



**COUNCIL OF  
THE EUROPEAN UNION**

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**NOTE**

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from : Greek Permanent Representation to the European Union

to : General Secretariat of the Council

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

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

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Delegations will find attached written comments from Greece on the abovementioned subject.

**SUBJECT:**        *"Proposal for a Council Regulation establishing measures for the recovery of the stock of European eel"*

Ref.:               European Commission document – COM(2005) 472 final

In preparation for discussion of the above proposal for a Regulation at the meeting of the Working Party on Internal Fisheries Policy on 9 February 2006, we would ask that the following comments be taken into account to enable a better technical examination to be made of the Articles of the draft Regulation:

– Article 2:

We consider that the general closure proposed in this Article should be examined further and backed up by scientific evidence.

There should be an explicit statement/clarification that the proposed fifteen days restriction each month on fishing for, landing or retaining eel of the species *Anguilla anguilla* does not apply to the harvesting of eel from extensive or semi-intensive farming systems such as those found in lagoons, for the following reasons:

- Lagoon fisheries come under the heading of extensive aquaculture.
- Harvesting, not active fishing, is involved and depends mainly on atmospheric conditions, while it is not possible to retain eel harvested in this way during the proposed fifteen-day period of closure each month.

The same exception will clearly also apply to harvesting from aquaculture units engaged in the intensive rearing of eel.

– Article 3

The derogation from Article 2 for fishing for small eel subject to the conditions laid down in (a) and (b), as proposed in this Article, should not be restricted in time (until 30 June 2007) nor related to the establishment and approval of management plans for "eel river basins" in accordance with Article 6 of the proposal.

This comment is justified by the fact that under the proposal "all the eel captured are released into European inland waters".

In order to provide support for units rearing eel intensively - a development activity subsidised under the Fisheries Structures Regulation - and to secure the development prospects of such units, the Article should make provision for fishing for eel less than 12cm long for the purposes of stocking intensive farming units, regardless of whether a management plan has been established or not.

– Article 6

The establishment of management plans for "eel river basins" as defined in Article 6(1) (prior to human intervention) in order to achieve the objective laid down in paragraph 4 (escapement to the sea of 40% of the biomass of adult eel) and monitoring the attainment of that objective, creates particular difficulties in countries like Greece, where commercial eel fisheries are a small-scale activity.

