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**NOTE**

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from : Permanent Representation of Latvia 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 Latvia on the subject mentioned above.

**Latvia's Comments**  
**on Proposal for the Council Regulation Establishing Measures**  
**for Recovery of the Stocks of European Eel**

In general Latvia supports Council Regulation Establishing Measures for recovery of the Stocks of European eel. It is clear that the former experience of European eel management practice emerge the need for more drastic measures. Taking into account these concerns Latvia, as a country with poor natural eel stock appearance in it's economic zone and inland waters, is very interested to enforce European scale activities to restore sustainable eel stock in future.

As a general comment, Latvia expresses opinion that the eel stock restoration must primarily be based on the protection of glass-eel and young eel, as well as on the use of young individuals for restocking purposes, instead of use for food and food in aquaculture.

**Specific comments on Articles**

**Article 2**

Latvia accepts the necessity for reduction of existing effort in eel fisheries. However shortening of fisheries season is not the only management tool, which decreases the fishing effort. The Member States should be allowed to apply any other fisheries effort reduction measures to attain the 50% reduction.

Latvia considers that establishment of fishing effort decreasing measures in Regulation should be supplied with specific reference date (year), compared to which 50% reduction will be counted.

As well it seems that there is an overlap between Article 2 and Article 9, taking into account that the context of Article 2 covers also maritime waters.

### **Article 3**

Words “laid down in” should be substituted by “set in accordance with”, because Article 2 do not specifies the particular season, but only describes principle of its shortening.

### **Article 6**

Latvia agrees that hydro power stations’ turbines are one of the main causes of eel mortality in its migratory waterways. However for some eel stocks possibility for escapement to the sea from bigger lakes and water reservoirs, where active and long-term restocking programs were held, today are practically impossible. The measures for mitigation of turbine mortality are economically unrealistic due to high expenses and low benefit/costs ratio. Therefore Latvia proposes to apply more flexible approaches and add the possibility for other compensatory measures in the Regulation, which should be implemented to increase silver eel free escapement to the sea.

### **Article 9**

At present there are no fisheries in Latvian coastal waters targeting the eel stocks. Eel is caught mostly in minor quantities as a by-catch in mixed fisheries operating with relatively small mesh-size trap nets. Practically it is impossible to change the selectivity of such type of the gear used for relatively small size fish species like smelt, herring and perch.

Latvia would like to stress that implementation of proposed eel management measures in maritime waters in relation to coastal fisheries will cause serious economical and social problems for local fisheries communities.

Therefore Latvia would like to encourage to consider specific attention to such coastal fisheries by amending Article 9 in a way that it provides application of 50% reduction only for fisheries targeting or seriously affecting eel stock.

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