

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



Seventy-seventh meeting of the Standing Committee  
Geneva (Switzerland), 6–10 November 2023

Species conservation and trade

Fauna

Aquatic species

EELS (*ANGUILLA* SPP.)

1. This document has been prepared by the Secretariat.
2. At its 19th meeting (CoP19; Panama City, 2022), the Conference of the Parties adopted Decisions 19.218 to 19.221 on *Eels* (*Anguilla spp.*) as follows:

***Directed to Range States of European eels (*Anguilla anguilla*), transit and importing Parties***

**19.218** *Range States of European eel (*Anguilla anguilla*), transit and importing Parties are encouraged to:*

- a) *strengthen co-ordination between range States, (re-)exporting and importing Parties to improve traceability and effective enforcement measures for trade in *Anguilla spp.*, particularly the European eel;*
- b) *submit any non-detriment finding studies on European eel they have undertaken to the Secretariat for inclusion on the CITES website; explore the different approaches that might be taken for making non-detriment findings for European eels traded as fingerlings (FIG) compared with those traded as other live eels (LIV); collaborate and share information with other Parties regarding such studies and their outcome, especially where the Parties share catchments or water bodies; seek review and advice from the Animals Committee or other suitable body on any non-detriment findings for European eels, where appropriate;*
- c) *develop and/or implement adaptive European eel management plans at national or sub-national (or catchment) level, with defined and time-bound goals, and enhance collaboration within countries between authorities and other stakeholders with responsibilities for eel management, and between countries where water bodies or catchments are shared;*
- d) *implement the reporting recommendations in document SC75 Doc. 12 to ensure that, where possible, trade in Anguillid eels is reported at species-level and differentiated by life stage (as set out in the Guidelines for the preparation and submission of CITES annual reports).*
- e) *share information on stock assessments, harvests, the results of monitoring and other relevant data with the Joint Working Group on Eels (WGEEL) of the European Inland Fisheries and Aquaculture Advisory Commission, the International Council for the Exploration of the Seas and the Central Fisheries Commission for the Mediterranean (EIFAAC/ICES/GFCM), so that a full and complete picture of the state of the European eel stock can be established;*

- f) *develop measures or implement more effectively existing measures to improve the traceability or assessment of legal acquisition of eels in trade (both live and dead) and aquaculture and share these with the Secretariat;*
- g) *provide the Secretariat with information regarding any changes to measures they have in place to restrict the trade in live 'glass' or fingerling European eels;*
- h) *share with the Secretariat, where available, protocols and guidelines for reintroduction of seized live European eels to the wild; and*
- i) *provide information to the Secretariat on the implementation of this Decision or any updates to the information previously submitted in response to Notification to the Parties No. 2021/018 on eels, to allow it to report to the Animals Committee and Standing Committee, as appropriate.*

**Directed to the Secretariat**

**19.219** *The Secretariat shall:*

- a) *issue a notification inviting range States of European eel (Anguilla anguilla), transit and importing Parties to submit to the Secretariat information on the implementation of Decision 19.218, any information sought in Notification No. 2021/018 not already provided or any updates to the information previously submitted in response to Notification to the Parties No. 2021/018 on eels, especially information on current levels of, or emerging trends in, trade in specimens of Anguilla spp;*
- b) *prepare and submit a summary of the responses to Notification to the Parties No. 2021/018 on eels, including any updates provided under Decision 19.218, with draft recommendations on the conservation and management of European eel to the Animals Committee and draft recommendations to improve implementation of the Convention for European eel to the Standing Committee, for their consideration; and*
- c) *submit the study prepared in the implementation of Decision 18.199, paragraph d), on levels of trade and trade patterns, especially in live eels for aquaculture, and sources of supply, identify any disparities between these, and draft recommendations for the more effective future management of harvests and trade for consideration by the Animals Committee and Standing Committee, as appropriate.*

**Directed to the Animals Committee**

**19.220** *The Animals Committee shall:*

- a) *if requested, consider any reports submitted by Parties with respect to the making of non-detriment findings for trade in European eel and provide advice and guidance as needed; and*
- b) *consider the study referred to in paragraph c) of Decision 19.219, the report produced by the Secretariat under paragraph b) of Decision 19.219 and make recommendations to improve the conservation and management of European eel, for consideration by the Standing Committee or the 20th meeting of the Conference of the Parties, as appropriate.*

**Directed to the Standing Committee**

**19.221** *The Standing Committee shall:*

- a) *consider the report prepared by the Secretariat and any other available information relating to illegal trade in European eel and make recommendations as appropriate;*
- b) *review any advice and recommendations from the Animals Committee concerning Decision 19.220 and make recommendations to improve the implementation of the Convention for European eel and the applicability of developing a specific Resolution to the Parties or the Conference of the Parties, as appropriate;*

