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NOTE

from : Hungarian delegation
to : 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 the Hungarian delegation, supported by the Austrian, Romanian and Slovakian delegations, on the inclusion of the Black Sea and its water system in the scope of the eel proposal.

The inclusion of the Black Sea in Article 1 (Subject-matter) of the proposal for a Council Regulation establishing measures for the recovery of the stock of European eel is not acceptable for the following reasons:

From the point of view of the regulation the Black Sea and its water system cannot be regarded as a natural habitat of the European Eel. Although eels certainly have the possibility of migrating as far as the upper reaches of rivers flowing into the Black Sea, its occurrence in these waters was occasional¹ before the artificial introductions started². It did not appear in the statistics before that time. On this basis the Black sea and its rivers cannot be mentioned on equal grounds with the different ICES zones and the Mediterranean Sea in the regulation.

With the inclusion of the Black Sea in the scope, the regulation gives the possibility that member states declare areas in this water system as a natural habitat of eel which is the basis for those areas to become eligible for support under the European Fisheries Fund for further introduction of eels on condition that it serves conservation.

¹ *The statement on the occasional appearance of eel in the water system of the Black Sea is based on the following scientific literature:*

Banarescu, P., 1964. Fauna Republicii Populare Romine. Pisces - Osteichthyes. Ed. Academiiei Republicii Populare Romine, Bucuresti.

Barus, N., Oliva, O. (eds.), 1995. Fauna CR a SR. Mihulovci - Petromyzontes a ryby - Osteichthyes. Vol. 1-2. Academia, Praha

Berg, L.S., 1949. Ryby presnyk vod SSSR i sopredelnyk stran. Iz. Akademii Nauk SSSR, Moskva-Leningrad.

Pintér, K., 1998. Die Fische Ungarns. Ihre Biologie und Nutzung. Akadémiai Kiadó, Budapest

Tesch, F.-W., 1984. Der Aal. (2. Aufl.), Paul Parey, Hamburg, Berlin.

² *Introductions and statistics:*

Bavaria: middle of the 19th century (exact year is not documented)

Lake Fertő (Neusiedler-See) on the Austrian-Hungarian border: 1957

Hungary: first experimental introduction (close to Budapest): 1887

Regular introductions: 1961-1991.

First appearance of eel in Hungarian fishing statistics: Lake Fertő - 1960: 20 kg

Lake Balaton - 1964: 720 kg

Public money will be spent on keeping up an artificial level of eel population in these water areas, which would not exist without previous anthropogenic actions and without knowing if it will contribute to the spawning at the end:

- there is scientific evidence that of elvers migrating close to the surface of the sea pass Bosphorus and reach the Black Sea in small quantities
- however there is no scientific evidence that silver eels which migrate close to the sea-bottom can pass the Black Sea and reach the Mediterranean, regarding the lifeless bottom zone of the Black Sea due to its high sulphydric acid content

Thus it is disputable that any restocking in these waters could be regarded as a conservation measure. At the same time it takes away valuable amount of eels to introduce from those waters that are undoubtedly natural habitats of eel and from where the adults could migrate with a better chance back to the Sargasso Sea.
