



**COUNCIL OF
THE EUROPEAN UNION**

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NOTE

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

COMMENTS OF THE REPUBLIC OF LITHUANIA ON A PROPOSAL FOR A COUNCIL REGULATION ESTABLISHING MEASURES FOR THE RECOVERY OF THE STOCK OF EUROPEAN EEL

The Republic of Lithuania welcomes the proposal for a Council Regulation establishing measures for the recovery of the stock of European eel. However, the following provisions are unacceptable:

- the prohibition to fish for, land or retain European eel from the first to the fifteenth day of each month (Article 2) should not be applied to inland fishing in Lithuania. Inland fishing of European eel in Lithuania is duly regulated by national legislation; Lithuania has already set seasonal closures of fishing and mesh size. Furthermore, the prohibition to fish for, land or retain European eel from the first to the fifteenth day of each month would lead to grave social economic consequences. The fishermen would lose a large part of their income and they would suffer additional costs of the removal of fishing gears from the water. In order to set the prohibition proposed it is necessary to compensate these additional costs and lost income.
- The measures for the recovery of the stock of European eel should not be limited to fishing restraints, direct restocking is also necessary and should be financed. The fishing of glass eel for human consumption should be limited.
- Article 10 paragraph 1 can not be applicable for inland fishing.

Please find attached the comments of Dr. Linas Ložys, scientific officer in the Institute of Ecology of Vilnius University.

Comments of the Republic of Lithuania on a proposal for a Council Regulation establishing measures for the recovery of the stock of European Eel

The Republic of Lithuania welcomes a proposal for a Council Regulation establishing measures for the recovery of the stock of European Eel of the species *Anguila anguilla*.

Low numbers of young eels recruiting, as well as both yellow and silver eel fishery landings decline in most distribution areas of European eel indicates rapid decline in the stock. Therefore international actions for European eel stock recovery are urgently required. We assume that all member states recognize European eels as endangered species after Council for the Exploration of the Sea and the European Inland Fisheries Advisory Committee indicated that recent recruitments of eel have been as low as 1% of historic levels and later life stages suffer high mortality rates. In our opinion, one major issue is not addressed in the proposal: we lack for measures which would introduce principal changes in the existing glass eels trade outside natural range of distribution. In case if all member states agree on the European eel status as the species which stock is characterized as being outside safe biological limits, we are of the opinion that eel should be protected especially by:

- limiting glass eel fishery for trade outside the natural range of distribution of this endangered species;
- employment quota for eel aquaculture in countries within natural range of distribution, since eel in aquaculture are lost for natural reproduction cycle;
- ensuring reasonable part of spawners (both males and females) escapement from the inland or continental shelf to spawning grounds; we would like to stress that limit (depending on the limit size) for commercial eel length could affect in terms of protection „small“ male, but do not affect „large“ female stocks.
- bringing in financial support for promoting eel reintroduction into river basins where eel stock densities are low, water bodies are little polluted, not closed for eel migrations by artificial obstacles (i.e. dams) and are not intensively exploited.
- enhancing a reconstruction of water flows by removing artificial obstacles and/or building or renewal of eel passages.

We are of the opinion, that to prohibit eel fishing, landing or retaining in first 15 days of each month could: firstly, to be not fully effective measure to protect stocks, and, secondly, to involve unacceptable disturbance into fisheries do not related to eel fishery. Hence, we would suggest prepare Member states' management plans to particular date. The plans could involve optimal and balanced measures for eel stock protection and minimize conflict with other fisheries. 15 days ban for fisheries could be released for Member States in case if management plan is not prepared to date or is not approved.

Institute of Ecology of Vilnius University
scientific officer
Dr. Linas Ložys
