

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES  
OF WILD FAUNA AND FLORA



Seventy-fifth meeting of the Standing Committee  
Panama City (Panama), 13 November 2022

Species specific matters

EELS (ANGUILLA SPP.)

1. This document has been prepared by the Secretariat.
2. At its 18th meeting (CoP18, Geneva, 2019), the Conference of the Parties adopted Decisions 18.197 to 18.202 on Eels (*Anguilla* spp), of which paragraph a) of Decision 18.201, which is directed to the Standing Committee, reads as follows:

**18.201 Directed to the Standing Committee**

*The Standing Committee shall:*

- a) *consider the report prepared by the Secretariat and any other available information relating to illegal trade in European eel, including the case study by the United Nations Office on Drugs and Crime (UNODC) on European eel trafficking as part of the 2nd World Wildlife Crime Report, and make recommendations as appropriate;*

....

3. At the 74th meeting of the Standing Committee (SC74, Lyon, March 2022), the Secretariat presented document [SC74 Doc. 64.1](#), which reported on the implementation of Decisions 18.197 and 18.198 and included a summary of Parties' responses to a questionnaire on the status, management, and trade in eels; an analysis of the data on seizures of *Anguilla anguilla* (European eel) as submitted by CITES Parties; additional information on illegal trade in *A. anguilla*, including a summary of the case study on glass eels in the 2nd World Wildlife Crime report; and a further study on *The status of use and trade of anguillid eels*, presented in Annex 4 of document SC74 Doc. 64.1.
3. At SC74, the Standing Committee invited the Secretariat to review the responses to Notification to the Parties [No. 2021/018](#) in Annex 2 of document [SC74 Doc. 64.1](#), the case study on glass eels in the [2nd World Wildlife Crime report](#), the analysis of the data compiled from annual illegal trade reports submitted by Parties in Annex 3 of document SC74 Doc. 64.1 and the findings of the study presented in Annex 4 to document SC74 Doc. 64.1, 53 and prepare a consolidated set of draft recommendations for consideration by the Standing Committee at its 75th meeting.
4. Concerning illegal trade in European eel, the Secretariat notes that the species has received a significant amount of attention from national and international enforcement agencies. Details of the actions taken by national CITES authorities and enforcement agencies have been reported in several previous documents including SC69 [Doc. 47.1](#) and [Doc. 47.2](#); SC70 [Doc. 45](#); and SC74 [Doc. 64.1](#). The results of continued special operations such as [Operation Lake V](#) and [Operation Lake VI](#) demonstrate the value of such targeted activities. The results [Operation Vitrum](#) by authorities in Canada also demonstrated the importance of deploying forensic applications in the fight against illegal trade in European eel. The use of DNA sampling and analyses in this operation exposed illegal trade where specimens of European eel were falsely declared

as American eel. The results Operation Vitrum resulted in a strict penalty being imposed, and similar strict penalties were [also imposed in other cases](#).

5. Despite significant attention being paid to illegal trade in European eel, it continues, and therefore sustained vigilance and effort to address it remains essential. The value of targeted special operations focusing on illegal trade in European eel is evident and should be maintained and expanded. Whilst such operations in Europe occurred frequently in recent years, Parties in other regions affected by this illegal trade are encouraged to also consider undertaking such operations.
6. The Secretariat also continues to collaborate closely with its partners in the [International Consortium on Combating Wildlife Crime \(ICWC\)](#). Undertakings such as the Thunder series of global law enforcement operations to address wildlife crime, led by INTERPOL and the World Customs Organization, can make an important contribution in the fight against illegal trade in European eel.
7. In addition, increasingly deploying forensic applications in the fight against these crimes is effective. The [2020 World Wildlife Crime Report](#) highlights that legitimate products can be tainted by illegitimate sources of supply, as demonstrated by the results of for example Operation Vitrum. As noted in the 2020 World Wildlife Crime Report, DNA tests could be used at various points in the supply chain to ensure that species are accurately declared. It is further important that strong and deterrent penalties be imposed on the offenders involved, as anticipated by the provisions of paragraph 14. b) in Resolution Conf. 11.3 (Rev. Cop18) on *Compliance and enforcement*.
8. The Secretariat further notes that as highlighted in the 2020 World Wildlife Crime Report, 2017 statistics from the Food and Agriculture Organization of the United Nations showed that over 96 per cent of the global eel supply was from aquaculture. In this regard, it seems essential that Parties with aquaculture production facilities for these species implement strict measures to regulate the activities of such facilities, including undertaking regular audits to monitor sources of supply. National management practices and controls that are in place for such facilities should also regularly be reviewed, to ensure that they remain adequate to prevent specimens from illegitimate sources of supply from being laundered into legal trade. Management practices and controls must be adapted to respond to any newly identified trends.
9. To address knowledge gaps, the Secretariat proposes that Parties who did not respond to Notification to the Parties No. 2020/018 and were identified in Annex 4 to document SC74 Doc. 64.1 as being important in the global trade in European eel, in particular China, Egypt and Turkey, be requested to provide a response to the follow up Notification seeking information on eel trade that will be issued by the Secretariat after CoP19.
10. The report entitled "Status of use and trade in anguillid eels" contained in Annex 4 to document SC74 Doc. 64.1 noted that "concerns over the original sourcing and legality of (re-)exports and (re-)imports of processed European eel farmed in non-range States, and associated enforcement and implementation challenges have continued over the past five years". Parties report having overcome some enforcement challenges by strengthening inter-agency and/or international cooperation, participating in multi-lateral operations, carrying out regular/random inspections of eel shipments (declared as CITES or non-CITES listed species) and/or improving species identification techniques.
11. Concerns were also raised in the responses to Notification to the Parties No. 2020/018 regarding lack of reporting and/or inaccurate reporting, as well as traceability issues, Parties would therefore benefit from sharing experiences on traceability challenges and solutions, particularly relating to the international eel supply chain. In addition, where glass eels are imported and subsequently grown in aquaculture facilities, Parties are encouraged to include the species name and country of origin of the glass eels on their re-export declarations to ensure greater traceability.
12. The report in Annex 4 to document SC74 Doc. 64.1 noted several reporting issues that were identified through analysis of CITES trade data, including discrepancies between exporter and importer reported data, temporal discrepancies and errors in use of codes, terms and units. The inconsistent use of the terms 'fingerling' (FIG) or 'live' (LIV) for glass eels was highlighted. Similarly, depending on the commodity and associated term, trade was reported in weight (kg) or pieces – sometimes interchangeably – making analysis and comparison challenging. These issues were discussed at the 30<sup>th</sup> meeting of the Animals Committee (AC30, Geneva, July 2018) and recommendations were agreed to amend the descriptions for specimen codes in the [Guidelines for the Preparation and Submission of CITES Annual Reports](#) and in the [Guidelines for the preparation and submission of CITES annual illegal trade reports](#). These issues should improve in future if Parties follow these updated guidance documents.

