of eel through the dam and turbines of Narva hydropower station is finished.**

Notably, Estonia is not able to guarantee the escapement of eel from river basin to the sea through the Narva hydropower plant, because the possible fish pass could be built on the territory of the Russian Federation and until now the Russian side has shown no interest of constructing this eel pass.

It should be also noted, that for over 50 years the elvers have been restocked to the Lake Võrtsjärv, situated in basin of Lake Peipsi and the whole fisheries of that lake is based on restocking of these elvers. The cessation of the eel fishery in this lake leads to the unemployment of 60 fishermen, which would be drastic for the region, where alternative employment possibilities are very limited.

Furthermore, releasing eels to Lake Võrtsjärv and basin of Lake Peipsi may be compared to eel farming, which is much more natural than ordinary fish farming in fish farms, because according to the studies some of the silver eel escapes through the dam of Narva and finds it's way back to the sea.

**3. Estonia is in the position, that for human consumption, minimum size of eel should be established. Catches of glass eel should be allowed only for restocking purposes to the natural distribution areas, as this kind of restocking favours the escapement of the eel to its spawning grounds.**

**4. Estonia does not support the export of glass eel to Asia and in that respect, supports stronger measures to limit the export.**