- c) *with the assistance of the Secretariat, engage with the World Customs Organization to examine the feasibility of harmonizing customs codes relevant to trade in all Anguilla species; and*
- d) *report on the implementation of this decision to the 20th meeting of the Conference of the Parties.*

## Background

3. As reported in document [CoP19 Doc. 61](#), in order to facilitate the collation of the information sought under Decisions 18.197 and 18.198 on eels from Parties and allow the Secretariat to report to the Animals and Standing Committees, the Secretariat developed a questionnaire on the status, management and conservation of all anguillid eels (*Anguilla* spp.) to be completed by the range States of all anguillid eels (*Anguilla* spp.). Decision 18.197 was directed to range States of European eel (*Anguilla anguilla*), while Decision 18.198 was directed to range States of non-CITES listed *Anguilla* spp.<sup>1</sup> in international trade. This questionnaire was made available in [Annex 2](#) to [Notification to the Parties No. 2021/018](#) of 8 February 2021.
4. To facilitate the collation of the information sought from Parties under Decision 18.199, paragraph c), and allow the Secretariat to report to the Animals and Standing Committees as instructed in paragraph e) of Decision 18.199, a questionnaire on the use and trade of anguillid eels was included in [Annex 3](#) to [Notification to the Parties No. 2021/018](#). This questionnaire sought to collect information from Parties regarding current levels of, or emerging trends in, trade in specimens of *Anguilla* spp. and was to be completed by those Parties that are source, transit or destination countries for the anguillid eels. The information collected in response to this questionnaire was used to inform the study referred to in Decision 19.219 paragraph c).
5. The following 27 Parties responded to [Notification to the Parties No. 2021/018](#): Algeria, Australia, Canada, Croatia, Cuba, Czech Republic, Denmark, Dominican Republic, Estonia, Finland, Greece, Ireland, Japan, Malaysia, Mexico, Morocco, Netherlands, New Zealand, Norway, Slovakia, Republic of Korea, Spain, Sweden, Tunisia, Ukraine, the United Kingdom of Great Britain and Northern Ireland, and the United States of America. Of the 27 Parties that responded, 16 Parties are range States of *A. anguilla*, one has an introduced population of *A. anguilla*, and the remaining ten are range States of at least one non-CITES *Anguilla* species.
6. A summary of Parties' responses to [Notification to the Parties No. 2021/018](#) was presented in Annex 1 to the [addendum](#) to document [AC31 Doc. 22](#) and was also submitted to the Standing Committee at its 74th meeting (SC74; Lyon, March 2022) in Annex 2 to document [SC74 Doc. 64.1](#).
7. The study prepared in implementation of Decision 18.199, paragraph d) [also referred to in paragraph c) of Decision 19.219] was presented in Annex 4 to document SC74 Doc. 64.1.
8. At SC74, the Standing Committee invited the Secretariat to review the responses to [Notification to the Parties No. 2021/018](#) in Annex 2 to document SC74 Doc. 64.1, the case study on glass eels in the second World Wildlife Crime report, the analysis of the data compiled from annual illegal trade reports submitted by Parties, contained in Annex 3 to document SC74 Doc. 64.1 and the findings of the study presented in Annex 4 to document SC74 Doc. 64.1, and prepare a consolidated set of draft recommendations for consideration by the Standing Committee at its 75th meeting (SC75; Panama City, November 2022).
9. At SC75, the Secretariat presented a consolidated set of draft recommendations in document [SC75 Doc. 12](#) and the Standing Committee agreed on a number of recommendations, *inter alia*, to address illegal trade and enforcement challenges and to improve reporting and traceability of trade in European eel (see summary record [SC75 Sum. Rec.](#)).

## Implementation of Decision 19.219

10. The Secretariat reported to the 32nd meeting of the Animals Committee (AC32; Geneva, June 2023) that, concerning paragraph a) of Decision 19.219, the Secretariat had issued [Notification to the Parties No. 2023/062](#) on 18 May 2023 inviting range States of European eel (*Anguilla anguilla*), transit and importing Parties to submit any information sought in [Notification No. 2021/018](#) not already provided or any updates

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<sup>1</sup> *Anguilla australis*, *A. bengalensis*, *A. bicolor*, *A. borneensis*, *A. celebesensis*, *A. dieffenbachii*, *A. interioris*, *A. japonica*, *A. luzonensis*, *A. marmorata*, *A. megastoma*, *A. mossambica*, *A. obscura*, *A. reinhardtii* and *A. rostrata*.

to the information previously submitted by those Parties indicated in paragraph 5 above, especially information on current levels of, or emerging trends in, trade in specimens of *Anguilla* spp. The Notification also invited Parties to submit information on the implementation of Decision 19.218 that was not requested by Notification No. 2021/018, specifically with regards to sharing protocols and guidelines for reintroduction of seized live European eels to the wild.