13. The report also notes that in many cases, customs/tariff codes and other trade reporting requirements for *Anguilla* may be too generic for accurate trade monitoring in these species and several recommendations are made to improve the accuracy and harmonization of reporting on anguillid eels. These include requesting Parties when reporting to ensure greater differentiation between juvenile and adult life stages and ensuring Parties only apply customs codes for *Anguilla* spp. to report trade in *Anguilla* species and not other eel-like species (non-*Anguilla*, i.e. look-alikes).
14. At its 19th meeting (CoP19, Panama City, November 2022), the Conference of the Parties will consider document [CoP19 Doc. 61](#), which proposes draft decisions that *inter alia* instruct the Secretariat to seek any updates to the information previously submitted in response to Notification to the Parties No. 2021/018 on eels and submit its report to the Animals Committee, who will review the report from the Secretariat and the report contained in Annex 4 to document SC74 Doc. 64.1. Based on these documents the Animals Committee can then make its own recommendations for consideration by the Standing Committee or the 20th meeting of the Conference of the Parties, as appropriate.
15. The matters outlined above are reflected in the recommendations proposed in paragraph 16 below, for consideration by the Committee.

#### Recommendations

16. The Standing Committee is invited to:
  - a) encourage Parties affected by illegal trade in European eel as source, transit and destination country, to initiate targeted special operations focusing on illegal trade in European eel, where not yet done;
  - b) request the Secretariat to encourage ICCWC to include European eel as a target species during global law enforcement operations to address wildlife crime, and encourage Parties affected by illegal trade in European eel to participate in such operations;
  - c) encourage Parties affected by illegal trade in European eel to deploy forensic applications in the fight against this illegal trade, and to identify key points in the supply chain where DNA sampling and testing can be undertaken to ensure that species are accurately declared and any illegal trade detected;
  - d) encourage Parties to pursue strong and deterrent penalties for offenders involved in illegal trade in European eel, taking into consideration the provisions of paragraphs 15. e) to h) in Resolution Conf. 11.3 (Rev. Cop18) on *Compliance and enforcement*;
  - e) encourage Parties with aquaculture facilities producing European eel specimens for export to implement strict measures to regulate the activities of such facilities, including undertaking regular audits to monitor sources of supply;
  - f) encourage Parties with aquaculture facilities producing European eel specimens for export to review their national management practices and controls for such facilities to ensure that they are adequate to prevent specimens from illegal sources of supply from being laundered into legal trade, and to ensure that management practices and controls are adapted when needed to respond to any newly identified trends;
  - g) encourage Parties who did not respond to Notification to the Parties No. 2020/018, and were identified in Annex 4 to document SC74 Doc. 64.1 as being important in the global trade in European eel, in particular China, Egypt and Turkey, to provide a response to the follow up Notification seeking information on eel trade that will be issued by the Secretariat after CoP19;
  - h) encourage Parties to communicate to the Secretariat information on best practices identified in relation to overcoming management and enforcement challenges specific to European eel harvest and trade, including legal acquisition findings and traceability, for this information to be made available to other Parties;
  - i) encourage Parties when recording data on *Anguilla* eel species to record to the species level (rather than recording as *Anguilla* spp.) and to differentiate between juvenile (glass eels) and larger size live eels, to improve accurate trade monitoring for all *Anguilla* eel species;

- j) encourage Parties to scale up efforts to ensure that they apply the correct tariff codes for *Anguilla* species; and where glass eels are imported and subsequently grown in aquaculture facilities, Parties are encouraged to include the species name and country of origin of the glass eels on their re-export declarations; and
- k) encourage Parties to use the descriptions for specimen codes provided in the [Guidelines for the Preparation and Submission of CITES Annual Reports](#) and in the [Guidelines for the preparation and submission of CITES annual illegal trade reports](#), to standardize reporting and facilitate better data that could be drawn upon, including to support the design of appropriate law enforcement responses.