11. By the deadline of 16 June 2023, responses had been received from the following 18 Parties: Algeria, Austria, Croatia, Czech Republic, Dominican Republic, Finland, France, Indonesia, Japan, Mexico, Monaco, Morocco, the Netherlands, Republic of Korea, Slovakia, Slovenia, Tunisia and the United States of America. At the time of writing, additional responses had been received from nine Parties: Belgium, China, Estonia, Germany, Greece, Italy, Spain, Switzerland and the United Kingdom of Great Britain and Northern Ireland. Of these 27 responses, 17 were updates, as those Parties had replied to the previous Notification and ten were new respondents. The following Parties that responded to the previous Notification did not submit a response to the new Notification: Australia, Canada, Cuba, Ireland, Malaysia, New Zealand, Norway, Sweden and Ukraine. Of the three Parties having been identified in Annex 4 to document SC74 Doc. 64.1 as being important in the global trade in European eel (China, Egypt and Türkiye) and highlighted in Notification No. 2023/62, only China provided a response.
12. Concerning paragraph b) of Decision 19.219, the Secretariat is in the process of collating and summarising all the responses to the two Notifications on eels (Notification to the Parties No. 2021/018 and No. 2023/062). On the basis of these responses, the Secretariat will prepare draft recommendations on the conservation and management of European eel to be considered by an intersessional working group on eels formed at AC32 and reported to the 33rd meeting of Animals Committee.
13. With regards to paragraph c) of this Decision, the Secretariat included the study in its report to AC32 ([AC32 Doc. 36 – Annex](#)), reflected on the outcomes of the previous intersessional period as contained in paragraphs 7 to 9 above and presented recommendations for the more effective future management of harvest of and trade in eels for consideration by the Animals Committee.

#### Implementation of Decision 19.220

14. Concerning paragraph a) of this Decision, the Animals Committee has not received any requests from Parties to provide advice and guidance with respect to the making of non-detriment findings for trade in European eel, since CoP19.
15. Concerning paragraph b) of Decision 19.220, the full study and recommendations were shared with AC32 in the Annex to document [AC32 Doc. 36](#).
16. At AC32, the Animals Committee [see [AC32 Sum. 3 \(Rev. 1\)](#)]:
  - a) encouraged 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;
  - b) encouraged Parties to use the descriptions for specimen codes provided in the *Guidelines for the Preparation and Submission of CITES Annual Reports* and the *Guidelines for the preparation and submission of CITES annual illegal trade reports* to standardize reporting and facilitate better data collection;
  - c) encouraged range States to collaborate and share their experiences on the making of non-detriment findings;
  - d) encouraged range States to share their experiences with any challenges and benefits of available techniques and mechanisms to address identification issues concerning *Anguilla* species in trade;
  - e) encouraged range States to conduct research to increase the understanding of the basic biology and life histories of anguillid eel species; conduct joint programmes of work, experience knowledge and best practice; and manage their *Anguilla* resources in a sustainable manner;
  - f) encouraged range States to establish abundance monitoring programmes for the different life stages of *Anguilla* species; and

- g) encouraged range States to fully implement Decision 19.218.
17. The Animals Committee also established an intersessional working group on eels at AC32 with a mandate to:
- a) review the summary of the responses to Notification to the Parties No. 2021/018 and Notification to the Parties No. 2023/062 on eels, including any updates provided under Decision 19.218 and any recommendations from the Secretariat;
  - b) review the potential use of source code R (ranching) for specimens of European eel (*A. anguilla*) from aquaculture production systems and the potential risks and benefits of reintroducing seized, live European eels to the wild; and
  - c) make draft recommendations on the conservation and management of European eel for consideration by the Animals Committee at its 33rd meeting.

The membership of the working group can be found [here](#).

#### Implementation of Decision 19.221

18. Concerning paragraph a) of Decision 19.221, the Standing Committee is asked to “consider the report prepared by the Secretariat and any other available information relating to illegal trade in European eel and make recommendations as appropriate”; the Secretariat provides an update on illegal trade in European eel in paragraphs 21 to 33 below.
19. Concerning paragraph b) of Decision 19.221, the Secretariat is in the process of collating and summarising all of the responses to the two notifications on eels (Notification to the Parties No. 2021/018 and No. 2023/062). On the basis of these responses, the Secretariat will prepare draft recommendations on improving the implementation of the Convention for European eel. The Standing Committee may wish to consider establishing an intersessional working group on eels with the mandate to:
- a) review the Secretariat’s summary of the responses to Notification to the Parties No. 2021/018 and Notification to the Parties No. 2023/062 on eels, including any updates provided under Decision 19.218 and any recommendations from the Secretariat to improve the implementation of the Convention for European eels;
  - b) consider the recommendations of the Animals Committee;
  - c) consider the applicability of developing a specific Resolution on European eel; and
  - d) make draft recommendations to improve the implementation of the Convention for European eel for consideration by the Standing Committee at its 78th meeting.
20. Concerning paragraph c) of this Decision, the Secretariat has reached out to the World Customs Organization (WCO) to examine the feasibility of harmonizing customs codes relevant to trade in all *Anguilla* species and will report on progress to SC78.

#### Analysis of the data on seizures of *A. anguilla* in the CITES Illegal Trade Database

21. The Secretariat conducted an analysis of data on European eel seizures from 2016 to 2022, as reported by Parties and recorded in the CITES Illegal Trade Database. This data was extracted from the database in July 2023, and the results of this work are summarised in the table below. It should be noted that it is difficult to draw conclusions from this data, primarily due to the units used in reporting (kg vs numbers). It should also be noted that there are some discrepancies between this analysis and the previous analysis submitted to SC74 (see document [SC74 Doc. 64.1](#)), which is due to the correction of some reporting errors between the two analyses.

Year	Parties reporting seizures	Total number of seizures reported	Quantity seized (kg)	Quantity seized (num)
2016	France, Italy, Spain, United Kingdom (4 Parties)	13	585.87	-
2017	Canada, China, France, Greece, Italy, Morocco, Netherlands, Portugal, Spain, United Kingdom (10 Parties)	87	3,081.37	387
2018	Bulgaria, Canada, France, Germany, Italy, Lithuania, Morocco, Poland, Portugal, Spain, Sweden, Thailand, United States of America (13 Parties)	140	28,955.71	165
2019	Austria, Bulgaria, Canada, Croatia, Czech Republic, France, Germany, Italy, Morocco, Norway, Portugal, Spain, Switzerland, United States of America (14 Parties)	65	57,240.68	386,170
2020	France, Greece, Italy, Lithuania, Morocco, Poland, Portugal, Spain, Sweden, Switzerland (10 Parties)	53	101,106.87	11
2021	Estonia, France, Italy, Lithuania, Poland, Portugal, Spain, Switzerland (8 Parties)	22	122.03	148

22. Closer examination of the 2018-2021 data indicates that, during this four-year period, a total of 280 records (140 in 2018; 65 in 2019; 53 in 2020 and 22 in 2021) of seizures of European eels were submitted by a total of 21 Parties, accounting for a total of at least 187,405.29 kg of European eels. It should be noted that not all seizures reported the weight of the seizures, so these figures are known to be underestimates.
23. In 2018, most of the seizures were made in Spain and Portugal, followed by France. Most specimens were indicated as having originated in Portugal, followed by France or Spain. The main destinations indicated were Viet Nam and China, though many origins and destinations were unknown or not indicated. Transportation methods included land, air and sea. As the description in all cases is either LIV (live) or MEA (meat), it is difficult to know what proportion of the records for LIV in the table below may have referred to glass eels. In addition, two large seizures recorded as LIV were of note; one of 3,100 kg destined for Singapore and another of 2,000 kg with an unknown destination.

Description	Quantity seized (where indicated in kg)
FIG	2,340.47
BOD	64.92
MEAT	18,550
LIV	8,000.32

24. In 2019, most of the seizures were made in France, followed by Spain and Switzerland. Most specimens were indicated as having originated in Portugal, followed by France or Spain. The main destinations indicated were Viet Nam and Malaysia, though many origins and destinations were unknown or not indicated. Transportation methods included land, air and sea. As the description in all cases is either LIV (live) or MEA (meat), it is difficult to know what proportion of the records for LIV in the table below may have referred to glass eels. In addition, several large seizures (one of 252,000 fingerlings (FIG); and two totalling 131,000 LIV) were recorded as number rather than weight.

Description	Quantity seized (where indicated in kg)
FIG	2,303.68
BOD	-
MEAT	53,455.95
LIV	1,481.05

25. In 2020, most of the seizures were made in Sweden, followed by Spain, France and Portugal. Most specimens were indicated as having originated in Sweden, followed by Portugal and Spain. The main destinations indicated were Poland, followed by the Russian Federation and Malaysia, though many origins and destinations were unknown. Transportation methods included land, air and sea. Of note was a large seizure reported by Lithuania of 77,200 kg (presumably adult eels) with origin China and destination the Russian Federation. There was also a large number of small 5kg seizures reported as bodies (BOD) from Sweden destined for Poland. A total of 817 kg of juvenile eel or glass eel, recorded as fingerlings (FIG), was reported to have been seized by four Parties (France, Greece, Morocco and Portugal). Weight was not recorded for a number of these seizures, so this figure is an underestimate.

Description	Quantity seized (where indicated in kg)
FIG	817.72
BOD	94.4
MEAT	99,206.7
LIV	988.05

26. In 2021, most of the seizures were made in Switzerland, followed by Italy, Lithuania, Poland and Portugal. Most specimens were indicated as having originated in Italy, Lithuania and the Netherlands. The destinations indicated were China and the United Kingdom of the Great Britain and Northern Ireland, though many origins and destinations were unknown. Transportation methods included land and air. Of note was one seizure of over 60kg of glass eels reported by Portugal. The number and volume of seizures appear to have decreased considerably in 2021, but this dataset may be incomplete as not all Parties have submitted their annual illegal trade reports for 2021. This may therefore not reflect accurately the reduction in the illegal trade in European eel. It may also indicate that focus has shifted to other *Anguilla* species.

Description	Quantity seized (where indicated in kg)
FIG	63.605
BOD	12.6
MEAT	18.8
LIV	27.025

27. To improve reporting accuracy, Parties are reminded that under “Description of specimens” in section 3 of the *Guidelines for the preparation and submission of the CITES annual illegal trade report*, it states that:

For European eel (*Anguilla anguilla*), it is essential that live eels of <12cm length (and which may be referred to as glass eels or elvers) in trade are distinguished from other live specimens by reporting them as fingerlings (FIG); other live specimens should be reported as LIV. It is also desirable that the code for meat (MEA) should be used for trade in eels destined for human consumption. In all cases, Parties should report trade in live specimens (LIV), live fingerlings (FIG) and meat (MEA) of European eel by weight and not as number of specimens. The net weight of live specimens should be recorded and not the combined weight of eels and the water in which they are transported.

Additional information on illegal trade in *A. anguilla*

28. The Secretariat notes that the European eel has received significant attention from national and international enforcement agencies since its inclusion in Appendix II of CITES in 2009. Details of the actions taken by national CITES authorities and enforcement agencies have been reported in several previous documents, including documents SC69 Doc. 47.1 and Doc. 47.2; SC70 Doc. 45; SC74 Doc. 64.1 and SC75 Doc. 12. The results of continued special operations such as Operation LAKE V, Operation LAKE VI, Operation Fame and Operation Vitrum demonstrate the value of such targeted activities.
29. The latest edition of [Operation LAKE which took place from October 2022 to June 2023](#), resulted in the arrest of 256 persons responsible for the trafficking of 25 tonnes of live glass eels worth approximately

EUR 13 million. The Secretariat commends the inter-agency coordination and collaboration achieved through support provided by EUROPOL, working closely with countries both within and outside the European Union.

30. The Secretariat 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 WCO, make an important contribution to the fight against illegal trade in European eel.
31. [Operation Thunder 2022](#), undertaken in October 2022, brought together police, customs, financial intelligence units, wildlife and forestry enforcement agencies from 125 Parties (the largest number of Parties to take part in a Thunder operation since the series started in 2017). Parties that participated in Operation Thunder 2022 reported the seizure of 4,337 specimens and 2,813 kg of marine products, including eels, corals and sea cucumbers.
33. Parties are encouraged to continue to actively engage in operations and targeted activities aimed at addressing wildlife crime, including illegal eel trade, as recommended in paragraph 14 d) of Resolution Conf. 11.3 (Rev. CoP19) on *Compliance and enforcement*.

#### Recommendations

34. The Standing Committee is invited to:
  - a) note the information in paragraphs 14 to 17 concerning the ongoing work on eels being carried out by the Animals Committee with regards to the implementation of Decision 19.220 and the information on illegal trade in European eel outlined in paragraphs 21 to 33;
  - b) invite the views of the Animals Committee on the possible development of a specific Resolution on European eels;
  - c) consider establishing an intersessional working group with the mandate outlined in paragraph 19; and
  - d) encourage Parties to actively engage in any operations and targeted activities to address illegal eel trade.